

January 25, 2023

Monex Group Code of Conduct

Monex Group, Inc. (the “Company”) defines its corporate philosophy as “Always a step ahead of the “Y” in “MONEY, ” our name MONEX expresses our desire to embrace all people who are engaged at the forefront of our future. With state-of-the-art Information Technology, globally universal values and a sense of professionalism, Monex Group designs innovative ways of managing money and realizing individual self - fulfillment for an ever-changing future. Our ultimate goal is to optimize each person’s lifetime balance sheet.”

Based on our corporate philosophy, we have created and implemented the Monex Group Code of Conduct which is applicable to the Company and its group companies (collectively, the “Group”) and to be observed by anyone, including directors, officers and employees, working in the Group (collectively, the “Monex People”), so that we would be able to continue providing our customers innovative and best-quality products and services, and being a company that is trusted and respected by society.

1. Creativity and ethical manner

We shall pursue creativity and ethical manner as we continue to serve people who are engaged at the forefront of our future.

2. Responsible stakeholder dialogue

To provide the best services for individual self-fulfillment, we shall pay constant attention to maintaining and maximizing engagement with our various stakeholders, including customers, shareholders, the Monex People and suppliers and business partners through timely and appropriate information disclosure.

3. A commitment to a sustainable society

We shall establish a relationship of unwavering trust with our stakeholders and society by conducting corporate activities as a responsible and thoughtful citizen and by contributing to a sustainable society, through strict compliance with all laws and regulations.

4. Respect for human rights and diversity

We shall create an open and fair corporate culture through fair treatment, an appropriate work environment, mutual respect that is free from discrimination or human rights violations, and the acceptance of diverse values.

1. Creativity and ethical manner

1-1 Creativity

We understand the importance of being cheerful, optimistic, and doing our best. We shall open new realms of the forefront of our future through step-by-step improvements.

1-2 An open and free workplace

We believe new ideas that create the future are born in a work environment that is open and free. With the future always in mind, we shall make every effort to explain essential information to everyone.

1-3 Ethical manner

To maintain an environment where we can freely create the forefront of our future, we shall eliminate any personal conflict of interest and act in an ethical manner.

2. Responsible stakeholder dialogue

2-1 Quality communication with customers

We shall accept with humility and sincerity customer feedback obtained through a diverse range of channels and strive to communicate clearly, kindly, accurately, and promptly to provide the best services for our customers.

2-2 Dialogue with shareholders, the Monex People and suppliers and business partners

We shall continue to engage in dialogue with our shareholders, the Monex People, suppliers and business partners and other stakeholders with a strong awareness of the trust they have placed in us and use this dialogue to guide us in our corporate activities.

2-3 Timely and appropriate information disclosure

As part of our responsible communication with various stakeholders, including customers, shareholders, the Monex People and suppliers and business partners, we shall disclose information in a timely and appropriate manner.

3. A commitment to a sustainable society

3-1 Relationship with society

As a company that is supported by society and provides a wide range of products and services to individuals who live in that society, we shall act as a good corporate citizen.

3-2 Caring for the global environment

As a future-oriented company, we recognize the importance of the global environment and shall always

give due consideration to the environment with a high level of insight.

3-3 Compliance with laws and regulations

As a good citizen, we shall comply with laws and regulations and act in accordance with social norms.

3-4 Anti-corruption measures

To fulfill our responsibilities as a member of society, we shall work to prevent and eliminate all corrupt and criminal activities. This includes our efforts to prevent insider trading and money laundering activities, and to eliminate bribery and corruption by ensuring that any gifts, entertainment, donations, political contributions, etc., are made in a legal and appropriate manner.

3-5 Handling of information

We shall properly manage the personal information of our customers and the Monex People as well as information belonging to the Group to prevent its loss, theft, or unauthorized use. We shall not misuse or illegally obtain confidential information from third parties.

3-6 Avoiding involvement with antisocial forces

We shall have no ties whatsoever with forces that disrupt societal order and safety.

3-7 Prevention and early elimination of misconduct

In the event we become aware of any corrupt and criminal activities that is or may be construed as corruption, we shall promptly report it to the appropriate point of contact within each of the Group companies or utilize our Internal Consultation and Reporting Desk, which is a whistleblowing hotline and accepts anonymous reporting, to prevent or eliminate at the earliest stages any form of misconduct.

4. Respect for human rights and diversity

4-1 Fair treatment

For hiring, promotions, training, and other employment opportunities, we shall not discriminate on the basis of race, nationality, beliefs, religion, disabilities, family origin, gender, sexual orientation, gender identity, age, health status, or other, nor violate human rights.

4-2 Pursuit of an appropriate work environment

We shall pursue a fair, healthy, safe, and open work environment, free from discrimination or harassment.

4-3 Respect for diversity

With a willingness to accept opinions different from our own, we shall create a corporate culture that respects a diverse range of values and where everyone feels safe to express themselves freely.