

## **Monex Group Human Rights Policy**

### **1. Background**

Monex Group, Inc. (the “Company”) defines its corporate philosophy as “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 a 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.

In order to further promote sustainable business management and in recognition of the importance of human rights in our business activities, we have formulated this Monex Group Human Rights Policy (this “Policy”).

The Company’s Board of Directors shall oversee the progress of promotion of this Policy. This Policy is subject to revision in response to changes in external business environment, including those in business operations and demands of stakeholders.

### **2. Scope of Policy**

Any and all of the Monex People, and suppliers and business partners of the Group.

### **3. International norms to be respected and applied**

Universal Declaration of Human Rights  
Guiding Principles on Business and Human Rights  
OECD Guidelines for Multinational Enterprises  
Children's Rights and Business Principles

### **4. Commitments to the Monex People**

The Group shall respect the fundamental human rights of the Monex People by not engaging in discrimination or human rights violations, by having mutual respect and by recognizing and accepting diverse values. We will maintain a proper work environment, including equal opportunity in employment and control of overtime work that leads to overwork, as well as comply with equal work and equal pay, and not only exceed but also improve the minimum wage levels set in each country. 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, we shall not tolerate sexual harassment, power harassment or other forms of harassment, and we shall not allow forced labor, child labor or other forms of human rights abuses; and we ensure compliance with these commitments. The Group supports freedom of association and the right to collective bargaining. Furthermore, we have set up a harassment and human rights consultation desk in the Company in pursuit of a healthy, safe and open work environment free from unfair discrimination and harassment. We conduct human rights awareness training on a regular basis to further advance understanding of human rights among each and every Monex People.

**5. Requirement for our suppliers and business partners**

The Group requires all our suppliers and business partners to abide by fair ethical standards. If there is an incident where a supplier or business partner is suspected of violating human rights, the Group shall work with that supplier or business partner in an appropriate manner to remedy and resolve the situation.

**6. Access to remedy**

In the event that the Group has caused or is involved in a human rights violation in our business activities or transactions with any of its supplier or business partner, we shall implement appropriate relief or corrective measures. In addition, the Company has a system that allows whistleblowers to report anonymously to the Internal Consultation and Reporting Desk which is designed to prevent the identification of whistleblowers.

**7. Stakeholder engagement**

To ensure that no human rights violations of any kind are committed through our business, the Group shall engage in dialogue and discussion with its stakeholders, while maintaining ongoing constructive dialogue with NGOs and other external human rights experts.

Formulated on September 24, 2019

Revised on December 21, 2021

Revised on January 24, 2023