

Ethics and Compliance Code of Conduct

Monex Group's Ethics and Compliance Code of Conduct is a set of guidelines for all people working for Monex Group and its group subsidiary companies (collectively, the "Group"), regardless of title, including directors, officers, and employees (collectively, "Monex People"). Based on the Monex Group Code of Conduct, it is formulated to ensure that Monex People comply with laws and regulations and act in an ethical manner when conducting business activities for the Group.

Compliance with laws and regulations:

In the performance of their duties, Monex People shall strive to understand and comply with the purpose and content of applicable laws and regulations as well as the rules of financial instruments exchanges and other self-regulatory bodies in the countries and regions they operate in. In addition, Monex People shall pay attention to the extraterritorial application of foreign laws and regulations.

Monex People shall comply with all laws and regulations as good citizens of the communities in which they live.

Monex People shall act in an ethical manner when making or implementing decisions.

Compliance system:

Monex People shall always explore higher standards of compliance and strive to put in place a system to secure them.

Prohibition of unfair discrimination:

Monex People shall not discriminate on the basis of race, nationality, beliefs, religion, disability, family origin, gender, sexual orientation, gender identity, age, health status, or other. In addition, Monex People shall work to prevent sexual harassment, power harassment, and other forms of unfair behavior that abuse job status.

Maintaining confidentiality:

Monex People shall not use information about customers or business partners obtained in the course of their duties, or information concerning Monex People, for any purpose other than the intended purpose, and shall not leak such confidential or undisclosed information to outside parties.

Corporate assets:

Monex People shall appropriately use and maintain corporate assets and shall not use them for personal or third-party purposes.

Appropriate finance and accounting procedures:

Monex People shall conduct appropriate finance and accounting procedures.

Anti-corruption:

Monex People shall not, directly or indirectly, give, offer, or promise bribes to government officials or persons equivalent to government officials, nor have inappropriate dealings with business partners or others. Furthermore, Monex People shall not provide nor accept entertainment or other forms of profit to or from outside parties, except those that are lawful and considered socially appropriate. Furthermore, care must be taken to ensure that donations and political contributions are legal and socially appropriate, and effort must be made to eliminate corruption and to prevent insider trading and money laundering.

Exclusion of antisocial forces:

Monex People shall not have any ties with organized crime groups or other antisocial forces.

Violations:

Monex People who violate this Ethics and Compliance Code of Conduct or engage in activities that contradict the principles of compliance shall be subject to disciplinary action or other form of punishment in accordance with the Rules of Employment or other rules governing the relationship of employment and shall also recognize that they may be subject to legal liability if they are in violation of laws or regulations.

Reporting of violations and prohibition of retaliation:

If a Monex Person becomes aware of an actual or possible compliance violation, he/she shall promptly report it directly to a supervisor or executive in charge, the relevant division in charge of compliance within each Group company, or the representative executive, or utilize the Internal Consultation and Reporting Desk, a whistleblowing hotline that accepts anonymous reports. In the event of such a communication or report, Monex People shall, at the request of each Group company, cooperate in the investigation of the existence or non-existence of violations and strive to prevent or correct such violations. In addition, Monex People shall not unfairly treat or retaliate against informants because of their report.