

## Compliance Policy for Anti-Money Laundering and Combating the Financing of Terrorism

It is extremely important to keep our financial system sound and immune from money laundering and financing of terrorism (“ML/FT”) and financial institutions are required on a global basis to take effective measures for anti-money laundering and combating the financing of terrorism (“AML/CFT”).

In order to fulfill this requirement, Monex Group, Inc. (“Monex”) and its subsidiaries (together with Monex, “the Group”) shall recognize the AML/CFT measures as a significant risk factor under the risk management programs of the Group, shall take a firm stand against ML/FT, and shall swear to comply with all applicable laws and regulations as to the AML/CFT measures.

To take group-wide AML/CFT measures for contribution to ensuring the soundness of the financial system, Monex enacted “Rules for Anti-Money Laundering and Combating the Financing of Terrorism” including, among other things, the following contents:

### 1. Development of a system to manage ML/FT risks

The Group shall build and maintain a solid system to manage ML/FT risks.

### 2. Involvement of management

Management of each company in the Group shall be involved in the AML/CFT measures proactively.

### 3. Assessment of ML/FT risks and measures in response to them

Each company in the Group shall identify and assess its own ML/FT risks and to apply a risk-based approach commensurate with those risks for effective mitigation of those risks.

### 4. Appointment of the executive responsible for the AML/CFT measures

Monex shall appoint an executive responsible for the AML/CFT measures (the “AML/CFT Executive”) to oversee group-wide AML/CFT measures.

### 5. Identification and verification at the time of transactions

Each company in the Group shall develop an internal system necessary for ensuring timely implementation of appropriate measures for identification and verification at the time of transactions.

### 6. Identification and verification of suspicious transactions

Each company in the Group shall develop an internal system for handling of suspicious transactions, which may include monitoring of transactions with customers. Each company in the Group shall promptly report any suspicious transaction to the competent authority in accordance with applicable laws and regulations.

### 7. Identification and verification of asset freeze and similar actions

Each company in the Group shall develop an internal system to identify and verify asset freeze and similar actions against terrorists and similar persons and organizations.

8. Record-keeping

Each company in the Group shall formulate its policies and procedures for keeping records relating to AML/CFT measures.

9. Training for officers and employees

Each company in the Group shall provide training or make other appropriate arrangements for enabling its officers and employees to acquire the necessary knowledge about and to make efforts for raising their awareness of the importance of, AML/CFT measures.

10. Reporting programs

The AML/CFT Executive shall periodically receive information about the status of the AML/CFT measures from a division in charge of the management of ML/FT risks of each company in the Group (through the intermediary holding company, if any, for the overseas group companies) and issue necessary instructions based on such information.

(Established on Sep.18, 2020)