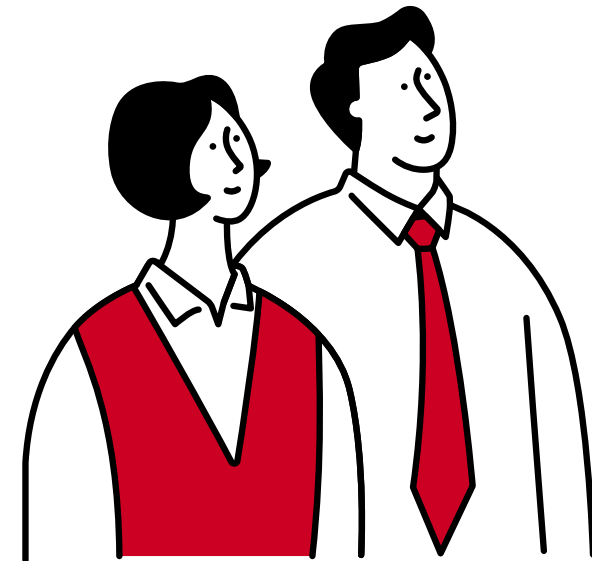




SOMPO Group

Compliance Code of Conduct

Keep doing the right thing
until embedded into the culture



※For questions regarding the Compliance Code of Conduct, please contact the department in charge.



Our Pledge

In order to realize the Group's purpose of “For a future of health, wellbeing and financial protection,” we will continue to do the right thing in line with the Sompo Group Compliance Code of Conduct as a trusted entity by society, customers, family and friends.

When performing our daily duties or when we are unsure of what to do, we will refer back to this Code of Conduct to confirm what actions are appropriate as officers and employees of the SOMPO Group, and we will put them into practice to meet the expectations from our customers and society.

Table of Contents

**SOMPO Group
Compliance Code of Conduct** — 3

**Guidance on the Compliance
Code of Conduct** ————— 7

- 1. Focusing on the Customer ————— 9
- 2. SOMPO's Purpose
and the Compliance Code of Conduct — 10
- 3. SOMPO Group Compliance ————— 11
- 4. SOMPO's Yes ————— 12
- 5. Responsibilities of
the Officers and Employees ————— 13
- 6. Reporting of Concerns or Problems — 15
- 7. Violation of the Code of Conduct — 18
- 8. Scope of the Code of Conduct ————— 18
- 9. Specific Action Examples ————— 19

SOMPO Group

Compliance Code of Conduct

SOMPO Group Compliance Code of Conduct

Sompo has established the Sompo Group Basic Policy on Compliance (collectively, "Basic Policy") with the aim of being a corporate group trusted by society by remaining constantly aware of the important public mission and social responsibility of its businesses and providing customers with the highest-quality services and sense of security through appropriate corporate activities that comply with laws and regulations, societal norms, and corporate ethics.

The Sompo Group Compliance Code of Conduct (collectively, "the Code of Conduct") clearly shows the actions required to ensure that all officers and employees ("Employees") of the Sompo Group understand the importance of compliance and act in ways that consider compliance seriously. All Employees must act in compliance with the Code of Conduct.

If you become aware of any compliance or ethical concerns or issues by you or others that violate this Code of Conduct, do not overlook or conceal them, but promptly notify your workplace supervisor or the Consultation Desk.

Established 04/01/2010

Revised 09/01/2014

Revised 10/01/2016

Revised 04/01/2017

Revised 08/01/2019

Revised 04/01/2020

Revised 04/01/2023 (Guidance)

Revised 04/01/2024

Revised 08/01/2024 (Guidance)

Revised 11/01/2024 (Guidance)

Revised 04/01/2025

SOMPO Group Compliance Code of Conduct

1. Compliance with Laws, Regulations and Internal Rules

We will act with integrity and good sense in compliance with laws, regulations and internal rules, and based on social norms and corporate ethics.

2. Respect for Human Rights

We will respect human rights in every aspect of our business activities.

3. Maintain and Promote a Healthy and Safe Working Environment

We will aim to maintain and promote a healthy and safe working environment in which Employees can have peace of mind and demonstrate their abilities fully without any concerns that threaten their mental or physical safety.

4. Protection of Company Assets

We will only use the assets of the Group for the Group's business activities and properly protect them.

5. Proper Document Creation and Management

We will properly create and manage documents, emails, and data, etc. related to our transactions and operations in accordance with laws, regulations and internal rules.

6. Fair and Free Competition

We will conduct our business under fair and free competition in accordance with laws, regulations, and internal rules related to Anti-Trust and Anti-Competition. We will not engage in unfair business practices such as cartels, bid riggings, and other acts that restrict competition or take advantage of our business position.

7. Prohibition of Bribery

To contribute to the maintenance and development of an orderly free competitive market, we will promote fair business activities with high ethical sense and will not engage in bribery.

8. Prohibition of Conflict of Interest

Under situations where the interests of Employees conflict with the interests of the company, we will take actions with preference to the interests of the company in accordance with related laws, regulations and internal rules.

9. Protection and Management of Personal and Confidential Information

We will properly deal with personal information, confidential information that we obtain and data, etc. that we create in connection with our business in accordance with laws, regulations and internal rules.

10. Protection of Intellectual Property

We will protect intellectual property possessed by the Group, and will not infringe it possessed by third parties.

11. Prohibition of Insider Trading

By strictly prohibiting insider trading by Employees, we will ensure investors' trust in the securities market.

12. Elimination of Relationships with Organized Crime Forces

We will strive not to have any relationship with organized crime forces, maintain public confidence, and realize a safe society and sound corporate management.

13. Prevention of Money Laundering and Terrorist Financing

We will strive to ensure that the Group's products and services are not used to transfer proceeds from crime, to finance terrorists, or to proliferate weapons of mass destruction.

14. Appropriate Political Activities

As a corporation, we will conduct fair business activities while maintaining an appropriate relationship with politics. In addition, we will clarify the distinction between public and private regarding personal political activities of Employees.

15. Appropriate Financial Reporting, Tax Processing Based on Laws and Regulations

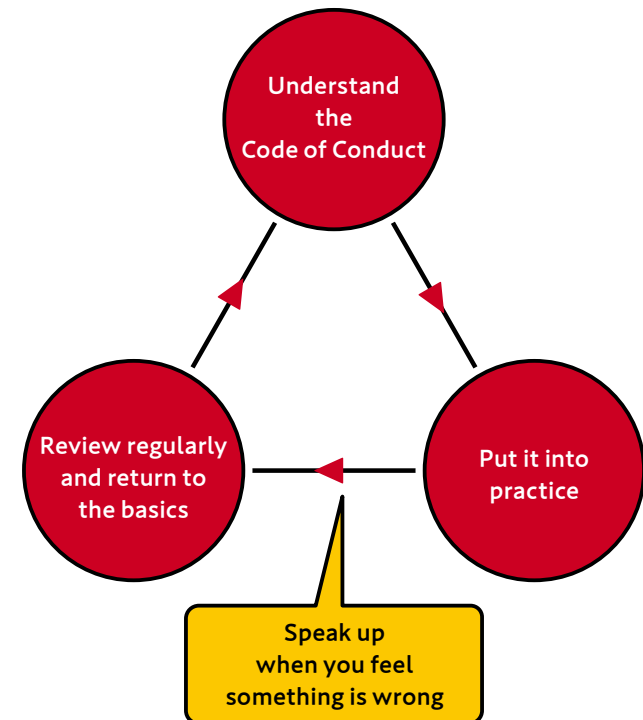
We will accurately record financial information and appropriately report and disclose such information in a timely and appropriate manner so that shareholders, investors, and other stakeholders can make decisions fairly and equitably, and also aim to maintain and improve tax compliance in accordance with tax related laws and regulations.

Guidance on the Compliance Code of Conduct

How to Use the Guidance on the Compliance Code of Conduct

The Guidance on the Compliance Code of Conduct provides specific examples of relevant matters and reference actions that all officers and employees of the Group companies should be aware of in order to put the Compliance Code of Conduct into practice.

The Compliance Code of Conduct is something that we should always be aware of in our day-to-day work. We should understand it deeply and put it into practice. When in doubt, we should go back to the basics. Through this cycle, all officers and employees of the Group should work together to build a culture of doing the right thing.



1. Focusing on the Customer

Learning from our Mistakes

The SOMPO Group has been involved in a number of incidents that have had an impact on society, including non-payment of insurance claims (2005, 2006), insurance premium adjustments (2023), inappropriate responses to fraudulent claims for automobile insurance (2023), and the leakage of insurance contract information (2024).

With each incident, we have lost the trust of our valued customers and stakeholders. We have learned first-hand how difficult it is to regain that lost trust.

We will not let our past mistakes fade away, but will face them, take them seriously, and learn from them.

What we need to do

The incidents that have occurred in the past have been due to factors such as a lack of awareness of laws and regulations, a lack of customer protection, and a corporate culture that prioritizes the company's or the individual's own convenience.

What we need to do is for each of us to understand the importance of this Code of Conduct, to think for ourselves without being bound by precedent, and to consider whether we are considering the customer's perspective and meeting society's expectations. If we can do this, the direction we take will naturally become clear.

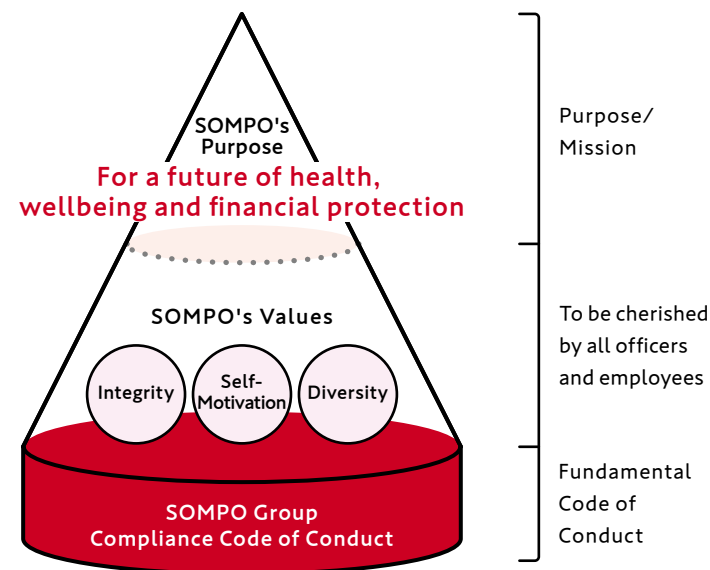
Doing the right thing in the eyes of all will lead to the trust of our customers and society.

2. SOMPO's Purpose and the Compliance Code of Conduct

The SOMPO Group has set out its vision in the form of SOMPO's Purpose, and to achieve this, it has established the SOMPO Values as the values that all officers and employees should cherish.

The SOMPO Group Code of Conduct for Compliance is a guide to how all officers and employees should act in their daily work in order to realize SOMPO's Purpose and embody the SOMPO Values.

With the basic premise of complying with laws and regulations and internal rules, and acting in accordance with social norms and corporate ethics, each and every one of us must always refer back to this Code of Conduct, reflect on ourselves, and do the right thing. Only then will we be able to realize SOMPO's Purpose.



3.SOMPO Group Compliance

We, the SOMPO Group, are deeply aware that business activities which disregard compliance are not sustainable and that compliance is a fundamental prerequisite for business operations. And we are committed to compliance with higher aspirations as we move toward the society we wish to realize.

Article 1 of the Code of Conduct states, "We will act with integrity and good sense in compliance with laws, regulations and internal rules, and based on social norms and corporate ethics. As one of SOMPO's Values is "Integrity," the SOMPO Group Compliance, in short, is the pursuit of "integrity."

What does the pursuit of integrity mean?

Even when there are no laws or company rules, you should think for yourself about what the ethically right thing to do is, whether it meets society's expectations, and then put into practice the action that everyone can see is right, without being constrained by precedent.






4.SOMPO's Yes

In our daily work, we need to make various decisions. However, sometimes we may be unsure of what to do or how to make a decision, depending on the situation we are in or the interests involved. If you are in doubt about what action to take in your daily work, or if you are unsure of how to make a decision, ask yourself the following questions:

SOMPO's Yes

Are your actions/decisions in compliance with regulations/ company policies and...

-  **do you feel comfortable explaining these openly and honestly to society?**
-  **are you being fair in your dealings with customers and business partners?**
-  **do you feel comfortable telling your family and friends with confidence?**

If you cannot answer "Yes" to all of the below about your actions, please pause and reconsider.

Then, consult with your superior, Compliance department, Whistleblowing or Consultation Desk.

All officers and employees must always consider whether your decisions are appropriate for SOMPO's sustainable growth.

5. Responsibilities of the Officers and Employees

All Officers and Employees

All officers and employees, as well as other officers and employees, have a responsibility to carry out their duties in compliance with relevant laws and regulations, internal rules, and this Code of Conduct. Please act autonomously with the following matters in mind.

Understand and put into practice

From day to day, please read this Code of Conduct carefully and understand it fully when doing your daily work. If you have doubts about this Code of Conduct, related laws and regulations, or internal rules, please contact the appropriate person in charge such as your superior at the workplace or the person responsible for compliance at your company and resolve the doubts.

Consult others when you are unsure

If you are unsure about a decision you need to make in the course of your daily work, ask yourself the questions included in “SOMPO’s Yes” and consult with your superior, Compliance department, Whistleblowing or Consultation Desk.

Report any problems and concerns

If you are aware of any violation of laws, internal rules or other ethics, compliance concerns or problems, do not overlook or hide them but promptly contact your superior or the consultation desk etc.

All Officers and Managers

In addition to establishing a compliance promotion system, officers and managers have the following responsibilities in order to demonstrate leadership in its implementation.

Set an example

Please practice behavior that serve as a model for other Employees in accordance with this Code of Conduct.

Create a comfortable atmosphere

Please foster an organizational culture that promotes consulting actively and makes it easy for employees to consult about active compliance and ethics concerns or problems.

Respond sincerely to consultations

If you receive a consultation about compliance and ethics concern or problem from a subordinate, etc., please deal with it seriously and if it is difficult to solve by yourself, please contact the person responsible for compliance, etc. in your company.

6. Reporting of Concerns or Problems

(1) Receiving of Whistleblowing and Consultation

If you notice any compliance or ethical concerns or problems that violate the Code of Conduct, such as violations of laws and regulations or company rules, or acts of harassment, please be sure to report or consult with someone without overlooking them by thinking “it's not a big deal” or “I might just be wrong” or “there's no point in saying anything.”

You will never be treated unfairly because you raised your voice or sought advice.

If you are able to consult with your superior

If it is difficult to resolve at your workplace
Or is inappropriate to consult with your supervisor

Consult with your supervisor immediately

In accordance with your company's rules consult with:

- the person responsible for compliance
- the internal Whistleblowing desk of each company

< Important points regarding informant protection >

- Personal information is strictly protected
- All information received is kept strictly confidential (except where prohibited by local laws and regulations)
- Prohibition of disadvantageous treatment on the grounds of consultation
- It is also possible to consult anonymously

(2) Response after Reporting

The company will promptly investigate thoroughly and fairly.

If you are asked to cooperate in an investigation, please cooperate fully, do not destroy or falsify related information, and do not make false statements.

Also, please do not tell the fact that you cooperated with the investigation or its contents to other parties until the results of the investigation are published internally and externally.

Having the Courage to Speak Up

You must never ignore any behavior that violates this Code of Conduct, such as fraud or harassment. If you become aware of a problem, it is important to consult with those around you first. Having the courage to speak up about situations that you feel are “wrong” will protect you, your colleagues, and the company.



7. Violation of the Code of Conduct

If you violate this Code of Conduct, you may be subject to disciplinary action, including dismissal, in accordance with the employment contract, employment rules, and disciplinary policies of each company.

If an employee is subject to disciplinary action, the supervisor who was in a position of authority may also be held responsible for failing to exercise proper supervision.

In addition, the system of reducing or exempting disciplinary action for informants (a system that reduces or exempts internal disciplinary action when a violation is voluntarily reported) shall be determined by the disciplinary action rules and regulations of each company.

8. Scope of the Code of Conduct

Applicable persons:

All Officers and Employees of SOMPO Group Companies

The term “officers and employees” refers to all those who carry out work under the direction and orders of our company or group companies, including officers, staff, commissioned staff, part-time workers, etc.

Applicable companies:

All SOMPO Group companies

Each company may formulate its own Code of Conduct, including the content of this Code of Conduct, in accordance with the laws, regulations and customs of each country and region as well as the business. However, it is not permitted to contradict this Code of Conduct or to relax its content.

9. Specific Action Examples

We have listed the situations you may encounter and the actions you should take in each situation for each of the code items. Please refer to this list relevant to your business, deepen your understanding of this Code of Conduct, use it to check your own day-to-day actions and put them into practice.

1

Compliance with Laws, Regulations and Internal Rules

We will act with integrity and good sense in compliance with laws, regulations and internal rules, and based on social norms and corporate ethics.

Specific Action Examples

- Familiarize ourselves with laws and regulations applicable to our businesses as well as their purposes, and pay attention to developments (new laws, revisions, etc.) in laws and regulations.
- Always evaluate ourselves whether industry practices, business practices, and internal practices are in accordance with expectations of society.
- Pay attention not only to domestic laws and regulations, but also to international rules and foreign laws and regulations that might be applied to our business.
- In our relationships with our customers, business partners, agents and other stakeholders, we will not only comply with laws, regulations and internal rules, but also act in good faith in accordance with social norms and corporate ethics.



2

Respect for Human Rights

We will respect human rights in every aspect of our business activities.

Specific Action Examples

- Understand and comply with laws and regulations, internal rules regarding respect and protection of human rights related to our business that apply internationally, nationally, and regionally.
- Never be involved in activities contrary to human rights such as forced labor, child labor, etc.
- Respect diversity of all people in every aspect of our business activities and always interact with other people with respect and dignity, and never discriminate unfairly based on race, color of skin, ethnicity, creed, nationality, gender, disability, or any other reason.
- Comply with laws and regulations concerning equality of employment opportunities and adopt fair and impartial employment practices.



3

Maintain and Promote a Healthy and Safe Working Environment

We will aim to maintain and promote a healthy and safe working environment in which Employees can have peace of mind and demonstrate their abilities fully without any concerns that threaten their mental or physical safety.

Specific Action Examples

- Understand and comply with labor-related laws, regulations and internal rules that apply to each workplace.
- Never allow any harassment such as bullying, violent behavior, intimidation, sexual harassment or abuse of authority whether physical or mental both inside and outside the workplace.



4

Protection of Company Assets

We will only use the assets of the Group for the Group's business activities and properly protect them.

Specific Action Examples

- Only use company assets (including intangible items such as logos and brands) for the Group's business activities, and never allow fraudulent use, personal use, theft, waste and damage in regard to them.
- Never post any comments or information that would adversely affect the Group's reputation on the Internet or through social media, etc.



5

Proper Document Creation and Management

We will properly create and manage documents, emails, and data, etc. related to our transactions and operations in accordance with laws, regulations and internal rules.

Specific Action Examples

- Create accurately and store documents, emails, and data, etc. including records of all transactions of the Group, business records, based on facts, and always store such materials in accordance with related laws, regulations and internal rules.
- Discard properly documents, emails, and data that have passed the storage period prescribed by laws and regulations and internal rules.



6

Fair and Free Competition

We will conduct our business under fair and free competition in accordance with laws, regulations, and internal rules related to Anti-Trust and Anti-Competition. We will not engage in unfair business practices such as cartels, bid riggings, and other acts that restrict competition or take advantage of our business position.

Specific Action Examples

- Comply with antitrust and fair competition laws and regulations of the countries and regions where we operate.
- Never collaborate with competitors to engage in unfair practices such as agreement on prices and selling conditions of products and services, assignment of markets, or elimination of specific companies, etc. from the market, explicitly or implicitly.
- Never conduct unjust bidding transactions.
- Obtain prices, sales conditions, cost and profit, etc. relating to products and services in an appropriate way and never share competitive information with our competitors or give any hints about them.
- Never act to abuse a superior position in relation to business partners.
- Never post any comments or information that would lead to slandering of other companies on the Internet or through social media, etc.



7

Prohibition of Bribery

To contribute to the maintenance and development of an orderly free competitive market, we will promote fair business activities with high ethical sense and will not engage in bribery.

Specific Action Examples

- Never provide money, entertainment, gifts, etc. (anything of value including nonmonetary favors) with the intent to obtain fraudulent profits in business. Also, never receive money, entertainment, gifts, etc. in circumstances where our business decisions may be affected or in such circumstances where it may be considered as such.
- Comply with regulations concerning facilitation payments to smoothen administrative procedures applicable to the country or region concerned, and will not make facilitation payments where prohibited.
- Follow the rules and procedures specified by each company concerned, when providing or receiving money, entertainment, gifts, etc. for appropriate purposes and to the extent deemed appropriate by social convention.
- When choosing an agent in relation to business, decide whether to accept or reject such agent by taking into consideration its attitudes and measures against bribery prevention and its relationships with public officials, etc.
- Carry out lobbying activities and make political contributions, donations, to charitable organizations or sponsorship (sponsorship money), etc., regardless of form, to public officials and organizations related to them in accordance with our firm's internal procedures for obtaining the other party's verification or necessary approvals and in accordance with local laws and regulations, in order to avoid inappropriate provision of benefits.



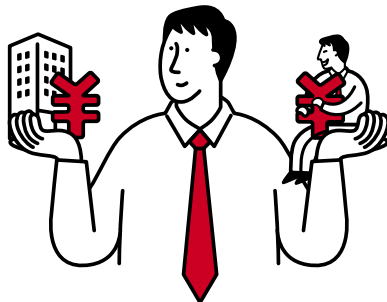
8

Prohibition of Conflict of Interest

Under situations where the interests of Employees conflict with the interests of the company, we will take actions with preference to the interests of the company in accordance with related laws, regulations and internal rules.

Specific Action Examples

- Avoid situations where personal interests conflict with company interests as much as possible.
- Never engage in activities that compete with the Group's businesses or profits or be employed as an officer or employee of a company or organization that competes with the Group while employed by the Group, and never prioritize employment of, or other transactions with, our relatives or acquaintances.
- Never use corporate position, company assets including confidential information, etc., or business opportunities obtained in business for personal profit.



9

Protection and Management of Personal and Confidential Information

We will properly deal with personal information, confidential information that we obtain and data, etc. that we create in connection with our business in accordance with laws, regulations and internal rules.

Specific Action Examples

- Only use business confidential information and personal information on executives, Employees, customers, etc. within agreed purpose and scope and never disclose such information outside the company unless permitted to do so by laws and regulations.
- Use and manage information communications equipment such as PCs properly according to internal rules.
- Comply with relevant domestic and foreign privacy laws and regulations, such as obtaining the consent of the individual when required, etc., when transferring personal information outside a country or region.
- Return all confidential information, communication devices, IDs, etc. at the time of termination of employment relationship with the Group, and never use or disclose confidential information obtained during employment even after ceasing employment relationship with the Group.



10

Protection of Intellectual Property

We will protect intellectual property possessed by the Group, and will not infringe it possessed by third parties.

Specific Action Examples

- Never use, duplicate, or sell contracts in relation to patent rights, copyrights, trademark rights, know-how or confidential information possessed by the Group or third parties about business, technology, etc. with disregard to the business purpose, laws and regulations.



11

Prohibition of Insider Trading

By strictly prohibiting insider trading by Employees, we will ensure investors' trust in the securities market.

Specific Action Examples

- Manage strictly material, nonpublic information about the Group and other companies, etc., and never buy or sell securities such as stocks issued by them based on such information and share or tip inside information to others or encourage trading based on such information.



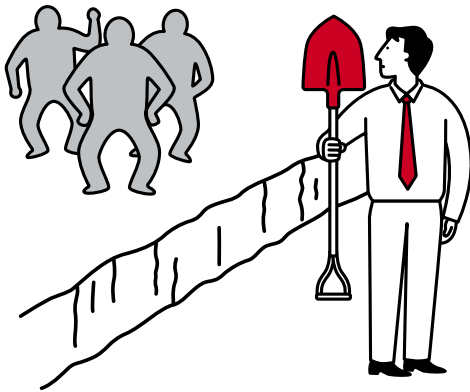
12

Elimination of Relationships with Organized Crime Forces

We will strive not to have any relationship with organized crime forces, maintain public confidence, and realize a safe society and sound corporate management.

Specific Action Examples

- Confirm that customers and business partners are not organized crime forces, and if there is any suspicion at all, always strive to refuse the transaction and end the business relationship.
- Refuse firmly demands or pressures from organized crime forces as an organization.



13

Prevention of Money Laundering and Terrorist Financing

We will strive to ensure that the Group's products and services are not used to transfer proceeds from crime, to finance terrorists, or to proliferate weapons of mass destruction (collectively, "money laundering, etc.").

Specific Action Examples

- Confirm that there are no suspicions about customers or transactions based on requirements of laws, regulations and internal rules, and degree of risk when starting and continuing business relationships with customers and contractors
- Promptly notify the authorities in accordance with the procedures stipulated by laws, regulations and internal rules, if we recognize a situation of suspected money laundering, etc.
- Never engage in transactions with persons subject to economic sanctions or organizations with which they are involved.



14

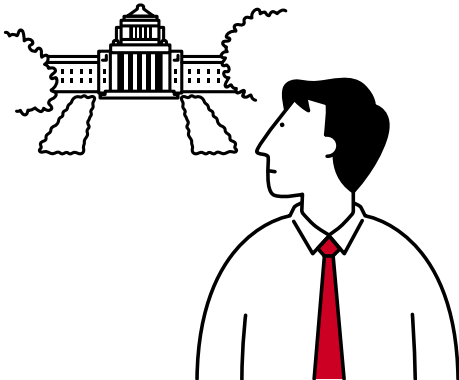
Appropriate Political Activities

As a corporation, we will conduct fair business activities while maintaining an appropriate relationship with politics.

In addition, we will clarify the distinction between public and private regarding personal political activities of Employees.

Specific Action Examples

- Conduct political activities as a corporation, such as lobbying to public officials and making corporate contributions to candidates for public office by following the necessary procedures required by internal rules.
- Conduct personal political activities or make political remarks after clarifying that such activities or remarks are those of the individual, without using the company name or logo.



15

Appropriate Financial Reporting, Tax Treatment Based on Laws and Regulations

We will accurately record financial information and report and disclose such information in a timely and appropriate manner so that shareholders, investors, and other stakeholders can make decisions fairly and equitably, and also aim to maintain and improve tax compliance in accordance with tax related laws and regulations.

Specific Action Examples

- Perform appropriate accounting in accordance with applicable standards and internal rules for all transactions and events that occurred.
- Disclose financial information such as on our finances and performance in a fair and equitable manner in accordance with related laws, regulations and internal rules.
- Conduct appropriate tax payments in accordance with the tax laws, etc. that apply to the countries and regions where we conduct business, tax ordinances that apply internationally, and the related laws and regulations.

