

Note: This document is a translation from the Japanese original for reference purposes only. In the event of any discrepancy between this translated document and the Japanese original, the original shall prevail.

## **Basic Policy of Group Compliance**

### **1. Purpose of the policy**

Under the management philosophy of “Peace of mind, forever”, Meiji Yasuda Life Insurance Company shall state fundamental views on implementing the compliance of Meiji Yasuda Life Insurance Group in accordance with “Basic Policy of Group Internal Controls”.

In this policy, Meiji Yasuda Life Insurance Company (the “Company”) and its subsidiaries and affiliates (the “group companies”) are collectively referred to as the “Group”.

### **2. Fundamental views on compliance**

The Company shall define compliance as the top priority matter in all aspects of performance of business operations and as premises of soundness and adequacy. The Company shall state fundamental views on compliance as follows:

- Besides complying with laws and ordinances applicable to Japan and overseas, international norms, internal rules and the like, the Company and group companies shall act fairly and faithfully based on corporate and community values.
- Every executive and employee of the Group shall practice compliance such that the Group can retain and build on the trust of its customers by offering the most suitable products and high quality services.
- The Company will work on improving the compliance system as the Group and the Company will support, provide guidance, oversee and monitor for compliance promotion by each group company in accordance with the methods specified in the Basic Policy of Group Internal Controls.

### **3. System to promote compliance (Not Disclosed)**

### **4. Compliance items to be prompted (Not Disclosed)**

### **5. Compliance Promotion Methods (Not Disclosed)**

### **6. Providing support and guidance to group companies (Not Disclosed)**

## **7. System to promote compliance of the Company**

- (1) The Company shall establish a department responsible for the comprehensive and collective management of compliance related matters of the Company and a committee for reviewing upon the matters concerning compliance for the Company.
- (2) The Company shall establish policies and procedures to develop the compliance system of the Company.
- (3) The Company shall set up the reporting system in the case where acts that may become a problem in terms of compliance are found.
- (4) The Company shall maintain the structure and system of reporting important compliance related issues to the management in a timely and appropriate manner.

## **8. Compliance items to be promoted by the Company**

Based on compliance items to be promoted as the Group described at chapter 4, the Company shall state compliance items which are especially required to promote as the Company as follows:

- (1) Appropriately manage transactions conducted by financial institutions of the Group that may have conflicts of interest so that the interests of the customers are not adversely affected.
- (2) Appropriately handle and implement appropriate safeguards to protect and manage the Company's confidential information including the customers' personal information.
- (3) Implement appropriate measures to completely cut off all relations with antisocial forces such as organized crime groups and other criminal organizations.
- (4) Implement appropriate measures for ensuring that the transactions are not used for money laundering and terrorism financing.
- (5) When collecting important information of other companies or other information that may fall under the important information for other companies, implement appropriate measures for proactively preventing fraudulent transactions (insider trading) such as sales and purchase of shares of such company before the information has become public.
- (6) Implement appropriate measures for proactively preventing exchange of entertainment, gifts, money and other profits for the purpose of obtaining and maintaining unfair profits and preferential treatment.

(7) Prevent all executives and employees from conducting fraudulent transactions such as restricting competition including price-fixing, and earning profits by taking their superior bargaining position.

### **9. Compliance Promotion Methods of the Company**

The Company shall prescribe compliance promotion methods so that the Company ensures the effectiveness of compliance promotion as follows:

- (1) For achieving compliance, the Company shall formulate and implement the detailed compliance plan by each fiscal year.
- (2) For fostering high ethical standards in every executive officer and employee and firmly establishing the culture of compliance in the organization, the Company shall continuously disseminate information and impart education about compliance.
- (3) The Company strive to offer most suitable products and high quality services to the customers.
- (4) The Company shall establish a direct reporting route that can be used by the discovering person when the normal reporting system is not feasible. In addition, the Company shall ensure a process in place to protect whistleblowers.
- (5) Upon receipt or identification of a compliance concern, the Company shall promptly conduct an investigation into the matter. If the compliance incident involves employee misconduct or a violation of any policy of the Company, the Company shall take appropriate disciplinary actions against the violators in accordance with the Company's policies.
- (6) In the event of detecting any acts that may become a problem in terms of compliance, the Company shall strive to make prompt improvements such as conducting root-cause analysis and formulating recurrence prevention measures.
- (7) If the Company finds or recognizes any incidents that could make serious impacts on its management or any concerns that these incidents could occur, the Company shall make efforts to prevent the spread or occurrence of the incidents and promptly report them to its Board of Directors.