

**Notification of Establishment of “ACOM Group Code of Ethics”  
and “Code of Conduct”**

ACOM CO., LTD. (hereinafter, “ACOM”) hereby announces the establishment of new “ACOM Group Code of Ethics” and “Code of Conduct.”

**1. Content**

ACOM has placed compliance at the highest priority as management challenge. The group has endeavored on construction of compliance structure, such as establishment of “ACOM’s Ethical Codes For Business” in 1998.

In order to further enhance the group’s compliance, “ACOM’s Ethical Codes For Business” was put under review, and “ACOM Group Code of Ethics” and “Code of Conduct” were newly established. The reviewing process was held in the Compliance Committee in which external experts constitutes the majority. The revision was approved at the meeting of the Board of Directors

**2. Date of Establishment**

December 1, 2007

**3. ACOM Group Code of Ethics**

**ACOM Group Code of Ethics**

We, the ACOM Group, are well aware of our corporate social responsibilities and mission, firmly maintain the “Circle of Trust,” which is the spirit of our founders, conduct ourselves on the basis of the Corporate Philosophy derived from that spirit and hereby establish the ACOM Group Code of Ethics.

1. We will take a sensible course of action at all times, not forgetting the “Respecting Other People”.
2. We will make efforts to improve ourselves every day, fully understand the point of work-related laws and regulations and comply with them.
3. We will adhere to the “Putting the Customer First” policy, respond to our customers’ needs and make efforts to provide services of good quality.
4. We will strictly maintain the confidentiality of customers and other information of various kinds that become known to us in connection with our duty.
5. We will make efforts to disclose corporate information in a timely and suitable manner for the purpose of securing transparency of management.
6. We will work to preserve the environment and conduct social contribution activities as members of society.

**4. Code of Conduct**

**Code of Conduct**

- 1 Respecting Other People
  - (1)Basis of Conduct
    - 1) We will make it the basis of our conduct to respect the fundamental human rights of our customers and all persons and make efforts to take a course of action that is true to the name of all employees of the ACOM Group at all times.
    - 2) We will never engage in any act that violates human rights such as that causes damage to honor and trust or that infringes privacy.
  - (2)Fair Treatment

We will protect the right of all employees to be treated fairly and will not discriminate against them in the areas of employment control or treatment on the basis of race, nationality, gender, creed, social status, or other characteristics.

### (3) Creation of a Comfortable Workplace

- 1) In order to form an organizational culture in which each employee can manifest their fullest capabilities, we will make efforts to create a comfortable workplace by maintaining a safe and healthy work environment and by providing a variety of employment patterns or working styles that can satisfy diversified working needs.
- 2) All employees treat each other as respectable colleagues. They report, communicate, consult mutually and endeavor to make the atmosphere of the workplace friendly through close communication.
- 3) We will never engage in any act that could injure the dignity of all employees or damage their motivation for working such as sexual harassment, power harassment or any other harassment.

## 2 Compliance with Laws and Regulations

### (1) Compliance with Laws and Regulations

- 1) We clearly realize that the existence of a company is supported by strict compliance with laws and regulations, and we will respect the priority of compliance in credit business promotion activities and keep in our minds not to seek after corporate profitability unnecessarily.
- 2) In our individual business activities, we will confirm which laws and regulations these activities are based on and act in accordance with them.
- 3) We will make efforts to understand fully the points and purposes of laws and regulations in our diligent study and to implement them with the correct interpretation and without falling into a self-righteous interpretation with minute provisions unnecessarily.

### (2) Fair Corporate Activities

In our corporate activities, we will respect the meaning of fair and free competition and follow fair market rules and right commercial practices.

### (3) International Business Activities

In our international business activities, we will endeavor to fully abide by the culture, traditions, religion, customs and others aspects of the country or region and to contribute to the development of such country and region on the basis of mutual trust.

## 3 Putting the Customer First

### (1) Basic Stance

- 1) We will always think from the standpoint of our customers and conduct ourselves paying respect to the position and sentiment of our customers.
- 2) We will try to deal with customers with kindness, politeness and sincerity and make efforts to use accurate and easy-to-understand language when we explain.

### (2) Provision of Products and Services

We will endeavor to grasp diversifying customer need correctly and develop and provide products and services that contribute to enhancing the life of our customers.

### (3) Provision of Information on Products and Services

- 1) With respect to the content of products and services, we will make efforts to provide our customers with information that is accurate and easy-to-understand, and when a contract is concluded, we will explain important matters in advance so that customers can understand well.
- 2) When we publicize or advertise products and services, we will avoid using expressions that could cause customers to understand incorrectly and show accurate content.

### (4) Settlement of Complaints

- 1) We will maintain contact so that our customers have no hesitancy in inquiring about our products and services and we will respond to consultations and complaints quickly and suitably.
- 2) We will relay information on consultations or complaints from customers to the departments and offices involved to help the improvement and development of products and services, and if any inappropriate actions have taken place, promptly rectify and make efforts to prevent any recurrence.

## 4 Information Control, Confidentiality Obligation

### (1) Maintenance of the System

We will maintain the administrative system that manages personal information, client information and information relating to corporate management, and make absolutely sure to

prevent unauthorized access to such information and loss, alteration or divulging of such information.

(2)Confidentiality Obligation

- 1) We will keep confidential information from customers that become known in connection with our duty confidential, and will not disclose to a third party without justifiable reason or the customer's own consent.
- 2) We will keep personal information, client information and information relating to corporate management that becomes known in connection with our duty strictly confidential, and will not disclose to a third party during the period of employment, as a matter of course, including after retirement.

(3)Insider Information

We will never engage in any act, including the sale and purchase of stocks, that seeks to make a profit for ourselves or other persons on the basis of important information that becomes known in connection with our duty and that has not been made open yet and could influence stock prices, etc.

5 Disclosure of Corporate Information

(1)Disclosure of Information

To contribute to the reasonable judgment of stockholders, investors and customers, we will disclose accurate and relevant information concerning the content of business, financial matters and others in a timely manner.

(2)Correct Accounting

To ensure accuracy and reliability of financial accounting, we will keep accurate accounts and records and control accounting.

6 The Environmental Preservation and Social Contribution Activities

(1)The Environmental Preservation

We realize the importance of preserving the environment, and will make efforts to save resources and energy and involve ourselves in reducing waste and the use of recycled goods.

(2)Social Contribution Activities

We will support activities that contribute to the promotion of culture, education, sport and others and involve ourselves in social contribution activities such as appropriate assistance by way of social welfare organizations.

(3)Assistance to Volunteer Activities

We will respect volunteer activities of all employees and assist them as much as we can in accordance with the content of such activities.

7 Stance against Antisocial Forces

- 1) We will never yield to unreasonable demands or interferences with our business by antisocial forces and organizations such as so-called corporate extortionists, organized crime groups and others.
- 2) In the event of unreasonable demands being made as outlined in the preceding paragraph, the departments and offices concerned will deal with them strictly by coordination and cooperation, and promptly notify the authorities relevant to case in question and seek their cooperation.

Reference: Members of Compliance Committee

Chairman	Tatsuzo Homma	Lawyer, Kawakami Law Firm (Ex. Attorney General of Yokohama District Public Prosecutor Office)
Member	Mitsuhiro Umezu	Managing Director at Japan Society for Business Ethics Study
Member	Michelle Tan	Professor, Faculty of Law and Policy at Tezukayama University
Member	Shigeyoshi Kinoshita	President & CEO at ACOM CO., LTD.
Member	Osamu Moriya	Managing Director at ACOM CO., LTD.