

Corporate Governance

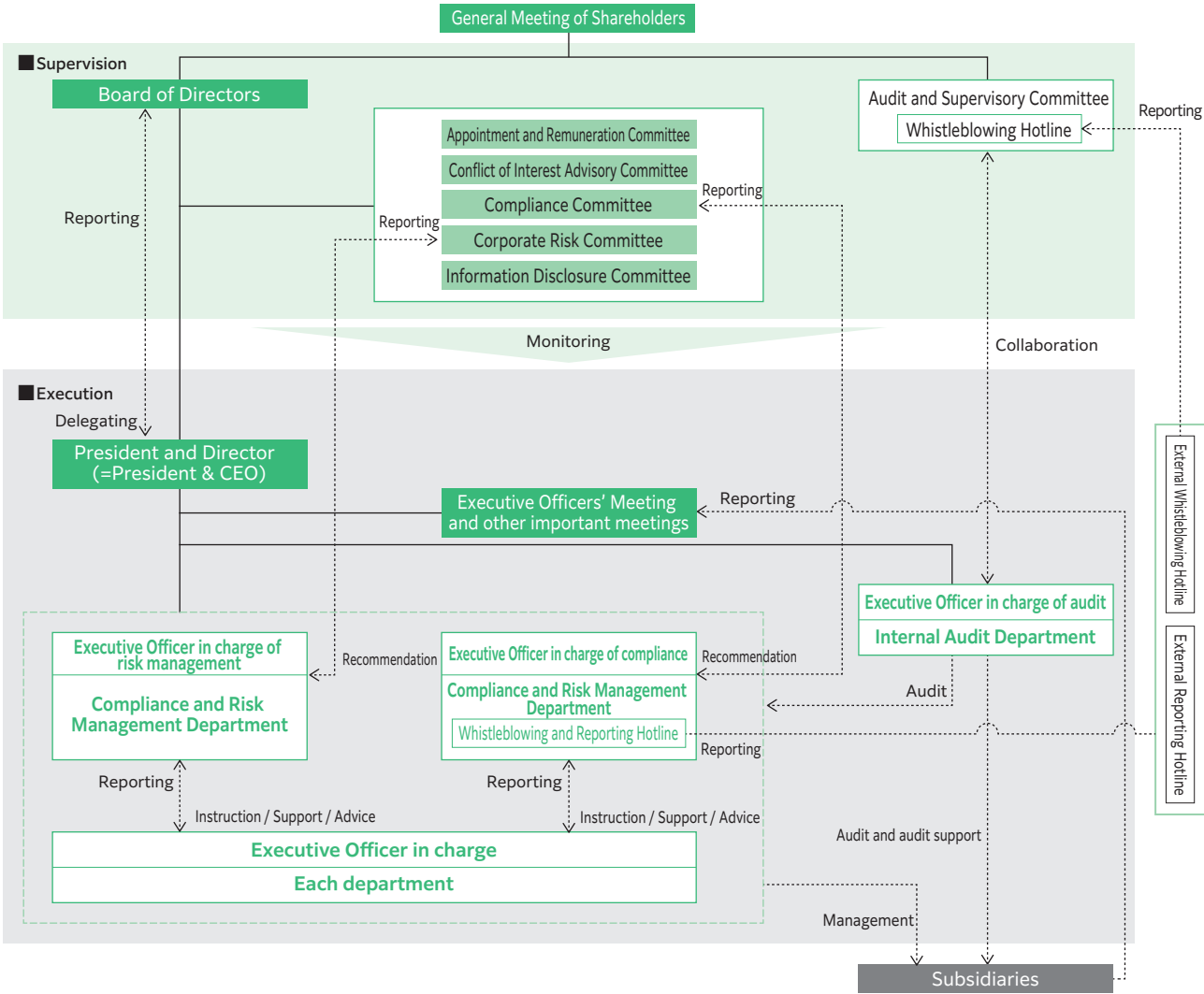
Basic Approach

ACOM Group, guided by its founding spirit—the Circle of Trust, maintains an ongoing corporate philosophy, the spirit of human dignity, customers first, and creative and innovative management. Based on this commitment, we are seeking to deepen mutual trust between our stakeholders and ourselves and thus progress in partnership with society.

In order to meet the expectations of stakeholders and build stronger trust, we will strengthen corporate governance as a key management priority. To this end, we will take steps to enhance the soundness, transparency, and efficiency of our operations and achieve sustained increases in our shareholder value.

We recognize that effective internal control systems are essential to creating an appropriate corporate governance framework. Based on this recognition, we are encouraging all members of our organization to join forces in building internal control systems and assuring their effectiveness, under the leadership of the management. At the same time, we are constantly evaluating, verifying, and improving the effectiveness of internal control systems already in place.

Corporate Governance Structure (As of June 30, 2025)



The Board of Directors

Chair Masataka Kinoshita, President & CEO

Meeting frequency At least once every three months, in principle

Number of meetings in FY2024 12

Role

- ✓ The Board deliberates on and decides important business management matters, such as management strategies and business planning, and basic policies for building corporate governance and internal control systems, while ensuring objective and rational judgment.
- ✓ The Board delegates decision-making on matters related to the execution of business operations other than matters to be resolved at the Board of Directors to the President and Director, and monitors and supervises the execution of duties by thorough monitoring and other measures on delegated matters.

Main topics considered in FY2024

[Management strategies]

- ✓ Single-year management plan
- ✓ Next Medium-term Management Plan
- ✓ Interim and year-end dividends

[Business management]

- ✓ Basic policy on the creation of an internal control system
- ✓ Response to the Corporate Governance Code
- ✓ Increasing the sophistication of committees that are subsidiary organizations to the Board of Directors

[Accounting and financial affairs]

- ✓ Financial statements
- ✓ Business reports

[Personnel]

- ✓ Selection of Directors' positions
- ✓ Directors' basic and performance-based remuneration as well as stock-based remuneration

Audit and Supervisory Committee

Chair Kikuo Asano, Director and Audit and Supervisory Committee Member (Outside Director)

Number of meetings in FY2024 14

Role

- ✓ Receives reports concerning important audit related matters, hold discussions, and pass resolutions

Key audit items

- ✓ Operation of Group governance structure
- ✓ Promotion of risk management structure and qualitative improvement measures
- ✓ Qualitative improvement measures for internal audits

- ✓ Response to legal violations, whistleblowing, unforeseen circumstances, and issues identified through internal audits
- ✓ Qualitative improvement measures for information disclosure
- ✓ Adequacy of loss on interest repayments and allowance for doubtful accounts

Key activities of Audit and Supervisory Committee Members

- ✓ Attendance at Board of Director meetings, committee meetings, and management-related meetings
- ✓ Exchange of opinions with Representative Directors, Directors, and Executive Officers
- ✓ Inspection of important approval documents, etc.
- ✓ Examination of operations and assets at head office, business sites, and subsidiaries based on audit plans

- ✓ Exchange of opinions with Representative Directors and Full-time Auditors at main subsidiaries
- ✓ Collaboration with Accounting Auditors, receipt of accounting audit reports, and exchange of opinions
- ✓ Collaboration with Internal Audit Department, receipt of internal audit reports, and exchange of opinions

Committees

Appointment and Remuneration Committee

Chair Masataka Kinoshita, President & CEO

Meeting frequency 3 times per year, in principle

Number of meetings in FY2024 4

Role

- ✓ Reviews and proposes the appointment of candidates and remuneration for Directors (excluding Directors serving as Members of the Audit and Supervisory Committee) for resolution at the Board of Directors Meeting
- ✓ Checks the status of training for both management and management candidates, and provides the overview to the Board of Directors

Main topics considered in FY2024

- ✓ Director evaluations
- ✓ Director candidates and Representative Director candidates at subsidiaries
- ✓ Selection of Directors' positions

- ✓ Directors' basic and performance-based remuneration as well as stock-based remuneration
- ✓ Development of management team and management candidates

Legend... ● Internal ● Outside ● Outside (female) ● Outside expert ● Non-Director(Internal)

Conflict of Interest Advisory Committee

Chair

Chair

Kikuo Asano, Director and Audit and Supervisory Committee Member (Outside Director)

Number of meetings in FY2024

1

Role

✓ Deliberates on material transactions, etc., where the interest of controlling shareholders conflicts with the interest of minority shareholders from the perspective of protecting the interests of minority shareholders, and makes recommendations to the Board of Directors, etc.

In the fiscal year ended March 2025, there were no relevant transactions throughout the year, but the Conflict of Interest Advisory Committee met once to report on the results. All members of the committee were in attendance.

Compliance Committee

Chair

Chair

Michelle Tan, Director (Outside Director)

Meeting frequency

4 times per year, in principle

Number of meetings in FY2024

4

Role

✓ Deliberates on compliance-related matters, and makes recommendations to the Board of Directors as necessary

Corporate Risk Committee

Chair

Chair

Hiroshi Naruse, Deputy Chairman

Meeting frequency

Once every quarter, in principle

Number of meetings in FY2024

4

Role

✓ Discusses important items related to risk management and makes proposals and reports to the Board of Directors as deemed necessary
✓ Monitors the status of risk management and other matters and reports the results to the Board of Directors

Information Disclosure Committee

Chair

Chair

Hiroshi Naruse, Deputy Chairman

Meeting frequency

Twice every quarter, in principle

Number of meetings in FY2024

6

Role

✓ To ensure accurate, timely and appropriate information disclosure, the Committee deliberates on matters such as statutory disclosure materials based on the Companies Act and Financial Instruments and Exchange Act, timely disclosure materials based on the Securities Listing Regulations, and matters related to the development of information disclosure systems.

Executive Officers' Meeting and other important meetings

Chair

Chair

Masataka Kinoshita, President & CEO

Meeting frequency

Three times a month, in principle

* Audit and Supervisory Committee Members are permitted to attend the Executive Officers' Meeting and other important meetings, where they may express their opinions.

Role

✓ In accordance with basic policies determined by the Board of Directors, discusses and makes decisions related to the execution of important business operations delegated by the Board of Directors to the President and Director
✓ Deliberates on management policies and management plans in advance for resolution at the Board of Directors

Director Appointment Process

At ACOM, to ensure that the Board of Directors can effectively fulfill its roles and responsibilities, we have outlined the Policy of the Composition of the Board of Directors as below.

In appointing Directors, in light of the management strategy and based on the Policy of the Composition of the Board of Directors, the Appointment and Remuneration Committee selects candidates, and resolutions are passed by the Board of Directors. Candidates are appointed from among those who meet the following policies.

- In order to raise the effectiveness of management supervision, possess ample corporate management experience, a high level of knowledge, and advanced expertise.
- Be well-respected, of excellent character, and have high ethical standards.
- Be in good physical and mental health and able to perform their duties without any problems.
- Have never violated laws, regulations, or compliance standards (including harassment) or caused significant loss to the Company or any company or organization to which they have previously belonged.
- Have no ties to anti-social forces.

Policy of the Composition of the Board of Directors

● **Balance of expertise, experience, and ability**

The Board of Directors has determined the skills that our Directors should possess in particular, in light of our management strategy, as follows, and has ensured that these skills are appropriately balanced overall.

Skill	Definition
Corporate Management and Planning	Either in-house (includes subsidiaries) or at another company, the individual has experience as a director or in the formulation and implementation of management strategies, and boasts a high level of relevant insight.
Business Management	The individual has experience in corporate governance or personnel management, and boasts a high level of relevant insight.
Execution of Business	The individual has experience in one of our core businesses—namely the Loan and Credit Card Business, the Guarantee Business, or the Overseas Financial Business—and boasts a high level of relevant insight.
System and Digital	The individual has experience with our system- and digital-related projects, and boasts a high level of relevant insight.
Finance and Accounting	The individual has experience in financial affairs and accounting and boasts a high level of relevant insight, or the individual is a certified public accountant and is well-versed in accounting with a high level of expertise.
Law, Compliance, and Risk Management	The individual has experience in corporate legal affairs, compliance, and risk management, and boasts a high level of relevant insight, or the individual is a qualified lawyer and is well-versed in law with a high level of expertise.

* In principle, Directors who are Members of the Audit and Supervisory Committee will also have a wealth of knowledge in financial affairs and accounting, while Independent Outside Directors will have experience in management at other companies.

- **Diversity**
- The Board of Directors shall be comprised of a diverse range of individuals in terms of gender, international experience, professional background, and age, etc.
- **Scale**
- To speed up decision-making processes and to ensure effective mutual supervision of Director duties, the scale of the Board of Directors shall be relative to the range and size of the Company's business.

Skills Matrix*1

Name	Position	Age*2	Corporate Management and Planning	Business Management	Execution of Business	System and Digital	Finance and Accounting	Law, Compliance, and Risk Management	Member committees and attendance		
									Board of Directors	Appointment and Remuneration Committee	Audit and Supervisory Committee
Shigeyoshi Kinoshita	Chairman	76	●	●			●		12/12 (100%)	4/4 (100%)	
Hiroshi Naruse	Deputy Chairman	66	●			●		●	12/12 (100%)	4/4 (100%)	
Masataka Kinoshita	President & CEO	47	●		●	●			12/12 (100%)	4/4 (100%)	
Takashi Kiribuchi	Director and Deputy President	63	●			●	●		12/12 (100%)		
Masashi Yoshiba*4	Senior Managing Director	62		●	●			●	—	—	—
Tadashi Yamamoto	Director	56	●	●				●	11/12 (91.7%)		
Michelle Tan*3	Director Independent Outside	63	●					●	8/8 (100%)		
Kikuo Asano*4	Director, Member of the Audit and Supervisory Committee Independent Outside	66	●	●			●		—	—	—
Akihiro Kiyooka*3	Director, Member of the Audit and Supervisory Committee	57	●				●	●	8/8 (100%)	1/1 (100%)	10/10 (100%)
Takuji Akiyama	Director, Member of the Audit and Supervisory Committee Independent Outside	67		●			● (Certified public accountant)	●	12/12 (100%)	4/4 (100%)	14/14 (100%)

*1 The above is a list of up to three major skills marked that each director possesses. It does not represent all the skills that each director possesses.
*2 The age shown above is as of the 48th Ordinary General Meeting of Shareholders (June 20, 2025).
*3 Took office as director effective June 21, 2024.
*4 Took office as director effective June 20, 2025.

Remuneration of Officers

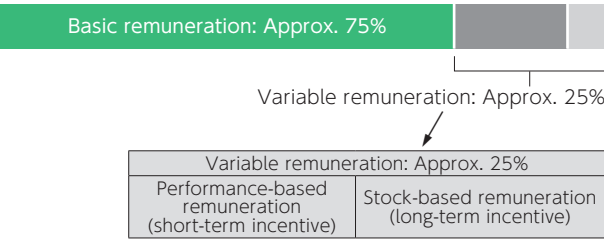
Decision policies relating to the specifics of remuneration for individual Directors (excluding those who are Audit and Supervisory Committee Members) are decided by the Board of Directors. The benchmark for remuneration of Directors (excluding those who are Audit and Supervisory Committee Members) is the remuneration level at companies with the same business scale as the Company, and belonging to a related industry type or category, and the remuneration system is structured to adequately function as an incentive for continually improving corporate value. Remuneration for individual Directors is provided only monetarily. Remuneration for Representative Directors and Directors who serve concurrently as Executive Officers consists of basic remuneration, performance-based remuneration, and stock-based remuneration, while remuneration for other Directors consists only of basic remuneration. Basic remuneration is fixed remuneration paid every month, performance-based remuneration is variable remuneration paid once a year based on performance, and stock-based remuneration is variable remuneration paid upon retirement based on stock prices.

Regarding basic compensation for Directors (excluding those who are Audit and Supervisory Committee Members), the Appointment and Remuneration Committee reviews and proposes an amount suited to the Director's position, taking into account levels at other companies, performance at the Company, employee salary levels, and so on, and then a decision is made by the Board of Directors. For performance-based remuneration, the basic funds for distribution are calculated using profit attributable to owners of the parent as an index for comprehensively measuring the management performance, and then the Appointment and Remuneration Committee reviews and proposes an amount suited to the Director's position and personal evaluation, etc., and a decision is made by the Board of Directors. For stock-based remuneration, virtual stock is awarded annually and multiplied by the stock price three years later. In line with management conditions, the Appointment and Remuneration Committee discusses and proposes the amount of virtual stock, and the final decision is made by the Board of Directors.

The guideline for variable remuneration (performance-based and stock-based remuneration) as a percentage of total remuneration is roughly 25% (when performance-based remuneration and stock-based remuneration are the standard amount). Regarding the method of determining the amount of performance-based remuneration, the range of profit attributable to owners of the parent for the year which serves as the standard for basic funds for distribution is determined by the Appointment and Remuneration Committee while taking into account extraordinary income or losses and other special factors, and then the amount is determined by the Board of Directors by multiplying by a multiplier commensurate with the position specific distribution ratio and personal evaluation of the Director with the basic funds for distribution. Regarding the method of determining the amount of stock-based remuneration, the Appointment and Compensation Committee determines the number of virtual shares calculated based on the base amount set for each Director who concurrently serves as a Representative Director or an Executive Officer each year, and the Board of Directors decides on the allotment of those shares. The virtual shares are converted into points by multiplying them by the stock price three years later, and the points accumulated during the term of office are converted into a monetary amount and paid at the time of retirement.

Also, a target for the performance-based remuneration index has not been set for the fiscal year ended March 2025, but in terms of track record, in the past there have been basic funds for distribution of 30 million yen for a range of 40-50 billion yen profit attributable to owners of the parent for the year serving as a basis.

Image



Other specifics relating to remuneration of Directors are reviewed and proposed by the Appointment and Remuneration Committee, and decided by the Board of Directors. Also, the amounts of remuneration for Audit and Supervisory Committee Members are determined through discussion by the Audit and Supervisory Committee Members, taking into account the duties and responsibilities of Audit and Supervisory Committee Members.

The stock-based remuneration system (phantom stock) is intended to provide an incentive that will encourage management to demonstrate a healthy entrepreneurial spirit toward the Company's sustainable growth and improvement of its medium- to long-term corporate value, as well as to further promote value sharing with shareholders. The plan was decided upon at the Board of Directors meeting held on January 31, 2023, and began operation in June 2023.

The maximum limit on remuneration of Directors (excluding those who are Audit and Supervisory Committee Members) was resolved to be 400 million yen (not including salary for the employee portion) per year at the 40th General Meeting of Shareholders held on June 22, 2017, and the number of Directors (excluding those who were Audit and Supervisory Committee Members) at the conclusion of said General Meeting of Shareholders was six. Also, at that same General Meeting of Shareholders, the maximum limit on remuneration for Directors who are Audit and Supervisory Committee Members was resolved to be 100 million yen per year, and the number of Directors who were Audit and Supervisory Committee Members at the time of said General Meeting of Shareholders was four. As of March 31, 2025, the number of Directors was seven (excluding Directors who were also Audit and Supervisory Committee Members), and the number of Directors who were also Audit and Supervisory Committee Members was three.

In deciding the individual remuneration for Directors for the fiscal year ended March 2025, the Appointment and Remuneration Committee conducts reviews and makes proposals based on factors such as the position and evaluation of the Director, within the scope of the remuneration limit approved at the General Meeting of Shareholders. A decision is then made by the Board of Directors while respecting the specifics of that proposal, and it is determined that the specifics follow the decision policy.

Total Amounts of Remuneration of Directors

Category	Total amount of remuneration (million yen)	Total amount of remuneration by type (million yen)			Number of applicable officers
		Fixed remuneration	Performance-based remuneration	Non-monetary remuneration, etc.	
Directors (excluding Audit and Supervisory Committee Members and Outside Directors)	196	155	28	12	6
Audit and Supervisory Committee Members (excluding Outside Directors)	19	19	—	—	2
Outside officers	37	37	—	—	3
Total	253	212	28	12	11

Training for Officers

We hold study sessions for officers in order to improve the skills of Directors and Executive Officers who are Director candidates and to improve the effectiveness of the Board of Directors. In the fiscal year ended March 2025, we held study sessions for officers on the following topics.

- ✓ Current state of the younger generation
- ✓ Future economic trends
- ✓ Current DX and generative AI
- ✓ Sustainability
- ✓ LGBTQ
- ✓ Cyber security
- ✓ M&A

Evaluation of Effectiveness of Board of Directors

The Company distributes a questionnaire regarding the effectiveness of the Board of Directors to all Directors every year, and conducts analysis and evaluation on effectiveness of the Board of Directors based on the responses to the questionnaire. The Company addresses any issues identified based on responses to the questionnaire, and works to increase the effectiveness of the Board of Directors.

Effectiveness Evaluation Process

1. Self-evaluation	Each Director responds to questionnaire
2. Overall evaluation	Board of Directors holds discussions about results of responses to questionnaire and issues identified
3. Disclosure of evaluation results	Disclose evaluation methodology and evaluation results in Corporate Governance Report

Evaluation Results

The Company conducted the analysis and evaluation of the effectiveness of the Board of Directors this fiscal year. Consequently, the Company assessed that the Board of Directors fulfills each and all of its functions, including the formulation of management strategies and targets, resolving management challenges, supervising risk management and business executives. Thus, the Company concluded that the current Board of Directors functions sufficiently and is effective.

In addition, the Company finds that a certain amount of progress has been made in addressing the issues identified in the previous year, in terms of enhancing the content of reports to strengthen the supervisory function and to enhance discussions to fulfill the functions of the Board of Directors. However, the Company recognizes that it is necessary to further enhance the operation of the Board of Directors to further enhance the content of reports and discussions.

Going forward, the Company operates the Board of Directors as described below, while the Company will regularly analyze and evaluate the effectiveness of the Board of Directors, and continue efforts to ensure enhanced effectiveness of the Board of Directors.

- (1) The Board of Directors will deliberate on and decide material business management matters, such as management strategies and business plans, while ensuring objective and rational decisions, and will also determine basic policies for corporate governance and building internal control systems, as it monitors and supervises the execution of business.
- (2) Material matters will be exhaustively selected as agenda items based on regulations for matters to be resolved at the Board of Directors meeting, as stipulated in the rules of the Board of Directors. The Board of Directors will discuss such selected material in timely and appropriate manner.
- (3) The Company will distribute materials to be used at Board of Directors meetings prior to the meeting, in order to ensure smooth and lively discussions. Explanations on the content will be provided in advance when deemed necessary.
- (4) The Board of Directors will receive periodic reports on the status of management, etc., and monitor the execution of business.

IR Activities

We strive to have constructive dialogue with shareholders in order to contribute to the sustainable growth of the Company and the improvement of our medium- to long-term corporate value. Overseen by the Executive Officer in charge of the Finance Department, the Public & Investor Relations Office of the Finance Department cooperates daily with related departments to engage in dialogue with domestic and overseas investors through interim and fiscal year-end financial results briefings, domestic conferences, overseas IR roadshows, and individual interviews. Investor concerns and opinions obtained through dialogue are fed back to the Board of Directors and used to improve future corporate management and information disclosure.

Status of IR Implementation in FY2024

Number of Dialogue with shareholders / investors	136
Number of briefings for institutional investors	6 (including for overseas investors)
Number of briefings for individual investors	3

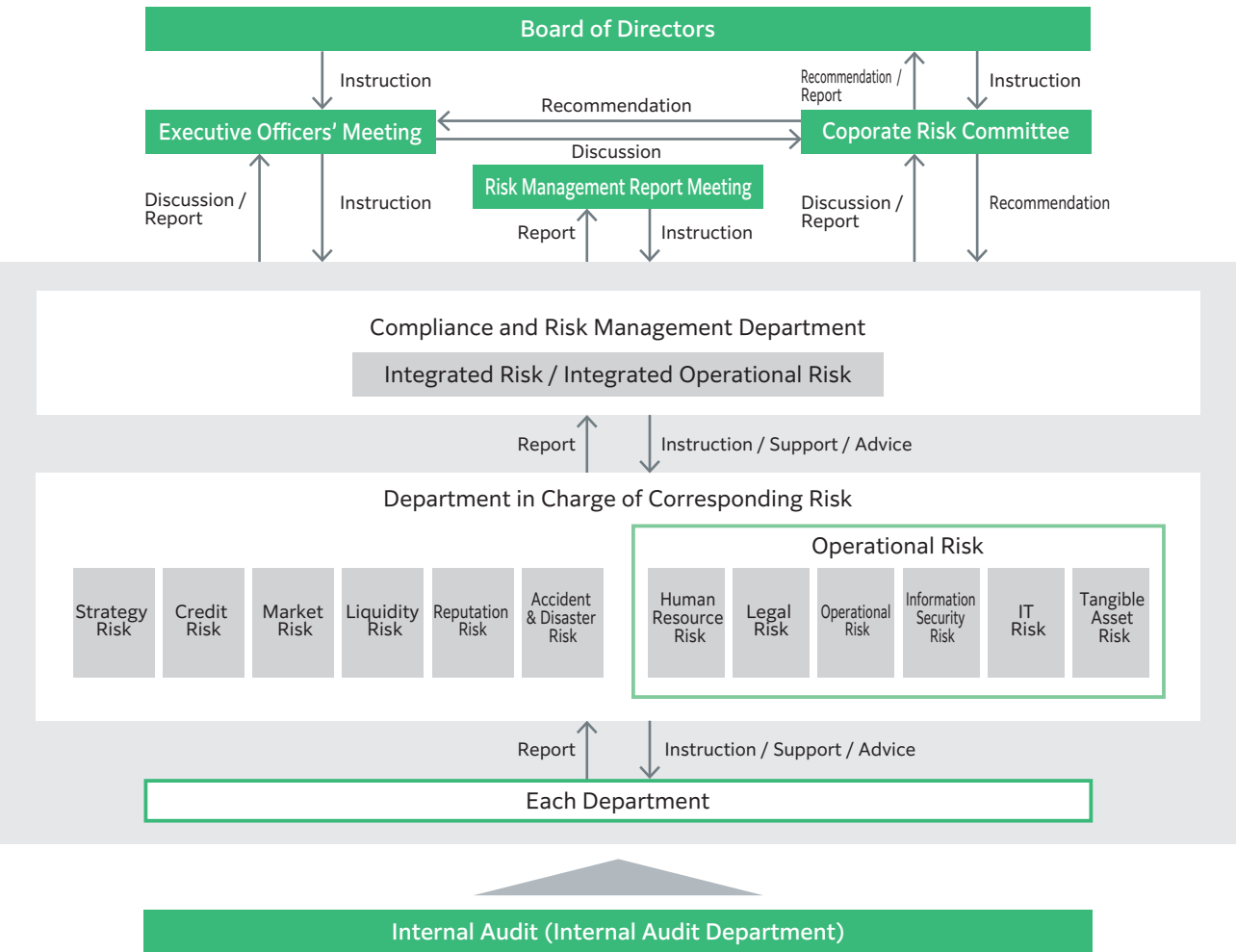


Risk Management

Risk Management System

The risks to be managed are becoming more complex and diverse as the management environment surrounding the Company changes. In this context, we are aware that one of our most vital management tasks is to build and reinforce a risk management system to fully recognize risks and make sure that management soundness is maintained, together with stable profitability, and growth potential. Our departments and sections in charge identify, evaluate, and control all the risks that are identified in the Risk Management Regulations as requiring management. Also, our Compliance and Risk Management Department provides integrated management of risks. Risk management activities in business execution are reported at Risk Management Report Meetings. The Corporate Risk Committee examines important matters concerning risk, monitors the risk management situation, and reports results and advice to the Board of Directors.

[Risk Management System Structure]



Current Management Environment and Top Risks

We determine the severity of a risk scenario based on its probability and potential impact on our operations. Risks which are perceived by management to have the potential to exert a major impact on our business in our management environment, now and in the future, are picked as top risks. For these, we assess the elevation of risk levels, warning signs, and the like, and devise appropriate countermeasures to suppress or otherwise respond to risks.

We have also established a system to respond swiftly when a risk emerges. Top risks are reviewed in advance by the Executive Officers' Meeting every fiscal year. They are then discussed by the Corporate Risk Committee before resolutions are made by the Board of Directors.

[Examples of Our Business Environment]

- Entry and ascendance of entities from other sectors
- Increasingly sophisticated cyberattacks
- Rise in market interest rates

[Top Risks]

Risk event	Risk scenario	Risk countermeasure (Example)
Decline in business earnings	• Declining earnings in the Loan and Credit Card Business, the Guarantee Business, or the Overseas Financial Business	• Improvement of product and service functions • Regularly manage and analyze business revenue compared to the plan, and make reports, including on the countermeasures, to Corporate Risk Committee, etc.
Increase in credit expenses	• Increase in expenses relating to doubtful accounts in the Loan and Credit Card Business, the Guarantee Business, or the Overseas Financial Business	• Implement regular monitoring of customers' creditworthiness
Emergence of IT risks	• The occurrence of situations which can impact business continuity due to delays in the planning and development of key system projects • The occurrence of situations which have major impacts on customer transactions, due to system failures	• Monitor in terms of system planning, development, and operation • Reallocate resources, establish systems and procedures in preparation for unforeseen situations, and address drills, etc.
Occurrence of damages from cyberattacks	• Customer information leakage and customer service stoppage due to cyberattack	• Establish procedures and manuals relating to cyberattacks, collection of vulnerability information, and implementation of countermeasures • Conduct regular training and drills
Personnel shortages	• Loss of competitive advantage due to personnel shortages	• Enhance various personnel systems and welfare programs, such as basic salary and bonus increases, allowances, and vacations • Make efforts to instill vision, and provide support for self-development, etc. • Securing talented and promising personnel through new graduate and mid-career recruitment activities • Enhance training programs, including selective education and digital talent development
Situations which have impacts due to external factors	• The occurrence of situations which have major impacts on the conduct of business, such as natural disasters, infectious diseases, and terrorism	• Establish a business continuity plan, and build a backup system, such as for call centers and mission critical systems • Secure the appropriate number of disaster stockpiles, and regularly implement training and drills, etc.
Increase in interest repayments	• Transfers to the provision for loss on interest repayment due to higher than anticipated interest repayments	• Predict future trends based on past performance at the end of each fiscal year, reevaluate provisions for loss on interest repayments, and make additional provisions if necessary • Conduct quarterly monitoring to ensure that there are no significant changes in future trends compared to those predicted during the most recent reevaluation
Emergence of conduct risks	• Situations which have major impacts on stakeholders, from perspectives such as consumer protection and maintaining the soundness of market	• Consumer awareness-raising activities for the purpose of customer protection, etc., stricter credit administration, and transaction monitoring
Procurement of funds	• Deterioration in financing due to rising market interest rates, worsening of financial situation due to decline in results, rating downgrades, etc.	• Diversify funding sources such as corporate bonds and commercial paper to maintain necessary cash on hand • Establish liquidity supplementation frameworks such as commitment lines • Maintain a fixed percentage of fixed-rate financing and adjust the ratio of short-term to long-term financing according to market conditions

For details, please refer to the securities report.
<https://pdf.irpocket.com/C8572/HgJ1/ku2g/dvWj.pdf>

Compliance Activities

The Company regards compliance as one of its most important management issues. The creation of "ACOM's Ethical Code for Business" (currently ACOM Group Code of Ethics and Code of Conduct) in 1998, established the Company as a forerunner in the industry and it has continued to focus on building and maintaining a robust compliance system.

• Compliance System

The Compliance and Risk Management Department supervises compliance throughout the Company. The Compliance and Risk Management Department is in charge of the following: developing, reviewing, and following up on implementation plans related to compliance with relevant laws and regulations; establishing, updating, and disseminating our Compliance Handbook which summarizes laws and regulations employees must abide by; raising awareness by conducting various training courses; and responding to reports of information and inquiries made to the Ethics Hotline by executives and employees.

In addition, Compliance Offices established within the Credit Business Promotion Division, Credit Management Department, and Guarantee Business Division collaborate with the Compliance and Risk Management Department in implementing a compliance system that allows for more task-focused compliance.

Furthermore, our Compliance Committee, which consists mainly of experts from outside the Company, operates according to a framework for deliberation of matters important for establishing and strengthening compliance. In this way, the Committee strives to ensure that the compliance system is effective.

As outlined above, The Company is engaged in a continuous challenge to strengthen the structure of its corporate culture of compliance, as well as improve every employee's awareness.

• Ethics Hotline (Whistleblowing)

The Company has established an Ethics Hotline as a contact point for executives and employees to report information regarding compliance violations or possible violation. The Ethics Hotline aims to prevent scandals and minimize the impact and damage caused by them through early detection of internal problems regarding compliance and appropriate corrective measures. The Ethics Hotline strictly prohibits acts of retaliation, as well as searching for and identifying anyone who has reported information or made an inquiry to the Hotline. Any information received is managed with strict security. We are working to improve the usefulness and reliability of the entire whistleblowing system, including the Ethics Hotline, so that it is easier for executives and employees to use.

• Action to Strengthen Financial Crime Countermeasures

There are demands for financial institutions to adopt even more sophisticated countermeasures against money laundering and terrorist financing amid the increasing threat of organized crime, terrorism, etc., in the international community.

In order to respond to the current situation, The Company established a new Financial Crime Prevention Office in April 2019 that aims to construct a system to prevent our products and services from being used for illegal activities involving money laundering or financing of terrorists.

Message from the Chair of the Compliance Committee

Michelle Tan Director (Outside Director)

Michelle Tan was born in Australia and came to Japan in 1985. Since attending graduate school at Osaka University, she has specialized in research on consumer policy and compliance in Japan and overseas, particularly in Australia. After working as a professor at Tezukayama University, Tan served as Chair of the Japan Consumer Network, before taking on her current role as Director of the Ethical Business Research Institute. She became a Director at ACOM on June 21, 2024. Tan specializes in consumer policy and consumer protection.



The fiscal year ending March 2026 will be the first year of our new Medium-term Management Plan. Under this plan, we will continue to focus on fostering a compliance culture (a corporate culture in which proper conduct based on the ACOM Group Code of Ethics and Code of Conduct is the norm) as a key theme, as we did under the previous Medium-term Management Plan.

At ACOM, we believe that fostering a compliance culture is essential to earning the trust and confidence of stakeholders and achieving sustainable growth. For this reason, we have made it an urgent priority to develop human resources who possess integrity (the commitment to always do what is right). Under the previous Medium-term Management Plan, we focused on initiatives such as integrity training. As a result of these efforts, awareness and understanding of integrity have steadily increased. In the fiscal year ending March 2026, we will further advance this process, and implement more initiatives aimed at ensuring that every employee practices proper conduct at the behavioral level.

In recent years, there has been an increase in financial crimes involving the fraudulent solicitation of money under the guise of investment or side businesses, which has become a serious social issue. At ACOM, we work to prevent such crimes and minimize the impact of any incidents by ensuring that every employee maintains a high level of awareness and handles customer inquiries with the greatest care. However, this problem is a key issue that the entire consumer finance industry must address as a whole. As a leading company in the industry, ACOM is committed to taking proactive measures in collaboration with the relevant organizations and other industry peers to effectively combat financial crimes and work toward their complete eradication.

The Compliance Committee will continue to offer advice and make recommendations for fostering a compliance culture based on applicable laws, corporate ethics, and consumer perspectives.