

Basic Policy on Customer Harassment

1. Introduction

As set out in its management philosophy, ZENKOKU HOSHO Co., Ltd. and its subsidiaries (hereinafter, referred to as the “Group”) aim to help customers realize their dreams and happiness by offering the highest-quality guarantee instruments and services, and contribute to the development of regional communities. In order to ensure that our officers and employees are able to commit fully to the realization of our management philosophy moving forward, we believe it is vital that we guarantee the provision of a working environment that allows them to work with security and peace of mind. To this end, we have formulated this Basic Policy on Customer Harassment.

2. Definition of Customer Harassment

Acts constituting complaints or types of behavior that involve demands that are deemed to be invalid or, even in the event that the demand itself is valid, the means or manner by which those demands must be met would be deemed to be socially inappropriate under normal social conventions, whereby such means or manners would be damaging to the Group’s business and the working environments of its officers and employees.

3. Acts Constituting Customer Harassment (Including but not limited to the following examples)

- (1) Physical attacks (assault or causing injury)
- (2) Psychological attacks (threats, slander, defamation of character, insulting language, abusive language)
- (3) Consistent or persistent types of behavior (intimidating behavior)
- (4) Demanding that officers or employees grovel (Dogeza)
- (5) Restrictive behavior (unlawful trespass, refusal to leave premises, confinement)
- (6) Use of discriminatory or sexual language/behavior
- (7) Attacking or making demands of individual officers or employees
- (8) Demanding monetary compensation or apologies that are inappropriate in respect of the specific circumstances
- (9) Photographing or video/audio recording of officers or employees without permission
- (10) Posting of the personal and other information of officers or employees, or making slanderous comments about them, on social media or the Internet (by means of publicly accessible photographs, audio, or video)

4. Responding to Instances of Customer Harassment

- (1) In the event of any applicable actions, we will make a careful judgment as to whether or not the

action constitutes customer harassment.

(2) To any customers found to have committed an act deemed as customer harassment, we shall respond sincerely and resolutely as an organization.

(3) In order to ensure the safety of other customers and our officers and employees, we shall provide an appropriate response, including but not limited to notifying the police and seeking legal advice.

(4) If the malicious behavior continues, we shall refuse the business of the offending party.

5. Responding to Officers and Employees

(1) We shall establish and maintain a system for officers and employees to seek consultation or make reports on matters to do with customer harassment. In the event that an officer or employee falls victim to customer harassment, we shall prioritize the provision of immediate care to the affected officer or employee and those officers and employees around them.

(2) We will run training sessions to ensure all employees are knowledgeable about matters to do with customer harassment and how best to respond to it.

(3) No officers or employees of the Group shall engage in acts of customer harassment, whether as part of or separate to their work duties at the Group.

6. Scope

This policy applies to all officers and employees of the Group.