

Aozora Bank Group Human Rights Policy

1. Basic Philosophy (Commitment to Respect for Human Rights)

The Aozora Bank Group intends to fulfill its responsibility to eliminate from its business operations any activities that are in opposition to the protection and promotion of human rights as well as any exploitative practices, including slavery, human trafficking, forced labor and child labor, while remaining dedicated to complying with applicable laws and regulations in the regions where it conducts business.

We also support the following international norms and standards on human rights:

- International Bill of Human Rights (Universal Declaration of Human Rights and International Covenants on Human Rights)
- ILO Declaration on Fundamental Principles and Rights at Work
- Guiding Principles on Business and Human Rights
- Children's Rights and Business Principles

2. Positioning of Human Rights Policy

The Aozora Bank Group recognizes the possibility that its business activities may have an impact on human rights. The "Aozora Bank Group Human Rights Policy", which was established in line with our management philosophy, sets our policy on initiatives for upholding the sanctity of human rights based on the "Code of Ethics and Conduct" that all officers and employees across the Aozora Bank Group are required to comply with.

3. Human Rights of Officers and Employees

The Aozora Bank Group works to eliminate all forms of discrimination in hiring and employment, and provides its officers and employees with a workplace free from human rights abuses, including discrimination or harassment mainly based on race, ethnicity, religion, creed, nationality, birthplace, social identity, family origin, gender, age, sexual orientation, gender identity, disability, pregnancy, marital status and health status. We also respect the rights to freedom of association and collective bargaining. In addition, we provide training sessions covering a range of human rights issues to raise awareness among officers and employees.

4. Human Rights of Retail Customers

The Aozora Bank Group respects the human rights of retail customers and exerts

every effort to protect their privacy. We strive to ensure an environment that enables customers to have secure access to funding as well as provide our financial products and services in a fair and responsible manner.

5. Human Rights of Borrowers and Investees

The Aozora Bank Group respects the human rights of borrowers and investees. We also remain concerned about the negative impact of borrowers and investees' business activities on human rights and, as stated in our "Investment and Lending Policies regarding Environmental & Societal Issues", prohibit any investments in and loans to companies whose business activities are in violation of international human rights norms.

6. Human Rights of Suppliers

The Aozora Bank Group respects the human rights of suppliers mainly in relation to the purchase of goods and services required for business operations, including IT systems and facilities, and outsourcing. We also remain concerned about the negative impact of suppliers' business activities on human rights and, as stated in the "Aozora Bank Group Outsourcing Policy", work to respect human rights through communication with them.

7. Human Rights Due Diligence

The Aozora Bank Group strives to properly conduct human rights due diligence as a means to identify, prevent, and mitigate any potential negative impacts of business activities on human rights.

As stated in our "Investment and Lending Policies regarding Environmental & Societal Issues" and other policies, if there is a possibility that the business activities of borrowers and investees may have a negative impact on human rights, we strive to make improvements through dialogue with them. When no improvements can be made, we will work further to reduce risk mainly by restricting or prohibiting credit. When financing large-scale projects, we conduct environmental and social due diligence, including respect for human rights, in accordance with the Equator Principles.

8. Remedial Actions

The Aozora Bank Group continues developing a system to receive consultation requests and reports on human rights from various stakeholders. We encourage

customers to request consultation by telephone or other means. We have also established a whistle-blower system called “Aozora Hotline Program”, which enables officers and employees to make reports through internal and external contact points. If the Aozora Bank Group causes or contributes to any negative impacts on human rights, we will take appropriate measures to remedy the situation.