

Aozora Bank Group Policy on Customer Harassment

1. Introduction

The Aozora Bank Group (hereinafter referred to as the 'Aozora Group') is committed to providing financial services that meet the true needs of customers under its "Code of Ethics and Conduct," "Aozora Bank Group Basic Policy on Customer-Oriented Business Conduct," and "Aozora Bank Group Human Rights Policy," and also works to secure a healthy and safe workplace environment while respecting the human rights of all individuals working within the Aozora Group (including not only those directly employed by the Group as well as its officers, but also temporary staff, people on secondment to the Group, and staff from outsourcing partners; hereinafter collectively referred to as the 'officers and employees').

Acts such as assault, unreasonable demands, prolonged detention, and defamation by certain customers or other individuals infringe upon the human rights of the officers and employees and undermine their working environment. These acts are also serious issues that can lead to a worsening of the workplace environment, a decline in overall workplace productivity, a deterioration in the health of the officers and employees, and their leave of absence or resignation. The Aozora Group regards such acts to be customer harassment, makes every effort to prevent them from occurring, and will respond resolutely if they occur.

2. Definition of Customer Harassment

The Aozora Group has defined the following behaviors as customer harassment:

- (1) Words and actions of customers or other individuals
- (2) Words and actions that, in light of the nature of businesses conducted by the Aozora Group's officers and employees as well as other circumstances, go beyond what is generally acceptable according to social norms
- (3) As a result, undermining the working environment of the relevant officers and employees

The term "customer harassment" as used here include words and actions made over the phone, via email, on social media, and elsewhere on the internet, in addition to the harassment committed in person both at branches and during customer visits.

The specific examples of customer harassment include (but not limited to) the following behaviors:

Unreasonable demands, etc.

- Making sexual demands or requests involving the privacy of the officers and employees
- Demanding services that significantly exceed the terms of the contract
- Demanding a significant reduction in the contract amount
- Making unreasonable claims for damages that are unrelated to the content of products or services

Physical aggression

- Physically offensive behavior such as punching, kicking, slapping, throwing things to, bumping intentionally into, or spitting on the officers and employees

Psychological aggression

- Threats, slander, defamation, insults, or verbal abuse
- Vandalizing company property or using such conduct to intimidate others; remarks that imply posting negative reviews on social media or other online platforms
- Posting or disseminating information concerning the privacy of the officers and employees, including their names, images, and voice recordings, or defaming them on social media, the internet, or in print media
- Forcing the officers and employees to kneel down on the ground and apologize
- Unauthorized photography or recording that continues even after the officers and employees have requested that it be stopped
- Revealing sexual orientation, gender identity, medical history, fertility treatments, or other sensitive personal information to others without the consent of the officers and employees, or coercing the officers and employees to disclose such information or prohibiting them from doing so

Intimidating words and actions

- Shouting to intimidate the officers and employees and those around them
- Engaging in antisocial behavior

Continued or persistent words and actions

- Repeatedly asking the same questions or making the same requests in a persistent and prolonged manner
- Shifting the discussion away from the original topic, nitpicking, or relentless criticism
- Persistently and repeatedly sending emails, social media posts, or other messages containing the same content

Restrictive or confining behavior

- Remaining in a branch for an extended period of time, refusal to leave
- Keeping the officers and employees engaged in prolonged telephone conversations

3. Response to customer harassment

In the event that the Aozora Group identifies a customer's demands, words, or actions as customer harassment, its engagement with the customer will be discontinued from that point onward in principle.

If necessary, the Aozora Group will take appropriate measures to respond resolutely against customer harassment, including legal action, after consulting with the police or lawyers.

The Aozora Group also works to promote awareness of required knowledge and response procedures as a means to appropriately address customer harassment.