



BNY MELLON

To Corporate Customer

From: The Bank of New York Mellon Securities Company Japan Ltd. (“BNYMSJ”)

Sharing Non-Public Information with BNY Mellon Affiliates

BNY Mellon is engaging in the business globally as a global financial services company focused on helping clients invest and manage their financial assets. Therefore, it is intended that Non-Public Information about our customers (including the information with respect to any transaction entered into between them and BNY Mellon Affiliates (as defined below)) will be shared among subsidiaries and affiliates of The Bank of New York Mellon Corporation (the “BNY Mellon Affiliates”). Non-Public Information has the meaning as defined in Article 1 paragraph 4 item 12 of the Cabinet Office Ordinance regarding Financial Instruments Business in Japan (the “Business Ordinance”).

Article 153 paragraph 1 item 7(a) of the Business Ordinance requires that in order for Non-Public Information concerning a client to be shared between a Financial Instruments Business Operator and its affiliates, a prior written consent to that effect must be obtained from the client. However, under Article 153 paragraph 2, such consent is deemed to have been obtained if an opportunity to seek the suspension of such sharing is provided in a proper manner to the client (“Opt-out Method”^{*}). This document is intended to provide our customers with such an opportunity.

^{*}In order to start providing information by the "opt-out method", BNYMSJ will provide prior notice to our customers.

1. Customers subject to the provision of information according to the "Opt-out Method"

Customers subject to the provision of information according to the "Opt-out Method" are corporate customers to whom the notice on the provision of customer's information to BNY Mellon's group companies by the "Opt-out Method" has been made by means such as Email, post or directly delivered by us etc, after the customer's approval on providing information has been obtained.

2. Scope of Non-Public Information shared with BNY Mellon Affiliates

Non-Public Information about the customer that has come to our knowledge until now and may come to our knowledge in the future.

3. Scope of BNY Mellon Affiliates with which Non-Public Information is shared

Any and all subsidiaries and affiliates of The Bank of New York Mellon Corporation (i.e. The Bank of New York Mellon Corporation as well as its affiliates, the majority of voting rights of which is directly or indirectly owned by it, including, but not limited to, The Bank of New York Mellon and BNYMSJ)

4. Methods of sharing Non-Public Information

Non-Public Information may be shared verbally, in writing, by email, or by giving access to a database, by joint ownership or by any other method.

5. Methods by which the recipient controls Non-Public Information

All BNY Mellon Affiliates that are the recipients of Non-Public Information will take necessary measures concerning the control of Non-Public Information to prevent any unlawful access to or usage of Non-Public Information by way of access control or any other means.

6. Purposes of the use of Non-Public Information by the recipient

Each BNY Mellon Affiliate may use Non-Public Information concerning the customer in order to manage its business relationship with them and to propose or provide a product or service to them.

7. Method of controlling Non-Public Information when the sharing of Non-Public Information concerning the customer has been discontinued

Non-Public Information concerning the customer that will be obtained by us after the they have sought the suspension of the sharing of Non-Public Information with BNY Mellon Affiliates will be treated as Non-Public Information that cannot be shared with BNY Mellon Affiliates (“Non-Sharable Information”) and will not be provided to BNY Mellon Affiliates unless otherwise permitted under applicable law or regulation. Furthermore, we will determine in advance which BNY Mellon Affiliate’s Non-Sharable Information each person who concurrently works for us and for another BNY Mellon Affiliate at its business section or any other section that uses Non-Public Information can have access to and will take necessary measures to prevent such person from accessing to Non-Sharable Information of any other BNY Mellon Affiliate. However, Non-Public Information concerning the customer that has already been received by BNY Mellon Affiliate(s) from us by the time of such request will continue to be possessed by such BNY Mellon Affiliate(s) under an appropriate control and may be used for a solicitation toward a trade.

8. Contact

If the customer would like us to suspend the provision of Non-Public Information about them to BNY Mellon Affiliates, we will do so upon receipt of their request to that effect. For more details, please contact the below:

Compliance

The Bank of New York Mellon Securities Company Ltd.

Marunouchi Trust Tower Main

1-8-3, Marunouchi, Chiyoda-ku,

Tokyo, 100-0005, Japan

Telephone number : +81-3-6756-4432 (Compliance)