

Policies on Prevention and Elimination of Relationships with Anti-Social Forces

The Bank of New York Mellon Trust (Japan), Ltd., has established and declared as follows its “Policies on Prevention and Elimination of Relationships with Anti-Social Forces” This constitutes the Company’s basic philosophy and specific response policy with the goal of preventing damages due to antisocial forces.

1. Unjustified demands made by anti-social forces cause feelings of anxiety and fear in peoples’ minds, and if a person or department in charge alone copes with them without any norm of conduct being set, there may be cases where such person or department is forced to accept their demands. In order to avoid such a situation, the Company sets forth express provisions in the Code of Conduct and internal rules, and the top management (including the Representative Director) shall cope with any such demands company-wide, without leaving them to the person or department in charge.
2. We will secure the safety of our employees who cope with unjustified demands from anti-social forces.
3. In the case of any unjustified demands made by anti-social forces, we will build a close cooperation with outside specialized agencies such as the police, the National Center for the Elimination of Boryokudan or lawyers under normal circumstances.
4. We will have no connection (including a business relationship) with anti-social forces. We will reject any unjustified demands from anti-social forces.
5. We will take legal action (both civil and criminal) against any unjustified demands from anti-social forces.
6. Even if an undue demand from an anti-social force arises from a scandal involved in business activities or any employee of the Company, we will never accept backstage deals to conceal such a scandal.
7. We will never provide any funds to anti-social forces.

The Bank of New York Mellon Trust (Japan), Ltd.