

Sharing of Client Information for Investment Banking Business

JPMorgan Securities Japan Co., Ltd.
JPMorgan Chase Bank, N.A.

As part of Our efforts to provide a broad array of sophisticated services to Our clients, JPMorgan Securities Japan Co., Ltd. and JPMorgan Chase Bank, N.A. may share certain non-public client information, including your transaction information, between the abovementioned two entities (collectively referred to as “**JPMorgan**”, “**We**”, “**Us**” or “**Our**”) to the extent permitted by law.

The Investment Banking Division of JPMorgan Securities Japan Co., Ltd. engages in financial advisory services including M&A, financing by equity/bond markets and related products (“Investment Banking Business”). In order to provide our clients with services in Investment Banking and broader financial services related to the Investment Banking Business, we may share non-public client information related to the Investment Banking Business between the Investment Banking Division of JPMorgan Securities Japan Co., Ltd., and the Global Corporate Bank Division and the Commercial Bank Division (which are responsible for providing various client coverage services for both Japan and overseas Corporate clients) of JPMorgan Chase Bank, N.A..

This sharing of information will only take place among Our employees as necessary to carry out Our Investment Banking Businesses. We will pay utmost attention to protecting the confidentiality of information and implementing necessary controls in the management of non-public client information related to the Investment Banking Business, including access restrictions to prevent improper access and use of non-public client information related to Investment Banking Business within JPMorgan for any business other than Our Investment Banking Business. Therefore, relevant information will not necessarily be shared across all of JPMorgan. Moreover, information of clients who have separately entered into individual confidentiality agreements with Us will continue to be managed in compliance with the terms of those agreements. Please note that if, prior to the date of this notification, you have already submitted to Us a written request to restrict Our ability to share your Non-Public Information related to Our Investment Banking Business (as defined below) within JPMorgan, We will continue to comply with the restrictions set out in such prior written request submitted by you, even after the date of this notification. If you have any questions or comments, please feel free to contact your JPMorgan business representative. A detailed explanation of our internal sharing procedures with respect to non-public client information related to Our Investment Banking Business is set forth below.

1. Scope of Information to be Shared

As used in this notification, the term “**Non-Public Information related to Our Investment Banking Business**” means:

Non-public information (as defined in Article 1 Paragraph 4 Item 12 of the Cabinet Office Ordinance on Financial Instruments Business, Etc.) such as contents of past transactions, planned transactions and timing of transactions, in each case that has previously come into, is currently in or will in the future come into the possession of JPMorgan and that relates to Our Investment Banking Business.

2. Method of Sharing of Non-Public Information related to Our Investment Banking Business

Non-Public Information related to Our Investment Banking Business shall be shared orally, in writing, via e-mail, through access to a shared data base or through other means of information sharing.

3. Procedures to Manage Non-Public Information related to Our Investment Banking Business

We will implement necessary controls for managing Non-Public Information related to Our Investment Banking Business to prevent improper access and use of Non-Public Information related to Our Investment Banking Business.

4. Purpose of Usage of Non-Public Information related to Our Investment Banking Business by the Receiving Entity

So as to provide a broader array of more sophisticated services to Our clients, JPMorgan shall use the Non-Public Information related to Our Investment Banking Business received from clients for the following purposes:

(1) To enhance services of Our Investment Banking Business

We will enhance Our Investment Banking Business services for clients by sharing Non-Public Information related to Our Investment Banking Business with the Global Corporate Bank Division and the Commercial Bank Division of JPMorgan Chase Bank, N.A..

(2) To develop, propose and introduce various financial products and services etc.

By applying the integrated resources of the J.P. Morgan group, We hope to further develop and propose financial products and services that meet your needs.

(3) To determine relevant financial products and services etc. for clients

We will propose those financial products and services offered by the J.P. Morgan group that are most suitable to you based on your transactional information.

5. Procedures Where Clients Request to Opt Out of Permitting Our Sharing of their Non-Public Information related to Our Investment Banking Business

In the event that you make a request to opt out of permitting JPMorgan to share your Non-Public Information related to Our Investment Banking Business among JPMorgan, We will, upon receipt of your request, differentiate your customer identification information (such as entity name and address) from your Non-Public Information related to Our Investment Banking Business and will cease any future sharing of your Non-Public Information related to Our Investment Banking Business as requested. However, we may continue to solicit transactions, etc., in line with appropriate information management practices, using your Non-Public Information related to Our Investment Banking Business that we already obtained and shared among Us prior to receiving such a request from you.

For the latest information, please access our website below (please refer to “Sharing of Information between J.P. Morgan Affiliates”). We ask for your continued understanding and cooperation as we strive to provide you with an even higher level of service in Japan.

JPMorgan Securities Japan Co., Ltd.
http://www.jpmorgan.co.jp/country/JP/EN/japan-jpmsj_optout

JPMorgan Chase Bank, N.A.
http://www.jpmorgan.co.jp/country/JP/EN/japan-jpmc_opt_out

Any questions or comments regarding the sharing of your client information by JPMorgan can be directed to your JPMorgan business representative.

Alternatively, for general inquiries about this matter, please contact below for both JPMorgan Securities Japan Co., Ltd. and JPMorgan Chase Bank, N.A., Tokyo Branch:

Email: [Opt-Out Query@jpmorgan.com](mailto:Opt-Out_Query@jpmorgan.com)