

Sharing of Information of Clients that are Listed Companies, etc. among the Group Companies

JPMorgan Securities Japan Co., Ltd.

JPMorgan Chase Bank, N.A.

JPMorgan Mansart Management Japan Co., Ltd.

As publicly announced, the amendments to the Cabinet Office Order on Financial Instruments Business, etc. and the Comprehensive Supervisory Guidelines for Financial Instruments Business Operators, etc. came into effect on June 22, 2022, in response to the recommendations of the Second Report (released in June 2021) by the "Market System Working Group" under the Financial System Council (the "Amendments"). Under these Amendments, a New Opt-Out system (*3) was established for clients who are "Listed Companies, etc." (*2). With this notification, JPMorgan Securities Japan Co., Ltd., JPMorgan Chase Bank, N.A. and JPMorgan Mansart Management Japan Co., Ltd. (collectively referred to as "J.P. Morgan", "we", "us" or "our") hereby notify our clients who are Listed Companies, etc. of our intent to handle Non-Public Information (*4) of such clients in accordance with the New Opt-Out System, along with other ancillary necessary information.

Prior to the Amendments, we have shared Non-Public Information of our clients, including that of Listed Companies, etc., to the extent permitted by law and necessary for conducting businesses after obtaining prior written consent or providing an opportunity via written notice for clients to request their Non-Public Information to not be shared. In light of the Amendments, upon the publication of this notification and lapse of the necessary notice period from the effective date of the Amendments, we will, in principle, deem that our clients who are Listed Companies, etc. have consented to our sharing of their Non-Public Information under the New Opt-Out System until such client requests us to no longer do so. This will not apply to cases where, prior to the Amendments, we have already obtained consent to share Non-Public Information through our prior written notice or client's written consent or where clients have indicated their desire not to have their Non-Public Information shared among us.

In accordance with the need-to-know principle and related internal rules, we have long taken necessary measures to manage Non-Public Information, such as taking the utmost care to ensure that the confidentiality of information is not compromised. In addition, we have in place a conflict of interest management system in accordance with laws and regulations to ensure that the interests of our clients are not unfairly impaired. Even within the same corporation, we have implemented measures to block the flow of information between public and private divisions as well as between divisions that may have business-related conflicts of interest. We will continue to maintain these measures going forward. In addition, we will continue to manage the

information of clients who have signed individual non-disclosure agreements in compliance with such non-disclosure agreements. Therefore, the system of strictly managing client information, including Non-Public Information, will be maintained in the same manner as it was before the enactment of the New Opt-Out System.

Details on how we share information of Listed Companies, etc. among us are as follows:

1. Scope of Non-Public Information to be shared

Non-Public Information about the client that has been known to us to date and Non-Public Information about the client that may become known to us in the future.

2. Scope of parent-subsidiary corporations, etc. that exchange Non-Public Information

JPMorgan Securities Japan Co., Ltd., JPMorgan Chase Bank, N.A. and JPMorgan Mansart Management Japan Co., Ltd.

3. How Non-Public Information is Shared

Non-Public Information will be shared orally, in writing, via email, through access to a shared database or through other means of information sharing.

4. Procedures to Manage Non-Public Information

We take necessary measures for the management of Non-Public Information to prevent unauthorized access to or use of Non-Public Information by restricting accesses or by other means.

5. Purpose of Use of Non-Public Information

We will use Non-Public Information in our possession for the following purposes.

- (1) To develop, propose and communicate various financial products and services

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

- (2) To offer financial products and services that are most appropriate to you

We will use client transactional information to offer financial products and services that are most appropriate to you.

- (3) To provide “first-class execution” of client services based on an integrated business management and controls within J.P. Morgan

In order to continue to provide the best service J.P. Morgan can to our clients, we will continue to build and develop robust business management methods and control structures.

6. Necessary procedures and contact information in case a client requests for their Non-Public Information to no longer be shared

If you wish to request for your Non-Public Information to no longer be shared, please send an email with the Required Information (as described in Item (1)) from your email address (in accordance with Item (2)) to our contact address (as described in Item (3)).

(1) Required Information:

- Your request to stop sharing Non-Public Information
- Your official company name
- Department, title and name of the person authorized to make the decision regarding the request
- Name, email address and telephone number of the person to be contacted regarding the request (please refer to Item (2) below for precautions regarding the email address to be used).
- If you are the top company of your group companies’ hierarchy and wish to opt out on behalf of all companies in your group, please indicate as such.

(2) Precautions about your email address:

When contacting us to request for your Non-Public Information to no longer be shared, please use the email address established in your organization for business purpose use. If this request is sent from a private email address, we will not be able to send a reply to such email address. In the event you use a private email address, we will contact you at the phone number provided in the email or your representative phone number for confirmation.

(3) Our contact information:

- Your J.P. Morgan business representative; or
- Email address: Opt-Out_Query@jpmorgan.com

7. Procedures for Sharing of Non-Public Information Where Clients Have Requested that Non-Public Information No Longer be Shared

In the event that you request for your Non-Public Information to no longer be shared among us, we will not share your Non-Public Information newly obtained after receipt of such request. With respect to any Non-Public Information that has been shared among us prior to such request and is included in common-use databases and other information repositories, we will continue to use the information but only for the purposes outlined in 5. above and in a manner compliant with all applicable laws and regulations. However, we may continue to solicit transactions, etc., in line with appropriate information management practices, using your Non-Public Information that we obtained and shared among us prior to receiving such request.

We appreciate your understanding of this matter which is intended to further improve our services we offer to you.

JPMorgan Securities Japan Co., Ltd.

http://www.jpmorgan.co.jp/country/JP/JA/japan-jpmsj_optout

JPMorgan Chase Bank, N.A.

http://www.jpmorgan.co.jp/country/JP/JA/japan-jpmc_opt_out

JPMorgan Mansart Management Japan Co., Ltd.

https://www.jpmorgan.co.jp/ja/disclosures/japan-jpmmmj_optout

In addition to your request for your Non-Public Information to no longer be shared among us, any specific questions or comments regarding the sharing of client information can be directed to your J.P. Morgan business representative.

Alternatively, for general questions about this notice, please contact below:

Common contact for JPMorgan Securities Japan Co., Ltd., JPMorgan Chase Bank, N.A. Tokyo Branch and JPMorgan Mansart Management Japan Co., Ltd.:

Email address: Opt-Out_Query@jpmorgan.com

(*1) Firewall restrictions: Regulations that prohibit the sharing of Non-Public Information, etc. mainly between banks and securities companies from the perspective of preventing the abuse of a superior bargaining position, preventing

conflict of interest in transactions, and ensuring the appropriate protection of client information, etc.

- (*2) Listed Companies, etc.: Clients who fall under any of the following as set forth in Article 123, Paragraph 1, Item 18 (g) of the Cabinet Office Order on Financial Instruments Business:
- (1) Listed companies, etc. and their subsidiaries, etc. as defined in Article 163, Paragraph 1 of the Financial Instruments and Exchange Act (hereinafter referred to as the "FIEA")
 - (2) A stock company that intends to list its issued shares on a financial instruments exchange (limited to a stock company that has entered into an agreement with a certified public accountant or an audit corporation to receive advice necessary to comply with the criteria for such listing or an audit pursuant to Article 193-2 of the same Act) and its subsidiaries, etc.
 - (3) Persons who have submitted securities reports prescribed in Article 24, Paragraph 1 of the FIEA (including the cases where it is applied mutatis mutandis under Paragraph 5 of the same Article (including the cases where it is applied mutatis mutandis under Article 27 of the Law) and Article 27 of the FIEA) and their subsidiaries, etc.
 - (4) Qualified Institutional Investors (excluding those listed in Article 10, Paragraph 1, Item 23 (limited to the part pertaining to (a)) and Item 24 of the Cabinet Office Order on Definitions under Article 2 of the FIEA) and their subsidiaries, etc.
- (*3) New Opt-Out System: Under Article 153(1)(vii) of the Cabinet Office Order on Financial Instruments Business, if a securities company, etc. provides its clients who are Listed Companies, etc. with easy access to the fact that the sharing of Non-Public Information will be suspended in response to an opt-out (a request to suspend the sharing of Non-Public Information by a securities company, etc. with its parent/subsidiary corporation, etc. in the event the Listed Company, etc. wishes for their Non-Public Information to not be shared), such securities company, etc. is permitted to share Non-Public Information of such clients with the parent/subsidiary corporation of such securities company, etc. without requiring consent from such client and until such client opts out.
- (*4) Non-Public Information: "Non-public information" as defined under Article 1, Paragraph 4, Item 12 of the Cabinet Office Order on Financial Instruments Business.