Recognizing compliance and conduct risk management to be critical to overall management, Nomura Group has established the "Conduct Program," a fundamental document that contains the frameworks and initiatives targeting compliance and appropriate conduct. This document is a key part of the Group's framework for achieving a high level of compliance and conduct risk management that transcends legal compliance.

**Compliance framework**

All Group companies and departments establish thorough compliance, and establish adequate control frameworks to ensure that their members do not engage in activities suspected of being in violation of laws or regulations. In the event that such issues arise, they are reported to members of senior management and handled appropriately.

A Chief Compliance Officer has been appointed to oversee compliance for Nomura Group as a whole. In addition, all Group companies and overseas regions have a Compliance Officer. The Chief Compliance Officer, through instructions to the Group Compliance Department, works with the Compliance Officers of each Group company and overseas regions to strengthen internal controls in response to global business development, and to develop and maintain the respective compliance structures of each Group company, including overseas offices.

**Compliance and conduct training**

Nomura Group provides comprehensive compliance and conduct training for all executive officers and employees on topics. We are working to raise the level of legal and regulatory knowledge among executives and employees, raise compliance awareness, and foster a corporate culture of pursuing appropriate business practices.

**Segregation of customer assets and information security**

In accordance with applicable laws and regulations, including the Financial Instruments and Exchange Act and the Personal Information Protection Act, Nomura Group works to properly protect customers' assets and information. For more information, visit our website.

**Proper segregation of customer assets**

Based on the Financial Instruments and Exchange Act, Nomura Securities has established an appropriate segregated asset management system to ensure that customers' assets are properly protected by clearly distinguishing between the securities and money of customers in custody and the assets held by Nomura Securities itself.

**Effective protection of clients' personal information and other information assets of the Group**

The Nomura Group Information Security Policy provides the basic principles for properly protecting information assets. Each Group company has its own information security related regulations in accordance with this basic policy. We are also working to enhance the management of information provided to customers in accordance with the characteristics of each company's business activities. In particular, customer related personal information is handled in line with rigorous standards set out in the Nomura Group Privacy Policy and other information security related rules, and is handled in full compliance with the Personal Information Protection Act and other related laws and regulations.

**Global financial crime compliance framework**

The Nomura Group Code of Conduct sets forth the basic policy of preventing money laundering and combating the financing of terrorism (AML/CFT) to ensure high level and effective AML/CFT framework.

1. Concrete measures to prevent money laundering and combating the financing of terrorism
2. Elimination of transactions with anti-social forces
3. Prevention of bribery and corruption

In addition to the basic policies set forth in the Nomura Group Code of Conduct, we have established the “Nomura Group Anti-Money Laundering and Combating the Financing of Terrorism Policy,” a global policy on AML/CFT, that stipulates the common rules to be complied with in each region and at each subsidiary. We have also established specific standards that apply across the entire Group in areas of particular importance, such as management of client due diligence and economic sanctions.

**Prevention of bribery and corruption framework**

In addition to the basic policies of the Nomura Group Code of Conduct, Nomura Group has established the Nomura Group Anti-Bribery and Anti-Corruption Policy as a global policy to ensure that standards are observed in each region and at each subsidiary. It specifies the types of activities that the Group as a whole should pay particular attention to, such as exchanging gifts and entertainment. While maintaining regulatory compliance within each country, the framework to prevent bribery and corruption is being implemented consistently across Nomura Group.

**Ensuring fair financial practices**

Nomura Group strictly complies with applicable laws and regulations and has established a management system to ensure market integrity. For details, visit our website.