

Compliance

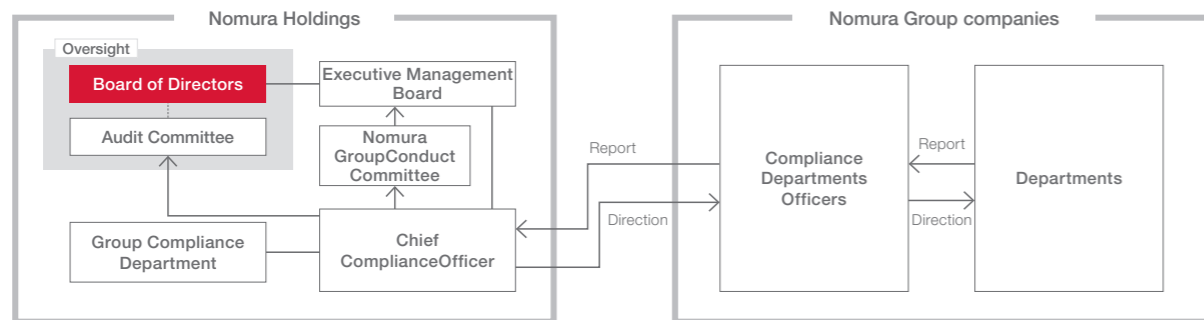
Recognizing compliance and conduct risk management to be critical to overall management, Nomura Group has established the “Conduct Program,” a fundamental document that contains the frameworks and initiatives targeting compliance and appropriate conduct. This document is a key part of the Group’s framework 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 region 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 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.

Nomura’s Segregation Management
<https://www.nomura.co.jp/guide/system/bunbetsu/>
 (Japanese only)

Effective protection of clients’ personal information and other information assets of the Group

The Nomura Group Information Security Policy provides the basic principles for appropriately 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.

Nomura Group Privacy Policy
<https://www.nomuraholdings.com/policy/privacy.html>

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.

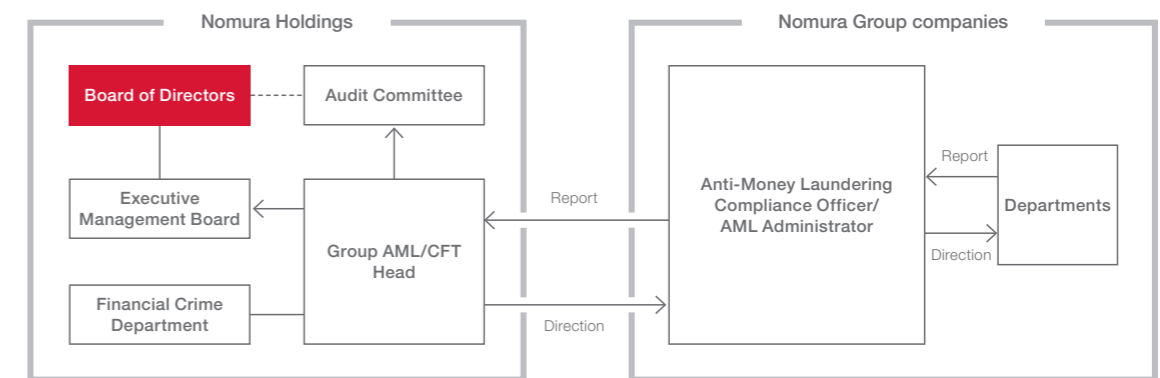
- 1 Concrete measures to prevent money laundering and combating the financing of terrorism
- 2 Elimination of transactions with anti-social forces
- 3 Prevention of bribery and corruption

Global financial crime compliance framework
https://www.nomuraholdings.com/company/compliance/index.html#aml_cft

Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT) Management Framework

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 within 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. While maintaining regulatory compliance within each country, AML/CFT framework is being implemented consistently across Nomura Group in accordance with the international trends involving Recommendations provided by the Financial Action Task Force (FATF).



Group AML/CFT Head : Responsible for establishing and maintaining the effectiveness of Nomura Group’s AML/CFT framework.
Financial Crime Department : Assist the Group AML/CFT Head to maintain and establish an effective AML/CFT framework
Anti-Money Laundering Compliance Officer : Designated at each Nomura Group company and is responsible for the company’s AML/CFT framework
AML/CFT Officers : Appointed in each department / branch of Nomura Securities to plan and implement the AML/CFT framework

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 establish standards to be 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 business 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.

- 1 Prevention of insider trading
 Prohibition of accepting orders that may violate laws and regulations, prevention of insider trading by preparing insider registration cards, management of undisclosed corporate information and undisclosed material information that is not publicly known
- 2 Measures to prevent conflicts of interest
 Establishment of a Group-wide Conflict of Interest Management System based on Nomura Group Conflicts of Interest Management Policy
- 3 Examining market manipulation and other unfair transactions
 Measures such as interviews, warnings, and suspension of received orders based on the results of transaction surveillance. Establishment and maintenance of an appropriate trading management framework through verification of the effectiveness and soundness of the process through analysis of the results of periodic surveillance

Ensuring fair financial business practices
<https://www.nomuraholdings.com/company/compliance/index.html#insider>