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ABN Amuro Clearing Securities Co., Ltd.

CEO: Richard Claremont

Employee Privacy Policy

ABN AMRO Clearing Tokyo Co., Ltd. (hereinafter referred to as the “Company”) shall appropriately handle the personal information of its officers, employees, part-time employees, temporary staff, and other persons currently or formerly engaged in the Company’s business (hereinafter collectively referred to as “Employees, etc.”), in accordance with the Act on the Protection of Personal Information (hereinafter referred to as the “APPI”), the Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures (hereinafter referred to as the “My Number Act”), the Company’s Personal Information Handling Rules, and other applicable internal rules and regulations, as set forth below. This Privacy Policy is subject to change without prior notice.

For the purposes of this Privacy Policy, “Personal Information” means an address, name, telephone number, or any other information that can identify an Employee, etc. as a specific individual (including information that can be readily cross-referenced with other information and thereby identify a specific individual), and any other information that constitutes personal information under the Act on the Protection of Personal Information.

1. Purpose of Use of Employees’ Personal Information

The Company shall acquire, retain, and use the Personal Information of Employees, etc. only to the extent necessary to achieve the following purposes of use:

item	Personal Information Items	Purpose of Use
Basic Information	Name, address, age, date of birth, nationality, gender, phone number, email address, photo, passport number, residence card information, Salary payment Bank Account Information, employee personal trading account information, Outside Business information, commuting route, employee ID number, department, position (qualification), employment history, employment status, biometric information, basic pension number, employment	Recruitment and selection; onboarding procedures; personnel management; determination of job assignments; preparation of employee rosters; payment of salaries and other compensation; employee benefits administration; social insurance procedures and other procedures required by law; confirmation of employee safety; business communications; biometric (identity) authentication; publication on recruitment media; compliance management; and

item	Personal Information Items	Purpose of Use
	insurance insured pension number, personal identifier (excluding My Numbers), etc.	other employment management purposes.
Wage-related Information	Address, family composition, dependents, commuting route, salary payment bank account information, etc.	Determination and payment of salaries and other compensation; withholding tax procedures; social insurance procedures and other procedures required by law; retirement benefit and pension procedures; employee benefits administration; and other purposes related to employment management.
Personnel Information	Performance evaluations, qualifications and licenses, disciplinary actions, awards and recognition, interview and meeting information, information provided in self-declaration forms, promotion examination results, aptitude test results, education and training history, employee development plans, etc.	Performance appraisal; determination of job assignments and responsibilities; determination of salaries and bonuses; employee training, skills development, and other educational programs; and other purposes related to employment management.
Family and Relative Information	Family composition, living arrangements (living together or separately), dependent status, family members' income, marital status, school enrollment status of dependent children, social insurance information of dependents, health and long-term care status, address and telephone number of emergency contact, etc.	Withholding tax procedures; social insurance procedures; childcare and family care leave procedures; employee benefits administration; emergency communications; and other purposes related to employment management.
Health Information	Health examination results, medical certificates from attending physicians, stress check results, occupational physicians' opinions, etc.	Health management of Employees, etc.; ensuring an appropriate working environment; procedures for leaves of absence, etc.; working hours management; procedures for workers' compensation insurance coverage and applications for

item	Personal Information Items	Purpose of Use
		various benefits; support for respondents by personnel responsible for conducting stress checks; and other purposes related to employment management.

2. Purpose of Use of Specific Personal Information of Employees, etc. and Their Dependents

The Company acquires, retains, and uses the Specific Personal Information of Employees, etc. and their dependents (i.e., My Numbers and personal information containing My Numbers) only to the extent necessary to achieve the following purposes of use:

- (1) Withholding Tax Related Duties, etc.
- (2) Special Local Tax Collection Related Tasks
- (3) Preparation of Declarations for Exemption for Dependents (and Changes Thereof), Declarations for Insurance Premium Deductions, and Declarations for Basic Exemption, Spousal Exemption for Employment Income Earners, and Income Adjustment Deduction, etc.
- (4) Salary Payment Report Preparation and Related Services
- (5) Preparation of Notification of Change in Employment Income Earners Related to Special Collection of Local Taxes, etc.
- (6) Preparation of Application for Switching to Special Collection, etc.
- (7) Preparation of payment records for each recipient of retirement allowance, etc
- (8) Preparation of Tax Returns Related to Retirement Income
- (9) Health insurance, Employees' pension insurance, etc.
- (10) National Pension No. 3 Notification Procedures, etc.
- (11) Health insurance, welfare pension, etc.
- (12) Employment Insurance Notification Procedures, etc.
- (13) Employment Insurance Application and Claims Processing, etc.
- (14) Administrative work related to handling group insurance

3. Proper Acquisition and Management of Personal Information

The Company acquires Personal Information by appropriate means and only to the extent necessary to achieve the purposes of use. The Company also exercises strict control over

Personal Information provided by Employees, etc. and endeavors to ensure that such information remains accurate and up to date.

The Company also endeavors to prevent unauthorized access to, loss, destruction, alteration, leakage, or other compromise of Personal Information, and implements organizational, personnel, physical, and technical security control measures, including the establishment and continuous improvement of internal rules and systems for the protection of Personal Information, education and awareness programs for personnel, access controls for Personal Information, management and auditing of information systems, and the appointment of a person responsible for the management of Personal Information protection.

4. Provision of Personal Information to Third Parties

The Company will not disclose or provide the Personal Information of Employees, etc. to any third party, other than service providers and parties with whom such information is jointly used, without the consent of the individual concerned. However, this shall not apply where such disclosure or provision is required or permitted by laws and regulations or otherwise provided for under the Act on the Protection of Personal Information or the My Number Act.

5. Handling of Outsourcing of Personal Information

The Company may outsource all or part of its operations involving the handling of Personal Information to third parties in Japan or overseas and may provide such service providers with the Personal Information necessary for the performance of the outsourced operations. When outsourcing such operations, the Company selects service providers in accordance with criteria established pursuant to applicable laws and regulations, enters into appropriate agreements or other arrangements with such service providers, and exercises necessary and appropriate supervision over them.

6. Joint Use of Personal Information

The Company may jointly use the Personal Information of Employees, etc. (excluding Specific Personal Information). For details, please refer to Appendix 2, "Joint Use."

(1) Scope of Joint Users

The Company and each ABN AMRO group company that is an affiliate of ABN AMRO.

(2) Information subject to joint use and purpose of joint use

The information specified under "Details" in the table set forth in "1. Purposes of Use of Personal Information of Employees, etc." may be jointly used for the purpose of achieving the corresponding "Purposes of Use" specified in the same table.

(3) Person responsible for the management of joint use:

Chief Internal Control Officer of ABN AMRO Clearing Tokyo Co., Ltd.

7. Disclosure of Personal Information of Employees, etc.

With respect to the Personal Information provided by Employees, etc., if the Company receives a request from the individual concerned or his or her authorized representative for notification of the purposes of use, disclosure, correction, addition or deletion of the content, suspension of use, erasure, suspension of provision to third parties, or disclosure of records of provision to third parties (collectively, "Disclosure, etc."), the Company will respond to such request within a reasonable period of time.

Employees, etc. who wish to request Disclosure, etc. should complete the required information on the form prescribed by the Company and submit it by post or email to the Company's contact point specified in "8. Inquiries Concerning the Handling of Personal Information." Please note that a fee may be charged for requests for Disclosure, etc. of Personal Information concerning the relevant Employee, etc. held by the Company.

8. Handling of Personal Information when providing Personal Information to Third Parties in Foreign Countries

The Company, its parent company, ABN AMRO Bank N.V. (hereinafter referred to as "ABN AMRO"), and their respective affiliates provide comprehensive financial services globally through, and with the support of, their branches, subsidiaries, and other affiliated companies located around the world. The Company may outsource the handling of Personal Information to, or jointly use Personal Information with, ABN AMRO affiliates and service providers located in and outside Japan (please also refer to Section 5, "Handling of Personal Information by Service Providers," and Section 6, "Joint Use of Personal Information").

When providing Personal Information to a third party located in a foreign country (excluding the United Kingdom and EU Member States), including where the handling of Personal Information is outsourced to, or Personal Information is jointly used with, such third party, the Personal Information of Employees, etc. will not be provided to such third party without obtaining, in advance, the consent of the individual concerned to the provision of his or her Personal Information to a third party in a foreign country, except where otherwise permitted by applicable laws and regulations. When obtaining the consent of Employees, etc., the Company will provide them with the name of the relevant foreign country, information obtained by appropriate and reasonable means concerning the system for the protection of Personal Information in that country, and information concerning the measures

taken by the relevant third party to protect Personal Information. (If, at the time the Company obtains the consent of Employees, etc., the Company is unable to identify or provide the name of the relevant foreign country or information concerning the measures taken by the relevant third party to protect Personal Information, the Company will instead provide information or take other measures in accordance with the Act on the Protection of Personal Information.)

In addition, where the Company provides the personal data of Employees, etc. to a third party located in a foreign country and the foreign country in which the recipient third party is located can subsequently be identified, Employees, etc. may request that the Company provide the name of the relevant foreign country and information concerning the system for the protection of Personal Information in that country. Where information concerning the measures taken by the recipient third party to protect Personal Information subsequently becomes available, Employees, etc. may also request that the Company provide such information.

The Company may also provide the Personal Information of Employees, etc. to a third party located in a foreign country without obtaining the consent of Employees, etc. where such third party has established a system that meets the standards prescribed by the Rules of the Personal Information Protection Commission as a system necessary to continuously implement measures equivalent to those that the Company is required to take under the Act on the Protection of Personal Information (hereinafter referred to as "Equivalent Measures"). In such case, the Company will take the measures necessary to ensure the continuous implementation of the Equivalent Measures by such third party, and Employees, etc. may request that the Company provide information concerning such necessary measures. However, where providing such information is likely to materially interfere with the proper conduct of the Company's business or in other similar circumstances, the Company may refrain from providing all or part of such information to Employees, etc.

9. Inquiries, comments, and complaints concerning the handling of Personal Information

The Human Resources Department serves as the point of contact for inquiries, comments, complaints, and other matters concerning the handling of Personal Information of Employees, etc., and will respond appropriately and in good faith in coordination with the Legal Department and the Compliance Department. Please contact the inquiry point set forth below.

[Contact Information]

- Business Hours: 9:00 a.m. to 5:00 p.m., weekdays
- Telephone: 03-3437-9900 (Main Number)

- Contact Department: Human Resources Department (DL-AACB-JP-Admin@abnamroclearing.com)

※ Please note that telephone calls are recorded in order to accurately understand your inquiries, requests, and other communications.

Supplementary Provisions

This Policy shall take effect on September 30, 2026.