



Conflict of Interest Management Policy

1. Purpose

Vantage Capital Markets Japan K.K. (hereinafter referred to as the "Company") based on the provisions of the Financial Instruments and Exchange Act and the Cabinet Office Ordinance on Financial Instruments Business, etc., transactions that may unfairly harm the interests of customers (hereinafter referred to as "Eligible Transactions"). We will establish a system to manage target transactions so that the interests of customers are not unfairly harmed by the target transactions as follows.

2. Method of Identifying and Typifying Eligible Transactions

The types and types of transactions subject to conflicts of interest that the Company manages are as follows.

- Situations in which our interests' conflict with those of our customers, or that our interests of one customer conflict with the interests of another of our customers;
- Engage in or make arrangements that may interfere with any conflict of interest that may interfere with our fiduciary obligations to our customers.
- When there are economic or other causes that prioritize other customers over the interests of the customer
- Transactions that are deemed to have reasonable potential to induce a conflict of interest due to the structure of the transaction
- Transactions that are not recognized as having reasonable potential to induce a conflict of interest due to the structure of the transaction, but are deemed to have the potential to induce a conflict of interest depending on the mode of the transaction.

3. Management method

- Disclosure that there is a risk that the interests of customers may be unfairly harmed
- Change the terms or method of trading
- Separation of departments and other information barriers and information isolation
- Discontinuation of one transaction
- Information sharer monitoring

4. Revision and abolition

The revision or abolition of this policy shall be subject to the approval of the Management Committee.

5. Supplementary Provisions

This policy shall be enforced from the date on which the registration of the Type I Financial Instruments Business conducted by the Company is completed.