

## Chapter of Corporate Behavior

**DISCLAIMER:**

This English translation is being provided for informational purposes only and represents a desire by the Exchange to promote better understanding of the Exchange by non-resident participants. While care has been taken to ensure that the translation is accurate and complete, Tokyo Commodity Exchange, Inc. accepts no liability or responsibility for any loss or damages, including trading losses, that may be incurred from any inaccuracy or omission in the English translation. In the event of discrepancies between the English version and the original Japanese version, the Japanese version shall prevail. Any dispute that may arise within or without a court of law with regard to the meaning of the words, provisions and stipulations of the rules, regulations and agreements shall be resolved in accordance with the Japanese texts.

---

## **Basic Philosophy**

Fully recognizing its public mission and responsibility to contribute to the economy and society through the establishment and operation of markets necessary for commodity futures transactions, Tokyo Commodity Exchange Group (Tokyo Commodity Exchange, Inc. and Japan Commodity Clearing House Co., Ltd. (hereinafter referred to as “we”)) will strictly abide by all laws, regulations, and rules.

### **1. Compliance with Laws, Regulations, and Other Rules**

(1) Compliance with laws and regulations

We will endeavor to correctly understand and thoroughly comply with the Commodity Derivatives Act, the Companies Act, and other related laws and regulations.

(2) Compliance with social codes and proper practices

We will conduct our business activities in a fair and transparent manner in accordance with social ethics, social codes, and best practices.

### **2. Strict and Proper Management of Information, including Confidential Information**

(1) Strict management of personal information

We will thoroughly protect all third party information, including personal data, acquired in the course of business and ensure that it is neither used for anything other than its primary purpose, nor leaked to outside parties.

(2) Strict management of confidential information

We will conduct strict information management of internal and third party confidential information acquired in the course of business to ensure that it will not be exposed to the risk of improper treatment, such as leaks, inside or outside of the Exchange Group.

### **3. Prohibition of Commodity Futures Transactions by Officers and Employees**

In view of the public standing of the Exchange Group, officers and employees (including any types of officers or employees; the same shall apply hereinafter) of the Exchange Group, will strive not to give rise to any doubt when they sell or purchase stocks and corporate bonds of a Trading Participant of the Exchange so

as to prevent loss of social credibility due to suspicion about their conduct, whether inside or outside the Exchange Group. Furthermore, we strictly prohibit the officers and employees from entering into any commodity futures transactions, excluding the case that Public Directors who engage in the businesses of Trading Participants entering into commodity futures transactions as part of his business.

#### **4. Timely and Appropriate Information Disclosure to Shareholders and Other Stakeholders**

We will ensure accountability as a public enterprise by disclosing necessary management information to shareholders and other stakeholders in a timely and appropriate manner.

#### **5. Sound Relations with Stakeholders**

(1) Fair and Appropriate transactions

We will comply with all laws and regulations concerning corporate activities, including the Antitrust Act, and will preclude any pursuit of profits by unjust or improper means by persons in an advantageous position. We will also build fair and appropriate relationships with our business partners.

(2) Distinction between official and personal matters and prohibition on provision of special benefits or accommodations

We shall draw a distinct line between official and private matters. We will not engage in the exchange of gifts or entertainment for purposes of obtaining or maintaining unjust benefits or preferential treatment in relation to transactions with stakeholders like Trade Members, etc. We will also not engage in any dining or gift exchanges with business associates beyond the minimum levels of courtesy that are customary in society.

(3) Sound relations with political and governmental entities

We will maintain sound relationships with all political and governmental entities, including their affiliate bodies.

(4) Respect for human rights and prohibition of discriminatory treatment

We will strive to ensure that employees can fulfill their potential in a pleasant, and rewarding workplace, free from unjust discrimination and harassment.

#### **6. Prohibit Association with Anti-social Forces**

We shall ban any relationship with anti-social forces that involved in activities that

threaten the order and safety of society, and will handle such anti-social forces in a determined manner across the organization.

#### **7. Establishment of Reliable Markets**

- (1) Recognizing that the stable operation of the trading system is the highest priority, we will take all necessary measures to maintain stable operations.
- (2) In anticipation of the occurrence of risks such as large-scale system failure, wide-area disaster, terrorism, and other unexpected events, we will make proper preparation for Exchange and Clearing business continuity in emergency situations, conduct ongoing reviews on the business continuity plan, and maintain our readiness to react under those situations.

#### **8. Establishment and Operation of Highly Convenient Markets**

Given that commodity markets are an important part of the infrastructure for the national economy, we will strive to establish and operate markets and execute clearing business that are highly convenient to Trading Participants, Clearing Participants and all other market participants.

#### **9. Improvement of Self-regulatory Functions**

We will conduct self-regulatory activities properly by establishing a Self-regulatory Committee at Tokyo Commodity Exchange, Inc. to ensure the fairness of commodity futures transactions and to protect the interests of the public and customers.