

## **Action Principles of the Money Forward Group**

### **[1] Basic action principles of the Money Forward Group**

1. We are careful not only to observe laws and regulations, but also to respect the expectations and demands of society and to conduct sensible and sound corporate activities.
  - (1) We observe laws and regulations in Japan and overseas.
  - (2) We will acquire the necessary licenses, permits, etc. for business activities and make sure to follow notification and other procedures.
  - (3) We fully recognize expectations and demands from society towards the Money Forward Group, and respond to those rational expectations and demands.
  - (4) We act with sincerity and appropriately as a corporate citizen and member of society, aiming to achieve the Company's Mission and Vision.
  - (5) We strive to embody the Company's Values and Culture.
  - (6) Both good information and bad information is promptly and accurately communicated to supervisors.
  
2. In addition to this manual and the Rules of Employment, applicable internal regulations are always observed.
  - (1) No prohibited acts specified in this manual, the Rules of Employment, and applicable internal regulations will be committed.
  - (2) No acts against this manual, the Rules of Employment, and applicable internal regulations will be committed.
  - (3) Compliance training by the Money Forward Group is always undertaken when necessary, and actively participated in at other times.

### **[2] Action principles toward customers and business partners**

1. Provision of secure and reliable services
  - (1) When developing and selling services, we always pay attention to quality and aim for reliable services that customers can use without worry, regardless of disabilities, age, or other factors.
  - (2) If information is received about service quality, we contact the related department(s) to check the facts promptly. If an issue with

service quality is found, we quickly investigate the cause and endeavor to prevent recurrence by taking corrective measures.

- (3) We will respond swiftly, honestly, and politely to complaints from customers about services.

## 2. Fair transactions

- (1) We conduct honest advertising, sales promotion activities, and other external announcements. When releasing information outside the company, we observe labeling laws and other related laws and regulations, etc., and never use exaggerated expressions or explanations that may cause misunderstanding. We never make or have third parties make representations that are difficult for recipients to distinguish whether they are advertisements or promotions.
- (2) We do not bring in or obtain another company's sales secrets or confidential information by improper means for any reason. We do not use another company's sales secrets or confidential information knowing that they were or may potentially have been brought in or obtained by improper means.
- (3) No matter the circumstances, we do not conduct any act against antitrust laws, competition laws, or other related laws and regulations, etc., by improper means including cartels, resale price maintenance or arrangement, etc.
- (4) We observe the Act against Delay in Payment of Subcontract Proceeds, etc. to Subcontractors and other related laws and regulations, etc. in transactions with vendors and subcontractors.

## 3. Appropriate transactions with business partners

- (1) We build incorrupt, appropriate, and highly transparent relationships with business partners.
- (2) When entertaining or presenting a gift to a business partner, we never deviate from generally accepted common sense, and do not receive or promise benefits, such as providing entertainment or gifts in order to secure inappropriate benefits. You also must not ask a business partner for entertainment or gifts.

- (3) We treat transactions with vendors and subcontractors sensibly, honestly, fairly, and justly. In addition, we appropriately select vendors and subcontractors in accordance with internal regulations.
- (4) In relationships with public officials or the equivalent, we observe the related laws and regulations, etc. and do not provide or promise benefits such as money, excessive service, entertainment, or gifts.
- (5) Transactions between Money Forward Group companies must also be conducted under appropriate terms and conditions.

### **[3] Action principles at the workplace**

#### **1. We respect human rights and prohibit discrimination**

- (1) We endeavor to maintain working environments where it is always safe and easy to work, respect each person's human rights, and do not commit any acts that lead to discrimination.
- (2) We do not discriminate and unfavorable treatment on any basis, including political belief, ideology, religion, gender, gender identity, sexual orientation, physical characteristics, state of illness, age, nationality, race, ethnicity, presence or absence of a disability, occupation, or employment status.
- (3) We do not violate human rights by violence, abusive language, disparagement, defamation, forcing any person to work by use of intimidation, bullying, etc.
- (4) We do not engage in forced labor or labor against one's will under any circumstance and will not engage in child labor.

#### **2. Prohibition of harassment**

- (1) We never commit sexual harassment (causing disadvantage or discomfort to another employee or worsening the working environment through sexual acts against the wishes of the other party).
- (2) We never commit power harassment (worsening the working environment by engaging in any acts beyond the proper scope of operations as a result of taking advantage of their official positions or their superior positions at the workplace based on human relations or the like).
- (3) We never commit maternity harassment (worsening the employment

environment of another employee by engaging in any acts relating to pregnancy, childbirth, or the like, or the use of systems or measures relating to pregnancy, childbirth, childcare, nursing care, or the like).

- (4) We never commit any other form of harassment.
- (5) We do not commit any act that may potentially be interpreted as harassment by the counterparty, and endeavor to create an atmosphere where harassment will not occur in the workplace.

### 3. Labor management and safety and health in the workplace

- (1) Supervisors thoroughly manage the work days and work hours of all members, always pay attention to the physical and mental health condition of their subordinates, and strive to prevent overwork and provide a suitable number of days off.
- (2) We strive to ensure a safe and healthy workplace environment, taking into consideration the physical and mental well-being of employees.
- (3) We observe laws and regulations, etc. relating to occupational safety and health, and work to maintain a safe and healthy workplace environment.

## **[4] Action principles toward shareholders and investors**

### 1. Appropriate accounting and financial reporting

- (1) When creating all business records and data, including accounting records, we do so accurately in accordance with related laws and regulations, etc., as well as internal regulations, and we do not make any false or fictitious entries.
- (2) We settle expenses according to accurate records. We do not use false declarations, fictitious receipts, or the like to improperly claim or receive expenses.

### 2. Disclosure of management information and other active communication

We provide accurate and timely disclosure of management information, including the Money Forward Group's financial position and business activities, as well as clearly communicate the Money

Forward Group's managing philosophy and management policy to shareholders and investors. We also take opinions and criticisms regarding these seriously.

### 3. Prohibition of insider trading

- (1) If we learn inside information regarding a Money Forward Group company or another company, we do not buy or sell any shares or other securities of that company until the information is publicly announced.
- (2) We buy and sell shares of Money Forward, Inc. in accordance with the Group Insider Trading Prevention Regulations.
- (3) We communicate inside information regarding Money Forward Group companies and other companies only to the extent required by operations, and never leak this information to officers and employees who do not require it for operations or to persons outside the Company, including spouses, partners, family members, and friends. We do not discuss inside information or confidential information in shared spaces in or outside the company, in public places, and on social media.

## **[5] Action principles for building good relationships with society**

### 1. Social contribution

- (1) As a corporate citizen, we actively engage in activities that contribute to communities.
- (2) We grow our business and make recommendations in order to realize an environmentally friendly society.

### 2. General donations and political donations

- (1) When making political donations and donations to various groups, we observe the related laws and regulations, etc. and follow proper methods.
- (2) We strictly refrain from bribery, favors, illegal political donations, and acts that may be misconstrued as colluding with politics or administration, and we endeavor to form healthy and transparent relationships with politics and administration.
- (3) We will not disseminate information that could give the false

impression of forcing employees, business partners, etc. to support a particular political or religious belief.

### 3. Breaking relationships with antisocial forces

- (1) We will endeavor to have social common sense and a sense of justice and to act sensibly so that we do not get involved in illegal or antisocial conducts.
- (2) We will respond with a firm attitude to and not have any relationships with antisocial forces. When we receive unreasonable demands, we will not try to resolve the issue by handing over money, etc. or making other accommodations for the sake of convenience.
- (3) We will not use antisocial forces for the Money Forward Group or our own benefit.
- (4) We will not conduct any transactions with antisocial forces or those who have relationships with antisocial forces. When conducting transactions with business partners, vendors, or subcontractors, we will do so in accordance with internal regulations and related guidelines after confirming that the counterparties are not antisocial forces and do not have relationships with antisocial forces.

## **[6] Action principles for protecting the company and its property/trust**

### 1. Protection of personal information

- (1) We strictly manage the personal information of customers, shareholders, business partners, and Money Forward Group officers and employees, and handle it in compliance with the Personal Information Protection Act and other related laws and regulations, etc. and internal regulations. We have established organizational, human, physical, and technical safety measures for storing personal information.
- (2) We will not internally or externally use personal information except for the publicly announced purpose of use or the purpose agreed when it was obtained, nor will we disclose or provide it to anyone without consent.
- (3) When disclosing or providing personal information externally to subcontractors or the like for operational purposes, we will do so in

accordance with the Personal Information Protection Act and other related laws and regulations, etc. and internal regulations after performing a security check and signing a confidentiality agreement or memorandum for the handling of personal information, and we will endeavor to prevent unintended leaks.

- (4) We will not use personal information for private purposes or externally disclose or leak personal information during employment or after retirement.

## 2. Management of information obtained during the course of operations

- (1) We will strictly manage information obtained during the course of operations (i.e., any kind of information regarding customers, shareholders, business partners, or Money Forward Group officers and employees; the same applies hereinafter), and we will not use said information internally or externally except for the purposes publicly announced or agreed to, nor will we disclose or provide it to any third party without consent.
- (2) If we externally disclose or provide information obtained during the course of operations, we will endeavor to prevent unintended leaks by signing a confidentiality agreement or the like.
- (3) We will not use information learned during the course of operations for private purposes or externally disclose or leak personal information during employment or after retirement.

## 3. Protection of intellectual property

- (1) The intellectual property of the Money Forward Group is an important Group asset, which we will use appropriately and endeavor to preserve its rights.
- (2) We will respect the intellectual property of others, conduct a search before providing services, and endeavor to not infringe on intellectual property rights. We will not conduct acts that may infringe on the intellectual property rights of others, such as unauthorized copies of another party's computer programs or unauthorized use of another party's patents, copyrights, or trademarks.
- (3) When using the intellectual property rights of another party, we will

do so after entering an appropriate agreement.

#### 4. Appropriate use of company assets

- (1) We will efficiently use company assets, recognize that they need to always be in a useable state, and appropriately handle both tangible and intangible assets in such a way as to prevent loss, theft, improper use, or the like.
- (2) Company assets must not be used for personal purposes.

#### 5. Appropriate use of information equipment and information systems

- (1) When using personal computers and other information equipment borrowed from Money Forward Group companies and information systems of Money Forward Group companies where one is employed (hereinafter correctively referred to as the “Information Equipment, etc. of the Money Forward Group”), internal regulations and rules for the protection and use of information systems established by each Group company must be observed.
- (2) We will not use any Information Equipment, etc. of the Money Forward Group for personal purposes.

#### 6. Conflict of interest

- (1) We will not engage in any activities that may cause a conflict between Money Forward Group interests and individual interests.
  - ① Business may not be conducted as a business partner of the Money Forward Group without obtaining permission from the Money Forward Group company where one is employed.
  - ② Business that competes with the interests of the Money Forward Group may not be engaged in.
  - ③ We do not accept personal kickbacks from customers or business partners.
- (2) If there is or may be a conflict between Money Forward Group interests and individual interests, it must be reported promptly to the Money Forward Group company where one is employed.

#### 7. Maintaining trust

- (1) We will not use Internet bulletin boards, blogs, or social media



(hereinafter correctively referred to as “Social Media, etc.”) to release any information that may damage trust in the Money Forward Group or involve the Money Forward Group in a dispute, argument, or other conflict. If any argument or other conflict should arise on Social Media, etc., we will promptly report to the Money Forward Group, regardless of whether the release was made on behalf of the company or personally.

- (2) We will not engage in any actions, whether inside or outside Money Forward Group companies or during or outside work hours, that will damage or are likely to damage trust in the Money Forward Group.