

## Basic Policy Regarding Anti-Social Forces

### 1. About this Basic Policy Regarding Anti-Social Forces

Seven Seas Advisors Co. Ltd. (hereinafter “our Company”) has established and complies with the following Basic Policy Regarding Anti-Social Forces, in order to protect the Company and its clients from damages caused by individual or group anti-social forces which pursue economic interests through the use of violence, force and fraud.

### 2. Basic Policies Regarding Anti-Social Forces

Our Basic Policies Regarding Anti-Social Forces are as follows:

#### A) Dealing with anti-social forces

Our Company fully recognizes that not being involved with anti-social forces is a part of the social responsibility of corporations, and our Company as a whole will endeavor to avoid anti-social forces.

#### B) Avoiding all relationships with anti-social forces

If transactions or suspected transactions with anti-social forces are discovered, our Company will immediately terminate the relevant transaction etc. or take measures towards terminating the transaction etc., and make efforts to exclude and avoid all relationships with anti-social forces.

#### C) Ensuring safety

Our Company will take measures as an organization to deal with any unreasonable demand made by anti-social forces, including appointing a Person in Charge of Preventing (Damages from) Unreasonable Demands, in order to ensure the safety of our directors and employees who deal with such unreasonable demands.

#### D) Cooperation with external specialist organizations

Our Company will constantly maintain close cooperative relationships with external specialist organizations, such as the police department, the National Center for Elimination of Boryokudan, and lawyers, and take measures necessary to eliminate relationships and dealings with anti-social forces. Furthermore, in emergency situations such as unreasonable demands being received from anti-social forces, we will take such civil and criminal legal measures as may be necessary or appropriate.

#### E) Prohibition of illicit transactions etc.

Our Company will never enter into unjustifiable transactions with anti-social forces, such as entering into illicit transactions, inappropriate transactions, or provide funds.

(End)