Basic Policy for Information Security

Seven Seas Advisors Co., Ltd. Minoru Yonekura, Representative Director & CEO

In order to protect information assets received from clients and others from any incident, disaster, crime or other threat, and respond to the trust of clients and society, Seven Seas Advisors Co., Ltd. (the "Company") handles information security on a company-wide basis in accordance with the following policies.

1. Responsibility of Executives

The Company will organizationally and continuously improve and enhance information security through the leadership of its executives.

2. Organization of Internal System

The Company will establish an organization for the maintenance and improvement of information security and adopt information security measures as formal internal regulations.

3. Efforts by Employees

The employees of the Company will make every effort regarding information security by acquiring the knowledge and techniques necessary for information security through participation in internal training.

4. Compliance with Legal and Contractual Requirements

The Company will comply with all obligations under laws, regulations, norms and contracts applicable to information security, and respond to the trust of clients and society.

5. Response to Violations and Incidents

In the event of a violation of any laws or contracts, or any incident relevant to information security, the Company will sincerely and appropriately respond to such violation or incident, and endeavor to prevent any recurrence.