Sumitomo Mitsui Finance and Leasing Group

SMFL MIRAI Partners

SMFL Code of Conduct

October 1, 2026

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SMFL MIRAI Partners

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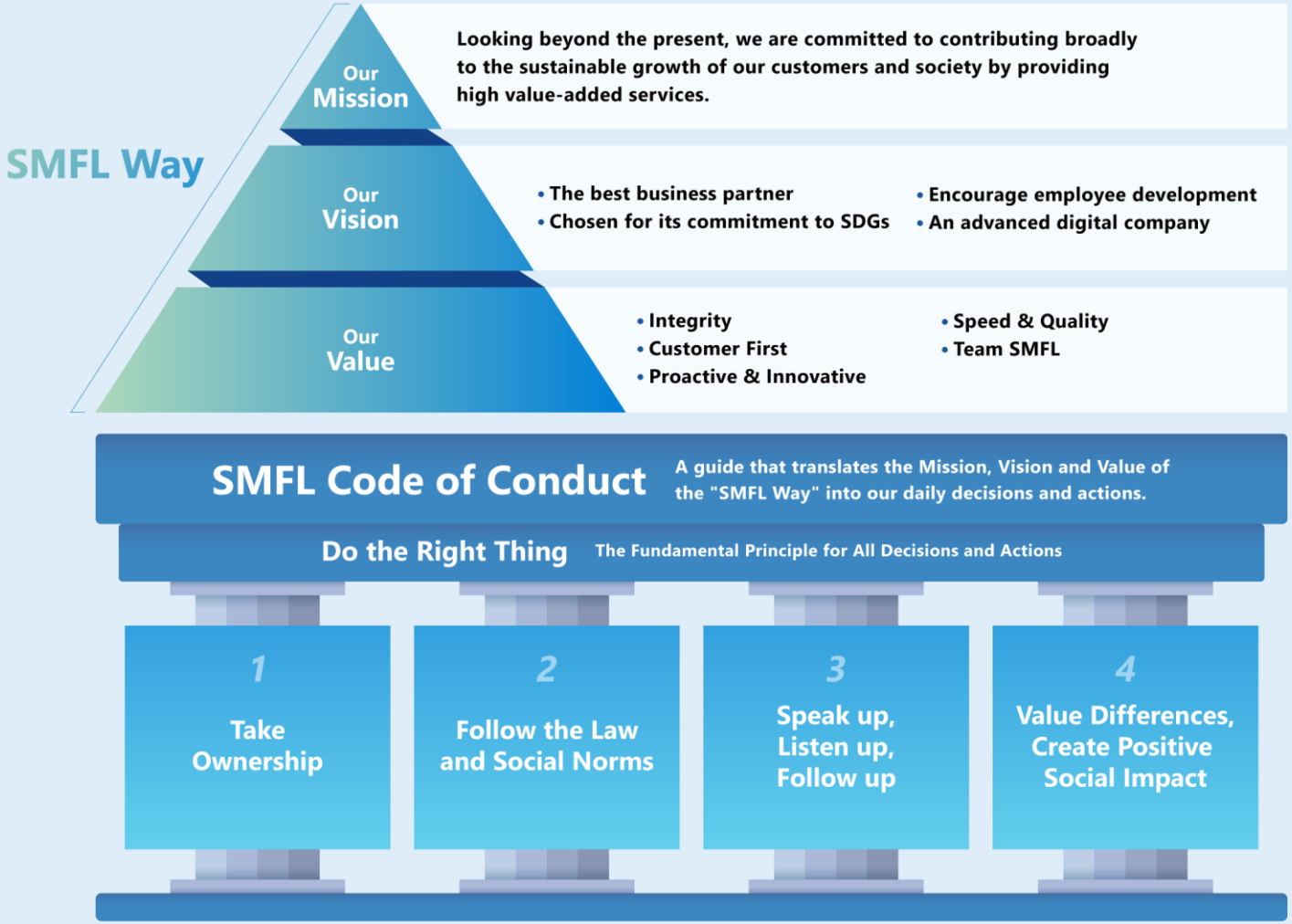
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Relationship Between the “SMFL Way” and the “SMFL Code of Conduct” (1)

We have established the "SMFL Code of Conduct" as a shared guide for translating the "SMFL Way" into our daily decisions and actions.



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Relationship Between the “SMFL Way” and the “SMFL Code of Conduct” (2)

SMFL Way

Sumitomo Mitsui Finance and Leasing Company, Limited(“SMFL”) has established **the “SMFL Way” as the foundation of its corporate philosophy. Serving as the guiding framework for all business activities**, the “SMFL Way” consists of three core elements: Our Mission, Our Vision, and Our Value. Our Value consists of five core values (Five Values), with **Integrity** positioned as the foremost value.

SMFL Code of Conduct

The “SMFL Code of Conduct” (the “Code”) serves as **a shared guide for translating the “SMFL Way” into our daily decisions and actions**. It also provides a point of reference when we are uncertain about the right course of action. The “SMFL Way” sets out the values we hold dear, while the “Code” serves as a shared guide that connects those values to our daily decisions and actions.

Do the Right Thing and Four Pillars

At the heart of the “Code” is **“Do the Right Thing”**. It **translates Integrity into everyday decisions and actions and serves as the fundamental principle for all our decisions and actions**.
Four Pillars support us in putting “Do the Right Thing” into practice each day. By making “Do the Right Thing” the fundamental principle for all our decisions and actions, and by acting based on these Four Pillars, we aim to realize the “SMFL Way”.

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“Do the Right Thing” and Four Pillars

When we are uncertain about what to do, we consider our decisions and actions through the lens of “Do the Right Thing” and act fairly and with Integrity. Four Pillars support us in putting “Do the Right Thing” into practice every day.



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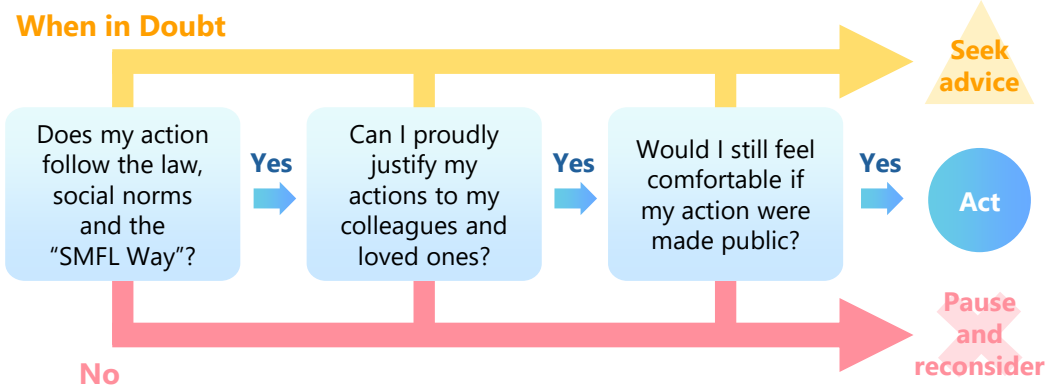
“Do the Right Thing” – The Fundamental Principle for All Decisions and Actions –

Do the Right Thing



- We consider what is the right thing to do and act accordingly.
- When in doubt, we ask ourselves the following questions.
  I. Does my action follow the law, social norms and the “SMFL Way”?
  II. Can I proudly justify my actions to my colleagues and loved ones?
  III. Would I still feel comfortable if my action were made public?
- If the answer is “No” to any of the questions, we pause before acting. If we are unsure whether our actions are right, we seek advice through the following methods.
  - Consult your manager, colleagues, the Compliance Department.
  - Use the whistleblowing system(*). *See p.10 for details of our whistleblowing channel.

Flowchart for Taking the Right Action



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Four Pillars for Putting “Do the Right Thing” into Daily Practice(1)

1

Take Ownership



- We think and act with a strong sense of ownership.
- We actively engage and collaborate with others, drawing on diverse perspectives to solve problems.
- We contribute to the sustainable development of our customers and society by understanding circumstances accurately and acting with sound judgment.
- We are accountable to our customers, colleagues, society, and other stakeholders for our decisions and actions.

Making Sound Judgements: The Importance of Risk Management

- We identify, assess, and manage the nature and extent of risks arising from our business activities.
- We implement appropriate controls and distinguish between risks that are acceptable to take and risks that must be avoided.

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Four Pillars for Putting “Do the Right Thing” into Daily Practice(2)

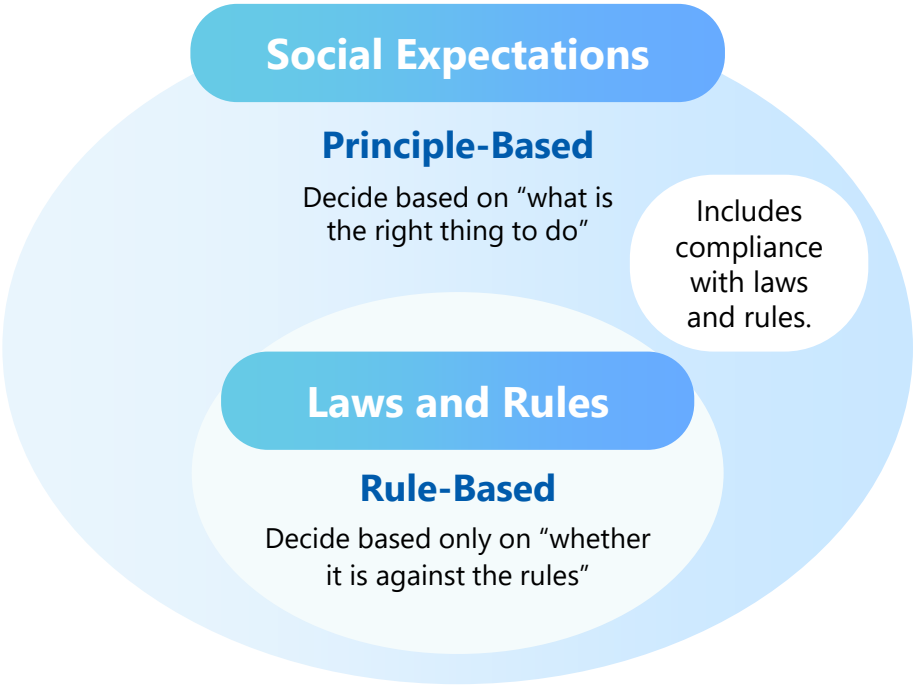
2

Follow the Law and Social Norms



- We go beyond mere compliance with laws and rules.
  By understanding the purpose and principles behind them, we act in ways that meet the expectations of society.

- Laws and rules cannot anticipate every situation.
  Even when no explicit guidance exists, we think critically about what is right, exercise sound judgment, and act responsibly in accordance with our principles.



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Areas Where We Must Build Trust with Society

Information Management

- We recognize that customers entrust information to us based on trust and that such information is one of the most valuable assets.
- We use and process customer information only within the scope authorized by our customers and safeguard it against loss, leakage, and improper use.
- To prevent insider trading, we strictly manage material non-public information and other confidential corporate information. We do not engage in activities that could result in unlawful gains for ourselves or others.

Customer-Oriented Business Conduct

- We place our customers' needs and best interests at the center of our decisions.
- We provide products and services that are appropriate to our customers' needs and circumstances.
- If we determine that a product or service may not be in a customer's best interest, we communicate our concerns clearly and transparently.

Preventing Financial Crime

- We prevent money laundering, terrorist financing and proliferation financing.
- We comply with all applicable laws and regulations relating to economic sanctions.
- We sever all relationships with antisocial forces.

Appropriate Use of Company Assets

- We properly safeguard company's tangible and intangible assets.
- We use company assets only for legitimate business purposes and do not use them for personal gain.

Fair Business Activities

- We refrain from offering or accepting entertainment, hospitality, or gifts that could compromise our fair business operations.
- We do not engage in bribery or corruption.
- We do not use our authority or position within the company to obtain personal benefits for ourselves or others.
- We comply with applicable competition and antitrust laws.

Accurate Records and Appropriate Disclosure

- We ensure that business activities are accurately recorded and properly maintained based on facts.
- We promote the timely and appropriate disclosure of financial and non-financial information, including our business strategies. We do not conceal information.

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Four Pillars for Putting “Do the Right Thing” into Daily Practice(3)

3

Speak up, Listen up, Follow up



- We seek advice and speak up for better decisions and a stronger organization.
- When we are uncertain about the right course of action or how to address a concern, we do not navigate difficult decisions alone. Instead, we seek guidance from our managers, colleagues, Compliance, Human Resources, or other appropriate functions.
  We may also use our whistleblowing channels.
- ”Bad News First and Fast” : The worse the news, the sooner we report and share it.
- We listen sincerely to everyone who seeks advice or raises a concern, regardless of their position or role, and help create an environment where everyone feels safe speaking up.
- To resolve issues, we work with others as needed and take appropriate action to drive continuous improvement.

About Our Whistleblowing Hotline

- Reports can be made anonymously.
- Confidentiality of the whistleblower’s identity and the reported information is strictly protected.
- No whistleblower will suffer retaliation as a result of whistleblowing.
  You can feel safe speaking up.
- Directors, officers, and employees must not obstruct the reporting or investigation of concerns. Any such conduct may result in disciplinary action.

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Four Pillars for Putting “Do the Right Thing” into Daily Practice(4)

4

Value Differences, Create Positive Social Impact



- We respect each individual.
  - We respect the human rights and dignity of all people.
  - We foster an environment free from discrimination, bullying, and harassment, where everyone can perform with confidence and feel safe contributing their best work.
- We turn differences into value.
  - We respect the diversity of experiences, values, and perspectives that each person brings and deepen our understanding of one another through constructive dialogue.
  - We bring together differing views and concerns as valuable insights that drive better decisions, continuous improvement, and innovation.
- We strive to solve environmental and social challenges.
  - We strive to create a better future for our customers and society through responsible decisions and actions.
  - We work closely with our customers and business partners to address the impact of our business activities on society and the environment.

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