

Note: This is a translation of the Japanese language original for convenience purposes only, and in the event of any discrepancy, the Japanese language original shall prevail.

Code of Conduct (Our Action Principle)

Enacted on April 1, 1998

Revised on April 1, 2018

We, officers and employees of the Dai-ichi Life, have passion, pride and joy being able to engage in life insurance, a field with highly public nature, and in accordance with the Management Policies and the Dai-ichi's Social Responsibility Charter (DSR Charter), we comply with the Code of Conduct as follows.

1. Maximize Customer Satisfaction

Embody “By your side, for life” for the customers, always embrace the customer first philosophy, improve the quality of all operations and seek to maximize customer satisfaction.

- ① Have a deep understanding of the significance of life insurance and the customer first management philosophy and deliver “peace of mind” with a sense of mission.
- ② Provide excellent products and services accurately and timely, sincerely responding to the expectations of customers.
- ③ Perform accurate and easy-to-understand explanations about products, services, contract coverage, important matters and matters that customers wish to know.
- ④ Provide services and pay claims accurately and promptly from the perspective of the customers at all stages, “at the time of contract”, “during the contract period”, and “at the time of payout”.
- ⑤ Have a broad knowledge as a financial institution employee, not limited to our own products and services, and provide information to customers in a positive manner.
- ⑥ Listen to the voice of the society, especially the customers, and reflect it within the company.
- ⑦ Be honest, accurate and prompt to the customers and respond in a humble manner.

2. Secure Social Trust

(1) Have high ethical standards, comply with laws and regulations and company rules, conduct business in a fair and sound manner in accordance with social norms and market rules.

- ① Comply with laws and regulations such as Insurance Business Law, and company rules.
- ② In relation with customers, business partners and the like, shall not perform any action that may contribute to promotion or induction of illegal act and circumvention of law of the other party.
- ③ Shall not provide gifts and entertainment to customers, business partners and the like beyond the scope of social courtesy. In particular, shall not provide gifts and entertainment to public officials and the equivalent. In the same way, shall not receive gifts and entertainment from customers, business partners and the like beyond the scope of social courtesy.
- ④ Clarify the distinction between public and private at all times and shall not use one's position to gain personal benefits. In addition, shall not have a relation with customers, business partners and competitors that may be against the interest of the company.
- ⑤ Have a deep understanding and awareness about human right issues in general, and respect basic human rights when carrying out day-to-day operations. In addition, when acting abroad, while respecting the human rights, comply with laws and regulations of the country concerned, and pay regard to the local culture and practices.
- ⑥ Conduct strict management of information about customers, insider information and confidential information. In addition, shall not disclose such information or use it personally or for a third party, both during employment and after leaving the company.

(2) Commit to the development of the life insurance business, and as a “good corporate citizen”, contribute to the prosperity and welfare of the society and to the harmonious coexistence with the society.

- ① Recognize the position of the company as a public entity of society and at all times act in a fair manner based on common sense.
- ② Recognize the position of oneself as a member of society and strive to promote interaction with society and harmonize through active participation in social contribution activities.
- ③ Regard environmental protection, conservation and creation of a recycle-oriented society as a social responsibility and commit to deal with the environmental issues from the resource conservation point of view.
- ④ Actively promote good health for people through providing products and services and social contribution activities.
- ⑤ Commit not to have relationships with antisocial forces that threaten order and safety of civil society, obstruct sound economic and social developments and business activities.

3. Create sustainable corporate value

(1) In performing duties, shall be in accordance with the DSR Management concept and stand in the perspective of “most suitable for the entire company”, to promote innovation, effectively use management resources, improve productivity, and ensure thorough risk management.

- ① Take into account the necessity and effectiveness, when using management resources. Shall have the viewpoint of innovation when performing duties to increase quality and productivity.
- ② Always stand in the perspective of “most suitable for the entire company”, and ensure thorough risk management and high-quality operations.

(2) Accurately perceive the expectations of society and changes in the internal and external environment, and continuously strive for self-transformation towards corporate and individual growth.

- ① Have a strong interest in social conditions and trends in relation to the company's business perspective.
- ② Provide maximum performance as an organization and an individual at all times, proactively foster growth and encourage self-development to achieve personal growth as an employee.

4. Foster employee potential

Respect diversity and foster free and vigorous culture where all employees can play an active part.

- ① Recognize the diverse views and values of individuals from different gender, nationality, culture, age, education, career, lifestyle and other backgrounds. Create an organization and environment where each individual can capitalize on their personal characters to demonstrate their ability.
- ② Strive to maintain a vivid, reliable, secure, and pleasant working environment and promote mental and physical health.
- ③ Shall not discriminate against others based on gender, age, nationality, race, ethnicity, religion, social status, disability, sexual orientation, gender identity or any other reason.
- ④ Shall not conduct sexual harassment, power harassment or any other harassment, and shall not allow others to conduct these types of acts.

- ⑤ Respect the privacy of officers and employees, and when dealing with personal information, pay close attention and manage them properly.