

# Dai-ichi Life Group Code of Conduct



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# 1. Group CEO Message

Dear members of Dai-ichi Life Group,

We are living in an era of rapid and disruptive changes taking place on a global scale. The world is becoming increasingly complex, with impact from environmental issues and changing geopolitical risks. We are also witnessing unprecedented technological evolution including the emergence of generative AI, as well as accelerating change in people's values and lifestyles. In such a changing landscape of social issues, a business such as ours must continuously re-affirm the value we contribute to our customers' lives and to society. We must meet the expectations of our stakeholders by helping to address people's needs and concerns and make a positive contribution to solving social issues.

We have defined the Dai-ichi Life Group's Purpose and Values as the key principles for how we will make such a contribution. Our new Purpose "Partnering with you to build a brighter and more secure future" demonstrates our aspiration to help realize a society in which each individual's values and way of living are respected, and people can achieve a brighter and more secure future. We will take on the challenge of helping to build such a future by partnering with our customers, shareholders and other stakeholders.

To embody our Purpose, it is essential for everyone in the Dai-ichi Life Group to always live up to three Values: "We care," "We do what's right" and "We innovate."

The Group Code of Conduct is a specific set of guidelines to help each of us think, judge, and act based on these Values so that we build trust with our stakeholders and embody our Group Purpose. This Group Code of Conduct stipulates that we must ensure that we act with integrity, thinking deeply of our customers and other stakeholders.

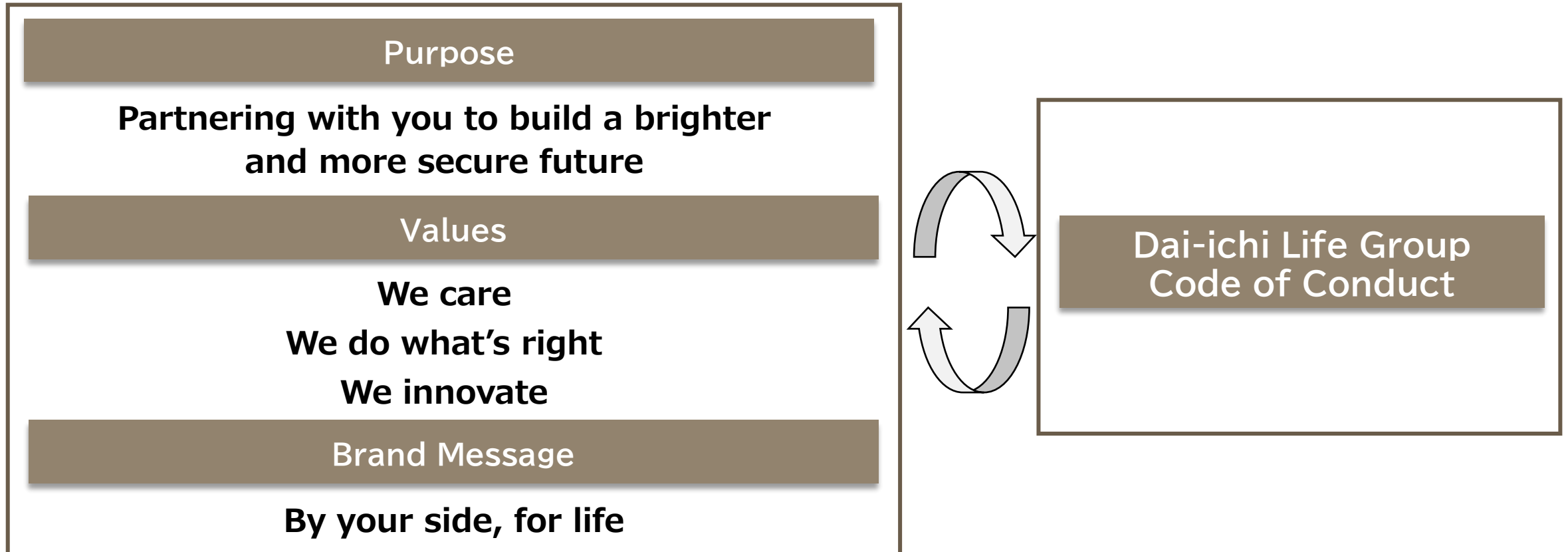
I strongly believe that if all members of the Dai-ichi Life Group commit to our work with a high sense of ethics, pride, and joy, we will be able to realize our Purpose, and people will always turn to us for help.



Tetsuya Kikuta  
Group CEO  
Dai-ichi Life Holdings, Inc.

## 2. Dai-ichi Life Group Principles and Code of Conduct

The Dai-ichi Life Group Code of Conduct is a guideline for how to think, decide and act based on our Values, so that each of us will earn the trust of stakeholders in order to achieve the Group's Purpose. By acting in accordance with the Group Code of Conduct, we will ensure that our actions meet the expectations of customers, society, and each other.

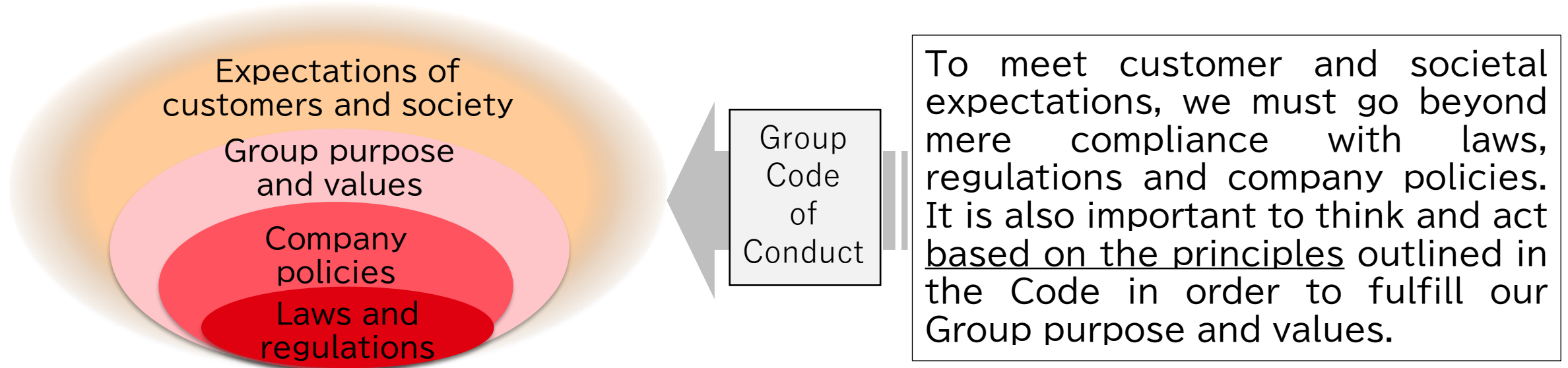


### 3. Intent of the Group Code of Conduct

The Dai-ichi Life Group strives to create sustainable corporate value and meet the expectations of all stakeholders through our corporate activities and our contribution to society.

The Group Code of Conduct consists of the basic principles underlying our Group purpose and values, which all employees should consider in their day-to-day actions in order to maintain a high standard of ethics.

This Group Code of Conduct is intended to guide you to make the right choices.



# 4. Acting in accordance with the Group Code of Conduct

In order to earn the trust and meet the expectations of customers, society, and each other, all members of Dai-ichi Life Holdings and its subsidiaries should follow the Group Code of Conduct, except where an individual business unit Code of Conduct is in effect. When faced with a difficult judgment, please consider the following perspectives.

Check	
<input checked="" type="checkbox"/>	Would this conduct violate laws / regulations or the Group Code of Conduct or company policies?
<input checked="" type="checkbox"/>	Is the judgment or conduct fair and reasonable, and does it meet the spirit of the Code?
<input checked="" type="checkbox"/>	Is the judgment or conduct appropriate based on common sense?
<input checked="" type="checkbox"/>	Would my actions be perceived to be driven by self-interest or am I making an excuse to justify my actions?
<input checked="" type="checkbox"/>	Would you make the same judgment or take the same action toward your own family or friends?

If you are uncomfortable about the answer to any of these questions, then reflect on the Group Code of Conduct and reconsider your judgment or conduct. Also, consult with your manager.

As a People Manager, you have a further responsibilities to your team members to:

**Lead by example**

Take the initiative to act in line with the Group Code of Conduct and encourage your team members to do the same.

**Embed the Group Code of Conduct in your workplace**

Put the Group Code of Conduct into practice through training and raising awareness.

**Create an open and trusting environment**

Managers should create an environment where team members can ask for input when they are unsure about their decisions. By fostering ongoing communication on a day-to-day basis, it will be easier for team members to report promptly when problems occur or are noticed.

## 5. Failure to observe the Group Code of Conduct

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- ❑ Failure to follow the Group Code of Conduct, applicable laws and regulations, or company policies may result in a breach of the trust and expectations of customers, society, and members of the Group, or degrade or threaten to degrade the Group's brand value and credibility. Violations may result in disciplinary action based on the applicable Group company's policies.
- ❑ Employees may be held responsible for failing to report to managers if they are aware that someone else has violated the Group Code of Conduct.
- ❑ Managers may be held responsible if the above conduct occurs in their organization.

## 6. Speaking up and getting help

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Employees should consult with their manager or report through the whistleblower system if they become aware of any violation of laws, regulations, internal rules, or the Group Code of Conduct.



# 7. Our Actions

The Group Code of Conduct sets out guidelines for acting For our Customers, For the trust of Society, and For our People, all built upon certain Foundational Conduct. Our actions have an impact on the brand value of our Group companies.

## For our Customers

→P10

Honesty, integrity and fairness  
Actions on behalf of customers  
Protecting information  
Improving customer experience through innovative products and services

## For the trust of Society

→P12

Appropriate information disclosure  
Appropriate handling of corporate assets  
Prohibition of the pursuit of personal gain

## For our People

→P14

Creating a comfortable working environment with respect for each other  
Challenge and Innovation  
Communication and Teamwork

## Foundational Conduct

→P16

① Compliance with laws and regulations

② Respect for human rights

③ Contribution to a sustainable society and future

# For our Customers

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Honesty, integrity and fairness  
Actions on behalf of customers  
Protecting information  
Improving customer experience  
through innovative products and  
services

# For our Customers

## Honesty, integrity and fairness

Conduct business with honesty, integrity and fairness to build trust with customers.

## Actions on behalf of customers

Be considerate of our customers, and accurately and clearly explain our products and services.  
Always listen to customers and strive to meet their expectations so that they will value and continue to choose us.

## Protecting information

Exercise particular care while appropriately using information received from customers to ensure that we maintain their trust.

## Improving customer experience through innovative products and services

Aim to propose solutions that exceed customers' expectations by leveraging the capabilities of the Dai-ichi Life Group so that we will optimize customer experience  
Strive to provide innovative products and services that meet the changing values and needs of customers.

# For the trust of Society

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Appropriate information disclosure

Appropriate handling of corporate assets

Prohibition of the pursuit of personal gain

# For the trust of Society

## Appropriate information disclosure

Accurately record and store business information, including financial data, as necessary. Also ensure fairness and transparency to market participants through timely and appropriate disclosure.

## Appropriate handling of corporate assets

Appropriately manage the tangible and intangible assets of our Group companies; prevent cyber-related risks, unauthorized access, or the theft / loss / misuse of property; and protect the confidentiality, safety and privacy of third-party information.

## Prohibition of the pursuit of personal gain

Avoid conflicts of interest and do not pursue personal gain by engaging in inappropriate behavior or abusing information learned in the course of business or through your position in the company.

# For our People

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Creating a comfortable  
working environment with  
respect for each other  
Challenge and Innovation  
Communication and Teamwork

# For our People

## Creating a comfortable working environment with respect for each other

We recognize and respect each other's individuality and work to create a safe, healthy and rewarding work environment where all employees can do the best, thereby realizing the well-being of all employees.

- ❑ Engaging in any form of harassment is prohibited, and you must report any such behavior by others.
- ❑ We will promote the mental and physical health of all employees.

## Communication and Teamwork

Strive to communicate effectively and achieve the best results through teamwork and the sharing of information, skills and know-how.

## Challenge and Innovation

Challenge each other and support our colleagues' success while working together to respond to the changing environment by growing and enhancing our knowledge, skills, expertise, and people skills.

Leverage diverse backgrounds, experiences and ways of thinking to achieve the best of our abilities and create new value.

# Foundational Conduct

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Compliance with laws and regulations

Respect for human rights

Contribution to a sustainable society and future



# Foundational Conduct

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## Compliance with laws and regulations

You must follow applicable laws and regulations as well as company policies, and conduct yourself in the right manner based on high ethical standards. When in doubt, think and act based on the principles outlined in the Group Code of Conduct. If you become aware of a suspected violation, report it to the company immediately. Foundational principles that apply throughout the group include the following:

- (1) Strictly manage important information and do not condone insider trading.
- (2) Prevent money laundering, the financing of terrorist activities, economic sanctions violations, tax evasion, and other financial crimes.
- (3) Abide by anti-bribery / corruption rules, and do not provide inappropriate entertainment or gifts that may cause suspicion or mistrust.
- (4) Do not engage in unfair practices (abuse of superior bargaining status, cartels, market manipulation, etc.).

## Respect for human rights

We respect the human rights of all people and actively work to raise awareness of human rights.

We do not discriminate or tolerate discrimination for any reason, including based on nationality, race, ethnicity, age, religion, thoughts and beliefs, gender, birth, disability, sexual orientation and gender identity.

## Contribution to a sustainable society and future

We actively engage in environmental protection on an ongoing basis, recognizing that preserving the global environment is our social responsibility.

We contribute to the realization of a sustainable society and the development of local communities through the corporate activities of each group company and social contribution activities carried out by companies and individuals.

# Dai-ichi Life Group Code of Conduct

April 1, 2024