Compliance Management System

With a view to fulfilling the social responsibility and public mission of a bank, it is indispensable to establish and implement a compliance management system. Thus, we regard compliance as one of the most important management tasks and will work together with all of our executives and employees to foster a corporate culture that emphasizes the importance of compliance.

Compliance management system

The Board of Directors is the highest organization responsible for compliance, and its authorized Compliance Committee deliberates on important matters related to compliance. In addition, managers and personnel in charge of compliance are assigned to all departments and branches to ensure thorough compliance by raising compliance awareness of the executives and employees and providing educational guidance to them. The Risk Management Department that oversees compliance, centrally manages compliance-related matters, and strives to develop and establish a system for compliance with applicable laws and regulations and a management system to protect our customers.

Compliance in practice

In order to put our Corporate Philosophy into practice, we have established Corporate Ethics as a basic policy for compliance and Action Guidelines as the criteria for compliance.

Further, we established Compliance Guidelines summarizing all matters necessary for practicing compliance, including Corporate Ethics and Action Guidelines. By using these Compliance Guidelines in our training programs and study sessions, we aim to ensure the thorough practice of compliance. In addition, the Compliance Action Plan, which is a specific practical plan for fulfilling compliance requirements, is formulated annually by the Board of Directors, based on which measures should be taken. We are striving to further enhance and reinforce compliance by, for example, giving training at each department and branch, checking and monitoring compliance status using checklists and conducting consultations and guidance by visiting branches.

Contents of Corporate Ethics and Action Guidelines

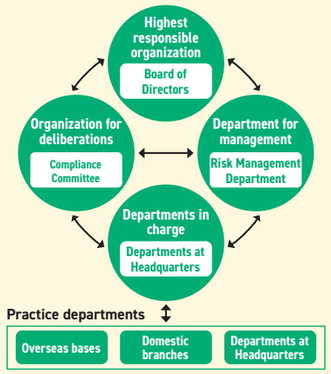
Corporate Ethics

1. Awareness of social responsibility and public mission
2. Strict compliance with laws and regulations
3. Transparency in management and openness to society
4. Measures to deal with anti-social forces (crime syndicates)

Action Guidelines

1. Understanding and complying with laws, regulations, and rules
2. Maintaining and improving confidence
3. Reporting, communicating, and consulting
4. Drawing a line between public and private matters
5. Honesty and sincerity in customer service
6. Steadfast actions against anti-social forces
7. Strict management of customer information
8. Prevention of money laundering

Compliance system



Themes of training sessions for each department and branch (FY2025)

April: The FY2025 Compliance Action Plan	October: Examples of unusual behaviors
May: Compliance Declaration	November: Ensuring appropriate reporting in the event of customer information leakage
June: Corporate Ethics and Action Guidelines	December: Cautions regarding drinking and occasions involving alcohol
July: Prevention of harassment	January: Strict handling of information on corporate entities
August: Employees' attitudes towards initiatives	February: Measures to prevent the recurrence of misconduct incidents
September: Customer harassment	March: Action Guidelines for the Use of Social Media

Internal whistleblowing system

We have established a system (Compliance Hotline) that allows all executives and employees to report violations of laws and regulations directly to the Risk Management Department and outside lawyers. This system has an important mechanism for protecting the confidentiality of whistleblowers and prohibiting disadvantageous handling of them, which results in ensuring the effectiveness of the system by protecting whistleblowers, and encouraging early detection of violations of laws and regulations.

Compliance action plan

The Board of Directors formulates a Compliance Action Plan every year as a specific, practical plan for enhancing and reinforcing compliance. In the Compliance Action Plan, the highest priority items are listed as common themes across the Bank. The Compliance Committee confirms the implementation status of the Compliance Action Plan every quarter, and the Board of Directors confirms the implementation status of the plan every six months.

<FY2026 Compliance Action Plan bank-wide common themes>

① Strict observance of laws and regulations, internal rules, etc.
② Eradication of harassment
③ Customer-oriented sales activities
④ Appropriate management of customer information

Measures to protect customers

In addition to announcing a Customer Protection Management Policy, the Bank assigns personnel in charge of customer protection management to each department and branch, allowing them to offer sufficient explanations about this to customers and handle consultations, requests, and complaints from customers appropriately. We are working to develop and establish an enhanced customer protection management system.

Our Customer Support Office handles customer complaints. In addition, we support the financial Alternative Dispute Resolution (ADR) system in which a designated dispute resolution organization settles conflicts from a fair and neutral position.

<Contacts and phone numbers for suggestions or complaints>

	Customer Support Office, Gunma Bank	Designated dispute resolution organization	
		Customer Relations Center, Japanese Bankers Association (JBA)	Trust Consultation Center, Trust Companies Association of Japan
Phone numbers	0120-203041 (Domestic toll free) +81-(0)27-252-1111 (key number)	0570-017109 (Navi Dial (NTT's Japan-wide call handling service)) +81-(0)3-5252-3772	0120-817335 (Domestic toll free) +81-(0)3-6206-3988
Reception hours	9:00 to 17:00	9:00 to 17:00	9:00 to 17:15
Reception days	Monday to Friday (excluding public holidays and Dec 31 to Jan 3)		

We have also announced that we would conduct foreign exchange operations adequately in compliance with the FX Global Code, and have released publicly our Basic Policy on Foreign Exchange Transactions, which stipulates how to conduct foreign exchange transactions with customers and how to protect customer information within the transactions.

Measures to protect customer information (personal information)

The Bank published a Personal Information Protection Declaration as our policy for appropriate protection and use of personal information obtained in connection with our operations, and assigns personnel responsible for managing and supervising customer information, including personal information throughout the Bank, thereby developing and establishing a management system to implement meticulous safety management measures and supervise outsourcers.

To protect specific information on corporate entities acquired by executives and employees, we have established measures to communicate and manage such information, and aim to prevent unfair transactions using such information.

Measures to manage conflicts of interest

Together with announcing a Conflict of Interest Management Policy, we perform our business operations so as not to unduly harm our customers' profits, by properly managing transactions that may cause conflicts of interest between customers and the Bank or its Group as well as between customers of the Bank or its Group companies.

Severing ties with anti-social forces

Unfair intervention by anti-social forces can lead to a decline in confidence of a bank, making it difficult to ensure the suitability and soundness of business operations.

Based on the importance of the social responsibility of a bank, we take a firm position against anti-social forces in accordance with the three principles of "Prevent access to our funds, prevent use of their funds, and do not fear such anti-social forces and groups." We are working to suspend relationships with such anti-social forces.

Specifically, starting new solicitation and transaction activities for anti-social forces is banned, and transactions already made are reduced and eventually stopped when such transactions are discovered. In addition, we have introduced stipulations to exclude anti-social forces in contracts.

In order to eliminate unreasonable claims from anti-social forces and transactions with such groups, we ensure the safety of executives, employees and related parties. The Bank and its Group companies take measures together and cooperate, on a daily basis, with external organizations such as the police and lawyers.

Other measures

As a measure to prevent bribery and corruption, we have established our Guidelines for Gifts and Entertainment, which aims to eliminate acts that may lead to suspicion, distrust, misunderstanding, and criticism from society, maintain sincere, fair, and transparent relationships with our customers, and gain a high level of trust and confidence from society. We are also working to enhance our system for preventing the occurrence of bribery and corruption cases by, among others, providing training for executives and employees and operating a consultation desk in the Risk Management Department, which handles matters related to gift-giving and entertainment.