

Commitment

We commit to protecting our assets.



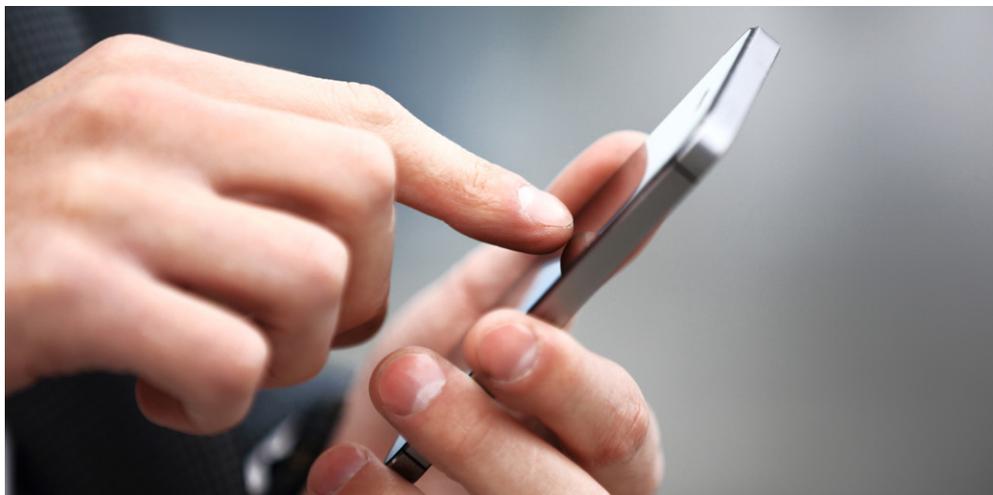
Protect Personal Data

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Privacy Policy ↗](#)

ORIX Group respects the privacy of our employees, customers, and other third parties with whom we do business and is committed to collecting and using their personal data in compliance with applicable law and internal policies. We are responsible for protecting the personal data entrusted to us.

WHAT TO KNOW

- ✓ The definition of **personal data**, sometimes referred to as PII, can vary widely, but generally includes information that relates to an identified or identifiable individual such as name and address, government identification number, date of birth. Some PII is particularly sensitive, such as an individual's financial account number or passport number or health information.
- ✓ An increasing number of jurisdictions, including Japan, the U.S. and the European Union, have been strengthening their regulations on the collection and use of personal data.



WHAT TO DO

- ✓ Only collect, use, and provide access to personal data for legitimate business purposes. Understand how the following apply to the personal data you handle:
 - applicable laws of jurisdictions from which the personal data is collected and in which it is processed or used,
 - legal requirements for cross border transfers of personal data,
 - the privacy policies of ORIX Group and your business, and
 - applicable contractual obligations.
- ✓ Safeguard personal data through appropriate security practices to prevent unauthorized access, use, or loss.
- ✓ Immediately report any violations of the policies of ORIX Group or your business regarding personal data, or the compromise of the security of any system or device containing personal data.

Protect Confidential Information

ORIX Group is committed to protecting ORIX Group's confidential information and the confidential information entrusted to us by our employees, customers, and other third parties with appropriate administrative, technical, and physical safeguards and to conducting our business in a way that supports and ensures the responsible use of this confidential information.



WHAT TO KNOW

- ✓ **Confidential information** is information ORIX Group has a legal, regulatory, or contractual obligation to safeguard and includes any information we create, develop, receive, or have access to in connection with our work, such as information about ORIX Group, our customers, or prospective customers.
- ✓ Unauthorized disclosure or use of confidential information, including through electronic means, could result in severe damage to ORIX Group and its customers, employees, and other third parties and is strictly prohibited.
- ✓ We must not only protect confidential information of third parties but also let them know we expect them to protect ours.
- ✓ The obligation to protect confidential information continues after leaving ORIX Group.
- ✓ Nothing in our Code or other policies prohibits or restricts an employee's right to report possible violations of law or regulation to any governmental agency or entity under any whistleblower protection provisions.



WHAT TO DO

- ✓ Enable and maintain reasonable security measures, including securing online accounts, to prevent unauthorized access in processing of confidential information or its accidental loss or destruction.
- ✓ Protect against loss or misuse of confidential information that may occur from the use of emerging technologies including third party artificial intelligence models and tools.
- ✓ Secure and limit access to confidential information to those within ORIX Group who need to know such information to do their jobs.
- ✓ Only use approved communication channels to conduct ORIX Group business.
- ✓ Discuss and handle confidential information discreetly to protect it from being overheard or seen by others.
- ✓ Working remotely should be considered an extension of the workplace. Exercise the same degree of care in protecting confidential information away from the office as you do when working in the office.
- ✓ Do not use or permit any other person to use confidential information for personal gain.
- ✓ Immediately report suspected accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, confidential information.

Protect ORIX Assets



LEARN MORE
Information Security Policy [↗](#)

ORIX Group provides employees valuable assets to help us perform our work at the highest levels including computer equipment, software, office equipment, facilities, electronic equipment, mobile devices, communications platforms, and intellectual property. By protecting and using these assets appropriately, we maintain the high quality of ORIX Group solutions and services.



WHAT TO KNOW

- ✓ Each of us must fully understand the requirements for appropriate use of ORIX Group's resources including its information security and other policies and how they apply to assets we use.



WHAT TO DO

- ✓ Use ORIX Group assets with care and for legitimate business purposes and protect them from cyber risk and attack, misuse, theft, waste, or abuse.
- ✓ Use customer, supplier, and other third-party assets only for approved purposes and in compliance with applicable laws, licenses, terms, and conditions. Respect and protect the intellectual property rights of all parties by using information technology and software that have been legitimately acquired and licensed.
- ✓ Use judgment in using company assets for private use or personal matters. Personal use should not be excessive and should never interfere with the performance of business duties or introduce additional risk to ORIX Group.
- ✓ Be aware that information and messages transmitted using company assets are ORIX Group property with no expectation of privacy and may be monitored, collected, and used by ORIX Group in its sole discretion.
- ✓ Understand that intellectual property we create related to ORIX Group business is owned by ORIX Group, and we must help ORIX Group protect it.

Protect the ORIX Brand

In our daily actions, each of us represents ORIX Group and must always act with the highest ethical standards to enhance and preserve ORIX Group's brand, good name, and reputation.



WHAT TO KNOW

- ✓ Our commitment to act ethically strengthens our brand, good name, and reputation, which are key factors in attracting customers. Unethical conduct, or the perception that ORIX Group does business with third parties that act unethically, reflects poorly on the entire Group.



WHAT TO DO

- ✓ Do not use social media to do business on behalf of ORIX Group or in such a way that it could be perceived you are speaking for ORIX Group unless authorized.
- ✓ Use social media responsibly. Please be thoughtful and make certain your posts reflect ORIX values and standards. Also, make sure you are not sharing confidential information.



Remember, anything you post on social media is public information. You are responsible for the content of what you post.