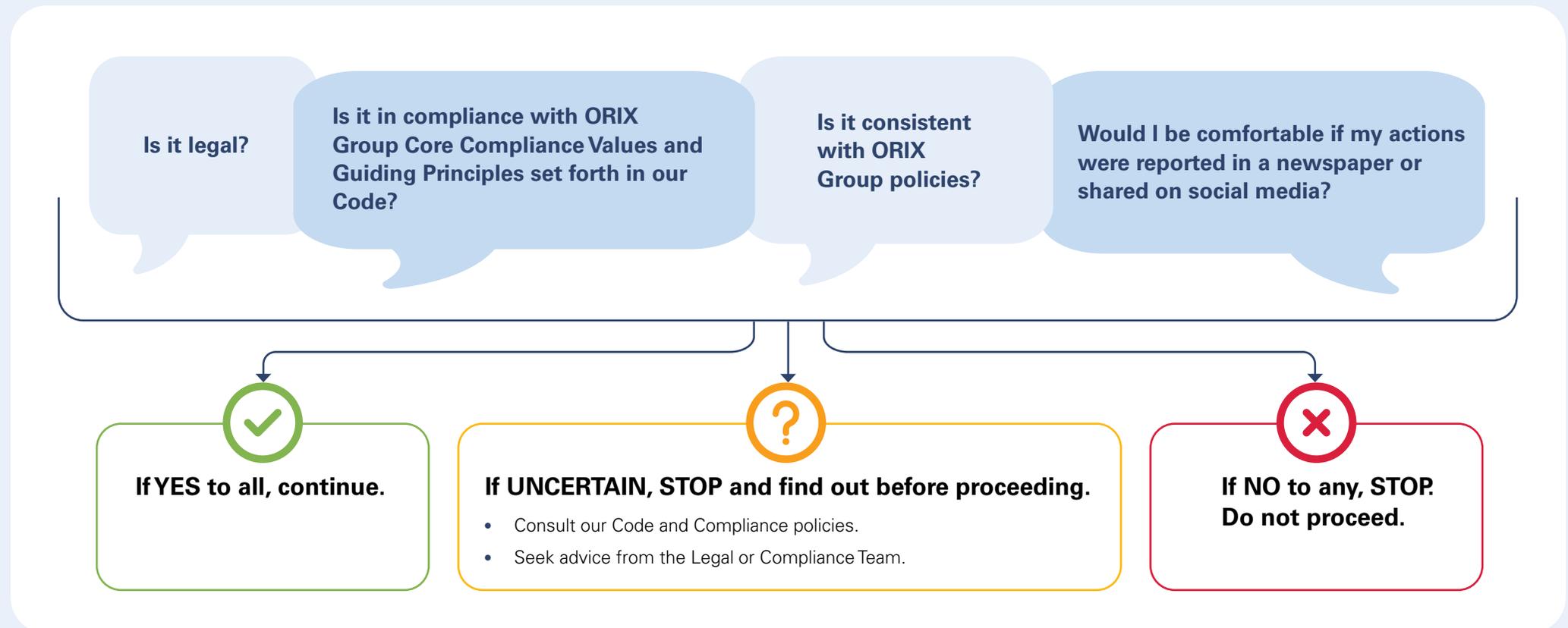


Making Good Decisions

When faced with difficult decisions or situations where the right course of action is unclear, always ask yourself the following questions to help navigate the compliance or ethical dilemma:



Remember, you can always reach out to any of the following to help you make the right decision:

- Your manager or another member of management
- Local officers, directors, board members
- Local Compliance officers
- Group Compliance Department, ORIX Corporation, Tokyo.

Speak Up

Each of us is responsible to report actual or suspected violations of our Code, ORIX Group policies, and the law.

How to Raise a Compliance Concern

There are many ways to “speak up” to raise a Compliance concern. You can use any of the following channels in addition to reporting to your manager or your local hotline channel and can remain anonymous if you wish, where permitted by law.

For General Hotline Issues

Group Compliance Department (GCD)

i DETAILS

For issues where the reporter prefers an investigation led by the GCD team in Tokyo, and/or where the reporter wishes to remain anonymous to the local team, and/or for cross-border issues.

EthicsPoint Global Hotline

i DETAILS

For issues where the reporter wishes to remain completely anonymous.



For Accounting and Audit Issues Only

ORIX Corporation Audit Committee Secretariat

i DETAILS

Exclusively for issues about accounting, internal accounting controls, or auditing matters.

Investigations and Disciplinary Actions Following Reports

ORIX Group will investigate reports of your Compliance concerns including actual or suspected violations of our Code, ORIX Group policies, and the law promptly, fairly, and in accordance with the law. We are all required to cooperate fully and honestly in any investigation and are asked to keep our knowledge of and participation in any investigation confidential to help safeguard the integrity of the investigation, protect witnesses, and ensure relevant evidence is properly secured.

At the end of an investigation, appropriate disciplinary action, up to and including termination of employment, will be taken based on the findings. Further, ORIX Group may report civil and criminal violations to the relevant authorities.

If you provide your name and contact information in your report, you may be contacted regarding the investigation. You may also receive feedback on the investigation outcome directly from an ORIX Group representative on a case-by-case basis.

Retaliation is Never Permitted

ORIX Group supports honest and open communication and is committed to maintaining a culture where each of us feels comfortable raising concerns. For that reason, ORIX Group will never tolerate retaliation against any employee who in good faith reports any actual or suspected violation or participates in an investigation.

ORIX Group does not tolerate reports made in bad faith. Always report if you have a reasonable, good-faith, concern, but you must never knowingly make a false or misleading accusation, lie, or refuse to cooperate in an investigation.

