

## **[Specific measures for effectively implementing Information Security Protection Policy]**

### **1. Complying with laws and regulations relating to information security**

In connection with the laws and regulations on information security established by the government which are relevant to the businesses run by the Relo Group, we have formulated these measures in compliance with the relevant laws and regulations listed below and those specified in our internal rules and ensure that our officers and employees observe them.

- The Basic Act on Cybersecurity
- Penal Code
- Copyright Act
- Telecommunications Business Act
- Act on Electronic Signatures and Certification Business
- Act on Regulation of Transmission of Specified Electronic Mail
- Act on Prohibition of Unauthorized Computer Access
- Act on the Protection of Personal Information
- Other laws and regulations specified in internal rules and equivalents

The responsible departments will regularly review and revise our Basic Information Security Policy, the Information Management Regulations and other related regulations and keep them up-to-date by collecting and identifying related laws, regulations and other norms via websites, seminars and other events operated by the relevant government ministries and agencies and other organizations.

Any violation of the standards will result in firm action as they are enforced in accordance with the Work Rules and other regulations.

### **2. Building an information security management system**

This Policy applies to all officers and employees. The Information Security Administrators Committee composed of officers and employees in charge of and performing information security duties will work to share information. Matters deemed by this committee to require companywide deliberation will be deliberated by the Management Advisory Council of Information Security consisting of officers responsible for departments of Relo Group, Inc. related to information security and presidents and other personnel of the principal operating companies.

Group companies that possess customers' personal information have acquired PrivacyMark certification and properly manage information including personal information. Group companies that have yet to acquired the certification apply and implement similar regulations to ensure their management of information is comparable with that of the certified companies.

### **3. Managing information assets**

We closely examine the content of the information assets handled in the Relo Group to classify and organize them. In addition, we firmly store and manage them depending on their content in accordance with the Standards for Information Security Measures formulated by Relo Group, Inc. We review and revise these Standards on a regular basis.

### **4. Continuously improving information security measures**

In addition to the regular review mentioned in section 3 above, we routinely check that individual companies within the Relo Group perform self-checks to ensure their information security management cycle works effectively. In parallel with these self-checks, the Internal Audit Department of Relo Group, Inc. audits the effectiveness of the information security management cycle.

We evaluate the state of information security management using the results of the self-checks, the audits and the information in reports and other documents and set appropriate improvement goals.

### **5. Information security training**

The Relo Group and group companies in Japan regularly provide e-learning training on information security to officers and employees, including training on personal information protection management. This training includes the sharing of information about information leakage accidents outside the Group and the latest information about network security. In addition, we familiarize our officers and employees with our standards regarding information security measures for our internal networks and other regulations and display warning messages as necessary to prevent information security incidents from happening within the Relo Group. Thus we are working intensively to educate our officers and employees and increase their awareness.