

利益相反管理方針

1. 目的

金融機関の提供するサービスの多様化や、世界的な金融コングロマリット化の進展に伴い、金融機関内または金融グループ内において、競合・対立する複数の利益が存在し、利益相反が発生するおそれが高まっており、特定金融商品取引業者等は、各社及びそのグループ会社の業務の内容・特性・規模等に応じ、顧客の利益が不当に害されることのないよう、利益相反のおそれのある取引を管理することが求められております。

株式会社 JRF Global Capital Investments（以下「当社」といいます）は、お客様の利益を不当に害することを回避する態勢整備を行うため、当社における利益相反の管理に関する措置等について定めたものです。

当社は、法令等及び本方針に従い、お客様の利益を不当に害するおそれのある取引（以下、「対象取引」といいます）を適切な方法により特定・類型化し、お客様の保護を適正に確保するために「対象取引」を管理する体制を利益相反管理方針として策定しました。

2. 利益相反取引

利益相反取引とは、当社が行う取引に伴い、お客様の得られる利益を不当に害するおそれのある取引をいいます。

3. 利益相反取引の特定・類型化

当社は、利益相反取引をあらかじめ、以下のとおり特定・類型化します。

	お客様と当社	お客様と当社の他のお客様
利害対立型	お客様と当社またはグループ会社の利害が対立する取引	お客様と当社またはグループ会社の他のお客様との利害が対立する取引
競争取引型	お客様と当社またはグループ会社が同一の対象に対して競合する取引	お客様と当社またはグループ会社の他のお客様とが競合する取引

Conflict of Interest Management Policy

1. Purpose

With the diversification of financial services provided by financial institutions and the global advancement of financial conglomeration, multiple competing or conflicting interests may arise within a financial institution or its financial group, increasing the risk of conflicts of interest. Accordingly, Specified Financial Instruments Business Operators and similar entities are required, in light of their business content, characteristics, and scale, to manage transactions that may give rise to conflicts of interest so as not to unduly harm customer interests.

JRF Global Capital Investments Co., Ltd. (the “Company”) establishes this policy to set forth measures for managing conflicts of interest in order to maintain an organizational framework that prevents undue harm to customer interests.

In accordance with applicable laws and regulations and this Policy, the Company identifies and categorizes transactions that may unduly harm customer interests (the “Covered Transactions”) by appropriate means and has established this Conflict of Interest Management Policy to ensure proper customer protection.

2. Conflict of Interest Transactions

A conflict of interest transaction refers to any transaction conducted by the Company that may unduly harm the interests of its customers.

3. Identification and Categorization of Conflict of Interest Transactions

The Company specifies and classifies conflict of interest transactions on an ex ante basis as follows.

Type	Between Customer and the Company	Between Customer and Other Customers of the Company
Conflict of Interest	Conflicts between the interests of the customer and the Company or its group companies	Conflicts between the interests of the customer and those of other customers of the Company or its group companies
Competitive Transaction	Competition between the customer and the Company or its group	Competition between the customer and other customers of the Company or its group

情報利 用型	当社がお客様との関係を通 じて入手した情報を利用し て当社またはグルー プ会社が利益を得る取引	当社がお客様との関係を通じ て入手した情報を利用して当 社またはグループ会社の他の お客様が利益を得る取引

	companies for the same subject	companies
Information Utilization	The Company or its group companies obtain benefits using information acquired through the customer relationship	Other customers of the Company or its group companies obtain benefits using information acquired through the Company's relationship with the customer

4. 利益相反の管理方法

- ①情報隔壁の設置による部門間の情報遮断
- ②対象取引および当該お客様との取引の一方または双方の条件または方法の変更
- ③対象取引または当該お客様との取引の一方の中止
- ④お客様への利益相反の開示とお客様の同意
- ⑤その他、取引に応じた適切な方法

5. 利益相反の管理体制

①利益相反管理統括部署の設置

当社は、当社のコンプライアンス部を利益相反管理統括部署とし、コンプライアンス部長を利益相反管理統括者とします。また、コンプライアンス部長は本方針に基づき利益相反管理を適切に行うこととします。

利益相反管理統括部署はいかなる他の部署の責任者からも具体的な業務について指示を受けません。

利益相反管理統括部署は、対象取引の特定および利益相反に関する全社的な管理体制を統括します。

②利益相反管理統括部署の責務

利益相反管理統括部署は、本方針に沿って、利益相反のおそれのある取引の特定および利益相反管理を的確に実施するとともに、その有効性を適切に検証し、改善します。

利益相反管理統括部署は、対象取引の特定およびその管理の為にを行った措置について記録し、作成の日から5年間それを保持します。

4. Methods of Managing Conflicts of Interest

The Company manages conflicts of interest using one or more of the following methods:

- ①Establishment of information barriers to restrict information sharing between departments
- ②Modification of the terms or methods of one or both of the Covered Transaction and the transaction with the relevant customer
- ③Suspension or termination of either the Covered Transaction or the transaction with the relevant customer
- ④Disclosure of the conflict of interest to the customer and obtaining the customer's consent
- ⑤Other appropriate methods depending on the nature of the transaction

5. Conflict of Interest Management Framework

① Establishment of a Supervisory Department

The Company designates its Compliance Department as the department responsible for overseeing conflict of interest management, and the Head of the Compliance Department as the Conflict of Interest Management Officer. The Head of the Compliance Department shall appropriately manage conflicts of interest in accordance with this Policy.

The supervisory department shall not receive instructions regarding specific operations from the heads of any other departments.

The supervisory department shall oversee the company-wide framework for identifying Covered Transactions and managing conflicts of interest.

② Responsibilities of the Supervisory Department

The supervisory department shall, in accordance with this Policy, accurately identify transactions that may involve conflicts of interest and implement appropriate conflict of interest management measures, while properly reviewing and improving their effectiveness.

The supervisory department shall record the measures taken to identify and manage Covered Transactions and retain such records for five (5) years from the date of creation.

<p>利益相反管理統括部署は、当社の役職員に対し、本方針および本方針を踏まえた業務運用の手続きについて周知徹底致します。</p> <p>6. 利益相反管理の対象となる会社の範囲</p> <p>利益相反管理の対象となる会社は、以下の通りです。</p> <p>株式会社ジャパンレミットファイナンス</p> <p>株式会社 JRF Intelligence</p> <p>なお、上記利益相反管理の対象となる会社の範囲については、適時見直しさせていただきます。</p> <p>7. 利益相反管理方針の公表</p> <p>利益相反管理方針は、①本店の受付に備え置き公衆の縦覧に供する、②ホームページに掲載する、③新規お客様との取引に係る配布書類に含む等の方法により公表を行います。</p> <p>付則</p> <p>2024 年 11 月 30 日 制定</p>	<p>The supervisory department shall ensure that all officers and employees of the Company are fully informed of this Policy and the operational procedures established in accordance with it.</p> <p>6. Scope of Companies Subject to Conflict of Interest Management</p> <p>The companies subject to conflict of interest management are as follows:</p> <ul style="list-style-type: none">• Japan Remit Finance Co., Ltd.• JRF Intelligence Co., Ltd. <p>The scope of companies subject to conflict of interest management will be reviewed as necessary.</p> <p>7. Publication of the Conflict of Interest Management Policy</p> <p>This Policy shall be disclosed by, including but not limited to, the following means:</p> <ul style="list-style-type: none">① Making it available for public inspection at the reception area of the Company's head office② Posting it on the Company's website③ Including it in documents distributed in connection with transactions with new customers <p>Supplementary Provision</p> <p>Established on November 30, 2024</p>
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