

Citigroup Global Markets Japan Inc.
Executive Committee
August 19, 2008
Amendment as of October 1, 2009

Basic Principles to Prevent Damages from Antisocial Forces

In order to prevent damages from antisocial forces, we, Citigroup Global Markets Japan Inc., have established the ground rules below and deny and refuse all relations with antisocial forces. The definition of antisocial forces is generally defined as *boryokudan* (暴力団) or any other individual or organization whose activities purposefully disrupt normal, legal and morale business and social conduct in Japan or abroad.

Article1 Undue claims from antisocial forces brings uncertainty and fear to people, and without guiding principles an employee, staff, or responsible department who receives contact related to antisocial force may be compelled to comply with a demand. Our code of conduct and internal regulations provide this guidance; rather than an individual employee, staff member, or department, the entire organization up to and including the representative director will engage such antisocial force appropriately.

Article2 Ensure safety of the staff receiving undue claims or demands from antisocial forces.

Article 3 In order to prepare for the possibility of receiving undue claims or demands from antisocial forces, establish a close working relationship with the Police, the National Center for Elimination of Boryokudan (NCEB), legal counsel, and other organizations specialized in dealing with such antisocial forces.

Article 4 Deny any connection, including business relations, with antisocial forces. Remain firm and absolute in rejecting undue claims or demands from antisocial forces.

Article 5 When it becomes necessary, the firm will take an appropriate legal course of

action by pursuing civil and criminal charges for undue claims from antisocial forces.

Article 6 Although the reason cited for undue claims or demands from antisocial forces may be due to business activities, or misconduct by an employee or officer, the firm will not negotiate or enter into “backroom” deals to hide such activities, misconduct, etc.

Article 7 The firm will absolutely not fund any organization supporting or engaging in antisocial force.

Declare the above.