

Global Policy Regarding Fraud Risk

1. Purpose

This Global Policy on Fraud Risk (hereinafter referred to as “Global Policy”) aims to ensure legal compliance and the soundness and appropriateness of business operations by properly recognizing and assessing internal and external fraud risks that may arise in the business operations of the Group and implementing appropriate controls.

2. Definitions

- **“Fraud”** refers to acts designed to deceive others, including misstatements or omissions, and the use of dishonest means with intent, resulting in loss to victims or gain to the perpetrator. Fraud may be committed by individuals or organizations, either alone or in collaboration.
- **“Internal Fraud”** refers to fraud committed by Officers, Employees, and Related Parties in the course of business operations, or acts that contribute to such fraud. Internal fraud can be committed against the Group or its customers.
- **“External Fraud”** refers to fraud committed by customers or external individuals/organizations in connection with the business of the Group, targeting the Group or its customers.
- **“Officers and Employees”** refers to all officers and employees of the Group.
- **“Officers, Employees, and Related Parties”** refers to all Officers and Employees of the Group, as well as related parties including outsourcing service providers.
- **“SMFL”** refers to Sumitomo Mitsui Finance and Leasing Company, Limited.
- **“The Group”** refers to SMFL and the Group Companies.
- **“Group Companies”** refers to the following subsidiaries.

SMFL MIRAI Partners Co., Ltd.	SMFL MIRAI PARTNERS (SINGAPORE) PTE. LTD.	Aravest Pte.Ltd.
CRE, Inc.	Kenedix, Inc.	MAX-REALTY INC.
SMBC Aviation Capital Limited	SMBC Aero Engine Lease B.V.	DMG MORI Finance GmbH

SMFL LCI Helicopters Limited	AJCC Co., Ltd	SFI Leasing Co., Ltd.
SMFL Trust Co., Ltd.	SMFL Business Service Co., Ltd.	SMFL Rental Co., Ltd.
SC Club Co., Ltd.	YANMAR CREDIT SERVICE CO.,LTD.	Sumitomo Mitsui Finance and Leasing (China)Co.,Ltd.
Shanghai Sumitomo Mitsui General Finance and Leasing Co.,Ltd	Sumitomo Mitsui Finance and Leasing (Hong Kong) Limited	PT.SMFL Leasing Indonesia
Sumitomo Mitsui Finance and Leasing (Singapore) Pte Ltd.	SMFL Leasing (Thailand) Co.,Ltd.	SMFL Leasing (Malaysia) Sdn. Bhd./ SMFL Hire Purchase (Malaysia) Sdn. Bhd.

3. Scope

This Global Policy applies to the Group and its Officers and Employees.

4. Policy Principles

As stated in 1. Purpose, the Group shall appropriately control both internal and external fraud risks to ensure legal compliance and the soundness and appropriateness of business operations. The policy principles for each risk are as follows:

The Group's business is built on the trust of customers, shareholders, and society. The occurrence of Internal Fraud by Officers, Employees, and Related Parties poses an immediate threat to this foundation. Furthermore, Internal Fraud increases the risk of legal and regulatory violations and may damage a healthy corporate culture. Therefore, the Group does not tolerate any Internal Fraud by Officers, Employees, and Related Parties.

Regarding External Fraud risks that may arise in connection with the Group's business, committed by customers or external individuals/organizations, the Group shall establish a framework to control such risks in accordance with this Global Policy and related policies.

5. Establishment of a Framework for Fraud Risk

(1) Internal Fraud Risk

In accordance with 4. Policy Principles, the Group shall establish a global framework for managing Internal Fraud risk and fostering an organizational culture that promotes integrity and compliance with laws and internal policies. Each Group Company and region shall establish a framework to mitigate internal fraud risk, taking into account their business and regional characteristics, with reference to the following measures:

- Clarify the roles of each line of defense and implement appropriate control measures, including reporting to management as necessary. Control measures include risk assessments, whistleblower systems, appropriate training to executive officers, employees, and related parties, and independent audits by the audit unit.
- Conduct regular and appropriate risk assessments for related parties, including outsourcing service providers, from beginning to termination of contract, and implement control measures as described above to control fraud risk.
- In the event Internal Fraud is discovered, conduct a strict and impartial investigation to clarify the facts and responsible parties, and respond promptly and appropriately.
- If Internal Fraud is found conducted by Officers or Employees, consider disciplinary action and reflect the findings appropriately in personnel evaluations.

(2) External Fraud Risk

In accordance with 4. Policy Principles, the Group shall establish a global framework for managing External Fraud risk, ensuring compliance with relevant laws and regulations in each country. Each Group Company and region shall establish a framework to control External Fraud risk, taking into account their business and regional characteristics, with reference to the following measures:

- Clarify the roles of each line of defense and implement appropriate control measures, including reporting to management as necessary. Examples of control measures include risk assessments, appropriate training to Officers, Employees, and Related Parties, and independent audits by the audit unit.

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