

RGA Reinsurance Company Japan Branch
Local Conflict of Interest Management Policy
June 2020

Purpose

Consistent with the Insurance Business Act (and Ordinance for Enforcement of the Insurance Business Act), RGA Reinsurance Company Japan Branch ("the Company") will properly manage and conduct business operations. Specifically, the Company will keep its clients from being unduly interfered with their interests when the Company performs any transaction that may cause a conflict of interest between the Company or financial institutions of the Company (collectively "the Group Companies") and the clients.

1. Scope

The Company will properly manage and conduct business operations. Specifically, the Company will keep its clients from being unduly interfered with their interests when the Company performs any transaction that may cause a conflict of interest between the Company or financial institutions of the Company (collectively "the Group Companies") and the clients.

2. Identifying Transactions Causing Conflicts of Interest

Any transaction creating a conflict of interest between the Group Companies' clients

3. Methods of Managing Conflict of Interest

The Company will manage conflict of interest by selecting and implementing one or combination of the measures described below:

- 1) Segregate the team performing the Subject Transaction from the team performing the transaction with the client;
- 2) Change the Subject Transaction or conditions or manners of the transaction with the client;
- 3) Disclose to the client that the Subject Transaction may unduly harm the interest of the client, and obtain the client's consent; or