

Complaints Handling and Dispute Resolution

Citigroup Global Markets Japan Inc.

We shall respect the complaints received from our customer in relation to our business and strive for the prompt, good faith, fair and appropriate settlement thereof.

1. Contact Information for Registering Complaints

If you have a complaint in relation to our business, please contact the coverage sales representative or the following:

Compliance Division Citigroup Global Markets Japan Inc. Otemachi Park Building 1-1-1 Otemachi, Chiyoda-ku, Tokyo 100-8132 Tel : 03-6776-8800 (Mon – Fri, 9 a.m. – 5 p.m.)

2. Our Business Operation in relation to Complaints Handling and Dispute Resolution

We are taking the following measures for complaints handling and dispute resolution depending on the classification of the business as listed below.

1. Type 1 Financial Instruments Business

Measures to conclude a Basic Contract for the Implementation of Dispute Resolution Procedures with Financial Instruments Mediation Assistance Center (“FINMAC”)*.

2. Type II Financial Instruments Business

Measures to utilize the Financial Futures Association of Japan (which outsources such operation to “FINMAC”) for disputes relating to the market derivatives transactions, or measures to utilize Type II Financial Instruments Firms Association (which outsources such operation to “FINMAC”) for disputes relating to transactions other than market derivatives.

3. Investment Advisory and Agency Business

Complaints Handling : Measure to publicize the business operation system and internal policy

Dispute Resolution : Measures to utilize the Dispute resolution Center of Tokyo Bar Association, Dai-ichi Tokyo Bar Association, and Dai-ni Tokyo Bar Association**

4. Money Lending Business

Measures to conclude a Basic Contract for the Implementation of Dispute Resolution Procedures with Japan Financial Services Association***.

5. Insurance Business (insurance broker)

Measures to conclude a Basic Contract for the Implementation of Dispute Resolution Procedures with Insurance Ombudsman****.

***Financial Instruments Mediation Assistance Center (FINMAC)**

2-1-1 Dai-ni Shoken Building, Nihonbashi-Kayabacho, Chuo-ku, Tokyo 103-0025

Tel: 0120-64-5005 (Toll free number)

Hours: 9:00 a.m. – 5:00 p.m. (Monday to Friday except for public holidays)

****Tokyo Bar Association – Dispute Resolution Center**

6F Bar Association Bldg, 1-1-3 Kasumigaseki, Chiyoda-ku, Tokyo 100-0013

Tel: 03-3581-0031

Hours: 9:30 a.m. – 12:00 noon, 1:00 p.m.- 3:00 p.m. (Monday to Friday except for public holidays)

****Dai-ichi Tokyo Bar Association – Arbitration Center**

11F Bar Association Bldg., 1-1-3 Kasumigaseki Chiyoda-ku, Tokyo 100-0013

Tel: 03-3595-8588

Hours: 10:00 a.m. – 12:00 noon, 1:00 p.m. – 4:00 p.m.
(Monday to Friday except for public holidays)

**** Dai-ni Tokyo Bar Association - Arbitration and Mediation Center**

9F Bar Association Bldg., 1-1-3 Kasumigaseki, Chiyoda-ku, Tokyo 100-0013

Tel: 03-3581-2249

Hours: 9:30 a.m. – 12:00 noon, 1:00 p.m. - 5:00 p.m. (Monday to Friday except for public holidays)

*****Japan Financial Services Association — ADR**

3-19-15 Takanawa, Minato-ku, Tokyo 108-0074

Tel: 03-5739-3861

Hours: 9:00 a.m. – 5 p.m. (Monday to Friday except for public holidays)

******Insurance Ombudsman**

7F Tranomon Suzuki bldg., 3-20-4 Toranomon, Minato-ku, Tokyo 105-0001

Tel: 03-5425-7963

Hours: 9:00 a.m. – 12:00 noon, 1p.m. - 5 p.m. (Monday to Friday except for public holidays)

3. Summary of Internal Directive

(Directive for Handling)

1. When handling Complaints, considering the Financial ADR System, the Responsible Department involved shall, in cooperation, clarify the facts and responsibilities thereof, respect the position of the customer, strive for the prompt, good faith, fair and appropriate settlement thereof, and, in any of the events listed in Items 1 through 8 of Article 119, Paragraph 1 of the Cabinet Office Ordinance Concerning Financial Instruments Business, respect the said provisions.
2. The Company shall sincerely accept customer opinions, strive for sharing information and make use of such information for the improvement of the business operations.
3. Personal information received from customers shall be handled in an appropriate manner.
4. The Company shall act in a firm attitude against unjustified involvement posing as Complaints by antisocial forces, and shall appropriately cooperate with police and other relevant authorities as necessary.
5. When resolving Complaints, the Company shall try to gain customer understanding and satisfaction as much as possible, including providing the customer with appropriate explanation according to the progress of handling Complaints.
6. If it is not possible to resolve the Complaints by internal efforts or otherwise considered appropriate, the Company shall introduce any external dispute resolution organization to the customer for a resolution of the Complaints.

(Division to Accept Complaints etc.)

1. The department which the Complaint directly pertains (hereafter “Responsible Department”) will be responsible for accepting and handling the Complaints.
2. The Responsible Department shall make an arrangement for accepting Complaints widely from customers taking into consideration the customer convenience.

3. With respect to the Complaints relating to any business that the Company outsources, the division outsourcing such business shall receive information as to such Complaints from the relevant outsource provider.
4. Notwithstanding the preceding paragraph, if the Responsible Department receives Complaints directly from any customer in relation to any outsourced business, the Responsible Department shall promptly notify the outsourcing division of such Complaint, and the outsourcing division shall then respond to issue

(Division Responsible for Managing Actions against Complaints)

1. When responding to complaints from customers, etc., the division head who covers the Responsible Department shall be the person responsible for handling the complaint, and the Business Execution Department, Planning and Management Department, or equivalent team of each division shall be the department responsible for handling complaints (hereinafter referred to as the "Complaints Management Department"). In order to take prompt, fair and appropriate actions against the Complaints, the Complaints Management Department shall determine the approach for responding to the Complaints and supervise the progress of the actions taken by the Responsible Department.
2. When deciding on the action policy as set forth in the immediately preceding paragraph, Complaints Management Department shall bear in mind the compliance with the laws and ordinances concerning a prohibition of compensation for losses and other rules and seek advice from ICRM as needed.

(Reporting and Measures for resolution)

1. Upon receipt of Complaints, the Responsible Department shall report an outline thereof to the Complaint Management Department.
2. The Complaints Management Department shall promptly take the appropriate measures for the resolution of the Complaints, in cooperation with the sales manager and the head of the Responsible Department and the relevant division.
3. The Complaints Management Department shall report the occurrence, status, measures to be taken, etc. with respect to the Complaints to the ICRM, Legal and Business Risk and Control Committee (BRCC) and, in critical cases, shall promptly report to the Country Coordinating Committee.

(Reinforcement of Internal Control Arrangement)

The Company shall conduct internal audit to ensure that the actions against the Complaints are properly taken in accordance with FIEA and other laws and ordinances, and internal rules.

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