Vortex Investment Advisors Ltd.

Kanto Local Finance Bureau (FIBO) No.3015 Associations in which a Member: The Japan Investment Advisers Association



Basic Policy on Anti-social Forces

In order to prevent harm by groups or individuals who pursue their economic interests through the use of violence, force and fraudulent means (hereinafter referred to as "Anti-social Forces") and to maintain the public trust in the financial instruments business, our company has formulated and complies with this basic policy to firmly block and eliminate relationships with Anti-social Forces.

1. We respond to Anti-social Forces as an organization.

If unreasonable demands are made by Anti-social Forces, our company does not leave them solely to the person in charge or the department in charge, but responds with a firm attitude as a whole organization and ensures the safety of our officers and employees.

2. We respond to Anti-social Forces in cooperation with external expert organizations.

Our company communicates with external expert organizations such as the police, the National Center for Removal of Criminal Organizations, and attorneys at law, etc. as necessary to prepare for unreasonable demands by Anti-social Forces and builds a close collaborative relationship.

3. We block any relationship, including transactions, with Anti-social Forces.

Our company has no relationships with Anti-social Forces. If our company has a relationship with the party without knowing that such party is an Anti-social Force, we promptly dissolve the relationship when the party is found to be an Anti-social Force.

4. In case of emergency, we take legal measures from both civil and criminal perspectives.

Our company takes legal measures against unreasonable demands by Anti-social Forces from both civil and criminal standpoints, takes all civil legal measures and does not hesitate to take actions as a criminal case, such as actively submitting a damage report.

5. We do not conduct backroom transactions or provide funds to Anti-social Forces.

Our company never conducts any act such as conducting backroom transactions or providing funds in order to conceal the fact even if an unreasonable demand from Anti-social Forces is made due to scandals concerning our business activities or scandals involving our officers and employees.