



June 22, 2022

From: Citibank, N.A., Tokyo Branch
Citigroup Global Markets Japan Inc.
Citigroup Japan Holdings G.K.
Citigroup Services Japan G.K.

Sharing Information among our Group Companies
(Special Opt-out Structure)

Through the utilization of our global networks and local business structures, Citibank, N.A., Tokyo Branch and other branches in Japan (collectively, "CBNA Tokyo") and Citigroup Global Markets Japan Inc. ("CGMJ") would like to provide to our customers financial products which are enhanced in quality and feature.

In order for us to improve our services and streamline our workflow within our operational environment, we consider it important to be able to share customer information amongst our group companies in Japan and would like to exchange and share certain non-public information relating to our customers among CBNA Tokyo, CGMJ, Citigroup Japan Holdings G.K. ("CJH") and Citigroup Services Japan G.K. ("CSJ", and together with CBNA Tokyo, CGMJ and CJH "our Companies").

Under the Special Opt-out Structure described in Item 1 below, a customer may request our Companies to discontinue sharing its information at any time. The purpose of this notice is to explain to our customers the details of such sharing of information among our Companies as well as the opportunity to request us to discontinue such information sharing among our Companies ("Opt-out"). Please see below the details of the information sharing and the Opt-out process.

Our Companies will maintain confidentiality of customers' information by abiding by the applicable laws and regulations and our internal rules concerning customer information. Your understanding towards our sharing of information among our Companies for the betterment of our services would be appreciated.

1. Applicable scope of this notice

The content of this notice shall be applicable to customers who are subject to the simplified opt-out structure ("Special Opt-out Structure") stipulated in Article 153, Paragraph 1, Items 7 and 8 of the Cabinet Ordinance of Financial Instruments Business ("Cabinet Ordinance") (i.e., (i) listed companies and their subsidiaries, (ii) companies scheduled to be listed and their subsidiaries, (iii) companies submitting securities reports and their subsidiaries and (iv) certain qualified institutional investors and their subsidiaries, as described in Article 123, Paragraph 1, Item 18, Sub-Items 7(1) to 7(4) of the Cabinet Ordinance) ("Subject Customers").



2. Scope of information to be shared

The scope of the information to be shared is any customer information that our Companies have obtained until now or will obtain in the future, including any “non-public information” (*Hi Koukai Jouhou*) (as defined in Item 12, Paragraph 4, Article 1 of the Cabinet Ordinance), the content of past or planned transactions, the timing of transactions, and other undisclosed information relating to the customers obtained or that may obtain upon execution of transactions (“Non-Public Information”).

3. Scope of our group companies which share Non-Public Information

Citibank, N.A., CGMJ, CJH and CSJ

4. Method of sharing Non-Public Information

Non-Public Information may be shared verbally, in writing, via e-mail, by giving access to, or sharing of, databases or by any other means.

5. Method to control Non-Public Information

Our Companies will take necessary and appropriate steps, including the restriction of access to our Companies’ databases, to prevent Non-Public Information from being wrongly accessed or used illegitimately.

6. Purpose for the use of Non-Public Information

Our Companies may use Non-Public Information for the purpose of appropriately managing our relationships with customers, proposing and providing products and services to our customers and for any other marketing purposes.

7. Method to control Non-Public Information when the sharing of Non-Public Information is discontinued

Customers may request our Companies to discontinue sharing its Non-Public Information at any time in accordance with this notice (Opt-out). Once a customer makes an Opt-out request, each of our Companies will not share Non-Public Information of such customer with the other three Companies for marketing purposes that we obtain after such request is made. We will exercise appropriate information control in maintaining Non-Public Information obtained and shared amongst our Companies before the Opt-out request is made from the customer. Further, we may use such Non-Public Information obtained before Opt-out request is received to conduct solicitation for transactions and any other marketing or business activities.

8. To make a request for our Companies to discontinue sharing Non-Public Information (Opt-out request), please contact the coverage Citi employee for your firm or the information below.



Citigroup Global Markets Japan Inc./ Citibank, N.A., Tokyo Branch / Citigroup Japan Holdings G.K. / Citigroup Services Japan G.K.

1-1, Otemachi 1-chome, Chiyoda-ku, Tokyo, 100-8132, Japan

Phone: 03-6776-4796 (Hours: Monday to Friday 9 a.m. - 5 p.m.)

E-mail: cgmj.optoutcontact@citi.com

Please note that, under the Special Opt-out Structure, an Opt-out request may be submitted by one company representing all your group companies. Otherwise, please contact us as described above for any queries as to the Special Opt-out Structure.

9. With respect to customers that have given consent for information sharing

If a customer has given our Companies a consent to the effect that we may share its Non-Public Information, notwithstanding that the customer is a Subject Customer under the Special Opt-out Structure, the information sharing among our Companies will be made in accordance with the provisions contained in the consent. Please note, however, that, when a customer has submitted a consent where the scope of information sharing is limited to some extent ("Limited Consent"), we may request the customer to agree that, in place of the Limited Consent, it shall be subject to the Special Opt-out Structure. Furthermore, if there is a confidentiality agreement between our Companies and a customer regarding the sharing of specific Non-Public Information of the customer among our Companies, notwithstanding the description of this notice, our Companies will follow the provisions of such confidentiality agreement with respect to that specific Non-Public Information.

10. Commencement of information sharing under Special Opt-out Structure

Information sharing among our Companies under the Special Opt-out Structure shall commence, for customers who are Subject Customers as of June 22, 2022, on and from July 22, 2022 and, for customers who become Subject Customers after June 22, 2022, on and from the day one-month past after the customer becomes a Subject Customer.

Established on June 22, 2022: