

# Solicitation Policy

Citigroup Global Markets Japan Inc.  
Originally Established: March 30, 2001

(1) Matters to consider in light of investment knowledge, investment experiences and financial conditions of customers whom the Firm solicits The Firm endeavors to solicit a customer for an investment which is suitable to the intentions and situations of the customer, having an understanding of the customer's investment experiences, investment purposes and financial capabilities.

The Firm endeavors to solicit a customer for a product which is considered to be appropriate in light of the customer's knowledge, experiences and financial conditions.

When the Firm proposes a product to a customer, the Firm endeavors to provide the customer with an explanation of the details of the product and the associated risks and other relevant matters which are appropriate in light of the customer's knowledge and experiences.

(2) Matters to consider in light of manner of solicitation and time zone for solicitation Upon solicitation, the Firm focuses primarily on obtaining a trust from customers and complies with applicable laws and regulations. The Firm endeavors to solicit customers for investments considering priorities on interests of customers.

The Firm endeavors to solicit customers having a reasonable basis as well as complying with applicable laws and regulations.

The Firm does not solicit a customer making phone calls or visits during a time zone which is inconvenient to the customer. Any customer should feel free to indicate to the salesperson in charge whenever the Firm's solicitation is inconvenient to the customer.

The Firm endeavors to present appropriate contents on its internet website.

(3) Other matters to consider for appropriateness of solicitation

The Firm provides its officers and employees with sufficient internal training for the purpose of preventing any inappropriate solicitation being made by them.

The Firm's officers and employees endeavor to acquire and maintain knowledge and skills on a continuous basis in order to measure up to customers' trust and expectations.

The Firm endeavors to enforce its internal control structure in order to enhance appropriateness in solicitation in compliance with the Financial Instruments and Exchange Law of Japan and other relevant laws and regulations.

The Firm endeavors to provide customers with adequate information to enable customers to engage in transactions based upon their own judgments and responsibilities.

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