

Policy on Customer-Oriented Business Operations

Being a member of the Mitsubishi Corporation Group, Diamond Realty Management Inc. (DREAM) upholds the Three Corporate Principles (Corporate Responsibility to Society, Integrity and Fairness, and Global Understanding Through Business) of Mitsubishi Corporation as its corporate principles, and hereby announces its Policy on Customer-Oriented Business Operations (the “Policy”) which it has established in order to conduct business operations that prioritize customers as a financial services provider with whom customers can feel assured in entrusting their asset management.

Customers of DREAM are mostly specified investors with abundant experience in investing in real estate funds, but also include investors to which final gain/loss belongs in addition to those who conclude contracts directly with DREAM.

Furthermore, DREAM will periodically validate and review the contents of the Policy as well as its own efforts towards the Policy in order to achieve better business operations.

I. Pursuit of best interest of customers

As a group of professionals equipped with rich experience in each field of investment, development and management of real estate, DREAM will provide high quality investment services capable of living up to customers’ trust by fully capitalizing on the information network of the Mitsubishi Corporation Group that encompasses all industries globally, as well as on its solid reputation.

Furthermore, DREAM will pursue the best interest of its customers by striving to establish a corporate culture that encourages each and every employee to have dignity appropriate to a Mitsubishi Corporation Group company and to firmly maintain professional ethics.

II. Appropriate management of conflict of interest

Pursuant to the interested party transaction rules, DREAM assesses the possibility of conflict of interest in transactions with customers so as not to inflict undue damage on customers’ interest.



Specifically, the interested party transaction rules clearly define the scope of interested parties and transactions which may result in conflict of interest.

Furthermore, the rules stipulate that any transactions with an interested party require procedures prescribed in the interested party transaction rules, and particularly with such transactions as those involving sale/purchase of properties, stipulate that the Compliance & Risk Management Committee including outside experts be convened in principle and approval with the favor of outside experts be essentially obtained.

III. Clarification of handling fees

Since the securities DREAM handles and the services it provides cover a broad range of fields and vary in nature, consideration such as handling fees and remuneration paid to DREAM by customers are determined in accordance with specific details of individual transactions, including the specific type of product or service, details of duties and contract period.

As a result, DREAM provides detailed information on handling fees and other costs for all items payable by customers upon transaction, including information on which fees apply to what services, in a manner understandable by customers.

IV. Easy-to-understand provision of important information

DREAM clearly and sufficiently explains important information related to transactions with customers (including the basic scheme of financial products, etc., expected return, risks, terms and conditions of transaction and details of conflict of interest if such is likely) upon consultation with customers while taking into account their needs, asset status, transaction record and knowledge. Furthermore, important information, such as on the management status, is provided in a timely manner using easy-to-understand terms, diagrams, etc. also during the contract period.

Note that DREAM does not currently sell, recommend, etc. multiple financial products/services as a package.

V. Provision of services appropriate for customers

DREAM offers financial products/services appropriate for customers by utilizing the knowledge, experience and wide range of financial know-how in the real estate market possessed by the Mitsubishi Corporation Group, while also taking into account the needs, asset status, transaction record and knowledge of each customer. Furthermore, particularly when selling, recommending, etc. financial products of high complexity or risk, DREAM verifies the appropriateness of selling, recommending, etc. the products



based on its own prescribed transaction commencement standards.

Note that DREAM will not sell, recommend, etc. financial products to those of the group of customers having attributes of being vulnerable to damage from financial transactions.

VI. Framework for properly motivating employees, etc.

While periodically and continuously conducting training for employees to encourage actions to pursue the best interest of customers, fair treatment of customers, appropriate management of conflict of interest, etc., DREAM adopts a personnel evaluation system which takes into account compliance and such in addition to performance.

Furthermore, DREAM properly motivates employees to obtain higher expertise and specialist skills by setting self-development subsidy standards to support acquisition of qualifications related to operations, in order to promote self-development efforts by employees.

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