

## Corporate Ethics and Compliance

### Corporate Ethics and Compliance System

Since September 2002, the ITOCHU Group has implemented a system striving toward thorough compliance under the Corporate Ethics and Compliance Committee, as shown in the diagram below.

In April 2005, because the committee was given an additional function of promoting CSR, it was renamed CSR Compliance Committee.

### Hotline

Every Group employee is required to report violations of laws and other specified situations to his or her superior. In cases where such violations do not get corrected or whistle-blowing would be awkward, a hotline is available for directly contacting the head of the Compliance Office and outside counsels. Written rules are in place guaranteeing that employees suffer no negative consequences for whistle-blowing.

### Compliance Education

We educate and train employees on a group-wide basis to ensure that all employees understand the importance of compliance. Division Companies and group companies also undertake original education and training with manuals prepared by Compliance Officers in cooperation with the Compliance Office.

In fiscal year 2005, we fully revised our compliance education pamphlet for the first time in two years, and distributed it to employees, directors, and officers. The pamphlet was also translated into English and distributed to overseas regional staff.

We also began providing education programs through e-learning. All employees took and passed courses on Information Security and Corporate Ethic and Compliance. In fiscal year 2006, we plan to create new e-learning programs on the "ITOCHU's Credo and Way" and "Corporate Code of Conduct," and have all employees, including overseas regional staff, take the programs.

### Current ITOCHU Group CSR and Compliance System

