**Date:**

**Compliance Check Sheet**

**Trade or company name:**

**Title:**

**Representative:**

**Preparer:**

(1) Do you have internal rules on stock and other transactions by officers designed to prevent conflicts of interest, insider trading, and other risks?

□ Yes (see attached)

□ No (specify by when you plan to establish such rules: \_\_\_\_\_\_\_\_\_\_)

(2) How do you manage undisclosed important corporate information? Describe the internal management structure including the appointment of a person responsible for information management.

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(3) (Answer only if you have your own website or run advertisements)

In running advertisements, do you properly provide information, ensuring to include information on fees (investment advisory fees) and risks involved and not to contain any improper information in presenting the past performance? Do you properly retain the advertisements for future review?

□ We properly provide information and retain relevant documents.

□ We do not retain relevant documents.

□ We do not properly provide some information.

🡪 Specify the information not provided.

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□ We have not yet commenced business.

🡪 If you plan to run advertisements after commencement of business, what information do you intend to include in the advertisements? Please specify the types and content of advertisements, matters you will consider in running them, and how you will retain the content of advertisements.

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(4) How do you solicit customers?

(\*If you have not yet commenced business, provide specific solicitation methods, policies, etc. you plan to implement after commencement of business.)

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(5)-i When do you deliver documents required to be furnished to customers before concluding a contract (hereinafter “designated explanatory documents”) and at what timing do you provide an explanation to customers? Do you properly retain a copy of the documents?

(\*If you have not yet commenced business, indicate what you plan to do after commencement of business with regard to the timing of delivering the designated explanatory documents, the timing of providing an explanation, and the methods of retaining copies of the documents.)

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(5)-ii If you use electronic or magnetic means to deliver designated explanatory documents, etc., what process do you follow in doing so?

(\*If you have not yet commenced business but plan to use electronic or magnetic means to deliver designated explanatory documents, describe the process thereof.)

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(6) Do your investment advisory contracts contain a clause providing for the cooling-off rights of the customer and the procedure for cancellation after the expiry of the cooling-off period, and if so, do you explain the clauses to your customers in concluding a contract?

□ Such information is provided in the designated explanatory documents and properly explained to customers.

□ Some information is not provided in the designated explanatory documents.

🡪 Specify the information not included in the designated explanatory documents.

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□ We have not yet commenced business.

🡪 Specify the planned content of clauses regarding the cooling-off rights and the procedure for cancellation after the expiry of the cooling-off period, and how you intend to explain them to customers.

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(7) How big is the number of cancellations that have occurred during and after the expiry of the cooling-off period?

□ Almost none (no more than 10% of the total number of contracts concluded)

□ More than 10% of the total number of contracts concluded

What are the factors behind the relatively large number of cancellations?

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□ We have not yet commenced business.

(8) Do you properly retain written records of advice given to customers and supporting documents based on which such advice has been given?

□ We properly keep such records in writing and retain them.

□ We do not retain such records and documents.

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□ We have not yet commenced business.

🡪 Specify how you intend to retain materials and other documents after commencement of business.

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(9) Have you ever engaged in the solicitation of investments in, or the sale of, private equities, private equity funds, or other private offerings?

□ No.

□ Yes.

🡪 Specify the transactions.

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