

当社は、「金融商品の販売等に関する法律」第9条における「勧誘方針」を下記の通り定め、この勧誘方針に基づいて、投資顧問契約の勧誘を行ないます。

1. 勧誘の対象となる者の、知識、経験、財産の状況及び投資顧問契約を締結する目的に照らして配慮すべき事項
 - 当社は、お客様の投資目的、資産の状況等を十分把握したうえ、お客様の意向と実情に適合した投資勧誘に努め、お客様の知識、経験、財産の状況及び投資目的に照らして適当と考えられる投資顧問契約をお勧めいたします。
 - 投資顧問契約をお勧めするにあたっては、当社はおお客様の知識、経験、財産の状況及び投資目的に照らして、お客様に理解されるために必要な方法及び程度に配慮し、商品内容やリスク内容等の適切な説明に努めます。

2. 勧誘の方法及び時間帯に関し勧誘の対象となる者に配慮すべき事項
 - 勧誘にあたっては、常におお客様の信頼の確保を第一義とし、法令・諸規則を遵守し、お客様本位の投資勧誘に徹するとともに、合理的な根拠に基づき勧誘を行なうよう努めます。
 - 当社においては、電話や訪問による勧誘は、お客様のご事情を勘案し、適正な時間帯に行ないます。

3. その他勧誘の適正の確保に関する事項
 - 当社においては、金融商品取引法及び関連法令を遵守し、適切な勧誘が行なわれるよう、内部管理態勢の強化に努めます。
 - 当社においては、お客様の判断と責任において取引が行なわれるよう、適切な情報提供に努めます。
 - 当社の役職員は、お客様の信頼と期待を裏切らないよう、常に知識技能の修得、研さんに努めます。
 - 当社では不適切な勧誘が行なわれないよう、役職員に対し十分な社内研修を行なっております。

We have adopted the following solicitation policy as specified in Article 9 of the Act on Sales, etc. of Financial Instruments and performs solicitation of investment advisory contracts in accordance with this policy.

1. Matters that should be considered in light of the knowledge, experience, and financial standing of individuals subject to solicitations and the objectives of concluding agreements for the sale of financial products
 - We solicit investments appropriate for the customer's intentions and circumstances based on an adequate understanding of the customer's investment objectives, asset status, and other factors and shall recommend investment advisory contracts that we believe is appropriate in light of the customer's knowledge, experience, financial standing, and investment objectives.
 - When soliciting investment advisory contracts, we provide appropriate explanations of products and their risks using such methods and to the extent necessary to gain the customer's understanding in light of the customer's knowledge, experience, financial standing, and investment objectives.
2. Matters that should be considered regarding persons subject to solicitations with respect to solicitation methods and times
 - When performing solicitations, we place primary importance on gaining the trust of customers and shall perform all customer solicitations in accordance with applicable law and regulations while striving to conduct solicitations that place primary importance on customers based on reasonable grounds.
 - When we make solicitations by telephone or in person, it shall do so at appropriate times, taking into consideration the customer's circumstances.
3. Other matters concerning the appropriateness of solicitations
 - We comply with the Financial Instruments and Exchange Act, other laws and regulations relevant to our activities and take measures to reinforce its internal control system to ensure that all solicitation activity is appropriate.
 - We strive to provide appropriate information so customers can conduct transactions in accordance with their own decisions and under their own responsibility.
 - Our officers and employees constantly strive to acquire and enhance the knowledge and skills necessary to prevent any betrayal of the confidence and trust of its customers.

- We conduct adequate internal training of our officers and employees to ensure that no inappropriate solicitation takes place.