

Risk Management

Progress in Perfecting the Risk Management System

Ogaki Kyoritsu Bank is committed to managing its risks properly, by keeping them in balance with income. The Company has developed and adopted appropriate and effective risk management systems, based on risk details and scale. These systems comply with the Company's Risk Management Policies, which set out handling policies and organizational structures relating to risk management, and other risk management regulations, management procedures and risk management regulations are stipulated for each risk category.

Specifically, the Company has established committees dedicated to risk management, including the ALM Committee. The Company has also set up sections that manage risks in an integrated manner, as well as risk control and supervisory sections in each category. In doing so, the Company has built a system through which the risk status is reported regularly and as required from the risk management sections to the management directly. Operational audits are also carried out by the Audit Division, which is organizationally independent of the units of the Company that it audits, to confirm the appropriateness and validity of risk management.

Credit Risk Management

Credit risk refers to the risk of a reduction or elimination of asset value, and the resulting loss, owing to factors such as the aggravation of the financial position of borrowers.

The Company carries out rigorous credit screening on an individual loan basis prior to the extension of each loan, based on its Credit Risk Management Regulations, and follows this up with close monitoring of repayment. We also manage our loan portfolio as a whole. Through this two-pronged approach, we are able to maintain the soundness of the Company's loan assets.

Maintaining its objective and independent status, the Loan & Credit Supervision Division applies strict criteria to individual loans in both the credit screening and post-loan management phases to ensure that the loans contribute to the public good, have reasonable prospects of repayment, the loans are profitable, and borrowers have a sufficient degree of future growth potential.

In the management of the Company's loan asset portfolio as a whole, the Company conducts credit rating and self-assessments to ensure that there is no undue concentration of loans in particular industries, in particular corporate borrower sizes, or particular geographic areas. The aim of these regular checks is to disperse risk and create a well-balanced asset portfolio.

Market Risk Management

Market risk refers to the risk of a downward adjustment in the value of the Bank's assets (including off-balance-sheet assets) as a result of fluctuations in market factors, including interest rates, currency exchange rates and share prices, and the risk of a downward adjustment in the value of the Bank's assets as a result of fluctuations in income generated by assets and liabilities. This risk category is principally subdivided into interest rate risk, price fluctuation risk, and exchange rate risk.

Ogaki Kyoritsu Bank has drawn up a set of Market Risk

Management Regulations. The Company controls market risk adequately through the administration of its credit limits. In addition, the Company has established an organization that allows controls to function by separating the market risk management division (middle office) and the office work management division (back office) from the market division (front office).

Liquidity Risk Management

Liquidity risk refers to the possibility that the Company may not be able to secure sufficient funds from its normal sources for necessary operations, due to a mismatched term between fund procurement and investment, or the occurrence of a contingent withdrawal of deposits (known as funding risk). This may result in the Company being forced to take funds at considerably higher interest rates than normal, thus causing the Company to suffer a loss. Liquidity risk also refers to the possibility that the Company may not be able to engage in market transactions, due to factors such as market turmoil (known as market liquidity risk). This may result in the Company being forced to carry out transactions at much more disadvantageous prices than normal, generating a loss.

Ogaki Kyoritsu Bank has drawn up a set of Liquidity Risk Management Regulations. The Company is applying the rules so that it manages its funds in a conservative way. To prepare for any contingency, the Company has also adopted measures to deal with a liquidity crisis, and has established an organization that allows it to make an immediate response.

The ALM Committee

At meetings of the ALM Committee held each month, policies on securities management, funding and other matters are discussed and adopted to improve profitability by keeping market risk, liquidity risk and credit risk within their allowable ranges.

Operational Risk Management

Operational risk refers to the risk of loss resulting from bank business processes, the activities of executives and employees, or systems being inappropriate, as well as from external events.

The Company classifies risks into the categories of (1) administrative risk, (2) system risk, (3) legal risk, (4) human resource risk, (5) tangible asset risk, and (6) reputational risk, and addresses risk management in accordance with the Operational Risk Management Regulations.

Furthermore, at the Operational Risk Management Committee that is held on a regular basis, efforts are made to improve the effectiveness of risk management through discussions aimed at understanding the status of operational risks and possible countermeasures.

The management systems for the administrative risk and system risk, which are key proponents of operational risk, are as follows.

Administrative Risk Management

Administrative risk refers to the risk of losses, as a result of negligence on the part of executives and regular employees in the performance of clerical duties, accidents they cause, or acts of dishonesty they commit.

Ogaki Kyoritsu Bank is working to strengthen the administrative risk management organization in compliance with its Administrative Risk Management Regulations in order to minimize the materialization of foreseeable categories of administrative risk and thereby enable the Company to cope with the diversification of the banking business and the trend toward an increasing number of transactions.

Specifically, we are collecting and analyzing information on administrative errors so that we can put in place measures to prevent any recurrence and improve our administrative processes. We have also set up administrative work support teams to help the branch offices maintain an adequately high level of accuracy in administrative work. Members of the team visit the branches to supervise work procedures directly, and the team also conducts training courses to raise the skill levels of branch staff. In addition, regular training courses are conducted for different rankings of employees by division to raise the administrative skill levels of the whole Bank.

System Risk Management

System risk refers to the risk of the Company suffering monetary loss as a result of the crashing or serious malfunctioning of one or more of the Company's computer systems, or the unauthorized use of a computer system.

In view of the vital importance to a bank of the information in its possession and of the computer systems it employs, Ogaki Kyoritsu Bank has taken appropriate steps to protect the information in its safekeeping and to ensure the secure and continued operation of its computer systems.

Specifically, the Company has instituted computer system risk management, and has laid down the System Risk Management Regulations, which set out policies regarding the management

of the computer systems themselves and the data (information) contained within them. The Company is exerting its full efforts to assure the confidentiality of information in its possession through the application of the Regulations.

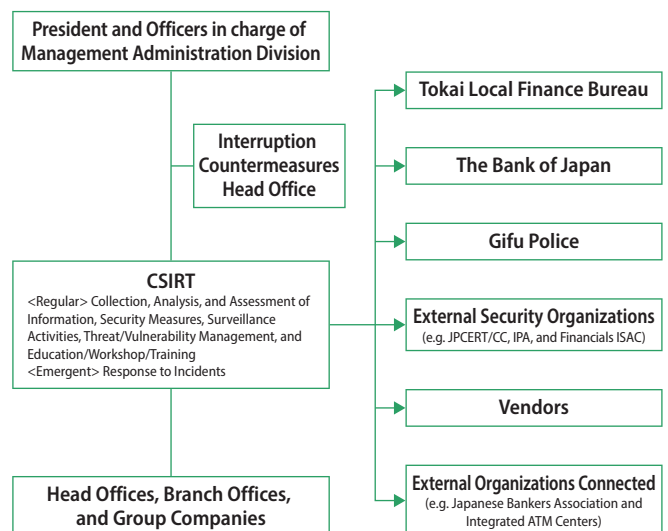
Information Asset Management

The term "information assets" as used here refers both to information itself and to the computer systems. In the event that confidential information is leaked to persons outside the Company, or improper use is made of the Company's information assets, the Company could suffer considerable damage.

To ensure that Ogaki Kyoritsu Bank conducts its banking business in an ethically correct manner, we have published our Security Policy, which clarifies the principles that the Company applies to the protection of information assets, in addition to the Customer Information Management Regulations, which set out in detail the procedures to be followed for the proper protection and use of the Company's customer information assets.

Response to Cyber Security

We established the CSIRT, a cross-functional organization, to respond to the threat of cyber-attacks, and have early warning and emergency response systems in place to respond to cyber-attacks.



Initiatives to Improve the Effectiveness of Cyber Security Countermeasures

- Collection and analysis of threat trends and security-related information
- Evaluation of cyber security countermeasure implementation status
- Verification of contingency preparedness through joint exercises and drills
- Training of security personnel to promote PDCA