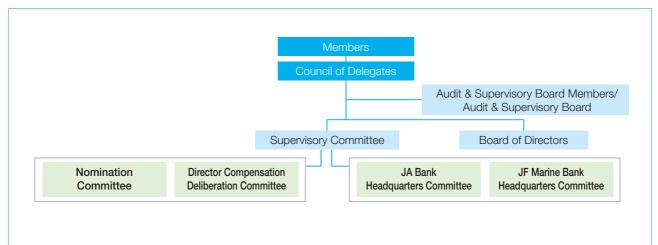
Organizational Foundation **Governance**

Part 1

To fulfill its fundamental mission as the central financial institution for Japan's agricultural, fishery and forestry cooperatives, as well as its social responsibility, The Norinchukin Bank views the construction of management control systems as its top priority issue in management.

Corporate Governance

The Bank is both the national-level organization for Japan's agricultural, fishery and forestry cooperatives as well as an institutional investor that plays a major role in the financial and capital markets through investment of funds in Japan and overseas. Naturally, the Bank adheres to decisions made within the Council of Delegates comprising representative members of all shareholders. At the same time, the Supervisory Committee and the Board of Directors, as stipulated by the Norinchukin Bank Act, are organized to share duties as well as coordinate the Bank's decision-making, while taking into consideration the internal and external situations of the cooperatives.

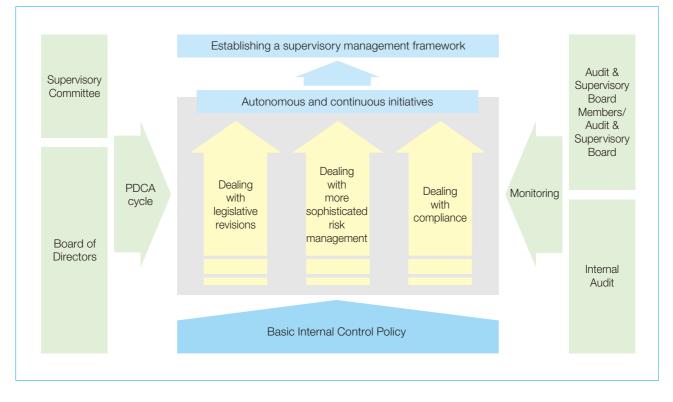


Management System of the Bank

Initiatives for Strengthening Internal Control

For the Bank to fulfill its fundamental mission as the central organization for Japan's agricultural, fishery and forestry cooperatives as well as its social responsibility, the Bank views the construction of management control systems as its highest priority. It has established basic policies for internal control to secure compliance with corporate ethics rules and relevant laws and regulations, proper management of risks, as well as appropriate business activities in general.

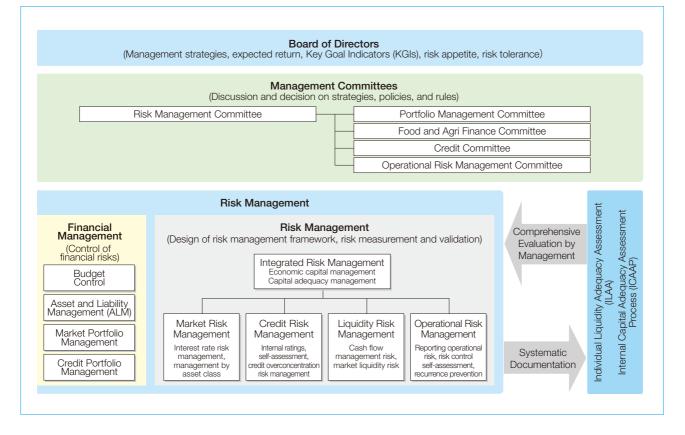




Risk Management

In line with the Basic Policies for Risk Management, which identify the types of risks to be managed and the basic framework for risk management, including organizational structure and methodology, the Bank manages individual risks after assessing the materiality of risks and identifying risks to be managed and implements integrated risk management by measuring the overall amount of risk using quantitative methods and comparing it with the Bank's capital resources.

Risk Management System



Organizational Foundation Corporate Ethics

Part 1

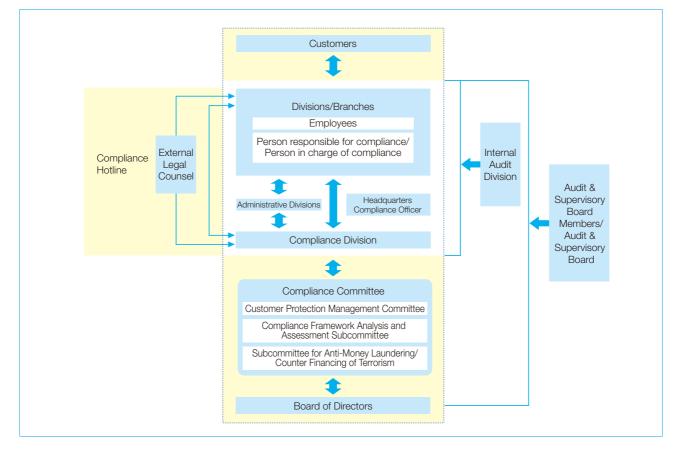
To carry out business operations with the trust of society, The Norinchukin Bank ensures that it complies with the related laws and regulations and acts with a high level of corporate ethics.

Compliance

As a financial institution whose business is founded first and foremost on trust and confidence, the Bank recognizes that not only the creation of a compliance framework but also its continued effectiveness enhancement is particularly important.

The Bank is committed to fulfilling its basic mission and social responsibilities. To prove itself worthy of its customers' and members' trust in light of changes in the social and business environment, the Bank continues its unceasing efforts in the area of compliance by managing its business in accordance with societal norms, for instance by fully complying with laws and regulations based on the principle of total self-reliance. We are also constantly working to achieve a higher degree of transparency by emphasizing proper disclosure and accountability.

By promoting awareness of the Compliance Manual among all directors and employees, we seek to ensure compliance when carrying out business operations and daily activities.



Compliance Framework

Organizational Foundation Respect for Human Rights

As a financial institution committed to global investing and financing activities, The Norinchukin Bank aims to contribute to the sustainable growth of the economy and society with trust of a wide range of stakeholders. With a view to international human rights issues, the Bank is committed to establishing an organizational culture that is highly transparent and based on the concept of respect for human rights as specified in the Code of Ethics. Education on various human rights issues is offered to directors and employees on a continual basis.

Basic Concept on Respect for Human Rights

In the Code of Conduct, the Bank mentions respect for human rights and the building of a workplace for employees to work with a sense of security. Discriminatory words and actions because of race, creed, sex, age, nationality, ethnic group, religion, social status and physical features are unacceptable in or outside the workplace. All directors and employees of the Bank are strictly advised not to engage in such acts or language under any circumstances.

Response to Global Human Right Issues

In addressing global human rights issues, we adhere to and respect the international standards, including the Universal Declaration of Human Rights; the International Covenant on Civil and Political Rights; the ILO Declaration on Fundamental Principles and Rights at Work; and the UN Global Compact. In addition, we comply with the domestic laws of the nations where we operate and prepare or update the rules and regulations on operations concerning human rights in the course of our business activities. In recent years, awareness of human rights is demanded for not only the Bank but also its entire supply chain. While referring to the Guiding Principles on Business and Human Rights, the Bank will continue to address issues of human rights from various angles, including Compliance with the UK Modern Slavery Act 2015.

UK Modern Slavery Act 2015 Transparency Statement

The UK Modern Slavery Act 2015 requires any commercial organization that has a certain annual turnover to produce a statement setting out what steps have been taken to ensure there is no slavery, forced labor or human trafficking in their business or their supply chain. The Bank has posted a statement required by the UK Modern Slavery Act 2015 since September 2016 on its English Web site. Called the Transparency Statement, it stresses that acts of slavery, forced labor and human trafficking are contrary to the Bank's mission and sets out the Bank's attempts to ensure such acts will not happen.

Part 1

Building a Working Environment with Respect for the Individuality of Employees and Attention to Their Health and Safety

Part 2

The Bank's biggest managerial source is each of its staff. The Bank's business operations are supported by the daily acts completed by each employee. To ensure that each employee fully demonstrates his/her abilities and assumes his/her role in an appropriate manner, we are committed to establishing an organizational culture that respects each person's individuality and creative ideas and encourages the free and active exchange of opinions, and to building attractive workplaces where staff can work with high motivation in life and a sense of fulfillment.

Educational Activities to Develop an Awareness of Human Rights

The Bank's business operations are supported by its customers. It is important that all directors and employees of the Bank have a sense of human rights with respect for the position and personality of the other person. To fulfill the Bank's fundamental mission, each director and employee respects the position of a customer and treats him/her with sincerity; acquires deep insights and highly professional knowledge; and behaves as a valued member of society.

Toward the establishment of a highly transparent organizational culture based on the concept of respect for human rights, we are carrying out educational activities on human rights on a continual basis, in line with the policy decided by the board of the Human Rights Promotion Council.

To prevent harassment at the workplace, including sexual harassment, power harassment and harassment on the basis of pregnancy, childbirth and childcare and nursing care leaves, we engage in various activities, such as providing e-learning and position-by-position education, guidance and consultation by the persons in charge of human rights issues at each store, and external contacts for consultation.

Specific Efforts to Raise Awareness of Human Rights (FY2018)

Basic Policy

- Ensure compliance with the Code of Ethics and the Code of Conduct (to establish a highly transparent organizational culture based on the concept of respect for human rights)
- · Strengthen efforts to prevent harassment at the workplace
- · Enhance the awareness of human rights of each directors and employees

Respect for Human Rights

Efforts in detail		
Category	Description	Details
Trainings on human rights	 Trainings by position Trainings by job field e-learning 	 Provide a session on human rights at major training opportunities Hold human rights seminars at the Bank's head office, branches, offices and overseas sites Provide human rights education for all directors and employees
Support for Group companies	Support for trainings on human rights	 Consultations on human rights seminars, etc. Provide the head office trainings on human rights via video conference Lend training equipment or supply e-learning materials
Individual consul- tations	Harassment hotline	 Disseminate information on the harassment hotline Protect the privacy of persons concerned and provide swift responses
Others	Responses to the diversifica- tion and internationalization of human rights issues	• Raise awareness of various human rights issues, including compliance with the UK Modern Slavery Act, through training sessions or other means

Human Rights Seminars

The Bank's 37 business sites in Japan hold human rights seminars each year, and all directors and employees are required to participate in at least more than one. The head office seminars are conducted under a broad range of themes, featuring guest lecturers versed in various fields, and are delivered to other business sites via video conference.

Organizational Foundation Stakeholder Engagement

The Norinchukin Bank's businesses are operated upon a relationship of trust between the Bank's various stakeholders and its directors and employees.

The Norinchukin Bank's Stakeholders and Engagement Opportunities

The Norinchukin Bank's Stakeholders

- Members such as JA, JF and JForest
- Individual members belonging to the above members (people working in the agricultural, fishery and forestry industries), corporate customers making deposits and savings and/or borrowing money mainly related in the agricultural, fishery and forestry industries
- People in local communities
- · Overall business partners, such as financial institutions, market players and subcontractors
- Governments
- Employees

The relationship of trust with these stakeholders, who are closely related to the Bank's management and daily business operations, has been forged over the many years since the Bank was established.

This trust relationship is a precious asset of the Bank, and maintaining and strengthening this relationship is highly important for the Bank to fulfill its fundamental mission and social responsibilities.

To this end, we value disclosure and accountability to our stakeholders and will make continued efforts to promote a highly transparent organizational culture.

