

# Millea Group CSR Report 2005



# Contents / Group Overview

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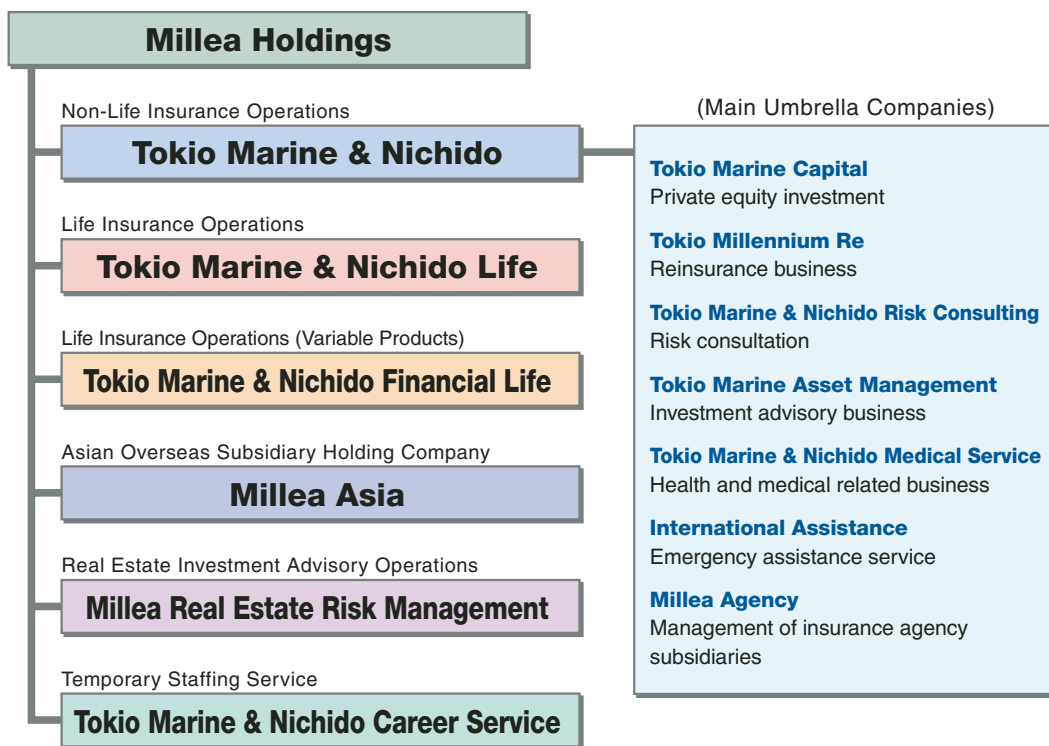
## Editorial Policy

Previously, our annual “Environmental Report” was published by Tokio Marine. However, this year Millea Group has taken the opportunity presented by the enactment of the Group CSR Charter to publish its first ever “CSR Report” for the group as a whole.

Our CSR Charter is made up of the six headings of “Products and Services”, “Respect for Human Rights and Dignity”, “Protection of the Global Environment”, “Contribution to Communities and Societies”, “Compliance”, and “Communication”. This report aims to provide information on the activities of Millea Group in the six areas defined in the Charter to our many stakeholders that include our shareholders, customers, agents, employees, and regional communities.

Millea Group considers this report to be one of its key communication tools. Through communication with all our stakeholders, we aim to continuously improve the content of this report.

※Limited liability company indications have been removed (as throughout the report)



## About This Report

### Organizations Covered in This Report

This report basically covers the activities of all companies within Millea Group.

### Reporting Period

This report basically covers activities from the 2004 Fiscal Year (from April 2004 until March 2005). However, there are passages where information from outside this time period has been provided in order to give complete explanations.

### The Publication Date

- The previous report (Tokio Marine "Environmental Report 2004") was published in August 2004.
- The publication date for this report is July 2005.
- The next projected publication date is July 2006.

### Referred Guidelines

- GRI (Global Reporting Initiative) "Sustainability Reporting Guidelines 2002".
- United Nations "Global Compact Guidelines for Communication on Progress (COPs)".
- Ministry of Environment "Environmental Reporting Guidelines (2003 Edition)".

### Significant Areas of Change from Last Year's Report

The following are points of significant areas of change from the "Environmental Report 2004" published last year by the former Tokio Marine:

- (1) Expansion of report scope arising out of the switch from an "Environmental Report" to a "CSR Report".
- (2) Expansion of reporting organization scope with the change from publication by Tokio Marine to Millea Group.

- (3) In October 2004, the two group companies of Tokio Marine and Nichido Fire merged to form Tokio Marine & Nichido.

As a result of the above, there have been a number of changes in organizations behind company initiatives, names, and the collection scope of related data, all of which results in this report not being easily comparable in many areas to the former Tokio Marine's "Environmental Report 2004" of last year.

### Means of Obtaining Further CSR Related Information

- IR and Financial Related Information:  
<http://www.millea.co.jp/en/index.html>
- Compliance:  
<http://www.millea.co.jp/en/conduct/index.html>
- Contribution to Communities and Societies, and Communication:  
[http://www.millea.co.jp/en/social\\_respon/social.html](http://www.millea.co.jp/en/social_respon/social.html)
- Protection of the Global Environment:  
[http://www.millea.co.jp/en/social\\_respon/earth.html](http://www.millea.co.jp/en/social_respon/earth.html)
- Products and Services:  
(Tokio Marine & Nichido)  
<http://www.tokiomarine-nichido.co.jp/index-e.html>  
(Tokio Marine & Nichido Life)  
<http://www.tmn-anshin.co.jp/> (in Japanese)  
(Tokio Marine & Nichido Financial Life)  
<http://www.tmn-financial.co.jp/> (in Japanese)  
(Tokio Marine & Nichido Career Service)  
<http://www.tcshaken.co.jp/> (in Japanese)  
(Millea Real Estate Risk Management)  
<http://www.mirerim.co.jp/> (in Japanese)

# Message From The President

**The Millea Group is committed to fulfilling its corporate social responsibilities (“CSR”) by implementing its Corporate Philosophy to achieve sustainable growth together with the development of society.**



President, Millea Holdings, Inc.



## What CSR Means to Millea Group

It is set down in our corporate philosophy that “Millea Group is committed to the continuous enhancement of corporate value, with customer trust at the base of all its activities.” Millea Group seeks to continue growing together with the various stakeholders of customers, shareholders, society, and group company employees that support us. We believe that the overall value we provide to each of our stakeholders represents our “Group Corporate Value”, and work hard to improve our Group Corporate Value while achieving mutual sustainable growth together with society as a whole. It is our belief that the fulfillment of our corporate social responsibilities can be achieved through actions based upon following our corporate philosophy.

## CSR Initiatives of Millea Group

For Millea Group, the year 2005 marks our first year of full scale CSR initiatives. Thus, for us it is our “inaugural CSR year”. In November 2004, we set out the “Millea Group CSR Charter” as an action agenda to spread awareness of CSR amongst all group employees, and to put our corporate philosophy into action in a concrete manner. This charter sets out six fundamental pillars that serve as principles for taking action, which are “Products and Services”, “Respect for Human Rights and Dignity”, “Protection of the Global Environment”, “Contribution to Communities and Societies”, “Compliance”, and “Communication”. In order to promote the adoption of concrete actions across the group as a whole, we have set out a “2005 Millea Group Annual CSR Plan”. In addition, we have also set up a “CSR Board” made up of group executives to act as a central entity to oversee and promote our various CSR initiatives.

## The United Nations Global Compact

As of April 2005, the two companies of Millea Holdings and Tokio Marine & Nichido began participating in the United Nations Global Compact. The Global Compact is a grand scheme to ensure that all people are able to share in the benefits and opportunities presented by globalization, through businesses adhering to ten principles relating to such areas as human rights, labor, the environment and anti-corruption measures. We seek to apply these kinds of universal principles in developing our business activities globally acting as a good corporate citizen.

## Looking Back at 2004

From the insurance perspective that makes up the core business of Millea Group, last year was one that will not soon be forgotten. With a record 10 typhoons making landfall in Japan, and major earthquakes in Niigata and Fukuoka, as well as the Great Indian Ocean Tsunami, there were a remarkable number of natural disaster events both in Japan and abroad that led to tragic loss of life. We were proactively involved in relief efforts offered to victims in these disaster areas. From among these efforts, we felt our appreciation of the importance of CSR activities was affirmed when we learned through news reports that during the Great Indian Ocean Tsunami, the green breakwater provided by mangroves had mitigated tsunami damage. Millea Group, primarily through Tokio Marine & Nichido is now in the 6th year of its "Mangrove Reforestation Project" which has achieved replanting of mangroves in an area in excess of 3,000 hectares. Some of these mangroves played a part in absorbing some of the energy of the tsunami, protecting people and their livelihoods. The original purpose of this initiative was to offset our business related CO<sub>2</sub> emissions and to become carbon neutral in order to contribute to global environmental protection. However, it has also ended up making a contribution in the area of disaster prevention.

## On the Publication of this CSR Report

Up until FY 2004, Millea Group has published an annual environmental report through Tokio Marine (which merged with Nichido Fire in October 2004 to form Tokio Marine & Nichido Fire Insurance). However, from this year onwards, we will publish a CSR Report with scope broadened to cover the entire group, in order to promote CSR activities throughout group companies.

CSR activities cover an extremely broad range of topics. We believe it is important to recognize that all our day to day activities are linked to CSR. Throughout the course of preparation of this report, we have renewed our own awareness of the very broad base that makes up CSR activities, and aim to take actions that encourage all group executives and employees to incorporate CSR into their daily activities.

Millea Group has expressed its long term strategy goal of becoming a "Top Ranked Global Insurance Group". Our executives and employees will work hard as one to develop CSR activities worthy of this goal, and so we sincerely look forward to your further support and encouragement.



## Millea Group Corporate Philosophy

**The Millea Group is committed to the continuous enhancement of corporate value, with customer trust at the base of all its activities.**

- By providing customers with the highest quality products and services, we will spread safety and security to all around us.
- For fulfilling our responsibility to shareholders, we will pursue global development of sound growing and profitable businesses.
- For promoting the creativity of each and every employee, we will foster a corporate culture which encourages free and open communications.
- While demonstrating responsible management as a good corporate citizen, we will make a positive contribution to society.



# CSR Charter / CSR Promotion Framework

Millea Group aims to fulfill our corporate social responsibilities while achieving mutual sustainable growth together with society as a whole, as we increase the “Group Corporate Value” we provide to each of our stakeholders.

## CSR Charter / CSR Promotion Framework

### CSR Charter

Millea Group enacted its “CSR Charter” based on its corporate philosophy as a common policy for promoting concrete initiatives in the area of CSR across all group companies. The creation of this charter was carried out based on such precepts as seeing business as a social entity, tying our own growth to that of developing sustainability across society in general, encompassing a set of stakeholders stretching broadly across the world, respecting a diverse set of values, and placing an emphasis on communication. The main message it enshrines is the clear statement that implementing our corporate philosophy will lead on to promotion of CSR. Furthermore, in the message given for each item, specific initiative policies are spelled out for each area of CSR.

#### Millea Group CSR Charter

The Millea Group is committed to fulfilling its corporate social responsibilities (“CSR”) by implementing its management philosophy to achieve sustainable growth together with the development of society, in accordance with the following principles:

##### ●Products and Services

-We aim to provide society with products and services to meet its needs for safety and security.

##### ●Respect for Human Rights and Dignity

-We respect and actively promote the recognition of human rights.  
-We strive to ensure an energetic working environment that is both safe and healthy and to promote training and education of our employees.  
-We respect the right to privacy and strive to enforce sound information management and control.

##### ●Protection of the Global Environment

-Acknowledging that the protection of the global environment is an important responsibility for all corporate entities, we respect harmonization with and improvement of the global environment in all of our activities.

##### ●Contribution to Communities and Societies

-As a member of various communities and societies, we respect the diversity of cultures and customs and we aim to contribute actively to the needs of the current era.

##### ●Compliance

-While striving to maintain high ethical standards at all times, we will pursue strict compliance in all aspects of our business activities.

##### ●Communication

-We intend to disclose information timely and appropriately and to promote dialogue with all our stakeholders to ensure effective corporate management.

## Participation in the United Nations Global Compact

Millea Holdings and Tokio Marine & Nichido Fire Insurance participate in the UN Global Compact as part of their CSR activities. The UN Global Compact (UNGC) was officially launched in July 2000 at UN Headquarters in New York, in accordance with the basic philosophy of the ten principles of business activities relating to human rights, labor, the environment and anti-corruption measures (see Exhibit) that were proposed by United Nations Secretary General Kofi Anan at the World Economic Forum in Davos, Switzerland, in January 1999. Our participation was based on the fact that the philosophy and content of the Compact shares the same philosophy applied to CSR within Millea Group and its CSR Charter. Millea Group will implement CSR activities based on the principles defined by the UNGC from now on, and plans to demonstrate its activities through various communication tools.



### The Ten Principles

#### (Human Rights)

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and  
Principle 2: make sure that they are not complicit in human rights abuses.

#### (Labor Standards)

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;  
Principle 4: the elimination of all forms of forced and compulsory labour;  
Principle 5: the effective abolition of child labour; and  
Principle 6: the elimination of discrimination in respect of employment and occupation.

#### (Environment)

Principle 7: Businesses should support a precautionary approach to environmental challenges;  
Principle 8: undertake initiatives to promote greater environmental responsibility; and  
Principle 9: encourage the development and diffusion of environmentally friendly technologies.

#### (Anti-Corruption)

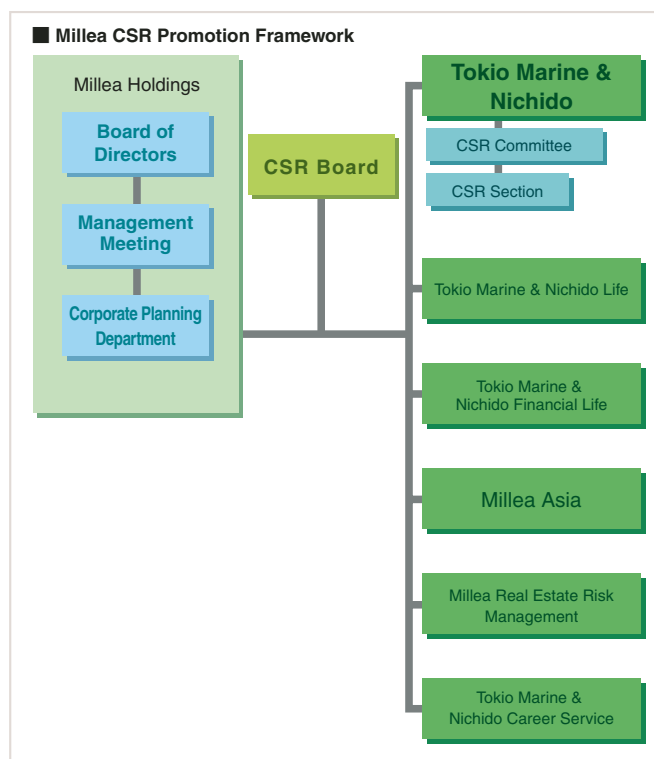
Principle 10: Businesses should work against all forms of corruption, including extortion and bribery.

## CSR Promotion Framework

In tandem with the creation of the CSR Charter, Millea Group has also set up a “CSR Board” that serves as the main entity promoting CSR related initiatives within group member companies. The CSR Board is headed by the President of Millea Holding and made up of chief executives from each group company. It fulfills the function of promoting CSR initiatives across the group as a whole. Following the basic policies and plans set out by the CSR Board, group companies oversee promotion of CSR among their own subsidiary companies while constructing their own tailored frameworks.

## Establishment of a CSR Section & CSR Committee (within Tokio Marine & Nichido)

Within Tokio Marine & Nichido, the recent merger was taken as an opportunity to establish a CSR Section within the Corporate Planning Department, to be dedicated to strengthening promotion of CSR. This CSR Section took over the role of the former Corporate Philanthropy & Environmental Preservation Section within the Corporate Administration Department of Tokio Marine which was responsible for promoting the environmental and philanthropic initiatives of that company. In addition, in November 2004 we established a “CSR Committee” in charge of sharing information among relevant departments and strengthening the effectiveness and promotion of initiatives.



## The Tokio Marine & Nichido Corporate Value Index - CSR Indexing

Within Tokio Marine & Nichido, corporate value is defined as the total value generated for all of our stakeholders. Tokio Marine developed a “Corporate Value Index” in 2003 to rate itself based on the view that it is important to review the effectiveness of company policies on a yearly basis to quantitatively measure whether they are leading to concrete improvements in value.

This self evaluation is carried out for the five stakeholder groups of customers, shareholders, agents, employees, and society, over nine designated areas to be evaluated, adding up to a final score given out of 1,000 points. While ascertaining the satisfaction levels of important CSR stakeholders such as customers, agents and employees, the CSR Index has also newly added themes such as promotion of women and the disabled, compliance, greenhouse gas emissions, contributions to regional communities, and participation in volunteer work. With this index, we aim to measure and verify the level of progress in implementing our corporate philosophy and CSR actions, and to tie into overall business strategy evaluation and planning.

Area of Evaluation	Main Index
Customer Relationship	Number of individual customers, proportion of small and medium sized enterprise transactions, proportion of large company transactions, feedback from (corporate) customer questionnaires, etc.
Agent Relationship	The proportion of insurance premiums obtained from leading agencies, feedback from customer questionnaires (about our agents), etc.
Leadership of Management	Surveys results on our external corporate image, feedback from employee questionnaires, etc.
Organization and Human Resources System	Employment rates of disabled, number of female staff (above a certain rank), feedback from employee questionnaires, etc.
Corporate Culture	Greenhouse gas emissions, number of cases of employees involved in making contributions to local communities, number of employees taking special volunteer-work leave, survey results regarding our external corporate image, etc.
Strength of Employee Skills and Business Processes	Compliance, surveys regarding our external corporate image, feedback from customer/agent questionnaires (on our employees, services, etc), feedback from employee questionnaires, etc.
Product Strength	Survey results regarding our external corporate image, feedback from agent/employee questionnaires, etc.
Brand Strength	Survey results regarding our external corporate image
Profitability and Soundness	Financial rating, ROE, etc.

# Corporate Governance

We have a sound and highly transparent corporate governance framework which enables us to effectively control each of our group companies and to conduct appropriate risk management.

## Current State of Corporate Governance

Millea Holdings is committed to the continuous enhancement of corporate value by fulfilling its responsibilities to shareholders, customers, society, employees and other stakeholders, in line with Millea Group's Corporate Philosophy. For this purpose, Millea Holdings maintain a sound and transparent corporate governance system and, as a holding company, aims to exercise appropriate control over its group companies.

### Board of Directors

The Board of Directors is responsible for deciding important matters relating to the execution of Millea Holdings' business, supervising the performance of individual directors, and establishing an effective internal control system. In addition, it is also responsible for determining medium to long-term business strategies and various basic business policies for Millea Group. The number of directors shall generally be approximately ten members, of whom, as a general rule, at least three shall be outside directors.

### Corporate Auditors and the Board of Corporate Auditors

Corporate auditors shall audit the performance of directors in accordance with the regulations of the Board of Corporate Auditors as well as the audit standards, audit policy and audit plan determined by the Board of Corporate Auditors. The number of corporate auditors shall generally be around five. As a general rule, a majority of the corporate auditors shall be external corporate auditors. Furthermore, as a general rule, at least one corporate auditor shall be qualified as an "Audit Committee Financial Expert" within the meaning of the rules of the United States Securities and Exchange Commission.

### Nomination Committee and Compensation Committee

The Nomination Committee shall deliberate on the appointment and discharge as well as the appointment criteria for directors and corporate auditors of the subsidiaries of Millea Holdings, and report to its Board of Directors. The Compensation Committee shall deliberate on the evaluation of the performance of directors of the principal

subsidiaries of Millea Holdings and the director's compensation system, and report to the Board of Directors. The Nomination Committee and the Compensation Committee shall generally each consist of approximately five members. As a general rule, a majority of the members of each committee shall be selected from outside the company, and the chairman of each committee shall be one of the outside members.

## Compensation Scheme for Directors and Corporate Auditors of Millea Group

Compensation for full-time directors of Millea Holdings and its main subsidiaries consists of three elements: fixed compensation; bonuses related to the business performance of Millea Holdings and the performance of individuals; and stock options. Compensation for corporate auditors and part-time directors consists of two elements: fixed compensation and stock options.

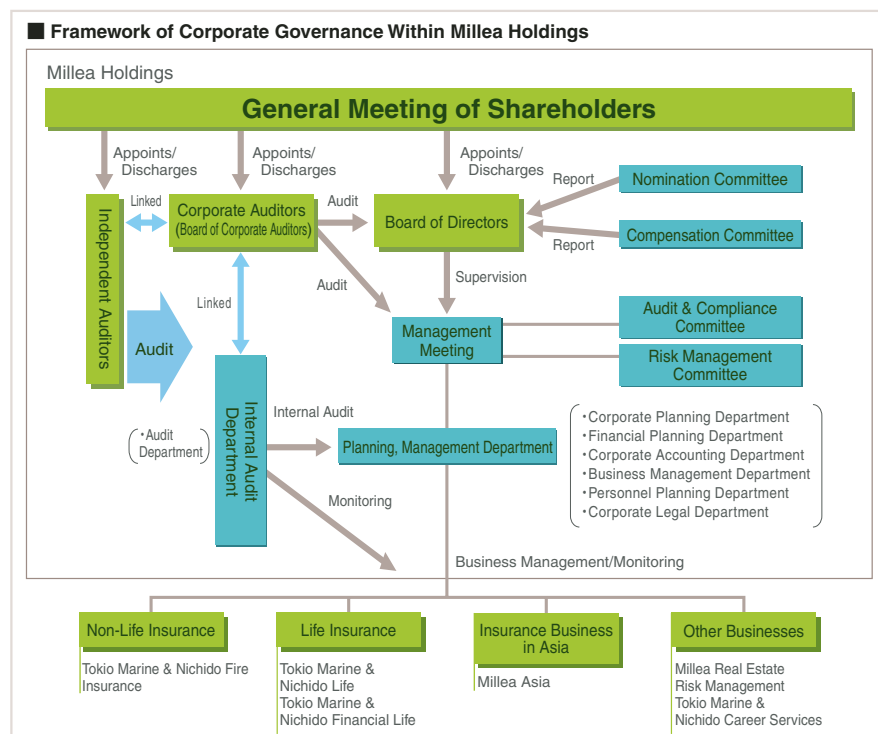
## Governance of Subsidiaries

### Governance System

Millea Holdings shall exercise its shareholder rights over its subsidiaries in an appropriate manner. In addition, Millea Holdings shall enter into business management agreements with each subsidiary and exercise effective control over the subsidiaries, setting out the basic policies for Millea Group and pre-approving matters such as corporate strategies and plans.

### Evaluation of the Business Results of the Subsidiaries

Millea Holdings shall evaluate the business results of each subsidiary of Millea Group on an annual basis, comparing actual results with previously determined indices. The results of such evaluations shall be considered in the determination of the compensation for the directors of each subsidiary.





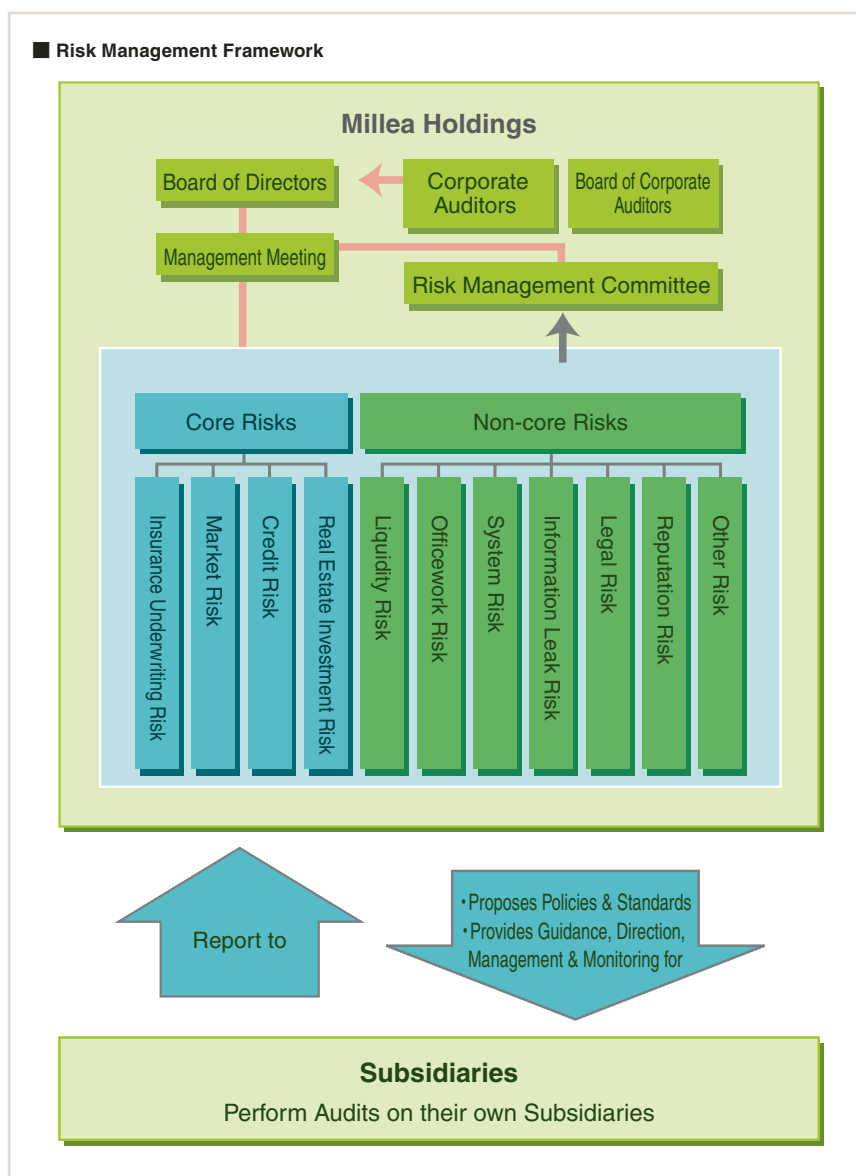
## Risk Management Framework

Millea Holdings tracks the state of risk for the entire group, and assumes the role of overseeing group-wide risk management.

In respect of insurance underwriting risk and investment risk (market risk, credit risk and real estate investment risk), Millea Holdings sees these as core risks related to its source of earnings that it must control, and manages such risks proactively and comprehensively. Furthermore, in respect of office work risk, system risk and other such risks accompanying business activities, actions are taken to identify these risks and to work to prevent or mitigate them through appropriate risk management, to ensure stable business management.

## Internal Audit Framework

Within Millea Group, internal audits are executed based on the belief that “in order to play an effective role in achieving our management targets, internal audits covering the full scope of operations performed in our business should not simply uncover and highlight issues found within internal office processes, but also include evaluations and highlight issues regarding our internal management framework, and propose methods of improvement.” Within Millea Holdings and its insurance subsidiaries, each company has its own specialized internal audit section, that performs internal audits accounting for types of risk and risk levels within the “Risk Management Framework” and a “Compliance Promotion Framework”, which make up the key pillars of risk management. For other subsidiaries which have no specialized internal audit department, Millea Holdings’ internal audit section directly carries out audits, and performs monitoring of the internal audit management framework. The results of these audits are reported to the internal audit department of Millea Holdings, as well as the Board of Directors of each member company of the group. Based on the audit findings, a report is submitted to the Board of



Directors of Millea Holdings in the event that serious issues are uncovered.

### Consistent Internal Auditing Framework as a Group

A set of unified “Internal Audit Policies” and “Internal Audit Rules” are applied to all internal audits performed by specialized internal audit sections within group companies, in order to maintain consistency among all internal audits. In addition, Millea Holdings defines key points and issues to be taken up each year, and works towards construction of a consistent internal

auditing framework throughout the group through such measures as pre-approving subsidiary’s annual internal audit plans.

### Joint Audit

In order to raise the effectiveness of internal audits, there are also cases where the internal audit departments of each subsidiary work together.

# Our Contributions in the Wake of the Great Indian Ocean Tsunami

Tokio Marine & Nichido practices provision of “safety and security” set out in its corporate philosophy from an environmental protection perspective with its mangrove reforestation activities. Recent events have shown that these mangroves also provide “safety and security” from a disaster prevention.



The Ranong Mangrove Reforestation Zone. Although the tsunami swept away small boat piers and huts, land behind the mangroves was protected.



Regions lacking vegetation like mangroves were struck directly by the tsunami, and suffered enormous damage (a photo showing this kind of damage in Sri Lanka)



Similarly, a ship struck directly by the tsunami in an coastal area lacking vegetation (in Sri Lanka)

## The Role that Mangroves Play

Tokio Marine & Nichido kicked off the Mangrove Reforestation Project in April 1999, and by 2003 had reached its target of reforesting a 3,000 hectare area in the five Southeast Asian countries of Indonesia, Thailand, Philippines, Myanmar and Vietnam. This project began with the aim of offsetting the carbon dioxide emissions caused by the business activities of Tokio Marine & Nichido by replanting an area of mangroves sufficient to absorb the same amount of carbon dioxide, neutralizing the global warming burden of our company. At present, having succeeded in reaching our 3,000 hectare first phase reforestation target, we are now in the second project phase starting in April 2004 that plans to reforest a further 2,000 hectares of mangroves over a five-year period.

These mangrove forests played a major role in preventing damage resulting from the Great Indian Ocean Tsunami that was caused by the Sumatra-Andaman Earthquake. As was widely shown in the media, the tsunami caused extensive damage to buildings in regions along Indian Ocean coastlines. However, in regions where mangroves were present, those mangroves slowed the momentum of the tsunami, minimizing the damage caused.

Mangroves flourish in coastal areas, and are firmly attached to the ground with uniquely shaped roots. The upper part of these plants is soft and flexible, and can grow to a height of around 10 to 20 meters. These mangrove characteristics acted as a natural wavebreak against the Indian Ocean Tsunami waves often seen as being around 10 meters high, proving effective in absorbing the enormous energy of the tsunami. Not only were the mangroves reforested by Tokio Marine & Nichido undamaged by the tsunami, but also the damage suffered by people living behind them was held to a minimum. While it has previously been well known that mangroves play a role in preventing coastal erosion and storm damage by protecting coastal and surrounding areas, there had been no such previous confirmation of their effectiveness in mitigating such large coastal disasters as tsunamis.

Over the last 30 to 40 years, mangrove deforestation has advanced with up to 80% lost in some countries within the Southeast Asian region due to their conversion into prawn farms, construction of factories and roads, and use as an energy source. Here at Tokio Marine & Nichido, we will continue to expand these forests of the sea that provide safety and security to the Earth and to people with a view not just to ecosystem protection and preventing global warming, but also to disaster prevention.

## Expert Comments on the Buffer Effect Mangroves Had on the Tsunami

[Professor Fumihiko Imamura, Director of the Disaster Control Research Institute of Graduate School of Engineering, Tohoku University]

During the Great Indian Ocean Tsunami, in regions without mangroves, there were many cases of people being injured by floating debris, and many cases of children lacking in strength who did not survive. Mangroves allow a certain degree of water to pass through, but large objects tend to get caught up in them, serving as a means of injury prevention from floating debris. Furthermore, it has been verified through scientific tests that by reducing the speed and height of waves, mangroves had an effect of dissipating the energy of the tsunami. They have been shown to be effective in cases of evacuations, in that it can slow the speed at which a tsunami strikes.

The onward advance of human-induced deforestation in recent years

has weakened the disaster preparedness of many of these regions. Had the mangroves not been deforested in the first place, it is likely that this would not have become such an enormous disaster. We have broken down the very barriers that protect us.

There is the suggestion that instead, breakwaters could be used, but taking the example of concrete breakwaters, this seems like rather strong medicine. While these provide 100% protection when tsunamis striking them are less than the height of the breakwater, when the wave height exceeds the breakwater, the power of the wave is undiminished and damage become enormous.

In contrast, mangroves are like traditional Chinese medicine in that while they do not completely block inundation, they

have an overall effect of broadly blocking debris in a manner that is gentle on the environment. Rather than using such breakwaters, it is important to consider the disaster prevention benefits of planting vegetation suitable for a given region, for example planting mangroves in the Southeast Asian region or planting pinewood forests and such in Japan.



Professor Fumihiko Imamura

## Donations Made to Tsunami Disaster and Mangrove Reforestation Sites

Tokio Marine & Nichido and Millea Group Companies along with our employees and agents collected a total of 63.6 million yen in donations for Sumatra-Andaman Earthquake and tsunami relief, which was passed on to victims and groups involved in providing relief in the disaster zones. Of this, 6 million yen was donated to the Ranong Province, Thailand in which our Mangrove Reforestation Project is being developed. Along with words of appreciation, it was also explained by Ranong provincial governor Winai Mongkonthan in the presentation ceremony that the donations would be put to use in newly building 800 boats for fishermen who had their boats swept away by the tsunami.

In addition, along with the 14 million yen for donations to NGOs involved in disaster relief work fundraised by Millea Asia and its staff, which has a growing practice in the region, Tokio Marine & Nichido's American and European entities also collected donations and passed them on to disaster zone governments and UNICEF.



Ranong provincial governor Winai Mongkonthan (on the right) accepting our donations.



An NGO we provided donations to issuing measles immunizations on the Indonesian Island of Sumatra (copyright: AMDA).

### Donation Information

Donation Received By	Donation	Details
Ranong Province, Thailand	6 Million Yen	Disaster relief to Ranong Province, Thailand
OISCA International (Jakarta Office)	6 Million Yen	Disaster relief to orphans in Sumatra Island due to tsunami disaster
NGOs in Millea Asia Countries	36 Million Yen	Disaster relief in Indonesia, India, Thailand and Malaysia
Japanese Red Cross	5.6 Million Yen	Disaster relief
"Emergency Relief NGOs (AMDA, Peace Winds Japan)"	10 Million Yen	Emergency medical relief in Indonesia, Sri Lanka and India Help in reconstruction and rehousing in Indonesia
<b>Total</b>	<b>63.6 Million Yen</b>	(Donation Base): Millea Group including Tokio Marine & Nichido: 50.6 million yen, Staff & Agents: 1.3 million yen



## Providing Security and Safety for the Environment and Society

Tokio Marine & Nichido is offering security and safety for the environment and society through insurance and financial products and services that enhance environmental quality and social welfare.

### Initiatives Relating to Our Core Business

#### Wind Condition Risk Hedging Programme

In 2001, Tokio Marine developed its “Wind Condition Risk Hedging Programme” with the aim of helping to stabilize the business operations of wind power generation enterprises, and facilitating their obtaining of finance. This product compensates for a loss in revenue taking place due to wind resource falling below that predicted, through the use of unusual weather event insurance and weather derivatives.

#### Eco-Car Discounts for Auto Insurance

We offer a 1.5% discount on auto insurance for low pollution, low fuel consumption, low emission vehicles with the aim of contributing to the spread of environmentally considerate cars. When this system was first introduced, there were hardly any cars that met the preset criteria. However, during FY 2003, this figure had grown to 3,551,000 vehicles, representing a 25% overall share being entitled to the discount.

Condition of Application	Corresponding Vehicles
<b>Low Pollution Vehicles</b>	Hybrid vehicles, methanol fueled vehicles, compressed natural gas (CNG) vehicles. Vehicles entitled to relief from vehicle Acquisition Tax as a result of the kind of fuel they use.
<b>High Mileage Vehicles</b>	Vehicles meeting target mileage standards, and that are entitled to relief from vehicle Acquisition Tax.
<b>Low Emission Vehicles</b>	Vehicles subject to the exhaust regulation anytime since 2001, or that are certified as being low emission vehicles.

#### P&I (Protection and Indemnity) Insurance Covering Loss from Groundings & Oil Spills

At Tokio Marine & Nichido, we have offered insurance covering liability (P&I Insurance) arising from the costs of clearing ships that are written off after running aground, and liability incurred from oil spill accidents. Recently, ships running aground and causing oil pollution through spillages have been a major cause of concern in Japanese society, which resulted in an amendment to the Law on Liability for Oil Pollution Damage setting out that as of March 2005, all ships docking in Japanese ports are now required to have P&I insurance. At Tokio Marine & Nichido, the proactive role we played in giving advice to the Ministry of Land, Infrastructure and Transport on practicalities relating to insurance has been recognized, and the P&I Insurance that we issue has been recognized by the Ministry of Land, Infrastructure and Transport as an alternative to the Guarantee Contract Security that it issues itself.



#### Investments in Environment Related Ventures

At Tokio Marine & Nichido, we have been investing in environmental venture businesses since April 2000, with the aim of supporting and fostering their growth. Up until now, we have invested 800 million yen into recycling, semiconductor related, energy conservation, and biomass related businesses, and have seen concrete successes achieved such as some of the companies we invested in registering as listed companies. During the 2004 fiscal year, we made

investments in three firms, one that builds and sells small scale wind power generators, another that is involved in the development of next generation batteries, and one more that is involved in energy conservation. As well as continuing to proactively make such investments into the future, we are also looking into purchasing of the products and services that these businesses provide, with a view to helping these businesses to grow and to further environmental protection.



#### Environmental Consideration Level Check During Business Financing

Ever since 1999, Tokio Marine has included “Environmental Consideration / Solutions” into the negative check points used during credit checking, in order to promote environmental consideration through its financing. Specifically, in cases where we find in our investigation that an applicant has been punished or fined for violations of any environmental legislation aimed at business, this enters into the decision of whether to extend credit or not. During FY 2004, we did not encounter any businesses with these issues.

## Cooperation in Campaigns to “Use Recycled Parts” and “Repaired Parts”

The General Insurance Association of Japan is currently running a campaign to promote extended use of parts from a waste reduction perspective, through the use of recycled exchange parts in the case of accidents, and the use of repaired parts. Within Tokio Marine & Nichido, we deal with vast numbers of around 900,000 claims for damage to insured automobiles, and around 1 million claims for damage to vehicles and objects belonging to third parties. As a result, we give explanations to our customers from a social responsibility perspective about recycling in cases where vehicles suffer light damage and work with repair businesses to promote the use of recycled and repaired parts. In FY 2004, we ran a campaign between June and July during which we issued posters, and held study meetings related to the use of recycled and repaired parts.



## Risk Consulting Services

The risks related to business are becoming more and more complicated and diversified. Based on its technology and expertise, Tokio Marine & Nichido Risk Consulting, a subsidiary of Tokio Marine & Nichido, provides comprehensive risk consulting services to private and public institutions facing various risks.

### Crisis Management Consulting

We support framework solutions that range from scoping and evaluation of all domestic and overseas related risks affecting business, to the creation of management frameworks, and on further to emergency response solutions.

### Environmental Consulting

We advise many multinational companies on various environmental issues likely to affect their operations based on our extensive research of overseas environmental regulations, and environmental policy trends.

### Compliance Consulting

We provide compliance risk assessment services and training for managers and employees responsible for promotion of compliance to support companies in setting up their own compliance management systems.

### CSR Consulting

The diverse range of themes covered by CSR often inhibits companies from setting priorities and winning the cooperation of their employees. This service uses various analysis tools to provide customized solutions to these issues, and helps companies to establish effective and efficient CSR management systems.

### Natural Disaster Loss Consulting

We offer efficient and effective solutions to mitigate natural disaster loss based on quantitative data created by our own original analysis models which can estimate earthquake and typhoon risk and project damage across broad areas.



Example of earthquake damage projection



Example of typhoon damage projection

### Road Safety Consulting

Using a data safety recorder that analyzes driving behavior to ascertain the causes of road accidents, we help companies to promote safer driving by their employees.

## Providing Comprehensive Restoration Services for Disaster Damage

Since 2004, Tokio Marine & Nichido Risk Consulting has offered a Business Continuity Plan (BCP) creation support service for operational facilities and equipment, in alliance with BELFOR International GmbH, the biggest disaster damage restoration company in the world. This is in addition to a service for supporting the creation of BCPs focusing more on overall business recovery. Furthermore, this alliance has created another new service for post-disaster damage recovery of operational facilities and equipment, enabling us to provide comprehensive services against disaster loss.



Example of water-blasting recovery of damaged equipment



## Creating a Frank and Open Business Culture

Millea Group respects human rights and pays consideration to the health of each and every one of its employees. Moreover, it is also undertaking to create workplaces that are comfortable to work in, through providing various opportunities for lifestyle and career development.

### Protection of Privacy & Human Rights

#### Standards of Human Rights Awareness

Millea Group has set down its own “Standards of Human Rights Awareness” aimed to promote human rights awareness among staff throughout group companies. Furthermore, we gather reports on initiatives called for by these standards and issue guidance once a year or as the need arises.

#### Millea Group “Standards of Human Rights Awareness”

※ Note that only Item Headers have been listed below

- Aim
  - Definitions
  - Role of Millea Holdings
  - Role of Subsidiary Companies
  - Standards of Human Rights Awareness
1. Establishment and Promotion of Basic Policy
  2. Creation of an Organizational Framework for Promoting Human Rights Awareness
  3. Promotion of Human Rights Awareness Training
  4. Enforcement of Non-Discriminatory Hiring Practices
  5. Promotion of Normalization
  6. Prevention of Sexual Harassment

#### Human Rights Awareness Related Initiatives

Tokio Marine & Nichido has established a “Human Rights Awareness Training Committee” with the company president as chairperson, and also holds Human Rights Awareness Training for all company employees with the aim of “building a comfortable workplace for each and every employee” and “instilling of a human rights affirming culture” within the company. This training started in 1980 addressing issues relating to minority discrimination, and has been held annually since

1983. The training covers such issues as minority discrimination, sexual harassment, normalization for disabled employees, challenges faced by Korean residents of Japan, and invasion of privacy. Furthermore, each December the company has a “Human Rights Week” whereby all employees of the Tokio Marine & Nichido Group and their families are invited to submit human rights related catch phrases, with the aim of raising the level of human rights awareness within the company. During the 2004 fiscal year, 23 entries were selected out of submissions made from each of our departments and offices.



Staff Undergoing Human Rights Training

#### Creation of a Privacy Policy

Millea Group and its subsidiary, Tokio Marine & Nichido have set out a “Privacy Policy” in order to ensure proper handling and safe management of our customer personal information. Tokio Marine & Nichido has had rules in place for the management of customer information since 1994 and worked hard to ensure proper management of personal information. However, in the face of recent increased concern and awareness of the importance of protecting personal information in the IT age, we have also engaged in a review and revision of these policies. On the organizational side, our information management framework was further strengthened in October 2004 when the “Information Security Department” was established as a single unified department dedicated to information security, and an “Information Security Committee” was set up as a management committee subcommittee to resolve inter-departmental information security issues.

※Please refer to the links below for further information on our Privacy Policy  
(Millea Group)  
<http://www.millea.co.jp/en/info/privacy.html>  
(Tokio Marine & Nichido)  
<http://www.tokiomarine-nichido.co.jp/privacy.html>  
(In Japanese)

#### Working Together With Disabled Employees

Tokio Marine & Nichido has continued exceeding the 1.80% Japanese legal threshold for employment of disabled people since March 2001, with an employment rate of 1.91% (as of March 31st, 2005). Since setting up the “In-House Promotion of Normalization Center” in 1991, we have held a dialog semi-annually with our disabled employees in order to assist them in adapting to our workplace and working conditions. In addition to this feedback, we have also continued moving forward with making the buildings we occupy barrier free, through such steps as installation of ramps, textured floor tiles, and disabled-friendly toilets. Furthermore, we are presently assessing employment rates of disabled people within other Millea Group companies, and working to increase rates of employment where shortfalls are found.



Periodic Dialogue with Disabled Employees

## Equal Opportunity / Career Development

### Increased Opportunities for Female Employees

Tokio Marine & Nichido is engaged in an “Increased Opportunities for Female Employees” campaign, with the philosophy that we need to create an environment that allows our ambitious and most competent employees to realise their full potential, irrespective of gender. In addition, we have reviewed all related company systems to support female staff through career development and various training opportunities. We have also furthered discussion in each workplace of the ways in which we can give people roles suited to their wishes and abilities, and this is now becoming reflected in the division of roles within the company.

### Job Request System

We run a “Job Request System” as one of our key human resource systems to maintain and expand the dynamism of our employees. Under this system employees have the opportunity to choose their own job placement, and the system aims to effect job placement preferences insofar as possible from the viewpoint of “optimization of human resource placement”, and “building up staff autonomy based on choice and personal responsibility.” As of the 2004 fiscal year, we have also newly added U-Turn and I-Turn placement systems as part of our system of increased opportunities for female employees.

#### Number of Job Request System Participants

Fiscal Year	Applicants	Successful
2003	119	20
2004	136	32
2005	189	56

#### Fixed Duration Placement Transfers (U-Turn Placements)

One element of the Job Request system is the new addition of “U-Turn Placements”. This system takes employees from regions not previously

subject to transfers, and allows them to try working in a new area for a fixed period to make the best of their own abilities. Through these U-Turn Placements, employees from more remote regions have the opportunity to be transferred to more central regions, and provides the opportunity to attempt new job tasks going beyond those available under the old framework.

### Support For Employee Skill Development

#### Range of Training Systems

At Tokio Marine & Nichido, we offer various kinds of training such as Rank-Specific Training, Optional Training, and Specialization Training, in order to support our employees in their present work tasks, and to realize their career visions. Furthermore, we have also set up fee support for obtaining external qualifications through our “External Qualification Acquisition Incentive System”, and taking correspondence courses through our “External Correspondence Course Support System” in order to support voluntary learning by employees.

In addition, we have also set up the “Tokio Marine & Nichido University” that gathers together all forms of skill development related information onto our intranet portal site, allowing our employees to obtain any information they need, when they need it.

#### Skill Development

##### Target Setting / Tracking

We have competency / career development interviews between superiors and subordinates in order to help our employees move forward with their skill development in a planned manner. In these interviews, the employee sets out two kinds of skill development targets, and attaches a priority to those targets for goal completion, and then seeks feedback from their superior on those goals, as well as their strengths and weaknesses.

##### Study Abroad System

We proactively send young employees abroad for study with the aim of cultivating staff that have a broad perspective, are internationally minded, and that possess a high degree of knowledge, as well as to foster international links. Specifically, we dispatch around 30 of our staff overseas each fiscal year on short trips abroad to study, focusing on the following three courses:

- Business School (MBA Obtaining), Law School Courses
- Representative Training Courses (To Non English Speaking Countries)
- Internationalization Capability Development Course (1-4 weeks)

#### Number of Participants in Rank Specific Training

Training Course	Participants	Hours Per Person
New Appointee Manager Training	46	18 hours
New Leader Training	134	29 hours
Employee Rank Based Training (Rank Level 4)	368	14 hours
Employee Rank Based Training (Rank Level 3)	420	15.5 hours
Employee Rank Based Training (Rank Level 2)	91	7 hours
Basic Skills Training	148	28 hours
Nationwide New Hiree Training	148	224 hours
Regional New Hiree Training	320	81 hours

#### Number of Participants in Optional Training

Training Course	Participants	Hours Per Person
Coaching Training	226	15 hours
Step-Up Training (leadership development)	91	15 hours
Seven Habits Training	317	15 hours
Logical Thinking Basic Training	94	14.5 hours
Interpersonal Relationship Improvement Training	161	15 hours
Business Communication Reinforcement Training	36	15 hours

## Creating a Frank and Open Business Culture (Continued)

### Supporting Work and Home Coexistence

#### Response to Depopulation / Aging Society

We have taken a number of measures as policies that support “Work and Home Coexistence” seeking to expand the options available to our employees throughout various life stages. Furthermore, we have also created an action plan in accordance with the Law for the Promotion of Support Policies for Future Generations and are expanding our child care support system.

Number of Staff Taking Childcare / Caregiving Leave

Fiscal Year	Childcare Leave	Caregiving Leave
2002	58	0
2003	69	2
2004	83	3

### Creating Comfortable Workplaces

#### Employee Healthcare and Emotional Support

Tokio Marine & Nichido provides both healthcare and emotional support for its employees through medical checkups and counseling by clinical psychologists made available through the Healthcare Center in our Head Office, and the Health Consultation Offices we have in 46 locations nationwide. In the first round of medical examinations following the company merger, the number of staff examined increased by 1.5 times, accompanied by a participation rate of almost 100%, with the exception of the special case of just one person.

On emotional care, in 2004 we newly assigned clinical psychologists to six business support departments, on top of having maintained a network of 55 counseling centers nationwide for employees and their families since 2003. In the wake of the Chuetsu

#### Content of Our Support Policies

My Select	This enables adjustment of working times without any change in prescribed working hours.
Half Day Leave	12 Days of half day vacations (24 allotments) are available each fiscal year.
Overtime Exemption Measures	People with children less than three years old can claim exemption from doing overtime.
Maternity Leave	Maternity Leave is available for 8 weeks following childbirth (more than is legally required).
Childcare Leave System	This is generally for the period until the child's first birthday, although it can be extended until the child is one year and six months, or until the first April following the child's first birthday. (more than is legally required).
Early End of Working Day	Female staff with children of pre school age are permitted to leave work 30 minutes early.
Nursing Leave	Staff are permitted to freely take up to five days leave for nursing preschool children each fiscal year. Available in half day units, this enables leave to be taken up to ten times.
Support of Use of Babysitters	The company provides financial support to pay part of the cost of babysitters.
Family Caregiving Leave System	It is possible to obtain Caregiving Leave for up to a year at a time whenever one member of a family requires round the clock nursing.

Earthquake in Niigata Prefecture, we assigned additional clinical psychologists to look after the emotional wellbeing of our employees. Moreover, we have also established a Mental Health Project Team within the Human Resource Department and are consulting on new measures to improve current service.

#### Initiatives to Cut Back Working Hours

Tokio Marine & Nichido has established an Overtime Strategy Management Committee headed by the Human Resource Director, and Overtime Labor Management Committees for each region. These committees have conducted an overall review and looked into improving efficiency in order to raise worker satisfaction through reducing overtime hours. Furthermore, we have also commenced a flexible working hours system covering several of our branches and are implementing a discretionary work system\* and break system aimed at helping employees to improve their own efficiency through giving them the independence to decide on their own approach to work and time allocations.

##### \*Discretionary Work System

This is a system whereby working hours and how to move forward with work can be decided flexibly by the worker. Salary is then paid in line with fixed working hours under labor agreements.

#### Activities of Labor Union

Within Millea Group various labor unions exist, main one being the Tokio Marine & Nichido Labor Union. The Tokio Marine & Nichido Labor Union had 13,569 members as of March 31st 2005, making up 83% of all company employees (16,280 in total).

The Tokio Marine & Nichido Labor Union concludes collective labor agreements based on a high level of mutual trust between labor and management. Furthermore, labor-management meetings are held between top management and employee representatives over 10 times each year. The Tokio Marine & Nichido Labor Union also holds ongoing negotiations and consultations through daily negotiations between permanent representatives on matters from wages and human resource systems to management policies so as to build up a frank and open business culture.

# Initiatives Dealing With Global Environmental Issues

Acknowledging that the protection of the environment is an important responsibility for all corporate entities, Millea Group is expanding its activities with respect for harmonization with and improvement of the global environment.

## Environmental Philosophy / Policy at Tokio Marine & Nichido

### ■ Environmental Philosophy ■

Adopting the preservation of the global environment as one of its key management policies, Tokio Marine & Nichido recognizes that it is an important responsibility of all humans and companies in the present world to preserve the environment. Tokio Marine & Nichido commits to taking up the task of bringing about a society where sustainable development is maintained through the efforts of all employees throughout the entire range of our business activities, in order to improve and keep harmony with the environment.

### ■ Environmental Policies ■

Tokio Marine & Nichido has established the following policies and will make every effort to realize them in all areas of its activities.

#### 1. Preservation of the Global Environment Through the Insurance Business

We will work on the preservation of the global environment through our activities in the business fields of insurance products, claims services, financial services, etc.

#### 2. Effective Use of Resources & Energy

We will work on conserving resources and energy, recycling resources and green purchasing, in full recognition of the burden on the environment caused by the consumption of resources and energy, and the discharge of waste.

#### 3. Compliance with Environmental Laws

We will comply with relevant environmental laws and regulations and with other requirements to which Tokio Marine & Nichido subscribes.

#### 4. Continual Improvement of the Environment and Prevention of Pollution

We will continually work on the improvement of the environment and the prevention of pollution by setting objectives and targets and reviewing them periodically for better performance.

#### 5. Promotion of Environmental Awareness-Raising and Philanthropic Activities

We will work, on the preservation of the environment through the dissemination of relevant information, the provision of consulting services, promotion of environmental education both in and outside the company, and engage in furtherance of community and philanthropic activities as a good corporate citizen.

The above policies are to be well known and understood by all employees and released to the public.

October 1<sup>st</sup>, 2004

## Reduction of Environmental Burden

### Reduction of Paper Use

#### Copy Paper

At Tokio Marine & Nichido, we consume vast amounts of paper resources. In order to reduce the burden that this places on the environment, we are moving forward with a drive to decrease the volume of copy paper (paper used in printers and copy machines) consumed across all our nationwide offices through such steps as reusing paper already printed on one side and using double sided printing. Also at a branch level, there

are various initiatives in place utilizing ideas and ingenuity to work on achieving reductions. For FY 2004 copy paper consumption overshot our target of 1,644 tonnes, with a total of 1,737 tonnes consumed. The fact that in the previous financial year we switched over from our previous record keeping paper to ordinary copying paper is considered to have been a major factor in this.

#### Pamphlets and Other Such Printed Materials

Around the time of our merger in October 2004, we did whatever possible to reduce paper consumption by abandoning printed pamphlets, and changing over to digital media and the like. Nonetheless, the conversion of

pamphlets and company materials associated with the merger, as well as the introduction of new privacy legislation coming completely into force in April 2005 meant that consumption of printed materials (product pamphlets, booklets, etc) reached 7,510 tonnes.

#### Computer Paper

With respect to computer paper (paper used for statistical tables, management materials, etc.), we have various initiatives to cut back on paper use such as providing partial statistical table and management material data on CD-ROMS, but nonetheless consumption of such paper for FY 2004 reached 2,090 tonnes.



## Initiatives Dealing With Global Environmental Issues (Continued)

### Energy Efficiency

#### Initiatives within the Main Building of Tokio Marine & Nichido Headquarters

Based on the ISO14001 programme, an initiative has been carried on since FY 2003 aiming to “cut back energy consumption in the Main Building of the Tokio Marine & Nichido Head Office for FY 2004 to levels lower than FY 2001”. This has been achieved by;

- Switching off lights in common areas such as elevator halls and the like at night, during lunch and on holidays.
- Improved room temperature management on floors we occupy.
- Powering off office equipment after office hours.
- Partly shutting down fan coils and water closet heaters during breaks.
- Renovation of all elevators (between January 2004 and 2007).

As a result of these initiatives, the Main Building of our Head Office was able to limit power consumption to 96.95% of FY2003 levels and 94.25% of FY 2001 levels.

### Green Electricity Certificate System

The Green Electricity Certificate System is a system under which businesses paying the extra costs of electricity generated from renewable sources are entitled to “Green Electricity Certificates”, which are treated as purchases of green energy. For 15 years starting in April 2002, Tokio Marine & Nichido has formed a purchasing contract with Japan Natural Energy Company to purchase 1 million kilowatt hours of electricity per year generated by wind power, as a component of our measures for energy efficiency and to reduce carbon dioxide emissions. In FY 2004, this constituted around 8% of the electricity consumption of the Main Building of our Head Office, and contributed to reductions in CO<sub>2</sub> emissions.

### Recycling

#### Recycling of Confidential Documents

During the course of operations at Tokio Marine & Nichido, we handle large volumes of customer information. This means that there are also vast amounts of paper that we cannot recycle in a normal fashion, for protection of privacy reasons. We process such old documents by shredding them in industrial shredders we have in six of our buildings in our Head Office, Makuhari, Tama, Fukuoka, Osaka and Sendai, in order to protect confidential customer information while promoting resource recycling at the same time.

#### Recycling of Documents Disposed of During the Merger

As one component of our merger project, we have succeeded in having all our nationwide offices achieve a 100% recycling rate for disposed documentation. Given the differences in process frameworks set up in different regions, we created a standardized manual for checking procedures and confirming operations, and based on this have been able to set up a dual system for both information management and recycle processing.

#### Recycling of Expendable Accessories for Office Appliances

In 1996, Tokio Marine & Nichido established an “Office Appliance Recycling Center” and constructed a nationwide recycling system for items such as printer toner cassettes and ink cartridges, putting to effective use processed plastic that was disposed of. For FY 2004, a total of 19,022 items were recycled from within Tokio Marine & Nichido itself, and 21,755 items from the Tokio Marine & Nichido group companies as a whole.

### Green Purchasing

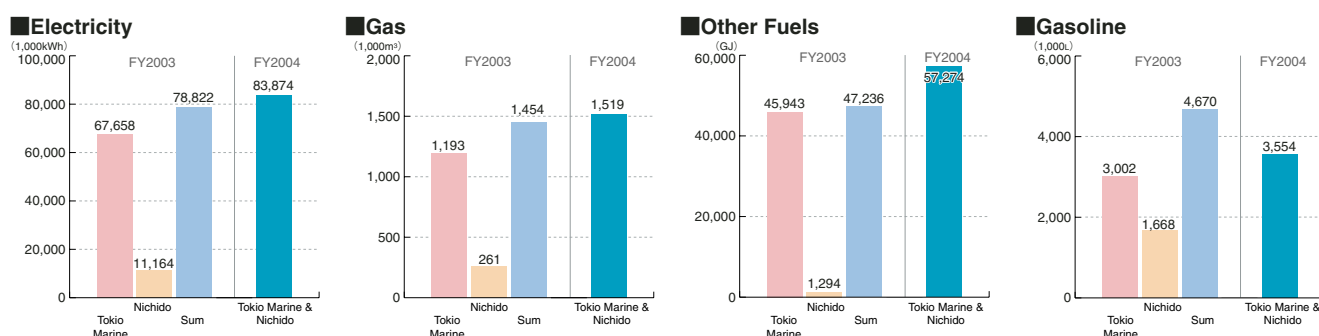
At Tokio Marine & Nichido, we promote “Green Purchasing”, which extends priority to the purchase of environmentally friendly goods and services with the aim of reducing our environmental burden. As well as having almost completely cut over to using 100% recycled paper for copying paper, Tokio Marine & Nichido also promotes “greening” through having put in place a system for making sure that when we purchase fixtures and fittings, the “Green Purchasing Law List of Items” is used as a selection criteria base. In 2004, we approached a firm that provides around 35% of our online office supply trading, and Tokio Marine Nichido Corporation which provides office products and services to cooperate in creating an eco friendly catalogue for the new merged company, which was distributed to all our offices in October.





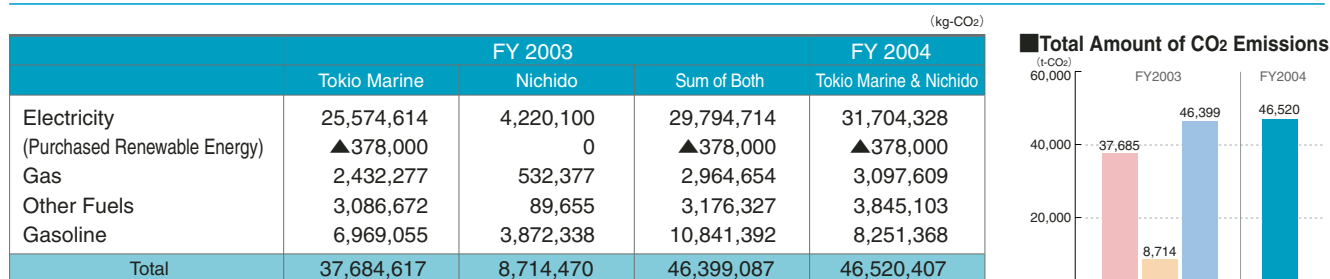
## Environmental Burden Data

### Energy Consumption



(Calculation Base: All nationwide offices of Tokio Marine & Nichido for gasoline, in other cases taken from the main 86 office buildings of Tokio Marine & Nichido (containing approximately 60% of our employees))

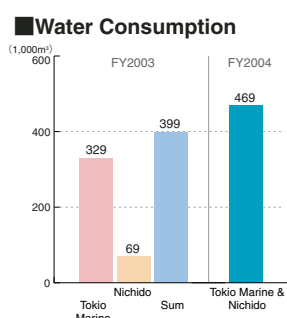
### Energy Based Carbon Dioxide Emissions



※ Calculated based on the emission factor set out in the Ministry of the Environment's "Environmental Performance Index Guideline for Business, 2002 Version"

※ We have deducted the portion of purchased renewable energy from greenhouse gas emissions caused by electricity consumption.

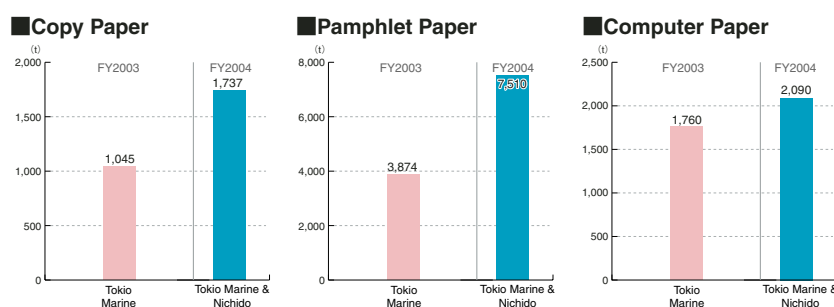
### Water Consumption



(Calculation Base: 86 Main Buildings of Tokio Marine & Nichido)

※ Calculated based on the assumption that company's share of the total floor area of the buildings is proportional to its share of the total water consumption of those.

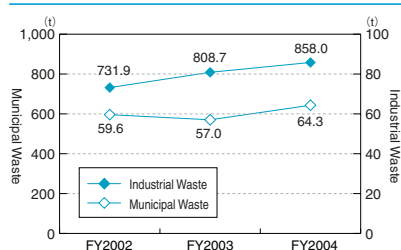
### Paper Consumption



(Calculation Base: All Branches of Tokio Marine & Nichido)

※ With respect to paper usage, data for 2003 only shows data for Tokio Marine because the statistical scope for data gathering used by Tokio Marine differed to that of Nichido Fire.

### Waste Generation



(Calculation Base: The Tokio Marine & Nichido Head Office)

### Group Company Energy Consumption

FY2004	Energy Consumption
Electricity	11,508,000 kWh
Gas	80,000 m³
Other Fuels	5,918 GJ

(Calculation Base: Major Group Companies)

※ Taken from the 37 buildings managed by Tokio Marine & Nichido Life, and the 15 buildings managed by Tokio Marine & Nichido Career Service.

## Initiatives Dealing With Global Environmental Issues (Continued)

### Environmental Objectives and Targets

Plan

The Tokio Marine & Nichido Head Office was certified with the ISO 14001 International Standard for Environmental Management Systems in 1999. For the 2004 fiscal year, we adopted 12 objectives and targets relating to environmental aspects and proceeded with initiatives to achieve them. In the 2005 fiscal year, we plan to expand our objectives and targets related to more stringent legal compliance and the environmental aspect of our core business of insurance and financial services in recognition of trends in recent years toward stricter environmental legislation along with amendments to ISO 14001 standards, and will undertake initiatives to achieve these objectives and targets.

Environmental Policies	Environmental Objectives	Environmental Targets
Global Environmental Protection Through the Insurance Business	Development of Eco Friendly Insurance Products	Holding consultations on how to incorporate need for eco friendly insurance products uncovered by research, into insurance.
	Investment in Worthwhile Environment Related Ventures	Research into making over 10 investments in environment related venture businesses annually.
Efficient Use of Resources and Energy	Control Over Power Usage	Promotion of our Power Use Control/Reduction plan set down in 2002 (aiming to keep power consumption below FY 2001 levels)
	Reduction of Paper for Pamphlet Usage	Aiming to cut paper consumption volume by 10% on FY 2003 levels.
	Cutover to On Demand Printing (ODP)	Aiming to increase ODP use to 150% of FY 2003 levels by FY 2005.
	Reduction in Volume of Copying Paper Use	Maintaining the same purchasing levels of copy paper as in FY2003.
	Installation of Double Sided Printing Enabled Printers in all our offices.	Installing 227 double side printing capable printers within our loss division.
Compliance with Environmental Regulations	Promotion of Green Purchasing	Switching over to green purchasing for more than five product items.
	Increasing the share of low emission vehicle ownership.	Aiming to make 45% of our managerial company cars low emission vehicles.
Continuous Environmental Improvement and Pollution Prevention	The Six Nation Southeast Asian Mangrove Reforestation Project (aiming for 2000ha by FY 2008)	397ha of mangroves to be reforested
Environmental Awareness Raising and Philanthropic Activities	Environmental Awareness Advertising	Engaging in environmental awareness advertising.
	Environmental Awareness Raising Directed at Employees and Agents	Engaging in environmental awareness raising for our employees at least once a month. Carrying out environmental awareness for our agents at least twice a year.



### Management Review

Act

Based on the results of the internal audit of November 2004, a management level review was carried out in January 2005. This review recommended obtaining a better grasp of environmental performance data, strengthening initiatives to promote global environmental protection through our core business activities, and reinforcing our environmental communication efforts in order for Tokio Marine & Nichido to promote further actions to protect the global environment. In June 2005, a final report for FY 2004 activities was received and all initiatives of the year were reviewed.



## Implementation and Operation

D.

Environmental initiatives aimed at achieving environmental objectives and targets are operated in accordance with "Environmental Aim / Target Achieving Programme". Of the environmental objectives and targets set out in FY 2004, only one of the 12 (reduction of copy paper usage) remains unfulfilled.

Environmental Objectives	Environmental Targets	Level of Achievement	
Development of Eco Friendly Insurance Products	Holding consultations on how to incorporate need for eco friendly insurance products uncovered by research, into insurance.	○	Enacted.
Investment in Worthwhile Environment Related Ventures	Research into making over 10 investments in environment related venture businesses annually.	○	12 investments under consideration.
Control Over Power Usage	Promotion of our Power Use Control/Reduction plan set down in 2002 (aiming to keep power consumption below FY 2001 levels)	○	Currently at 94.57% of FY 2001 levels (monthly average)
Reduction of Paper for Pamphlet Usage	Aiming to cut paper consumption volume by 10% on FY 2003 levels.	○	On track, and achieved mid-term targets.
Cutover to On Demand Printing (ODP)	Aiming to increase ODP use to 150% of FY 2003 levels by FY 2005.	○	Increase of 109% on FY 2003 levels.
Reduction in Volume of Copying Paper Use	Maintaining the same purchasing levels of copy paper as in FY2003.	×	Increase of 106% on FY 2003 levels.
Installation of Double Sided Printing Enabled Printers in all our Offices	Installing 227 double side printing capable printers within our loss division.	○	229 machines installed.
Promotion of Green Purchasing	Switching over to green purchasing for more than five product items.	○	Switched over to green purchasing of 6 items
Increasing the Share of Low Emission Vehicle Ownership	Aiming to make 45% of our managerial company cars low emission vehicles.	○	Ownership rate of 56.3%
The Six Nation Southeast Asian Mangrove Reforestation Project (aiming for 2000ha by FY 2008)	397ha of mangroves to be reforested (FY 2004).	○	434.7ha completed
Environmental Awareness Advertising	Engaging in environmental awareness advertising.	○	Enacted
Environmental Awareness Raising Directed at Employees and Agents	Engaging in environmental awareness raising for our employees at least once a month. Carrying out environmental awareness for our agents at least twice a year.	○	Activities held on average 1.3 times monthly for employees. 15 times annually for our agents.



## Inspection

Check

We hold an internal audit once a year in order to assess whether the Environmental Management System of our Head Office is fulfilling ISO 14001 requirements, and whether it is being appropriately maintained. In FY 2004, the internal audit was carried out in November following the company merger. This audit turned up five cases of "minor non-conformity" and 13 cases for "further monitoring". With respect to the items of non-conformity, corrective instructions were issued and each department took action to correct the matters raised. In February 2005, an enlarged audit was performed accompanying the merger (to become the regular audit henceforth), where a single "strong point" was identified, one "minor non-conformity" was found, and 8 cases for "further monitoring" were highlighted. Throughout 2005, we have focused on making improvements in the areas raised by the periodic audit so as to raise the overall effectiveness of the Environmental Management System of our Head Office.

## Environmental Communication & Awareness Raising

Tokio Marine & Nichido is proactively expanding its environmental communication and awareness raising activities through the use of various tools, starting with our own employees and agents.

### External Initiatives

#### Carbon Disclosure Project 3 (CDP3)

Tokio Marine & Nichido participated as a signed institutional investor in the running of the climate change risk survey of the world's top 500 companies carried out under the Carbon Disclosure Project's third survey (from February 2005 onwards). The CDP is operated with the aim of highlighting the possible risks posed by climate change to investment receiving corporations as well as business opportunities. 35 institutional investor companies participated in its first survey between 2002 and 2003, with 95 such companies in its second survey between 2003 and 2004, and 143 companies in its current survey. In addition, Millea Holdings is also participating as a respondent to the CDP survey, as one of the worlds leading 500 companies.

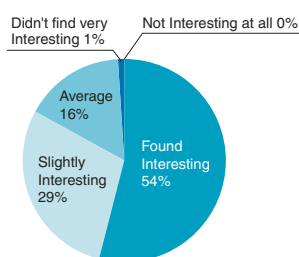
#### "Eco-Products 2004"

Following on from our participation last year, Tokio Marine & Nichido participated for the second time in "Eco-Products 2004" held at Tokyo Big Site. "Eco-Products 2004" is one of Japan's largest general environmental exhibitions involving over 400 businesses, local governments, research organizations and such, presenting their various environmentally friendly products, environmental services and initiatives. During this exhibition, we displayed videos relating to our "Mangrove Reforestation Project", and gave introductions to many of our initiatives aimed at global environmental issues including our environmentally considerate insurance products such as "Eco-Car Discounts For Auto Insurance", our "Soil Remediation Cost Insurance", "Weather Derivatives" and other environment related products and services, as well as our support for the spread of wind power through our "Wind Condition Risk Hedging Programme" and purchasing of wind generated power, among other things. The result of a questionnaire we ran during this exhibition showed that we received

around 80% favorable evaluations of the information we presented. Furthermore, Makoto Ando of the CSR Section of our Corporate Planning Department also participated as a panelist in the "Environment and Financial Services Seminar" held as one of the symposiums held along with the exhibition.

#### Eco Products Survey Results (N=94)

● On Content Relating To The Tokio Marine & Nichido Booth



The Tokio Marine & Nichido Booth at "Eco-Products 2004"

### Environmental Seminars

Since 1990, Tokio Marine & Nichido has held environmental seminars with the aim of deepening understanding among stakeholders of the most pressing environmental issues. Our 15th such seminar held last year adopted the theme of "Business Solutions for Waste Processing". Against the background of increasing numbers of businesses suffering losses as a result of illegal dumping of waste, the seminar was attended by 67 participants (from 53 the previous year), mainly being people directly involved in dealing with business waste. We received a number of comments indicating that the seminar was most enlightening on the establishment of internal company frameworks and rules for waste management.



Seminar in 2004

#### Examples of Environmental Seminar Topics in Recent Years

Month / Year	Theme
November 2004	Business Solutions for Waste Processing
December 2003	EU Environmental Policy and Business Solutions
October 2002	Business Solutions for the Soil Pollution Law
October 2001	The Environment and Business Management
December 2000	Environmental Risk Assessments Sought by Business

### Environmental Magazine "Talisman Special Edition"

Against a background of rising interest among businesses expanding overseas in concerns about environmental risk and environmental issues generally, Tokio Marine & Nichido began publishing the environmental magazine "Talisman Special Edition" in 1989, covering trends in environment related legislation in various countries worldwide and timely environmental topics (with 71 issues published to date). Each special edition is either a US, EU, Asian, Japan or Global Edition, and are published semi-annually.

In FY 2005, we took up the topics of "Recent Trends in Waste Legislation" (Japan Edition), and "Trends and Issues in Chinese Environmental Law" (Asian Edition). "Recent Trends in Waste Legislation" has been widely subscribed to, particularly by people responsible for waste management within enterprises.



## Marunouchi Townhall Environmental Forum

The “Marunouchi Townhall Environmental Forum” has been held jointly with Japan Airlines Corporation and Mitsubishi Corporation since 1993. In FY 2004, forums were held on two occasions, for the 38th time in November 2004, and the 39th time in March 2005. The 38th Forum was set on the topic of “New Ties Between the Environment and Architecture” in a lecture given by architect Norihiko Dan. The 39th Forum was a lecture given by medical researcher Takeshi Yoro on the topic “Thinking About the Environment Now”. The seminars were attended by 200 and 350 people respectively from within and outside the company, and were very well received.

### Examples of Marunouchi Townhall Forum Topics Given in Recent Years

Event No.	Topic
39th	Thinking About The Environment Now
38th	New Ties Between The Environment & Architecture
37th 36th	My Ecological Life 1. How Far the Global Environment Has Come 2. Thinking Globally, Acting Where You Are
35th	Living Alongside Nature



39th Seminar

## Internal Initiatives

### Training on ISO Environmental Fundamentals

Once every year, we hold “Training on ISO Environmental Fundamentals” for Head Office employees. Last year, we ran training in all departments through a

video we prepared outlining environmental problems affecting our company, an outline of ISO 14001, and our environmental objectives and targets. Executive training took place in September 2004.

### Company Magazine and Agency Office News

We distribute a company magazine and agency office news to our employees and agents on a quarterly basis, with articles related to the environment appearing in all issues, as part of our ongoing efforts to raise environmental awareness. The content of these materials is also made available on the internal company intranet and TNH (an electronic bulletin board for our agency offices). Furthermore, we took the opportunity of the merger last year to switch over the paper we use in our company magazine and agency office news to Forest Stewardship Council (FSC) certified paper.



### In-House Satellite Broadcasting

We work to raise awareness among our employees and agents by broadcasting information relating to our environmental initiatives through daily broadcasts on our in-house satellite broadcasting system “CSN”, taking advantage of the characteristics that visual media have

to offer. Our intra-office news programme “Morning Nextage” introduces environment related topics every morning. We also broadcast the special environmental documentary “The Tokio Marine & Nichido Nature Special ‘Journey Through Mangrove Forests of the Ocean Toward Fiji at the Crossroads of the Pacific’”, which was broadcast on public television in March 2005.

### Environmental Topics

Ever since 2002, we have periodically published “Environmental Topics” on-line, which contains articles explaining environmental issues, aimed mainly at our employees. In FY 2004, topics such as waste issues and the coming into force of the Kyoto Protocol were covered.

#### Topics Published in FY 2004

Edition No.	Title
No. 9	Recent Developments Related to Global Warming
No. 10	Current Situation Regarding the “Waste Law”
No. 11	Coming Into Force of the “Kyoto Protocol” Following Russian Ratification
No. 12	The Coming Into Force of the Kyoto Protocol On February 16th

### Green News

We periodically publish “Green News” which introduces initiatives relating to close to home global environmental protection initiatives, with the aim of promoting these initiatives within all our branch offices, and a sense of care for the environment among our employees. The 2004 edition raised such topics as our measures to reduce copy paper consumption, and measures taken to conserve energy.



Intranet site of Green News



# Insurance for the Planet - Mangrove Reforestation Project

Tokio Marine & Nichido has been operating a “Mangrove Reforestation Project” since 1999 with the aims of regenerating rapidly disappearing mangrove forests and contributing to the prevention of global warming.

## Overview of the Mangrove Reforestation Project

In late March 2004, Tokio Marine & Nichido completed a project set out as part of pre-merger Tokio Marine & Fire Insurance's 120th Anniversary Celebrations to reforest an area of 3,000 hectares in the project first phase with a total of 3,444 hectares of mangroves reforested in five Southeast Asian countries over a five year period starting in 1999. As of FY 2004, we have begun a second project phase with a target to reforest a further 2,000 hectares in five years in the previous five Southeast Asian Nations plus the newly added nation of Fiji.

This project is being carried out in partnership with two NGOs with a proven track record in mangrove reforestation; the Organization for Industrial, Spiritual and Cultural Advancement (OISCA), and Action for Mangrove Reforestation (ACTMANG).



Young, replanted Mangrove trees in Fiji

## Project Significance

### Project Significance

#### (1) Environmental Protection

The role mangroves play in sequestering carbon dioxide, one of the primary gases responsible for global warming, has drawn much attention in recent times. 3,000 hectares of mangrove forests is estimated to be a scale sufficient to absorb the emissions associated with the business activities of Tokio Marine & Nichido. Our aim is to balance the

volume of carbon dioxide emissions resulting from our business activities with the volume of carbon dioxide absorbed by reforested mangroves, so as to become “carbon neutral”.

#### (2) Disaster Prevention

In the Indian Ocean Tsunami that occurred in December 2004, a portion of mangroves played a role in acting as a wave break, protecting the lives of many people. It can be therefore said that this project also has great significance from a disaster prevention perspective.

#### (3) Regional Contributions and International Exchange

By reforesting mangroves which provide resources indispensable to the daily lives of local residents, we have been able to bring about improvements and greater stability in their living environment. Moreover, we are making efforts to foster international exchange with local people by way of our “Mangrove Reforestation Tours.”

#### (4) Environmental Awareness Raising

We are proactively engaging in environmental awareness raising both within and outside our company through our mangrove reforestation activities.

also hold study meetings on environmental issues, pay visits to local schools, have exchanges with local children, and visit NGO training centers along with other such cultural exchange programmes providing opportunities for participants to be involved in environmental education and international exchanges.

The 7th Mangrove Reforestation Volunteer Tour visited Tien Lang in the northern Vietnamese city of Haiphong. 22 Green Volunteers made up of Tokio Marine & Nichido employees, group company employees, retirees and their families participated, reforesting 6,000 plants in three days, on schedule as planned. Volunteers pitched in working together with Tien Lang women's groups in carrying out the mangrove reforestation, as they struggled to keep their footing in the mud of estuaries and river beds, forging deep ties of friendship through the exchange.



## Reforestation Activities in 2004

### The 7th Mangrove Reforestation Volunteer Tour

Once or twice a year, we hold weeklong Mangrove Reforestation Tours within Tokio Marine & Nichido whereby company employees, agents, staff alumni, and families join our “Green Volunteers”. Along with the tours, we



#### Reforestation Volunteer Tours Held To Date

Tour No.	Tour Period	Reforestation Site
1 <sup>st</sup>	18-24 July 1999	Tien Lang, Vietnam
2 <sup>nd</sup>	6-11 July 2000	Palawan Island, Philippines
3 <sup>rd</sup>	28 May - 2 June 2000	Tien Za, Vietnam
4 <sup>th</sup>	3-9 June 2001	Ranong, Thailand
5 <sup>th</sup>	19-25 May 2002	Ranong, Thailand
6 <sup>th</sup>	7-13 February 2004	Ranong, Thailand
7 <sup>th</sup>	6-11 June 2004	Tien Lang, Vietnam

## Project Phase 1

### Reforestation Results

During Phase 1 of this project between FY 1999 and 2003, we surpassed our goal of reforesting 3,000 hectares.

#### [Target Countries]

The five countries of Indonesia, Thailand, Philippines, Myanmar, and Vietnam.

Results of Project Phase 1 Reforestation (ha)

Reforestation Region	Area Reforested
Indonesia	911
Thailand	516
Philippines	505
Myanmar	610
Vietnam	902
<b>Total</b>	<b>3,444</b>
<b>Completion Rate</b>	<b>115 %</b>



## Project Phase 2

### Planned Reforestation

Project Phase 2 kicked off in FY 2004 with a reforestation goal of 2,000 hectares over five years in the same countries as previous, with the new addition of the South Pacific island nation of Fiji, which has particular concern about inundation due to sea level rise resulting from global warming. We continued on with this project in response to the many voices of our employees who raised the view that we should continue reforestation activities.

#### [Target Countries]

The six countries of Indonesia, Thailand, Philippines, Myanmar, Vietnam, and Fiji.

Reforestation Phase 2 Plan (ha)

Reforestation Region	Reforestation Area (Target)	Reforestation Area (Current Total)
Indonesia	650	68
Thailand	400	100
Philippines	100	0
Myanmar	550	216
Vietnam	250	43
Fiji	50	8
<b>Total</b>	<b>2,000</b>	<b>435</b>



## Environmental Awareness Raising Through Mangrove Reforestation

As an activity kicked off as part of its 5th Anniversary Celebrations in 2002, Tokio Marine & Nichido Life has been constantly involved in contributing to the "Forests for Children" Plan (of Mangrove Reforestation) run by the NGO OISCA in Thailand. Along with supporting the onsite reforestation of mangroves in these regions, this initiative provides environmental education to local children, develops fondness for nature through holding environmental camps, and contributes to awareness of the need to protect mangroves in the region.

#### Outline of the "Plan for Forests for Children" - Ranong, Thailand

**Scope** : Ban Koh Lhao School, elementary school students and teachers  
: Ban Had Sai Dum School, elementary school students and teachers

**Duration** : 5 Years (2002 - 2006)

**Goals** :

- (1) To impart knowledge and understanding in children of the ecosystems within mangrove forests.
- (2) To obtain knowledge and the ability to reforest and protect mangroves.
- (3) To make children think about preserving nature, make a contribution to the environment and to promote voluntary participation in mangrove reforestation.
- (4) To aim to regenerate mangrove forests near to schools that are in bad condition.
- (5) To encourage school participation in the reforestation project both as a school, and as part of environmental education.

"Forests for Children" Results (ha)

Location & Year	Area Reforested
<b>• Ban Koh Lhao School</b>	
2002	5.36
2003	5.36
2004	5.36
<b>• Ban Had Sai Dum School</b>	
2002	5.36
2003	5.36
2004	5.36
<b>Total</b>	<b>32.16</b>



## Practice of Community / Social Philanthropy

At Millea Group, we treat “Communities and Society” as among our most important stakeholders. We broadly contribute to the growth of society as a good corporate citizen.

### ■ Operational Policy ■

At Tokio Marine & Nichido, we define philanthropic activities as: “Activities not related to our core areas of business, where we make a contribution for the public good of our own initiative without expectation of any direct payback in return”.

- 1) We divide this into the three major areas of “social welfare”, “international exchange (international cooperation), and “global environmental protection”.
- 2) We support “community and philanthropic activities” across all regions.
- 3) We support the volunteer activities of our staff.

※In FY 2004, we have joined with NPOs to proactively support volunteer activities by our staff and community philanthropic work under the slogan “Supporting Philanthropic Activities at a Community Level”.

### Framework for Supporting Volunteer Activities

#### Volunteer Activity Financial Support System

Under this system, Tokio Marine & Nichido provides financial assistance to NPOs and such organizations where our staff engage in voluntary activities with the aim of supporting the volunteer activities of our employees, and to work with NPOs that are seen as one supporting element accompanying the formation of a new civil society. Since setting up this system in 2002, the number of groups we provide support for has grown year by year.

#### Number of Groups Receiving Support under the Volunteer Activity Financial Support System

Area of Support	FY 2002	FY 2003	FY 2004
Youth Development	2	4	5
Disabled/Elderly Care	2	3	3
International Exchange	2	3	2
Environment	—	1	1
Education	—	—	1
Total	6	11	12



Activities by one of the supporting NPOs

### Gift Matching System

Tokio Marine & Nichido set up this system in 1994 whereby the company matches the charitable donations of employees in the hope of raising levels of commitment among our employees to philanthropy. Along with the participation of our agents, we engage in charity bazaar auctions and fundraising activities. In FY 2004, through fundraising activities in support of disaster relief relating to floods, typhoons and such, we were successful in raising donations in excess of the amount gathered the previous year.

#### Gift Matching Donation Cases/Amount Raised

	FY 2001	FY 2002	FY 2003	FY 2004
No. of Cases	39	36	34	35
Amount Raised (1,000Yen)	6,297	5,005	3,826	5,322

### Volunteer Work Leave System

To date, four of our employees have made use of the Voluntary Long Term Leave System to participate in overseas youth cooperation groups, and performed support work in Bangladesh, Malaysia, Senegal and Samoa. Furthermore, in FY 2004, 45 people used our Volunteer Work Leave System to participate in such activities as Mangrove Reforestation Tours and the Special Olympics.

#### Number of People Taking Volunteer Work Leave / Long Term Leave

	FY 2001	FY 2002	FY 2003	FY 2004
Volunteer Work Leave	19	19	18	45
Volunteer Work Long Term Leave	1	0	0	0

### Providing Information by Forums / News

We provide information on philanthropic activities through our company intranet. The “Society & Environment Forum” is used as a bulletin board for employees to disseminate information on philanthropic activities going on at all our nationwide offices, and to exchange opinions. “CSR News” periodically introduces the activities of all our branch offices, and engages in awareness raising activities aimed at our employees.





## Philanthropic Activities Within Japan

### 2004 NPO Awards

In October 2004, Tokio Marine & Nichido held the 2004 NPO Awards jointly with Tokyo Junior Chamber, Inc. These NPO Awards, now in their third year, are held with the objective of providing awards to leading NPOs engaged in activities beneficial to society, and to foster exchanges among NPOs. These awards look at the activities of NPOs within Tokyo, and from those selects 30 organizations seen as best fitting the objective of achieving “public benefit from the standpoint of an ordinary citizen”, from which the decision on the top award is made. The selected 30 NPOs were able to make appeals for the activities of their group and deepen exchanges and cooperation with other groups and opened booths highlighting the activities they are involved in (such as “promotion of social education”, “improvements in sanitation, medical and general welfare”, “promoting children’s health”, “promoting town revival”, and “international cooperation”).



2004 NPO Awards Booth

### Support for the Pink Ribbon Drive

Ever since January 2005, Tokio Marine & Nichido Life via the NGO J.POSH has been proactively supporting the Pink Ribbon Drive through the sale of the women’s dedicated medical insurance “Assurance Amulet” to cover the costs of breast reconstructions and such. In FY 2004, our staff wore pink ribbon badges and worked towards communicating the importance to our customers and agents of the Pink Ribbon Drive and of the need to detect breast cancer at an early stage. Tokio Marine & Nichido along with lecturers from J.POSH also held seminars in 11 locations around the country aimed at our employees and agents in addition to our customers.



### Scholarships for Students Studying Abroad from ASEAN

Since 1990, Tokio Marine & Nichido has offered scholarship support to master’s degree students studying abroad from ASEAN countries, with the aim of furthering international friendship with the people of ASEAN countries through human development. The actual operation of this scheme is carried out by the Tokio Marine Kagami Commemorative Foundation.



ASEAN Scholarship Student’s Exchange Meeting

## Participation in the UN Disaster Prevention Meeting

On January 18th, 2005, the day of the 10th Anniversary of the Kobe Earthquake, “The United Nations World Conference on Disaster Reduction” was held in Kobe setting out policies and measures for future worldwide disaster prevention. The three companies of Tokio Marine & Nichido, Tokio Marine & Nichido Risk Consulting (both from Millea Group) along with our partner BELFOR Japan participated in this meeting holding lectures and setting up an exhibition booth.

As Counselor Koukei Higuchi of Tokio Marine & Nichido gave a lecture on the topic of “Disaster Prevention Utilizing the Dynamism of the Market and Private Sector”, Tokio Marine Risk Consulting and BELFOR Japan also gave lectures on such topics as “The Need for Business Continuity Planning (BCP)” and “Ways to Revive Business Operations”.

#### ※1 What is BELFOR?

BELFOR, based in Germany, is the world’s largest company specializing in disaster recovery, with a proven track record in recovering equipment and facilities damaged in natural disasters and accidents.

#### ※2 What is Business Continuity Planning (BCP)?

This is a predetermined plan by which companies plot out how they will continue or restore core operations in the event of an accident or disaster.



Counselor Higuchi giving a speech



Our exhibition booth

## Practice of Community / Social Philanthropy (Continued)

### Establishment of an “Environmental / Community Philanthropy Promotion Month” and a “Presidential Award System”

In October 2004, an “Environmental/Community Philanthropy Promotion Month” was established by Tokio Marine & Nichido throughout the company as part of our CSR practice with the aim of promoting environmental and community philanthropy by our employees. As part of this month, Presidential Awards are given for environmental and community philanthropic activities carried out over the last financial year seen as being in keeping with the character of Tokio Marine & Nichido, and that are deemed to have made a high level of contribution to local communities. In the first ever round of Presidential Awards, a total of 155 activities were nominated, from which awards were presented to the branch offices listed below.



### Initiatives From Each Branch Office Receiving the Presidential Award

#### Nagano Branch Office

Staff from our Nagano Branch Office showed Tokio Marine & Nichido's support for the “Special Olympics World Winter Games” held in Nagano from February 26th through March 5th 2005 by allowing the first floor of our office building to be used as a PR booth for the games for three months, fundraising 1.25 million yen and donating 5 million yen, and directly through the 46 staff who worked as translation volunteers. Free medical assistance with translators was also well received by games participants from all over the world.



#### Toyama Branch Office

Every Thursday between 11 and 11:30am, bread made at the “Mehi no Noen” facilities for the autistic and intellectually disabled is offered on sale in the seventh floor elevator hall of our Toyama Branch Office. Under the slogan “every Thursday is bread day”, the purchase of bread for lunch or taking home is proactively encouraged.



#### Saitama Central Branch Office

Between February and March 2005, all the staff from our Saitama Central Branch Office and agents wore Pink Ribbon Drive badges, and made and distributed pamphlets explaining the Pink Ribbon Drive as well as collecting donations, in order to promote the eradication of breast cancer through early detection.



#### Fukushima Branch Office

In January 2005, 55 employees from our Fukushima Branch Office ran our “Pink Ribbon Drive” street campaign outside the east exit of Fukushima Station in Fukushima City, and the west exit of JR Koriyama Station in Koriyama City. Participants handed out pamphlets as they promoted the importance of early diagnosis of breast cancer.



#### Tohoku Business Support Department

In October 2004, the Tohoku Business Support Department participated in the “Sendai Cares” event to introduce NPOs to ordinary citizens. Department staff also gathered together surplus office equipment and fixtures to offer to NPO groups, over half of which was taken away with messages of appreciation.



#### Ehime Branch Office

33 members of our Ehime Branch Office joined together to make a team that did rounds of volunteer work in flood stricken areas in Niihama City and Saijo City. This team helped clear mud from the floors of affected houses, and in the removal of household items. Staff received letters of appreciation from Saijo City, Niihama City and Shikoku Chuo City.





## Overseas Philanthropic Activities

### Brazil

In 2003, Tokio Marine Brazil started the "Tokio Marine Angels". This provides food packages to economically disadvantaged households four times annually. Last year marked our second initiative during the Christmas period. As occurred in 2003, we delivered food packages at Christmas to 208 economically struggling homes based in favelas. Last year, more so than in previous years, there was a high level of interest shown by our employees, whereby they not only delivered food packages, but also showed their feelings of support which was warmly received by all the recipient households. On top of this, Tokio Marine Brazil has also been presented with the FY 2004 Annual Brazil Best Enterprise Award. We were the only company of Japanese origin to be chosen among the 30 companies that received this award from Brazil's most widely published magazine.

### Indonesia

Tokio Marine Indonesia agreed to the plan for a "3 Year School Feeding Programme" set up by the United Nations World Food Programme to provide nutrition to impoverished and disadvantaged children, and made a US\$16,000 donation. This donation was used in the purchase of scales and measuring equipment necessary to assess the health of students in 103 elementary schools (covering 35,000 children) in and around Jakarta.



Donation Ceremony at one of the elementary schools

### Cambodia

As of FY 2003, Tokio Marine & Nichido Life has supported children's education through the NGO "Caring for Young Refugees (CYR)" which creates picture songbooks and character cards with the aim of improving the child literacy. In FY 2003, we provided part of the operation costs of the Prey Totung Kindergarten, and in FY 2004 we went beyond this to cover all direct operating costs (costs of local teachers, educational materials, and school lunches). Our company name was included as a supporter in a commemorative plaque mounted on the outer wall of the Prey Totung Kindergarten.

\*The NGO "Caring for Young Refugees (CYR): This is an NGO that acts in response to the needs of the Cambodian Education Agency to help its children recover from the impact of the civil war there in delaying children's education (with a rate of 11% of kindergarten students entering schooling).



©Kobayashi Masanori

### Hawaii

#### Support for Exhibition of Expressionist Painting

Tokio Marine & Nichido's affiliate company, Hawaii First Insurance was the main sponsor of the major exhibition "Japan and Paris" held between April and June 2004 in the Honolulu Art Exhibition Center, which is the only general art exhibition center in the state of Hawaii. We sought through this initiative to show our appreciation to our local customers, while supporting cultural activities in within Hawaii State.

#### Donations To Local Communities

Hawaii First Insurance has provided support to the needy among the Hawaiian Community since its foundation in 1911, and made US\$300,000 in donations during FY 2004.

#### "Best Places to Work in Hawaii" 25 Companies

Hawaii First Insurance was chosen as one of the 25 companies listed as the "Best Places to Work in Hawaii" for FY 2005 (FICOH Commendation Award). This is an award set up by Hawaii Business Magazine under its plan of the same name, in which Hawaii First Insurance was selected in the award's inaugural year. Selection was based on a company questionnaire and a staff questionnaire carried out with almost all our employees. Among our generally high evaluation, results rated our level of satisfaction with staff welfare particularly highly, showing a marked effect on staff motivation to work.



FICOH Award Ceremony

## Engaging in Fair Management

We aim to effect fairness and equity in our business activities by having our staff and agents maintain a high level of ethical standards throughout all aspects of our operations.

### Compliance Related Policy / Promotion Framework

#### Millea Group Code of Conduct

Millea Group is committed to continuous enhancement of its corporate value, with customer trust at the base of all its activities. The Millea Group Code of Conduct sets forth ethical standards that are essential for translating this corporate philosophy into action.

#### Millea Group Framework for Promotion of Compliance

Millea Group defines compliance as “complying with applicable laws, rules, regulations, internal rules, and conducting fair and equitable business activities within social norms”, and we actively engage in related initiatives based on this definition.

#### The Role of Millea Holdings

Millea Holdings sets out basic policies, general measures and engages in periodic monitoring of the progress of initiatives with a view to raising the level of those initiatives throughout the Group. Compliance is promoted in a manner that accounts for practical considerations such as the business operations of the group company concerned, its size, and so on, in order to raise the effectiveness of initiatives. Furthermore, reports are gathered from group companies on points detected through monitoring as being of clear importance, which are discussed in the Compliance Committee, Management Meeting, and Board of Directors and where necessary, those group companies are subject to guidance and advice.

#### Promotion of Compliance Among Group Companies

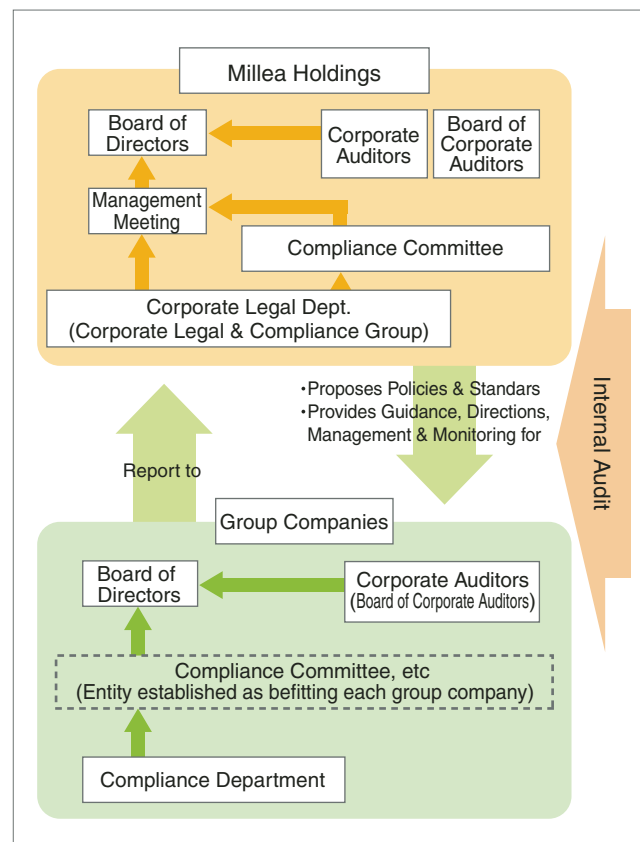
Group companies create tailored frameworks for the promotion of compliance within their own companies in accordance with the basic policies set out by Millea Holdings. They also oversee the promotion of compliance in subsidiaries, where such subsidiaries exist. Our insurance subsidiaries have done this through the creation of Compliance Departments that oversee initiatives generally, and by setting up Compliance Committees that engages in implementation and periodic status monitoring of action plans. Group companies other than those engaged in insurance have also set up their own promotion frameworks that fit each of their own circumstances.

These initiatives are all aimed at achieving continuous improvement, and are managed in accordance with the PDCA (Plan, Do, Check, & Act) Cycle. Furthermore, Millea Group as a whole continues to work at compliance awareness through the creation of manuals tailored for each area of operations, distributing such manuals, and providing access for company staff and management to information on the compliance framework and applicable rules.

#### Millea Group Code of Conduct

(as amended July 25th, 2005) ※Itemized outline only

- |  |                                     |
|--|-------------------------------------|
| 1. Purpose of This Code of Conduct       | 2-3 High Transparency in Management |
| 2. Basic Principles                      | ●Public Disclosure                  |
| 2-1 Compliance                           | ●Accurate Information               |
| ●What is Compliance                      | ●Confidential Information           |
| ●International Rules and Local Laws      | 2-4 Human Rights                    |
| ●Free and Fair Competition               | ●Anti-Discrimination                |
| ●Conflicts of Interest                   | ●Anti-Harassment                    |
| ●Insider Trading                         | ●Private Information                |
| ●Intellectual Property                   | 3. Enforcement and Administration   |
| ●Working Environment                     | ●Standards for Compliance           |
| 2-2 Social and Political Issues          | ●Reporting of Non-Compliance        |
| ●Anti-Social Forces                      | ●Consequences of Non-Compliance     |
| ●Political Activities, Political Funding |                                     |
| ●Gifts and Entertainment                 |                                     |



## Details of Initiatives

### Establishment of a Compliance Committee

A Compliance Committee more than half made up of members from outside the firm, such as lawyers and university academics, has been established within Tokio Marine & Nichido to gather a broad range of external opinions relating to the promotion of compliance. This committee is set up as a body accountable to the Board of Directors that reports and makes recommendations directly to management. We have been able to obtain invaluable advice and proposals based on the observations and expertise of these committee members.

### Hotline System

Within Millea Group, we have various hotline systems in place to handle compliance related reports and consultations from the staff and management of our group companies. Among these, we have set up a hotline to an external law firm, to facilitate use by group members. We also take care with the handling of information to ensure that use of the system does not result in any disadvantage to the person reporting

#### Details of the Hotline System

- Millea Holdings Hotline
- External Hotline (to an external law firm)
- Internal Hotlines: Examples from Tokio Marine & Nichido
  - Compliance Help Line (dedicated helpline handling calls for cases other than sexual harassment or human rights)
  - Human Rights Awareness Office (Sexual Harassment / Human Rights)
- Compliance Consultation Box: Examples from Tokio Marine & Nichido (we opened an interface for written submissions through the company intranet in October 2004)

or consulting.

### Compliance Staff Training

Within the companies of Millea Group, we hold training sessions for all ranks and workplaces in order to ensure proper knowledge of compliance requirements. At Tokio Marine & Nichido, we have formally commenced an e-Learning system that uses our intranet, and are working towards setting up an environment that enables our employees to learn more effectively.

#### Policies Aimed at Promoting Compliance Among Staff

- Training for management (seminars by external lecturers)
- Workplace training (common topics)
- Training by rank
- e-Learning using the company network (for management and staff)
- Compliance meetings in each of our department and branches (set out under annual measures)
- Information distributed by Compliance Departments (of useful examples of initiatives)

#### Policies Aimed at Promoting Compliance Among Our Agents

- Training for key agents with the aim of supporting internal management frameworks within our agents (accounting for agency characteristics)
- Newly offering training to our agents through the use of our online network (e-Training)
- Individual agent training with the aim of raising compliance related knowledge levels
- Introducing a "Compliance Checklist" to allow self-checking by our agents
- Continued operation of group agent training
- Distribution of our "Compliance Handbook For Agents" to all agents

### Compliance Promotion Among Our Agents

Within Tokio Marine & Nichido, training is provided aimed both at all agents in general, and specific training for key agents, in order to ensure that compliance initiatives are embraced by agents voluntarily. We have supported the development of a compliance management framework among our agents led by the person responsible for compliance in each branch. Also, we have distributed "Compliance Handbooks" to all our agents, and are constantly involved in raising compliance awareness in

## Dialogue With Stakeholders

We proactively engage in communication with all our stakeholders while at the same time disclosing timely and appropriate information relating to Millea Group's current state of affairs and the development of our business operations.

### Disclosure Policy of Millea Group

#### ■ Disclosure Policy of Millea Group ■

We aim to disclose meaningful information regarding Millea Group that enhances management transparency and fairness in connection with our "Corporate Social Responsibility".

##### 1. Disclosure Policy

It is our policy to disclose information expeditiously in accordance with the "Rules on Timely Disclosure of Corporate Information by Issuers of Listed Securities and the Like" stipulated by the Tokyo Stock Exchange.

We strive for timely, accurate and fair disclosure of other information that is relevant to our customers, shareholders and investors, representative offices and employees as well as the society at large.

In addition to disclosing appropriate information pursuant to Japanese laws and ordinances as well as stock exchange rules and regulations, it is our policy to disclose information in accordance with United States securities laws, rules and regulations, including providing annual reports containing consolidated financial statements prepared in accordance with the United States Generally Accepted Accounting Principles, or US-GAAP.

##### 2. Methods of Disclosure

Disclosure pursuant to stock exchange rules, regulations and other requirements is made through the Timely Disclosure network, or TDnet, of the Tokyo Stock Exchange as well as the press and other appropriate means. We subsequently post the disclosed information on our website.

Other disclosure is made in an appropriate manner based on the content of the relevant information.

English language information publicly filed with or submitted to the United States Securities and Exchange Commission, or the SEC, is available for viewing on the SEC website (<http://www.sec.gov/edgar.shtml>) or our website.

##### 3. Additional Information

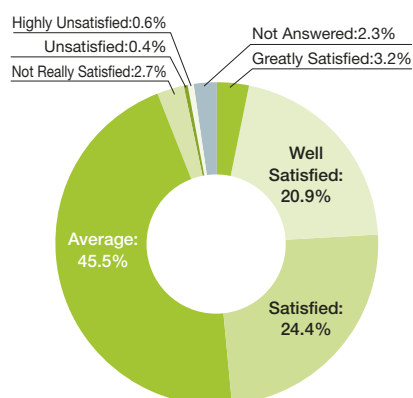
Disclosure made based on this Disclosure Policy is intended to inform the public regarding Millea Group's activities accurately, expeditiously and fairly and is not intended to constitute an investment solicitation.

### Communication With Our Customers

#### Customer Surveys

Every year, Tokio Marine & Nichido performs a postal survey of contracted insurance customers, seeking feedback on satisfaction levels, opinions and suggestions. Received opinions and suggestions are shared with relevant departments within the company, and applied in making improvements to our products and services. In FY 2004, approximately 4,000 of our automotive insurance clients were sent survey forms, from which we received around 1,100 responses. The responses included favorable comments regarding our response to accidents, as well as calls for improvements in our products and services, and reinforcement of our framework for providing information.

#### Customer Satisfaction Survey Results



#### Customer Center

The Customer Center handles inquiries relating to our insurance products, and looks after all the administrative needs of our customers contracted for insurance. They are equipped to handle all basic areas of inquiry. Furthermore, transfer of automobile insurance, cancellation of automobile liability

insurance, and reissuance of deduction certificates are included among the administrative operations handled by the Customer Center. In FY 2004, they handled around 640,000 calls.

#### Feedback and Inquiry Interface on Our Homepage

We have installed a "Feedback / Inquiry Corner" on our homepage that serves as a 24 hour-a-day, 365 day-a-year interface for receiving feedback and inquiries from our customers. In response to received feedback and inquiries, we generally provide a response from a specialist representative within 24 hours, making direct contact by phone where necessary. During FY 2004, we received around 6,000 items of feedback making such suggestions as that we improve the functionality of our homepage, and received inquiries on our contractual terms and product conditions.



## Improvements to Our Products/Services from “Our Customers’ Voice” and “Total Feedback”

We take our “Customer’s Voice” made up of feedback and suggestions received through a wide range of channels, and make it available via our company intranet, to be put to use in making improvements to our products and services. Furthermore, we also draw upon “Total Feedback” which are the improvements and suggestions from our customer’s perspective raised by our agents and employees. Until now, these have led to the making of concrete improvements such as revisions made to our automobile insurance products, terms and conditions, insurance account transfer system, and product information pamphlets.

### Results for FY 2004

Feedback and suggestions received from customers	460 cases
Suggestions for improvement from our agents and employees	1,200 cases

## Tokio Marine & Nichido Assurance Emergency Dial

Because one never knows when an accident is going to take place, we set up a 24-hour, 365 day-a-year freedial number in 1989 for dealing with inquiries and consultations relating to accidents. On October 1st, 2004, Tokio Marine Assurance Emergency Dial and Nichido Fire Backup Dial merged to form Tokio Marine & Nichido Assurance Emergency Dial, and continue providing freedial services. At the same time as setting up a new call center system last year, we also continue working to expand our services in many ways, such as through setting up an “English Response Corner”, “New Assurance Fax Service”, and an “Agent’s Late Night / Public Holiday Accident Support Desk”. The number of calls received by Assurance Emergency Dial reached about 1.02 million in FY 2004.



Assurance Emergency Dial Offices

## Communication With Our Employees

### CSR Forum

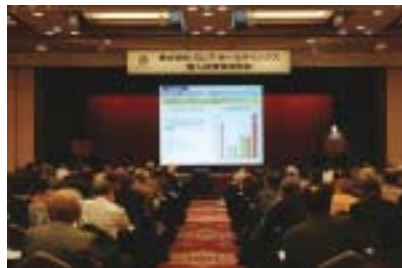
In February 2005, we established a CSR Forum on the Tokio Marine & Nichido company intranet as a place to share CSR related information and exchange opinions. This is done from the standpoint of considering information sharing and exchanging of opinions among all staff as being vital in order to have our CSR initiatives reach each and every company employee. The “CSR Forum” provides an introduction to CSR Committee meeting notes, good examples of initiatives, and references to CSR related information (records of lectures and examples from other firms). It also serves as a place in which opinions can be exchanged on other CSR initiatives.

## Communication With Shareholders and Private Investors

### Private Investor Briefings

In November 2004, we held a private investor briefing attended by 360 people. This kind of briefing aimed at private investors was a first within the insurance industry, and the first formal such briefing to have been held by a leading financial service industry member. At the briefing, company president Kunio Ishihara gave a lecture on the “Overview and Management Strategy of Millea Group”, while Mr. Makoto Sugimachi, General Manager of the Product Sales Support Department at Tokio Marine & Nichido gave a presentation on our “Super-Insurance”. According to the results of a

questionnaire distributed at the meeting (with a return rate of 95.6%), 62% of attendees expressed satisfied responses.



## “Top 190 Company Investor Relations Websites on the Internet”

A complete renewal of the Millea Holdings corporate website was carried out in March 2004 in order to improve the understandability and usability of the website to enable all investors and shareholders quick and convenient access to necessary information. As a result of this, Millea’s website was included in the Daiwa Investor Relations Co., Ltd. “Top 190 Company Investor Relations Websites on the Internet\*” announced in April 2004.

\* The “Top 190 Company Investor Relations Websites on the Internet” is a list of firms compiled by Daiwa Investor Relations Co., Ltd. based on a survey carried out between March 22nd and April 12th, 2004, in which the investor relations websites of 999 market leading firms were reviewed, the top 515 firms being selected and ranked according to the evaluation given them by Daiwa, with the top 190 being chosen for the “Top 190 Company Investor Relations Websites on the Internet” list.

## SRI Fund and Index

Millea Group receives favorable evaluations from corporate CSR rating agencies, and is included in many SRI Funds and Indices.

### Adopting Indices



Moving from being an “Environmental Report” to a “CSR Report”, the “Millea Group CSR Report 2005” has gone through a transformation whereby its content emphasizes the diverse philanthropic contributions of its business activities.

The main features of this report are how it has structured and set out its environmental and philanthropic goals along with measures for reaching them, and the zeal with which it demonstrates the governance framework for self evaluating progress towards those goals. Governance here refers to the control and autonomy that make up “Cooperative Governance”, which is to say strict adherence to corporate philosophy and implementation plans, and motivated stakeholders such as employees and shareholders who participate in CSR of their own volition. Thus, it is indeed the participant’s comprehension of CSR and this common understanding that makes putting it into practice possible. It is praiseworthy that from the very outset this “CSR Report 2005” concisely sets out the links between its Corporate Philosophy, CSR Charter, CSR Promotion Framework, as well as the related indices targeted by these, and calls for participation in CSR initiatives.

At the same time, this CSR report takes care that its message is in no way diminished to those within or outside the company, by introducing efforts from its group companies that work to enhance society, protect human rights and privacy, offer equal opportunity, career development, and so on. This is a key prerequisite for fostering the autonomy and initiative from within the company required for “Cooperative Governance”. To achieve that, common sharing of information through communication is indispensable. This report systematically explains this communication framework, and conveys the intent to attempt closer cooperation with stakeholders. Millea group continues with a communication framework to elaborate on initiatives to stakeholders, which shows Millea Group’s commitment to collaboration with stakeholders.

All companies broadening reporting content from that of an environmental report to a CSR report struggle with how to deal with the scope of CSR and add value. As the reporting scope expands, there tends to be a loss in structure and focus. “CSR Report 2005” has been painstaking in this respect. Introducing CSR based on the Corporate Philosophy, it is possible to understand the thinking that the implementation of this Corporate Philosophy is directly tied to environmental and CSR practices. However, it is not easy to systematically summarize such a broad policy as this and tie it to specific actions at ground level, as well as to foster common understanding and comprehension for readers from outside the company in particular. The other side to the enthusiasm shown in the “CSR Report 2005” is the inescapable impression that it remains at sea over systemization, as can be seen in the over brimming table of contents of the report.

It would be more desirable to have taken an editorial approach that organizes issues, establishes key concepts and introduces CSR as a built up series of concentric circles from within the company to society in general, from individual and local societies to the Asian region, and then to the broader world, to convey its message.

It is mentioned within the report that mangroves reforested through hard work since 1999, proved to have a strong effect in facing down the Indian Ocean Tsunami. Beyond this physical effect, one can’t help but think of the importance and size of intangible CSR related effects among individuals, and between people and society. I send my congratulations for having produced this work as befitting Millea Group’s inaugural CSR year.

### Profile



#### Professor Takeshi Hara

- Graduated Waseda University School of Law and entered the Mainichi Newspapers in 1962.
- On top of being Head of Science Section, and an editorial staff member, became a Waseda University Graduate School Professor in 1998.
- Also, a guest member of Mainichi Newspaper editorial staff and a guest lecturer at Tokyo University of Agriculture.
- Specializes in Environmental Sociology and Agricultural Economics.  
Recipient of the United Nations Environment Programme (UNEP) Global 500 / Reporting Award in 1993.

# Holding Company Overview

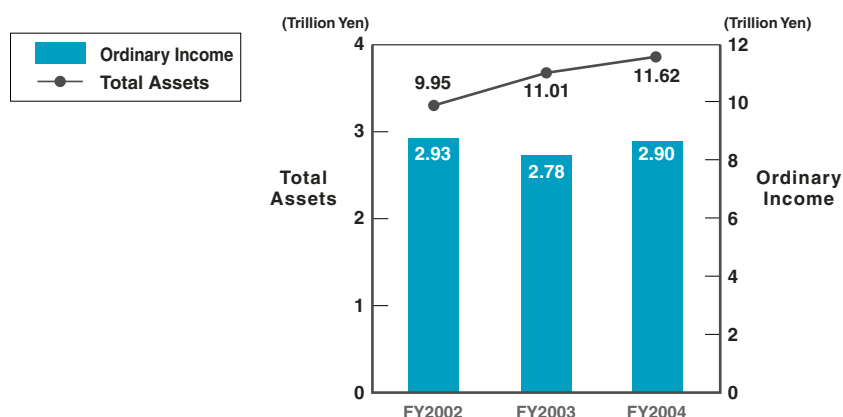
## Company Information

As of July 25, 2005

### Millea Holdings

Official Name	Millea Holdings , Inc.
Location of Headquarters	Tokio Kaijo Nichido Building Shinkan 9F, 1-2-1 Marunouchi, Chiyoda-ku, Tokyo, 100-0005, Japan
Date of Establishment	April 2, 2002
Common Stock	150 billion yen
Number of Employees	126 (As of March 31,2005)
Stock Exchange Listings	Tokyo, Osaka, and NASDAQ(U.S.)
Main Business	To manage its subsidiaries as an insurance holding company, and to conduct business pertaining thereto

### Ordinary Income and Total Assets of Millea Group



	(Million Yen)		
	FY2002	FY2003	FY2004
Ordinary Income	2,929,011	2,775,718	2,899,467
Total Assets	9,945,809	11,006,256	11,624,496

# The United Nations Global Compact Index / GRI Guideline Index

## UN Global Compact

Global Compact Principles		Page
Human Rights	Principle 1 Businesses should support and respect the protection of internationally proclaimed human rights.	P5
	Principle 2 Business should make sure that they are not complicit in human rights abuses.	P13, P27
Labour Standards	Principle 3 Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining	P15
	Principle 4 Businesses should uphold the elimination of all forms of forced and compulsory labour.	—
	Principle 5 Businesses should uphold the effective abolition of child labour.	—
	Principle 6 Businesses should uphold the elimination of discrimination in respect of employment and occupation.	P13, P27
Environment	Principle 7 Businesses should support a precautionary approach to environmental challenges.	P16-P17, P19-P20
	Principle 8 Businesses should undertake initiatives to promote greater environmental responsibility.	P21-P24
	Principle 9 Businesses should encourage the development and diffusion of environmentally friendly technologies.	P11, P17
	Principle 10 Businesses should work against all forms of corruption, including extortion and bribery.	P29, P30

## GRI Index

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<b>1 Vision and Strategy</b>		
1.1	Statement of the organisation's vision and strategy regarding its contribution to sustainable development	P4, P5
1.2	Statement from the CEO describing key elements of the report	P3, P4
<b>2 Profile</b>		
<b>Organisational Profile</b>		
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2.2	Major products and/or services, including brands if appropriate	P34
2.3	Operational structure of the organisation	—
2.4	Description of major divisions, operating companies, subsidiaries, and joint ventures	P2
2.5	Countries in which the organisation's operations are located	P34
2.6	Nature of ownership; legal form	P34
2.7	Nature of markets served	—
2.8	Scale of the reporting organisation	P34
2.9	List of stakeholders, key attributes of each, and relationship to the reporting organisation	—
<b>Report Scope</b>		
2.10	Contact person(s) for the report, including e-mail and web addresses	Back Cover
2.11	Reporting period (e.g., fiscal/calendar year) for information provided	P2
2.12	Date of most recent previous report (if any).	P2
2.13	Boundaries of report (countries/regions, products/services, divisions/facilities/joint ventures/subsidiaries) and any specific limitations on the scope	P2
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2.15	Basis for reporting on joint ventures, partially owned subsidiaries, leased facilities, outsourced operations, and other situations that can significantly affect comparability from period to period and/or between reporting organisations	P2
2.16	Explanation of the nature and effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement	—
<b>Report Profile</b>		
2.17	Decisions not to apply GRI principles or protocols in the preparation of the report	—
2.18	Criteria/definitions used in any accounting for economic, environmental, and social costs and benefits	—
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2.20	Policies and internal practices to enhance and provide assurance about the accuracy, completeness, and reliability that can be placed on the sustainability report	P33
2.21	Policy and current practice with regard to providing independent assurance for the full report	P33
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<b>3 Governance Structure and Management Systems</b>		
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GRI Elements and Indicators Page		Page
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MILLEA

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