



[Statement of Continued Support]

The Tokio Marine Group is a full-line insurance group comprising non-Life, life, reinsurance companies and others, including its major subsidiaries of Tokio Marine & Nichido Fire Insurance, Tokio Marine & Nichido Life Insurance, Philadelphia Consolidated Holding Corp. and Kiln, located in 432 cities, in 38 countries and regions in the world.

The Tokio Marine 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 its CSR initiatives, the Tokio Marine Group seeks to collaborate with all of its stakeholders, including members of the corporate, government and civic communities, in the solution of social issues, thereby contributing to the sustainable development of society.

The concepts behind and details of the 10 principles for behavior in connection with human rights, labor practices, environment, and anti-corruption advocated in the United Nations Global Compact coincide with the Tokio Marine Group's approach to CSR initiatives and its CSR Charter.

In April 2005, Tokio Marine Holdings (the Group's holding company) announced its support for the United Nations Global Compact (hereinafter "UNGC") and became a formal participant. This decision was based upon a desire to enhance the CSR activities of the Tokio Marine Group from global perspectives and better contribute to the sustainable development of society.

Since 2007, we have served as a steering committee / secretariat member of the UN Global Compact Japan Network (hereinafter "UNGC-JN"), a network of UNGC members in Japan, and provided support for its operations. Since 2008, we have led a subcommittee within UNGC-JN to investigate global warming issues. We continue to work in concert with other members to share information on global warming and conduct studies of the issues.

The Group supports the principles and actions of the UNGC and looks forward to maintaining its membership and participation in the future.

January 2011

Shuzo Sumi

President and Chief Executive Officer
Tokio Marine Holdings, Inc.

Reference

Message from the President: http://www.tokiomarinehd.com/en/social_respon/csr_message.html
The Global Compact and the Tokio Marine Group: http://www.tokiomarinehd.com/en/social_respon/group_csr/gcompact.html
Corporate Philosophy and CSR Charter: http://www.tokiomarinehd.com/en/social_respon/group_csr/csr_charter.html

General CSR information

CSR Report: http://www.tokiomarinehd.com/en/social_respon/report/index.html
Comparative Table on GRI Guidelines: http://www.tokiomarinehd.com/en/social_respon/report/guide.html
Overview of Performance Data: http://www.tokiomarinehd.com/en/social_respon/report/pdata.html

[Human Rights]

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: Businesses should make sure that they are not complicit in human rights abuses.

[Labor]

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 labor;

Principle 5: The effective abolition of child labor; and

Principle 6: The elimination of discrimination in respect of employment and occupation.

[Human Rights] [Labor] Assessment / Policy / Commitment/Goals

Principles 1-6

<Assessment>

The Tokio Marine Group implements the Plan-Do-Check-Act (PDCA) monitoring through the Basic Human Resources Policy or the Compliance and Risk Management Guidelines at Group companies as it strives for human rights and labor issues. Each member of the Tokio Marine Group holds human rights training in the workplace, in which all employees and other co-workers take part.

<Policy / Commitment >

Tokio Marine Holdings has formulated a “Tokio Marine Group CSR Charter” to serve as behavioral guidelines in the implementation of disciplined CSR management by all group companies.

“Tokio Marine Group CSR Charter” also acknowledges adherence to UN Global Compact, UN Universal Declaration of Human Rights and the ILO core labor areas.

To ensure appropriate business operations the Group adheres to fundamental policies (compliance, information security, human resources and others) as set out in the “Tokio Marine Group CSR Charter,” the “Basic Policies for Internal Controls” and the Group’s core management principles.

“Tokio Marine Group CSR Charter” (excerpt)

The Tokio Marine Group has articulated the following principles of conduct to be adhered to by all directors, officers and employees (including temporary staff) in the practice of CSR.

“Respect for Human Rights and Dignity”

- We respect and actively promote the recognition of human rights for all people.
- 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 thorough control of personal information.

“Tokio Marine Group Code of Conduct” (excerpt)

We, the directors, officers and employees of the Tokio Marine Group companies, shall obey applicable laws, rules and regulations and internal rules and conduct fair and equitable business activities within social norms. In order to conduct our business in a fair manner, we shall strive to understand the applicable rules and fully comply with them.

#1: “Compliance” (compliance with laws, ordinances and social norms, etc.)

#1-2 International Rules and Local Laws — The rules which we must obey are not restricted to those applicable in Japan. We shall obey international rules and local laws, rules and regulations in the countries where Tokio Marine Group companies operate. We shall also respect the traditions and cultures in such countries.

#1-7 Working Environment - We shall comply with labor-related laws, rules and regulations and maintain a safe and proper working environment.

#4: “Respect for Human Rights and the Environment” (respect for the basic human rights of all human beings)

#4-1 Anti-discrimination — Human rights are values widely recognized around the world, and any discrimination on grounds of sex, age, profession, nationality, race, thought, creed, religion, social status or birth as well as any act constituting an infringement of human rights should never be tolerated.

#4-2 Anti-harassment — Sexual or any other kind of harassment or intimidation should never be tolerated.

#4-3 Private Information — In compliance with applicable laws, rules and regulations as well as the Tokio Marine Group Privacy Policy, we shall safeguard private information, including customers’ information, and we shall not use such information except on a need basis to carry out our business operations, in order to avoid any breach of privacy.

“Tokio Marine Group Basic Human Resources Policy” (domestic) (excerpt)

Article 6: “Human rights promotion”

Domestic group companies are required to take the following measures in recognition of the importance of human rights promotion.

- Formulate and rigorously apply policies and guidelines for human rights promotion
- Create an organization for human rights promotion overseen directly by the president
- Conduct at least one training session per year on human rights promotion for all directors, officers and employees
- Formulate and rigorously implement guidelines concerning non-discriminatory hiring practices and establish a “Committee on Non-Discriminatory Hiring Practices and Human Rights Promotion”
- Promote normalization (achieve statutory disabled hiring rates and create working environments that are suitable to disabled employees on both the software and hardware sides)
- Formulate rules to prevent sexual harassment and establish internal consultation services

“Tokio Marine Group Company Compliance and Risk Management Guidelines” (international) (excerpt)

- Formulate policies and guidelines for non-discriminatory hiring practices.
- Establish internal and external consultation services to prevent sexual harassment and other forms of discrimination.
- * We have enhanced management systems by formulating individual guidelines and rules in light of the circumstances at national and regional locations.

<Goals>

- Annual Plan (2010) : Percentage of employees undergoing education and taking courses on human rights (Group companies in Japan): 100%
- Medium term Plan (2009-2011) : Percentage of employees with disabilities (Group companies in Japan) 2.20%

System / Action	Outcome / Evaluation
<p>Principles 1-6</p> <p>In the case of non-compliance (including doubtful cases) with this Code of Conduct, applicable laws, rules and regulations or internal rules, we, the directors, officers and employees of the Tokio Marine Group companies, shall make a prompt report or consultation in accordance with the applicable internal rules. If, for any reason, it is not appropriate to make use of the regular reporting system, one of the hotlines, including the external hotline (assigned law firm) may be used.</p> <p>The reporter will not be treated disadvantageously because of his or her report. Furthermore, private information of the reporter shall be handled responsibly.</p> <p>Based on the mechanisms described above, Group companies shall create compliance manuals and shall formulate and implement annual CSR and human rights plans.</p>	<p>Principles 1-6</p> <p>Tokio Marine & Nichido quantitatively evaluates the results of activities each year based on KPIs. KPIs include criteria such as employee satisfaction with corporate ethics and respect for human rights, disabled employment rates and numbers of female employees in positions of responsibility. They are used in plan-do-check-act (PDCA) monitoring and in the formulation of new strategies. KPIs are incorporated into the evaluation criteria used to determine executive compensation at Tokio Marine Holdings and Tokio Marine & Nichido.</p> <p>* Some KPIs are disclosed as Tokio Marine & Nichido’s CSR indicators.</p> <p>http://www.tokiomarinehd.com/en/social_respon/group_csr/promotion01.html</p> <p>Corporate Social Responsibility Report 2010 Page 8</p>

<p>Principles 1 and 2</p> <p>Group companies conduct training sessions for all directors, officers and employees each year in order to deepen their respect for human rights and prevent all forms of discrimination and harassment.</p> <p>Group companies also hold seminars featuring outside lecturers.</p> <p>Group companies also provide training tools on human rights issues to agents, who are important business partners.</p>	<p>Principles 1 and 2</p> <p>Group companies conduct human rights promotion training (e-learning, lectures) for all directors, officers and employees. Tokio Marine Holdings and Tokio Marine & Nichido hold seminars on CSR and human rights featuring outside lecturers for their executive-level employees. Tokio Marine & Nichido also provides training tools (e-learning, handbooks, and videos) on human rights issues to employees and agencies once per year to assist in their human resources development.</p> <p>* Percentage of employees undergoing education and taking courses on human rights (Group companies in Japan) : 100%</p> <p>In 2009, Tokio Marine & Nichido formulated a “Code of Conduct in Business Transactions” for its business partners, requiring them to adhere to national laws and ordinances and social norms, etc.</p>				
<p>Principles 3-6</p> <p>Group companies adhere to labor-related laws and ordinances in accordance with national laws, ordinances and rules, endeavor to build sound labor-management relations, maintain safe and healthy working environments, rigorously manage working hours and promote appropriate and fair hiring.</p>	<p>Principles 3-6</p> <p>Tokio Marine & Nichido holds approximately 50 meetings each year with the Tokio Marine & Nichido Labor Union to discuss wages, human resources systems, labor safety and sanitation, management programs and policies, and a wide range of other issues.</p> <p>The Tokio Marine Group also supports work/life balance, manages the working hours of their employees (including temporary staff) and provides physical and mental health management.</p> <p><u>* Overview of Performance Data (FY2009)</u></p> <table border="0"> <tr> <td>Labor union participation rate (Group companies in Japan)</td> <td>: 80.0%</td> </tr> <tr> <td>Employee health examination rate (Group companies in Japan)</td> <td>: 99.7%</td> </tr> </table> <p>Industrial accidents in FY2009 (Group companies in Japan)</p> <ul style="list-style-type: none"> • Occupational accidents : 57 people • Commuting accidents : 44 	Labor union participation rate (Group companies in Japan)	: 80.0%	Employee health examination rate (Group companies in Japan)	: 99.7%
Labor union participation rate (Group companies in Japan)	: 80.0%				
Employee health examination rate (Group companies in Japan)	: 99.7%				
<p>Principle 6</p> <p>The Tokio Marine Group believes it essential that motivated and capable employees who possess diverse senses of value should display their capabilities to the full, regardless of gender, age, nationality or other attributes, to improve the quality of the products and services that it provides to customers worldwide.</p> <p>We promote diversity within the group as a whole by encouraging the hiring of the disabled, providing opportunities for female employees and creating workplaces that are conducive to the employment of knowledgeable, experienced senior employees.</p>	<p>Principle 6</p> <p>The Tokio Marine Group’s domestic member companies have been making efforts to develop a working environment where employees with disabilities can work comfortably and demonstrate their abilities to the utmost extent through such means as individual counseling and improvements in the infrastructure appropriate for their specific needs.</p> <p>The Group’s companies in Japan employ approximately 500 individuals with disabilities. The percentage of employees with disabilities stood at 2.06% as of June 1, 2010.</p> <p>In January 2010, Tokio Marine established Tokio Marine Business Support Co., Ltd. to provide an even greater scope of opportunities for persons with disabilities across the entire group.</p> <p>Females account for approximately half of the Tokio Marine Group workforce. The Group has expanded the range of fields open to them and encourages them to be active in these fields as a means of meeting the diverse expectations of our customers and appropriately responding to their needs.</p> <p>Domestic Group companies hold a regular, annual “Women’s Forum.” In FY2009, a total of 250 female employees from domestic group companies participated in the “Women’s Forum.”</p> <p>Tokio Marine & Nichido also holds regular meetings for direct communications between executives and female managers. These meetings provide an opportunity to listen to the opinions of female employees, use them to make improvements in company policies and programs and improve workplaces so as to facilitate the activities of female employees throughout the company.</p>				

The numbers of female managers are steadily increasing at domestic group companies.

The Tokio Marine Group considers actively promoting the employment of elderly members to be an important management issue in maintaining the sustainable growth of the Group as a whole.

In addition to encouraging continuous self-advancement and changes in consciousness and behavior on the part of its employees, it intends to provide fields of activity in which employees can utilize their experiences and strengths to generate new added values while maintaining high levels of motivation.

* Overview of Performance Data (FY2009)

- Percentage of employees with disabilities (Group companies in Japan, as of June 1, 2010): 2.06%
- Number of female managers (Group companies in Japan, as of July 1, 2010): 246
- Number of employees using the sustainable system for continued employment for the elderly (Group companies in Japan, as of July 1, 2010): 278

[Human Rights] [Labor] Reference

Corporate Philosophy and CSR Charter: http://www.tokiomarinehd.com/en/social_respon/group_csr/csr_charter.html
Tokio Marine Group Code of Conduct: <http://www.tokiomarinehd.com/en/conduct/index.html>
Relations with employees: http://www.tokiomarinehd.com/en/social_respon/stakeholder/employee.html
Tokio Marine & Nichido Corporate Value Index and CSR Indicators: http://www.tokiomarinehd.com/en/social_respon/group_csr/promotion01.html

[Environment]

Principle 7: Business 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.

[Environment] Assessment / Policy / Commitment / Goals

Principles 7-9

<Assessment>

Tokio Marine Group has to recognize that climate change and global warming pose major risks to the management of the insurance business hereafter.

Since FY2006, Tokio Marine Group has been promoting the cross-organizational “Global Warming Research Project” through the joint efforts of Tokio Marine & Nichido, Tokio Marine Research Institute and Tokio Marine & Nichido Risk Consulting Co., Ltd. and is engaged in the study of climate change risks and global warming, as well as the development of products and services relating to them.

The Tokio Marine Group implements the Plan-Do-Check-Act (PDCA) cycle through environmental management systems (EMS) at all principal Group companies as it strives to reduce environmental impact from its business activities.

<Policy / Commitment >

The Tokio Marine Group endeavors to protect the global environment in all aspects of its business activities.

“Tokio Marine Group CSR Charter” (excerpt)

“Protection of the Global Environment”

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

“Tokio Marine Group Code of Conduct” (excerpt)

#4: “Respect for Human Rights and the Environment” (environment-friendly action)

#4-4 Protection of the global environment — Acknowledging that the protection of the global environment is an important responsibility, we shall comply with applicable laws, rules and regulations, and respect the harmonization with and the improvement of the global environment in all of our activities.

“Environmental Philosophy/Environmental Policy of Tokio Marine & Nichido”

“Environmental Philosophy”

Adopting the conservation 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 protect 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 Policy”

- Preservation of the global environment through the insurance business
- Compliance with environmental laws and regulations
- Promotion of environmental awareness-raising and philanthropic activities
- Efficient use of resources and energy
- Continuous improvement of the environment and prevention of pollution

<Goals>

- Development of products and services that adapt to and mitigate climate change (e.g., expand and upgrade Tokio Marine & Nichido’s “Green Gift” Project)
- Reduction in environmental impact at Group companies (Japan/overseas)

Targets (FY2010): CO₂ emissions: 79,500 tons (a reduction of 7% from the previous year) Copier paper use: 2,360 tons (a reduction of 8% from the previous year)

Targets (FY2011): The entire Tokio Marine Group (Japan/overseas) aims to become carbon-neutral by the end of FY2011.

In FY2010, Tokio Marine & Nichido set a medium-term target of attaining a 40% reduction in CO₂ emissions by fiscal 2020 compared with the fiscal 2006 level and a long-term target of attaining a 60% reduction in CO₂ emissions by fiscal 2050 compared with the fiscal 2006 level, and is currently progressing with CO₂ reduction measures.

System / Action	Outcome / Evaluation
Principles 7-9 In light of the highly public nature of the insurance business, insurance companies must provide products and services to their customers that are stable and viable over the long term. In FY2006, the Tokio Marine Group launched a “Global Warming Research Project Team,” with Tokio Marine & Nichido and Tokio Marine Research Institute serving as the leading members. The team is tasked with studying and researching risk management and product development responding to climate change. Tokio Millennium Re (Bermuda) holds a regular “Summit on Global Warming and Climate Change” to which it invites experts on climate change risk and natural disaster risk assessment from around the world to study and research climate change and global warming with a focus on hurricanes in the United States.	Principles 7-9 The Tokio Marine Group collaborates with outside academic institutions (University of Tokyo and Nagoya University) to study the impact of climate change on typhoons and other natural disasters. We aim to use the findings from this research to improve the accuracy of risk management, develop and market new products and services and communicate information to the general public. In 2007, Tokio Marine & Nichido formulated a “Comprehensive Program on Climate Change to serve as a strategy framework for climate change as well as an action plan for specific business areas. In accordance with the Comprehensive Program, the company is now working to improve the level of its activities and better contribute to the achievement of a sustainable society. Receiving high acclaim for these comprehensive initiatives, Tokio Marine & Nichido was certified as an “Eco-First Company” in 2008 based on the “Eco-First Program” established by the Ministry of the Environment of Japan. Tokio Marine & Nichido conducts quantitative evaluations of activity results each year based on KPIs. It also uses KPIs in PDCA monitoring and the formulation of new strategies. KPIs include CO ₂ emissions and use of paper resources, and they are incorporated into the evaluation criteria used to determine executive compensation at Tokio Marine Holdings and Tokio Marine & Nichido. * Some KPIs are disclosed as Tokio Marine & Nichido’s CSR indicators. http://www.tokiomarinehd.com/en/social_respon/group_csr/promotion01.html Corporate Social Responsibility Report 2010 Page 8

<p>Principle 7</p> <p>Since 1999 under the concept of “insurance for the future of the Earth,” Tokio Marine & Nichido has been active in mangrove planting projects, primarily in Southeast Asia.</p> <p>Mangrove trees have wide-ranging effects on the Earth. They help to prevent and mitigate global warming by absorbing and storing CO₂ and preserve ecosystems and biodiversity. They can also serve as bulwarks to protect people from tsunamis and other natural disasters.</p>	<p>Principle 7</p> <p>In 2008, Tokio Marine & Nichido declared a commitment to maintain its involvement in mangrove planting projects for the protection of the global environment for the next 100 years.</p> <p>Tokio Marine & Nichido has been promoting the Mangrove Planting Project since 1999, and as of the end of March 2010 has planted 6,293 hectares of forest.</p> <p>The third phase of this project from FY2009 to FY2013 is planting 2,300 hectares in seven countries, among which India has recently been included.</p>
<p>Principle 8</p> <p>The Tokio Marine Group develops and markets products that respond to climate change and biodiversity issues as part of its efforts to contribute to global environmental protection through the insurance business.</p> <p>Tokio Marine & Nichido is currently pursuing a project to encourage web-based browsing of content of clauses rather than sending paper copies to customers. (The “Green Gift” Project, initiated in 2009)</p> <p>When a customer signing a new policy elects to view it on the website, the company donates money equivalent to two mangrove seedlings to a mangrove planting project.</p>	<p>Principle 8</p> <p>As of the end of June 2010, more than 7 million contracts had been switched to paperless Web contracts through the “Green Gift” Project. As the result, Tokio Marine & Nichido reduced approximately 1,400 tons (per year) of paper resources in their daily operations.</p> <p>From September 2010, Tokio Marine & Nichido has designated customers who participate in the Green Gift Project as its Green Gift Partners and has undertaken a variety of initiatives that give customers a genuine sense that they are participating in and helping with global environmental protection and social contribution activities.</p> <p>This project is an example of how the company works in collaboration with its customers to save paper resources and reduce CO₂ emissions, thereby helping to alleviate global warming and preserve biodiversity.</p>
<p>Principle 8</p> <p>The Tokio Marine Holdings Board of Directors and CSR Board (committee made up of the presidents of group companies) formulate an annual plan for global environmental protection that includes reductions of environmental load throughout the Group. These bodies also monitor performance throughout the year.</p> <p>Group companies nominate CSR key persons to promote global environmental protection and social contribution activities. Programs are coordinated internally and among Group companies.</p> <p>Since FY1999, the Head Office of Tokio Marine & Nichido has adopted an environmental management system based on the ISO14001 environmental management standard. Tokio Marine & Nichido Facilities has adopted the system since FY2006. Tokio Marine & Nichido (excluding the Head Office) and all domestic member companies of the Tokio Marine Group have introduced a unique environmental management system of their own (“Green Assist”). Steps are being taken through the implementation of the Plan-Do-Check-Act (PDCA) cycle and to reduce the environmental impacts from business activities.</p> <p>From FY2009, the Group has expanded the scope of coverage for the environmental impact data to Group companies, and has now achieved approximately 100% coverage on a consolidated basis.</p> <p>Group companies work to save energy by adjusting office air-conditioning to appropriate levels, turning off lights during lunch breaks and other efforts. They also work to make their operations more paperless by eliminating forms</p>	<p>Principle 8</p> <p>CO₂ emissions and paper usage by the Tokio Marine Group in FY2009 are as follows.</p> <ul style="list-style-type: none"> • CO₂ emissions: 85,701 tons • Paper usage: 12,241 tons (Japan: 11,841 tons, overseas: 400 tons) <p>In fiscal 2009, Tokio Marine & Nichido of the CO₂ emissions is 49,307 tons. At the end of FY2009, Tokio Marine & Nichido became carbon neutral in its domestic operations.</p> <p>Internal and external audits based on ISO14001 have detected no major problems or violations of environmental laws, and no complaints from customers regarding the environment have been filed with the Tokio Marine Group.</p>

<p>and ledgers and computerizing processes where possible, thereby reducing the amount of paper consumed.</p>	
<p>Principle 9</p> <p>Tokio Marine & Nichido participates in domestic and international global environmental protection initiatives as one of the leading companies in Japan, and is active in the provision of information and advice.</p> <p>It also participates in the meetings of the General Insurance Association of Japan and Nippon Keidanren. At these organizations, it is involved in the formulation of recommendations concerning the reduction of industrial energy usage and in research into emissions rights trading.</p> <p>The Tokio Marine Group participates in international initiatives related to climate change in order to fulfill its role and responsibility as a global insurance company and actively proposes ways and means to adapt to and mitigate climate change.</p>	<p>Principle 9</p> <p>UNEP FI Insurance Working Group Tokio Marine & Nichido is the only insurance company in Asia taking part in the United Nations Environment Program Finance Initiative (UNEP FI) Insurance Working Group including approximately 10 companies worldwide, mainly insurance companies and brokers. As a member of the Insurance Working Group, the company conducted activities to deepen understanding of insurance and climate change/sustainability through a seminar entitled “Insuring for Sustainability” (2009) and issuance of a collaborative paper entitled “The Global State of Sustainable Insurance” (2010).</p> <p>Japan Climate Leaders’ Partnership Tokio Marine & Nichido has been a member of the Japan Climate Leaders’ Partnership (Japan-CLP), an initiative of Japanese companies to deal with issues of climate change, since July 2009. With Japan-CLP, companies from various industries (finance, insurance, logistics, construction, IT, etc.) join forces to lead initiatives aimed at realizing a sustainable low-carbon society and to make recommendations on how to tackle climate change together.</p> <p>Geneva Association Tokio Marine & Nichido is a member of the Geneva Association composed of approximately 80 executives from major insurance companies around the globe. Since September 2008, each company has been conducting research into climate change under the Climate Change and Insurance (CC+I) Project regarding the economic impact of climate change on insurance companies, and jointly launched a research report on “The Insurance Industry and Climate Change” (2009).</p> <p>ClimateWise Tokio Marine & Nichido is a member of ClimateWise, the global collaboration of leading insurers focused on reducing the risks of climate change, launched in 2007 by HRH The Prince of Wales. Facilitated by the University of Cambridge Programme for Sustainability Leadership, ClimateWise brings together over 40 international members from Europe, North America, Asia and Southern Africa. All members publicly commit to abide by the ClimateWise Principles, which cover climate risk analysis, public policy, climate awareness amongst customers, investment strategies and the impact of their business operations. Members also commit to independent public reporting consistent with all of these commitments.</p>
<p>Reference</p>	
<p>Corporate Philosophy and CSR Charter: http://www.tokiomarinehd.com/en/social_respon/group_csr/csr_charter.html</p> <p>Tokio Marine Group Code of Conduct: http://www.tokiomarinehd.com/en/conduct/index.html</p> <p>Contributions to the Global Environment: http://www.tokiomarinehd.com/en/social_respon/contribute/environment.html</p> <p>Tokio Marine & Nichido Corporate Value Index and CSR Indicators: http://www.tokiomarinehd.com/en/social_respon/group_csr/promotion01.html</p> <p>UNEP FI Insurance Working Group: http://www.unepfi.org/work_streams/insurance/index.html</p> <p>The Geneva Association: http://www.genevaassociation.org/Home/Climate_Change.aspx</p> <p>Japan-CLP: http://japan-clp.jp/en/index.html</p> <p>ClimateWise: http://www.climatewise.org.uk/</p>	

[Corruption]

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery

[Corruption] Assessment / Policy / Commitment

Principle 10

<Assessment>

The Tokio Marine Group implements the Plan-Do-Check-Act (PDCA) monitoring through the Compliance and Risk Management Guidelines at Group companies as it strives for compliance including corruption issues. Each member of the Tokio Marine Group holds compliance training in the workplace, in which all employees and other co-workers take part.

<Policy / Commitment >

The Tokio Marine Group supports and respects the OECD Guidelines for Multinational Enterprises.

The Group requires all directors, officers and employees to conduct business in a sincere and fair manner, adhering to all laws, ordinances and social norms, etc.

“Tokio Marine Group CSR Charter” (excerpt)

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

“Tokio Marine Group Code of Conduct” (excerpt)

All directors, officers and employees are required to adhere to domestic rules, international rules, national laws and ordinances, and to respect the customs and cultures of the countries in which the Tokio Marine Group does business. With respect to entertainment and gifts, “we shall not accept money, goods and other inappropriate or unlawful profits by taking advantage of our position. Also, we shall not accept or give any gifts or entertainment which are illegal or not considered reasonable by social standards.”

#1. “Compliance”: Compliance with applicable laws, regulations, international rules and local laws, promotion of fair and free competition, prevention of conflicts of interest, protection of intellectual property, maintaining a safe and proper working environment, etc.

#1-5. “Insider Trading”: We shall not buy or sell securities of any company while in possession of material, non-public information (known as “insider information”) regarding the subject company in violation of securities related laws, rules or regulations. This rule applies not only to the securities of Tokio Marine Holdings, Inc. but also to those of other companies. Without authorization, we shall not pass inside information to any other person.

#2. “Social and Political Issues”: Maintaining a firm stand against all anti-social forces, prevention of money laundering, respect for laws and ordinances concerning political activities, prohibition against accepting and giving entertainment and gifts, etc.

System / Action	Outcome / Evaluation
<p>In the case of non-compliance (including doubtful cases) with this Code of Conduct, applicable laws, rules and regulations or internal rules, we, the directors, officers and employees of the Tokio Marine Group companies, shall make a prompt report or consultation in accordance with the applicable internal rules.</p> <p>If, for any reason, it is not appropriate to make use of the regular reporting system, one of the hotlines, including the external hotline (assigned law firm) may be used.</p> <p>The reporter will not be treated disadvantageously because of his or her report. Furthermore, private information of the reporter shall be handled responsibly.</p> <p>Based on the mechanisms described above, Tokio Marine Group companies create their own compliance manuals and formulate and implement annual plans for CSR and human rights.</p>	<p>The Tokio Marine Group takes initiatives based on individually formulated compliance implementation plans. Group companies conduct human rights promotion training (e-learning, lectures) for all directors, officers and employees. Tokio Marine Holdings and Tokio Marine & Nichido hold seminars on corruption issues featuring outside lecturers for their executive-level employees. Tokio Marine & Nichido also provides training tools (e-learning, handbooks, and videos) on corruption issues to employees and agencies once per year to assist in their compliance department.</p> <p>Tokio Marine Holdings performs monitoring (internal audits) for all Group companies to confirm effectiveness.</p> <p>In 2009, Tokio Marine & Nichido formulated a “Code of Conduct in Business Transactions” for its business partners, requiring them to adhere to national laws and ordinances, social norms, etc.</p> <p>Tokio Marine & Nichido quantitatively evaluates the results of activities each year based on KPIs including criteria such as corporate ethics and compliance.</p> <p>* Some KPIs are disclosed as Tokio Marine & Nichido’s CSR indicators.</p> <p>http://www.tokiomarinehd.com/en/social_respon/group_csr/promotion01.html</p> <p>Corporate Social Responsibility Report 2010 Page 8</p>

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Corporate Philosophy and CSR Charter: http://www.tokiomarinehd.com/en/social_respon/group_csr/csr_charter.html

Tokio Marine Group Code of Conduct: <http://www.tokiomarinehd.com/en/conduct/index.html>

Compliance: http://www.tokiomarinehd.com/en/social_respon/management/compliance.html

Tokio Marine & Nichido Corporate Value Index and CSR Indicators: http://www.tokiomarinehd.com/en/social_respon/group_csr/promotion01.html