

**MUFG Bank, Ltd.****Slavery and Human Trafficking Statement****Financial year ending 31 March 2024****Introduction**

This statement sets out the steps that MUFG Bank, Ltd. (“**MUFG Bank**” or “**we**” or “**us**” or “**our**”) has taken in an attempt to ensure that modern slavery and human trafficking are not taking place in our supply chains or any part of our business.

We continue to strive to maintain the highest professional and ethical standards and we expect the same from our suppliers. Slavery and human trafficking remain entirely contradictory to the “MUFG Way” (the basic policy in conducting our business activities, which provides guidelines for all MUFG Group activities) and Code of Conduct, and have no place in or around our organization, and we are pleased to reinforce that principle through this statement.

This statement (including the addendum) is published on behalf of MUFG Bank (pursuant to the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (Cth)). It has been approved by the Board of Directors of MUFG Bank, Ltd. Japan.

**Modern slavery and human trafficking**

The term "modern slavery" is used to describe a range of situations in which coercion, threats or deceptions are used to exploit individuals and undermine their freedom. These situations include slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour and the worst forms of child labour.

"Human trafficking" occurs when a person arranges or facilitates the travel of another person with a view to the other person being exploited.

**Structure, operations and supply chains**

MUFG Bank is a financial institution incorporated and registered in Japan, headquartered in Tokyo, Japan. MUFG Bank is a subsidiary and core banking unit of Mitsubishi UFJ Financial Group, Inc. (“MUFG” or “Group”), listed on the Prime Section of the Tokyo Stock Exchange, the Nagoya Stock Exchange Premier Market and the New York Stock Exchange. We operate through branches, subsidiaries and representative offices throughout the world.

Our global management team sits both in Japan and abroad and ensures that our global corporate framework reflects the MUFG Way and Code of Conduct.

Our main operations are deposit taking, financial lending and other related businesses to clients both locally and internationally, in principle borrowing from regulated financial markets and on lending to our customers. Our supply chain includes procuring products and services for operating our offices and supporting our staff.

**The risks of Modern Slavery and Human Trafficking practices**

We understand that we operate in an industry, banking and financial services, where risk of modern slavery within our direct business operations is low, but we remain vigilant and prepared to uncover any such risks posed by our customers and their activities as well as within our main supply chain.

As part of our overall risk strategy and in accordance with our obligations, we have in place compliance and risk management frameworks incorporating systematic processes for the identification, assessment, treatment and monitoring of customers for financial and financial crime risks, including criminal or unethical activity (such as modern slavery and human trafficking), that their activities may pose to our operations.

We view that the risks of modern slavery sit within our main supply chain, as described above, such as procuring products and services for operating our offices and supporting our staff as these procuring activities may have an adverse impact on the employees of the suppliers. To avoid such risks, we have placed policies and procedures as we are committed in respecting human rights within our supply chain. Please refer to “Policies and procedures” below.

**Policies and procedures**

MUFG Bank is committed to the MUFG Way and Code of Conduct, which has been reviewed and updated during the year to give our staff additional guidance on MUFG's expectations in relation to their conduct.

The Code of Conduct requires, amongst other things, that MUFG Bank respect the human rights of all our employees, act with integrity and comply at all times with the letter and spirit of laws, regulations and rules that apply to us and combat criminal activity.

MUFG has also published policies and procedures including:

- MUFG Human Rights Policy Statement and MUFG Human Rights Policy Report which apply to the Group globally and which articulates the Group's dedication to the respect of human rights across all operations. This includes an expectation that our suppliers will avoid human rights violations.
- MUFG Environmental and Social Policy Framework that sets out our approach to managing the environmental and social risks arising from the business activities of the Group. The Framework explicitly prohibits the Group and all of its entities from financing transactions involving the use of child and/or forced labour or human trafficking. The Framework is regularly reviewed and updated where appropriate to support expectations laid out in the Code of Conduct and group policy statements including the Human Rights Policy Statement.
- Approach to Purchasing Activity that outlines basic principle for our purchasing policies and our requests to suppliers in maintaining fair and sound business practices.

MUFG has also in place whistleblowing and grievance procedures, both of which provide appropriate mechanisms for people to safely raise concerns about any actual or potential instances of modern slavery, and for any such instances to be assessed and, as appropriate, remediated.

**Due diligence processes and remediation**

MUFG has a credit application due diligence process that requires a Relationship Manager to confirm that the purpose of the funds does not fall under Prohibited Transactions including modern slavery and human trafficking using a check sheet.

We have a comprehensive financial crimes risk management framework (please refer to our [Global Financial Crimes Policy Statement](#) website), which includes adverse media checks of Customers both during onboarding and periodically. Adverse media checks include searches of databases which highlight any regulatory, financial crimes and reputational concerns.

Seeking to partner with suppliers whose ethical principles align with our own, and expect them to operate fair and ethical workplaces.

We have implemented measures to mitigate the risk of modern slavery and human trafficking in our business operations and supply chains, including:

- Our Human Resources policies that aim to create a working environment that is based on core values of respect, fairness, collaboration, teamwork, support, trust and transparency;
- Our Whistleblowing and grievance procedures, through which employees can escalate any concerns relating to modern slavery or human trafficking; and
- Our comprehensive financial crimes risk management framework that identifies and mitigate financial crimes risks, recognizing that modern slavery and human trafficking is a precursor to money laundering activity.

Through MUFG's Code of Conduct, internal policies (including Human Resources and Compliance policies) and through our Corporate Social Responsibility activities, we ensure that we do not condone or support any forms of bullying or harassment, and we continue to be committed to embracing diversity and building an inclusive culture where all employees are valued, respected, and feel that their opinions count.

We make our employment decisions in a non-discriminatory manner in accordance with our obligations under the law and in line with the national living wage.

**Training**

Regular Financial Crimes training and Code of Conduct training are provided for all staff globally. In the all staff e-Learning module on AML Training rolled out in 2023, content on human trafficking was included. Training on the Code of Conduct was conducted during the period covered by this statement and included all staff. In addition, our whistleblowing policy and processes are applicable globally, and the whistleblowing options are prominently highlighted on MUFG Bank's Intranet page.

**Senior management**

MUFG Bank's senior management continues to fully recognize that modern slavery and human trafficking are issues of global importance and scale. Where the processes and controls we have implemented identify an unacceptable level of risk of modern slavery or human trafficking we are committed to taking action, including ending relationships with suppliers.

**The effectiveness of actions taken**

MUFG Bank will continue to work towards enhancing its risk assessment processes to identify and measure risks related to modern slavery and to inform the enhancement of controls where required.

**Consultation process**

MUFG Bank closely communicates with its headquarters in Japan and with all overseas branches. Appropriate divisions of MUFG Bank (covering all relevant regions) work to enhance the communication between related overseas branches on issues, including in relation to modern slavery and human trafficking.

Signed by



Keitaro Tsukiyama  
Member of the Board of Directors,  
Managing Executive Officer  
MUFG Bank, Ltd.  
9<sup>th</sup> August, 2024

**<Addendum for measures to mitigate the risk of modern slavery and human trafficking in London branch>****Due diligence processes**

In addition to those outlined in the main statement above, our London branch takes the following due diligence measures:

- A Know Your Supplier process which monitors Country Risk, taking into account both modern slavery and human trafficking considerations along with other supplier risk factors.
- A risk assessment process to identify and measure risks related to modern slavery and to inform the enhancement of controls where required.
- The London Procurement team maintains a supplier Code of Conduct.
- The Third Party Risk Management team maintains enhanced processes that monitor and assess modern slavery and human trafficking risk.

Signed by



Keitaro Tsukiyama  
Member of the Board of Directors,  
Managing Executive Officer  
MUFG Bank, Ltd.  
9<sup>th</sup> August, 2024

**< Addendum for measures to mitigate the risk of modern slavery and human trafficking in MUFG Bank's Australian branch >**

MUFG Bank, Ltd. ("MUFG Bank") is a reporting entity per section 5 of the *Modern Slavery Act 2018 (Cth)* (the Act), as it carried on business in Australia during the Financial Year 2023 reporting period and exceeds the consolidated revenue threshold of \$100 million. MUFG Bank is part of the broader MUFG Group headquartered in Japan, which provides a full range of financial services in Japan and other jurisdictions. In Australia, MUFG Bank only provides wholesale banking services.

To meet reporting obligations under the Act, MUFG Bank relies on both the reporting set out in the main statement above and the information provided in this addendum particular to its Australian operations reflecting on the measures taken to analyse and report on the risk of modern slavery in Australia.

**Identity of the reporting entity in Australia**

MUFG Bank is the reporting entity for the purposes of the Act. In Australia, our branch operations are conducted through MUFG Bank, Ltd. (ARBN 103 418 882), which is a foreign company registered in accordance with the *Corporations Act 2001 (Cth)*.

In Australia, MUFG Bank has been authorised by the Australian Prudential Regulation Authority (APRA) to carry on banking business as a branch of a foreign Authorised Deposit-taking Institution (ADI) and we operate branch offices in Sydney, Melbourne and Perth. MUFG Bank does not own, operate or control any subsidiary entities in Australia.

**The structure, operations and supply chains of MUFG Bank**

As an ADI, we provide financial products and financial services to corporate customers in the areas of corporate and investment banking, global markets and transaction banking. We currently employ 363 employees in our three Australian branch locations.

The supply chain for our Australian business is focused on acquiring staffing, goods and services to support the operations of an ADI. We have an estimated 400 active entities acting as current suppliers to our branches, the bulk of whom provide banking and finance support services, IT infrastructure, and energy and other utilities.

MUFG Bank's clientele consists of wholesale clients, including private and government corporate entities. Our clients operate in sectors which may involve primary production, mining, manufacturing and transport, and operate in various jurisdictions. We expect clients to independently manage their modern slavery risks in accordance with the obligations placed upon them by the Act.

**Description of the risks of modern slavery practices in MUFG Bank's operations and supply chains**

Given the scope of our operations as an ADI, our natural risk of engaging in or being exposed to modern slavery is generally very low.

**Operations**

MUFG Bank itself does not engage in any practices that would or be considered modern slavery. All staff employed in Australia either directly or on a contract basis are afforded all rights and resources to perform their roles free of harassment or unfair employment terms. No conditions are placed on the right of movement of any person employed by us. This approach is also codified by multiple internal policies, including an MUFG Bank Australia Modern Slavery Policy. Global policies on ethics and human rights are binding on all employees and are available to all staff via an intranet portal.

Regular mandatory training on the MUFG Group Code of Conduct and the MUFG Way ensures staff in Australia are aware of their responsibilities to act in an equitable and conscientious manner and escalate any matters that they identify as being contrary to our business values and/or legal obligations.

Our business culture is centred around being a highly trusted global financial institution, and internally we employ a 'speak up' culture and process of collaborative continuous improvement known as 'kaizen'.

Additionally, we have implemented an effective whistleblowing process. Through these approaches any potential risks within the business, and concerns or grievances of staff as to conditions, will be exposed and addressed. Training is provided to all staff so they are aware of their rights in this regard.

We also engage in continuous improvement to ensure that we maintain current knowledge and awareness of modern slavery developments to support our business, both within our Compliance team through dedicated resources, and in the broader business. We are confident that MUFG Bank has no risk of modern slavery in its own operations in Australia.

### *Supply chains*

MUFG Bank generally does not produce any tangible goods in the general course of its business. Promotional and other goods are produced by third parties on our behalf. As such, there is no extended supply chain of tangible goods which MUFG Bank would rely upon to conduct its business, which lessens our risk of exposure to modern slavery. While we take every precaution to avoid modern slavery in our supply chain, there is still some level of risk that cannot be eliminated completely despite due diligence.

Our main risks in the supply chain regarding modern slavery in Australia include:

- Engaging suppliers for facilities management
- Outsourcing of services to countries which are known to have instances of ongoing modern slavery
- Procuring electronic goods with complex and obscure supply chains, even from trusted and high-profile suppliers
- Engaging suppliers to provide promotional goods, such as items of clothing, where the source of materials and/or labour to produce those goods is obscure or unknown

While we consider that risk might exist in these activities, MUFG Bank would not knowingly proceed with any engagement or supply if it becomes apparent that our suppliers are, or are likely to be, engaging in modern slavery practices to support the supply of goods or services to us. As outlined below, we have relevant policies and measures to respond to such a situation.

### **Description of the actions MUFG Bank has taken to assess and address those risks, including due diligence and remediation processes**

MUFG Bank maintains policies to prohibit behaviour that would amount to modern slavery or which compromises human rights, and provides open lines of communication to speak up about issues and provide protected disclosure through defined processes.

Our Australian Modern Slavery Policy raises awareness of modern slavery, and highlights that all staff within the business have a responsibility for avoiding and reporting modern slavery in our business practices and supply chains. It aligns with the MUFG Group Human Rights Policy and reflects our group's commitment to international standards, such as the Universal Declaration of Human Rights and the ILO's Declaration on Fundamental Principles and Rights at Work, as well as international initiatives such as the UN's Global Compact, Principles for Responsible Investment (PRI) and the Equator Principles.

The Australian Modern Slavery Policy also provides that business activity in locations with lower domestic standards of human rights is to be conducted in accordance with relevant MUFG Group ethical and business standards, and our Business Partners are expected to also meet these higher standards. Through these measures, we keep abreast of the risk of modern slavery in our operations.

### *Supply chain measures*

In the Financial Year 2023 reporting period, MUFG Bank continued to assess suppliers during on-boarding and contract refreshes using the Modern Slavery Questionnaire process, and capturing relevant information in our procurement system, as detailed in our Financial Year 2022 statement. Supplier responses received in the current reporting period did not indicate any modern slavery risk in our supply chain engagements.

### *Supplier Code of Conduct and Standard Purchase Agreement*

MUFG Bank has commenced use of its Supplier Code of Conduct and Master Goods and Services Agreement (MGSA) (referred to in prior statements as the Standard Purchase Agreement (SPA)). The MGSA requires Australian suppliers to provide services under terms that make the Supplier Code of Conduct enforceable, which make MUFG Bank's modern slavery expectations clear, and which enshrine modern slavery standards and processes into the supply arrangements. These documents also outline the process, and consequences, should modern slavery be detected in the processes and supply chains of those suppliers. The existing questionnaire process will run concurrently with the Supplier Code of Conduct and MGSA.

### **How MUFG Bank assesses the effectiveness of its actions**

The primary objective of MUFG Bank's implementation of a modern slavery approach is to avoid modern slavery entirely in our supply chains and operations.

From the information gathered up to end of Financial Year 2023, suppliers have not indicated any risk of modern slavery in their businesses. Data from existing and new responses will be further assessed to profile our risk of exposure to modern slavery.

We consider that the introduction of the MGSA and Supplier Code of Conduct, use of the questionnaires, and our follow up review, along with nil reported instances of modern slavery in our supply chains or operations, indicates that our actions have been effective in ensuring we do not use or promote the exploitation of others through modern slavery to conduct our business.

Our broader ambition is to set a positive example by drawing suppliers' attention to modern slavery, which we achieve during the on-boarding process through our questionnaire. We believe this will foster awareness of modern slavery, promote compliance with the law and ethical behaviour, and make progress towards combatting and reducing modern slavery in the world. In respect of these broader goals, it is difficult to completely measure the impact that our actions have had on secondary or tertiary sources of our suppliers, though it is hoped that modern slavery regimes in developed and developing countries will create awareness and help the plight of those who are exploited in the world.

### **The process of consultation within MUFG Bank on modern slavery**

The local Compliance team in MUFG Bank's operations in Australia has day-to-day oversight of the modern slavery approach, with resources dedicated to developing policy and procedures on modern slavery. Support is provided directly to the business on modern slavery issues, and Compliance and Procurement work together to ensure access to relevant records, and for continuous improvement of the function.

The MUFG Bank annual global Modern Slavery Statement has sign-off at the highest levels of governance in our Tokyo head office. The Modern Slavery Statement is developed collaboratively with oversight by our head office in Tokyo, Japan, our team in Europe Middle East and Africa (EMEA), Global Financial Crimes Division and Oceania branch.

Signed by



Keitaro Tsukiyama  
Member of the Board of Directors,  
Managing Executive Officer  
MUFG Bank, Ltd.  
9<sup>th</sup> August, 2024