



Global Anti-Bribery and Corruption (“ABC”) Policy

Our Commitment to ABC Compliance

MUFG Bank, Ltd., (“MUFG Bank” or “Bank”), a subsidiary of Mitsubishi UFJ Financial Group, Inc., recognizes that the Bank’s continued success depends in large part upon the trust and confidence of its millions of clients across the globe. As a member of the Wolfsberg Group,¹ MUFG Bank is committed to supporting the integrity of the financial system and combating financial crimes, including bribery and corruption.

Consistent with its zero-tolerance approach for bribery and corruption as set forth in the *MUFG Group Code of Conduct*, MUFG Bank established the Global ABC Policy to promote a corporate culture of ethical business practices and compliance with the letter and spirit of all applicable ABC laws.²

Global ABC Policy and Program

The Bank’s Global ABC Policy, which is made available to all employees, comprehensively addresses the key concepts of bribery and corruption and prohibits:

- Offering, giving, soliciting, or receiving, directly or indirectly, anything of value to or from anyone in exchange for an improper business benefit or advantage;
- Offering, promising, or giving facilitation payments (i.e., payments made to a public official to improperly expedite or facilitate routine, non-discretionary government actions or services, such as processing a visa, providing mail service, or supplying utility services);
- Falsifying books, records, and accounts relating to the activities of the Bank, its clients, or third-party providers;³ and
- Providing a political contribution to improperly influence any external party in connection with the Bank’s business, or in exchange for an improper business advantage.

Consistent with the Bank’s Global ABC Policy, the Bank has established a global ABC compliance program including the following risk-based control processes:

- Risk Assessment: Annual assessment of bribery and corruption risks and controls;
- Third-Party Provider Engagements: Due diligence, pre-clearance, and ongoing oversight by ABC Compliance of any engagements with Third Party Intermediaries (i.e., any third-party providers of goods or services paid directly or indirectly by the Bank to interact substantively with any non-Bank individual or entity on behalf of the Bank to help: (i) obtain or retain business or any other business advantage, or (ii) obtain government approvals or action), including risk-based ABC assessment and training of intermediaries, and communication to intermediaries of MUFG Bank’s ABC expectations as covered in the Bank’s Global ABC Policy;
- Gifts and Hospitality: Pre-clearance of gifts and hospitality dependent on the value, type, and nature of the recipient (e.g., public officials);

¹ An association of twelve banks seeking to develop frameworks and guidance for the management of financial crimes risk.

² Applicable ABC laws include the U.S. Foreign Corrupt Practices Act of 1977, the U.K. Bribery Act 2010, the anti-bribery elements of the Japanese Unfair Competition Prevention Act, and applicable laws in every country where the Bank does business.

³ Third-party providers include providers of both goods and services.

- Offers of Employment/Work Experience: Pre-clearance of offers of employment or work experience (e.g., internships) to high-risk candidates (e.g., candidates referred by or having close personal or familial relationships to certain public officials, clients, or prospective clients);
- Charitable Donations: Pre-clearance of charitable donations dependent on their value and connection to public officials, clients, or prospective clients;
- Appropriate Due Diligence for Business Transactions: Evaluation and management of ABC risks associated with proposed acquisitions or joint ventures and other business transactions presenting heightened risk factors;
- Training: Periodic employee training, including annual ABC training for all employees (e.g., a comprehensive review of key concepts of bribery and corruption, including different elements/types, and policy and procedure requirements as well as information regarding where to find ABC policies and procedures on the intranets); targeted training for key control functions; and awareness training for senior management and the Board;
- Recordkeeping: Compliance with applicable recordkeeping and record retention requirements;
- Monitoring/Control-Based Reviews: Risk-based evaluations, including quality assurance reviews, of ABC-related activities to confirm compliance with Global ABC Policy requirements; and
- Compliance Testing and Auditing: Periodic compliance testing and auditing of the design and effectiveness of ABC-related control processes.

Employee Responsibilities and Consequences of Non-Compliance

Our people play an important role in the fight against bribery and corruption. All employees are responsible for complying with the Bank's Global ABC Policy, and are encouraged to proactively manage ABC risks, including asking questions when unsure about any aspect of the *Global ABC Policy* or associated controls, and escalating concerns promptly to management or through our anonymous reporting channels. The Bank prohibits retaliation against anyone who raises concerns in good faith. Employees who violate the Bank's Global ABC Policy may be subject to disciplinary measures, up to and including termination and possible referral to regulators and other legal authorities.