



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

Our Commitment to ABC Compliance

Mitsubishi UFJ Financial Group, Inc. (“MUFG”) and its Subsidiaries^(note) recognize that their continued success depends in large part upon the trust and confidence of their millions of clients across the globe.

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

(note) MUFG Bank, Ltd.; Mitsubishi UFJ Trust and Banking Corporation; Mitsubishi UFJ Securities Holdings Co., Ltd.; Mitsubishi UFJ NICOS Co., Ltd.; ACOM CO., LTD.; and Mitsubishi UFJ Asset Management Co., Ltd.

MUFG ABC Policy and Program

The MUFG ABC Policy, which is made available to all employees in the form of Subsidiary-level ABC policies, 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 Subsidiaries’ business activities; and
- Providing a political contribution to improperly influence any external party in connection with Subsidiaries’ business, or in exchange for an improper business advantage.

Consistent with the MUFG ABC Policy, the Subsidiaries have established ABC compliance programs including the following risk-based control processes:

- Policies and Standards: Subsidiary-level policies and standards with adherence to applicable regulatory requirements;
- Risk Assessment: Annual assessment of bribery and corruption risks and controls;
- Third-Party Provider Engagements: Due diligence and oversight of third-party service providers who act on a Subsidiary's behalf (i.e., intermediaries);
- Gifts and Hospitality: Pre-clearance of gifts and hospitality above certain value thresholds particularly when such activities involve public officials;
- Offers of Employment/Work Experience: Pre-clearance of offers of employment/work experience particularly when such activities involve public officials;
- Charitable Donations: Pre-clearance of charitable donations above certain value thresholds, particularly when such activities involve public officials;



- Appropriate Due Diligence for Business Transactions: Evaluation and management of ABC risks associated with business transactions, including mergers and acquisitions;
- Training: Periodic training to all employees on applicable bribery and corruption risks and controls (e.g., a 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);
- Recordkeeping: Compliance with applicable recordkeeping and record retention requirements; and
- Testing, Auditing, and Other Control-Based Reviews: Periodic testing, auditing, and, as appropriate, other control-based reviews to assess 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 MUFG ABC Policy, asking questions, and escalating concerns, including seeking advice from a supervisor, Compliance Officer, or through our anonymous reporting channels. MUFG and its Subsidiaries prohibit retaliation against anyone who raises concerns in good faith. Employees who violate the MUFG ABC Policy may be subject to disciplinary measures, up to and including termination and possible referral to regulators and other legal authorities.