



## MUFG Anti-Money Laundering (“AML”) Policy

### **Our Commitment to AML/Countering the Financing of Terrorism (“CFT”) Compliance**

Mitsubishi UFJ Financial Group, Inc. (“MUFG”) and its Subsidiaries<sup>(note)</sup> 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 acts of money laundering and terrorist financing as set forth in the MUFG *Group Code of Conduct*, MUFG established the MUFG AML Policy to promote compliance with the letter and spirit of all applicable AML/CFT 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 AML Policy and Program**

The MUFG AML Policy, which is made available to all employees in the form of Subsidiary-level AML policies, prohibits:

- Knowingly facilitating or participating in any financial crimes activity or any activity that facilitates financial crimes (e.g., money laundering and financing of criminal activities);
- Ignoring information or circumstances that may be indicative of financial crimes;
- Informing any person known to be involved or suspected of being involved in illegal or suspicious activity that such activity is being investigated or reported internally and/or to law enforcement authorities and regulatory agencies (known as “tipping off”);
- Allowing a new customer to transact prior to completion of the know-your-customer (“KYC”) process;<sup>1</sup> or
- Onboarding a prohibited customer type, without appropriate exception or exemption.

Consistent with the MUFG AML Policy, the Subsidiaries have established AML compliance programs, including the following risk-based control processes to the extent applicable:

- Policies and Standards: Subsidiary-level policies and standards with adherence to applicable regulatory requirements;
- Responsible Officer for each Subsidiary: Designated persons responsible for their Subsidiaries’ AML compliance programs, including, as appropriate, dedicated AML officers in each country of operation;
- Risk Assessment: Annual AML risk assessments;

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<sup>1</sup> MUFG Subsidiaries may permit a potential customer to execute transactions before completing the customer verification process where doing so is essential to avoid interruptions to the normal conduct of business and does not conflict with local law. In limited circumstances, a Subsidiary may permit a temporary extension to complete the KYC process or an exemption/exception from a particular KYC requirement.

- KYC Framework: Risk-based KYC processes that require identification and appropriate verification of customer identities (including identification of ultimate beneficial owners), customer screening,<sup>2</sup> customer due diligence, enhanced due diligence, customer acceptance/rejection, and periodic customer reviews;
- AML Transaction Monitoring: Transaction monitoring systems and processes designed to detect unusual and potentially suspicious activity;
- AML Suspicious Activity Investigation and Reporting: Investigation processes to identify and report suspicious activity in compliance with applicable regulatory requirements;
- Prohibition on Certain Customer Types: Prohibitions on relationships with certain customer types, including a prohibition on relationships with shell banks;
- Information Sharing Protocols: AML information-sharing process to cooperate fully with regulators, law enforcement agencies, affiliates, financial institutions, and national investigative units, within the confines of applicable privacy laws and data protection controls;
- Recordkeeping: Maintaining comprehensive records related to the Subsidiary's AML compliance program;
- Training: Periodic employee training on applicable AML risks and controls (e.g., policy and procedure 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 AML -related control processes.

### **Employee Responsibilities and Consequences of Non-Compliance**

Our people play an important role in the fight against for acts of money laundering and terrorist financing. All employees are responsible for complying with the MUFG AML 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 AML Policy may be subject to disciplinary measures, up to and including termination and possible referral to regulators and other legal authorities.

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<sup>2</sup> Customer screening includes screening against, among other things, applicable lists of sanctioned parties, internally prohibited parties, and politically exposed persons.