



## **MUFG Sanctions Policy**

### **Our Commitment to Sanctions 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 sanctions circumvention and evasion as set forth in the *MUFG Group Code of Conduct*, MUFG established the MUFG Sanctions Policy to promote compliance with the letter and spirit of all applicable sanctions 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 Sanctions Policy and Program**

The MUFG Sanctions Policy, which is made available to all employees in the form of Subsidiary-level sanctions policies, prohibits funding of accounts and the processing of payments for, on behalf of, or for the benefit of, sanctions targets or jurisdictions in violation of applicable sanctions, including those established by U.S. Department of the Treasury’s Office of Foreign Assets Control and the Ministry of Finance in Japan.

Consistent with the MUFG Sanctions Policy, the Subsidiaries have established sanctions 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;
- Sanctions Screening: Sanctions screening and reviews with respect to customer on-boarding and processing of transactions;
- Risk Assessment: Annual assessments of sanctions risks and controls;
- Training: Periodic employee training on applicable sanctions risks and controls (e.g., policy and procedure requirements);
- Recordkeeping: Compliance with applicable recordkeeping and record retention requirements.
- Testing, Auditing, and Other Control-Based Reviews: Periodic testing, auditing, and, as appropriate, other control-based reviews to assess the design and effectiveness of sanctions-related control processes.

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

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