

MUFG Group  
Code of  
Conduct 2023



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## Code of Conduct



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(Note : Explanations in each chapter are described in **1** ~ **4** or ●)



Message from the Group CEO

## A Question for Our Times

“For what purpose does MUFG exist?”

How would you answer this question in our era of tremendous change?

It's clear that today, people's values and views are dispersed and diversified in countless new ways. But a growing awareness and sense of responsibility for global concerns – like social disruption and our threatened environment – seem to be common ground.

Given the social contract that anchors MUFG in our role as a major financial institution, duty demands we examine issues like these to assure alignment with current realities through a sharpened focus. This led us, in 2021, to formally define our *raison d'être* as being “Committed to empowering a brighter future.”

The best way to breathe life into these words is for each of us to connect MUFG's collective purpose to what makes our individual lives meaningful. Presuming we were drawn to MUFG because our personal values align with the company's, this connection can help open a path to a fulfilling career and a stronger MUFG.

This is why a mindset we call the “MUFG Way” – shaped by clearly defined shared values – guides our management activities and serves as a principle for our wider activities.

In that spirit, linking the MUFG Way to our purpose of “empowering a brighter future” is the reason for this Code of Conduct. It lays stepping-stones composing a path of certainty through uncertain times. It informs our decisions, our day-to-day behavior, and our efforts to do the right thing at all times.

Why is this important? Most fundamentally, it's because our business foundation is trust. While trust in MUFG is painstakingly built – moment by moment, year by year, through actions you and I take every day – it can be compromised instantly with one bad decision.

Some decisions can cause us to struggle. The path may not always be clear. In these cases, we refer to this Code as our guide. One good way to gauge if we are doing the right thing is to ask: Can we explain our choices with honor to our family and friends? Please, if you notice anything contravening our standards of conduct – even slightly – report it immediately to your supervisor or through the Compliance Helpline. Do not hesitate. It is the right thing to do and a sacred responsibility.

MUFG is committed to cultivating an atmosphere where every colleague can speak freely and fearlessly. Your courage is appreciated – encouraged, protected – and the firm is responsible for responding appropriately. No repercussive actions will be taken against a colleague making a honest report to protect what's right.

This Code is not just for reading. It is for action – literally. Sustaining the trust of customers and society depends on our conduct at day-to-day work.

Thank you for always doing the right thing.

April 2023

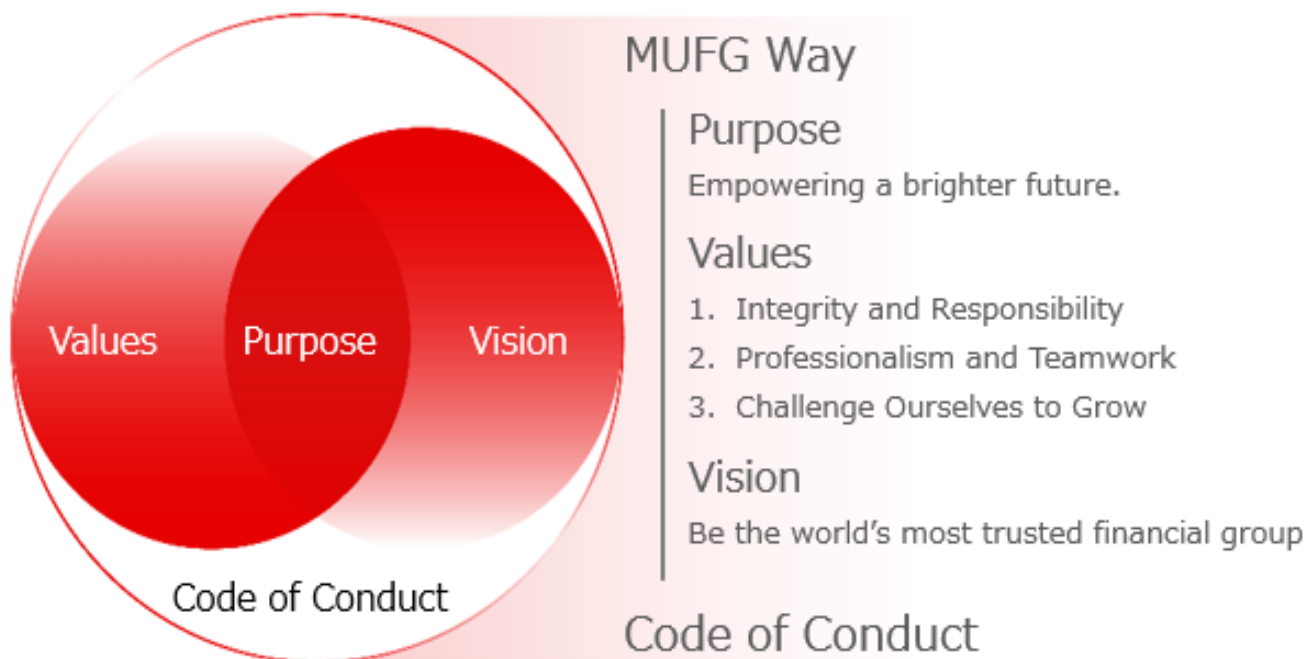
Hironori Kamezawa

Member of the Board of Directors, President & Group CEO

# 1 MUFG Way and Code of Conduct

The MUFG Way sets forth the most basic stance of the MUFG Group in the execution of its business activities. It is designed to make each employee aware of the purpose of the Group, and is the guiding principle for all its activities.

The Code of Conduct shows how Group members should make their decisions and act on a daily basis, and is an important part of supporting the MUFG Way.



## “Culture”

Culture is the common set of behaviours and underlying mindsets that shape how people work and interact day to day.\* Culture is the character and personality of our organization. It's what makes our business unique and is the sum of our values, traditions, beliefs, interactions, behaviors, and attitudes. This could include, but is not limited to, explicit written documents such as our MUFG Way and Code of Conduct, but more importantly, the shared norms of behaviour experienced by colleagues every day.

Culture has been proven to have a material effect on how colleagues behave and decisions are made, which when wrong, has led to some of the worst corporate incidents, so defining the right values and philosophy that drive the right corporate culture is critical to business success and how MUFG is perceived by our stakeholders.

\*Source: McKinsey & Company - Organisational Health Index.

## 2

# Code of Conduct (Main text)



## Chapter 1.

### Customer Focus

Our customers are at the center of everything we do, and should always be the focus of our thoughts. Our aim should be to win the trust and confidence of our customers at all times. MUFG exists today because of the trust and confidence that customers have placed in us over many years. Our role is to increase and strengthen this bedrock of trust and confidence. Our activities are not driven by the prospect of short-term gains. Instead, we look to build ongoing relationships with our customers to support their long-term growth.

#### 1-1

#### Honesty and Integrity

Our customers are at the center of everything we do. We carry out fair and transparent corporate activities with honesty and integrity. We treat customer assets with care and respect and always strive to ensure that our actions do not unjustly damage our customers' interests.

#### 1-2

#### Ensuring Quality

To build lasting relationships of trust and confidence with our customers, we listen carefully to what our customers are telling us and maintain thorough quality control of all our products and services, from planning and development to provision and subsequent revisions, with a view to further enhance quality.

#### 1-3

#### Exceeding Customer Expectations

We aim to meet the diverse needs of our customers worldwide, and to provide services exceeding their expectations through the highest standards of professionalism, by leveraging our global network and the consolidated strengths of the entire Group.



## Chapter 2.

### Responsibility as a Corporate Citizen

As we develop our business globally, we comply with all the domestic and international laws and rules that may apply. We do all we can to maintain stability and confidence in the global financial system, and we contribute to the sound and healthy growth of society. Acknowledging the responsibility and accountability that each of us have as a member of MUFG, we carry out fair and transparent corporate activities with honesty and integrity, in a manner that supports and strengthens the trust and confidence MUFG has earned from society over many years.

#### 2-1

#### Adherence to Laws and Rules

In addition to adhering strictly to all domestic and international laws, regulations and rules, we strive to do the right thing based on our strict code of ethics. Violations of laws or rules damage the vital social infrastructure of the financial system and lead to a loss of trust for MUFG. We strictly abide by all laws and rules relating to our business.

**2-2**

## Prevention of Financial Crime

We have zero tolerance for supporting or facilitating financial crime or any attempt to circumvent the rules and procedures aimed at preventing financial crime. We take all reasonable steps possible to prevent our products and services from being used by individuals or entities involved in illegal or improper activities such as money laundering and terrorist financing.

**2-3**

## Contributing to Society

We respect the history, cultures, and customs of different countries and regions around the world, and work to contribute to the development of diverse communities and the protection of the environment through our corporate activities and the social volunteer efforts of our colleagues.



### Chapter 3.

## Behaviors in the Workspace

We strive to respond and adapt promptly to the diversifying and evolving needs of our customers and the rapidly changing environment in which we work. The working environment at MUFG fosters mutual respect, enables individuals to make the most of their abilities as professionals, and maximizes the power of teamwork across regions and different areas of business, encouraging all colleagues to embrace new challenges. We always work to protect and maintain the tangible and intangible assets and property that MUFG has accumulated.

**3-1**

## Challenge Ourselves to Grow

We strive to enhance our knowledge, expertise, and potential and maximize the power of teamwork. We believe that the changing business environment represents opportunity and are always ready to embrace new challenges in new fields.

**3-2**

## Collaborative and Professional Working Environment

We respect the human rights and diversity of all MUFG colleagues. We do not engage in or tolerate any form of discrimination or harassment or any other behavior that infringes these beliefs.

**3-3**

## Protecting MUFG's Assets and Property

We protect the tangible and intangible assets and property of MUFG and individual Group entities and do not tolerate any behavior that might damage these assets.

**3-4**

## Reporting Issues and Seeking Advice

If we become aware of conduct that contravenes the law, company regulations, the provisions of this Code of Conduct, or any other issues, we must promptly report the matter in line with documented local escalation processes. This may include reporting to our supervisors, control functions such as Compliance and via Compliance Helpline arrangements made available by MUFG.

### 3 About the Code of Conduct

(1) The Code of Conduct is designed to provide guidance at all times, and in particular, when we find it difficult to know if we are making the right choice. (The Code of Conduct may be supplemented by entity or location specific guidelines, which provide further guidance.)

(2) In situations where you feel uncertain, you should consider the following:

<input checked="" type="checkbox"/>	Is the conduct in line with the Code of Conduct and internal or external laws, rules, and regulations?
<input checked="" type="checkbox"/>	Am I deceiving myself to rationalize my behavior?
<input checked="" type="checkbox"/>	Is there any possibility that others might regard my conduct as inappropriate?
<input checked="" type="checkbox"/>	Would I do the same thing to my family or those that are close to me?

(3) All colleagues must undertake training on the Code of Conduct once a year, as a general rule. In addition, each colleague must make an attestation, in a form determined by the relevant Group entity, that he, she or they will abide by the MUFG Code of Conduct.



#### Code of Conduct in practice

We expect the Code of Conduct to be acted on in our everyday interactions, but it is sometimes easy just to “do what we have always done”, so if you catch yourself or colleagues use the following words or phrases, maybe check if the behaviour needs review.

- *“Everyone is doing it so I am too…”*
- *“This is usually done, this is how we have always done it, this should be acceptable from market practice…”*
- *“It has always been ok, so it should be ok this time too…”*
- *“I have exceptions - it doesn’t apply for our division/department/unit”*
- *“There is no turning back now”*

These can be frequently-used phrases when individuals have been influenced by previous experience and perceived accepted normal practices (sometimes called biases). It might take courage to speak up against behaviors that have been accepted for a long time, however those practices which historically were acceptable may now not be acceptable as industry and society evolves. When you become aware of yourself, or notice your colleagues using these phrases, please pause, think and take action following the Code of Conduct.

## 4 Failure to Abide by the Code of Conduct

- (1) All colleagues must abide by the Code of Conduct, as well as applicable laws, regulations, rules, protocols, procedures, and other guidelines determined by Group MUFG entities. If we have policies that are more restrictive than the Code of Conduct, we must follow those policies. Any conduct that fails to meet these standards may result in disciplinary measures, up to and including termination of employment, in accordance with the employment regulations and other rules established separately by individual MUFG companies. All colleagues may be held personally responsible for conduct that damages the reputation and trust of any MUFG company or damages the company's interests.
- (2) All colleagues may also be held responsible and accountable for the action or inaction of others if they fail to take action despite knowing about inappropriate behavior or conduct on the part of others that is likely to have a serious negative impact on the trust or interests of any Group entity, or if they ignore any such conduct despite being in a position of responsibility requiring them to know about it. All colleagues must cooperate in any audit, examination, or investigation conducted related to potential violations of the Code, Company policy, procedures, or guidelines.
- (3) In addition, any colleagues' conduct may be reported to the relevant authorities, which could result in a fine, loss of the qualification to work in the financial industry, and/or even imprisonment.



**Would I be treated as breaching the Code of Conduct if I cannot exceed customer expectations or achieve growth which are specified in the Code of Conduct?**

The Code of Conduct contains a mixture of different guidelines. Behaviors like "Honesty and Integrity" and "Prevention of Financial Crime" must be followed at all times. Others, including "Exceeding Customer Expectations" and "Growth and Challenges" are more targets that you should aim towards.



### Conduct Risk

In addition to violation of existing rules (such as regulations), behavior 1) that is contrary to social norms, 2) that contravenes business customs or market practices, or 3) that does not consider the customers' perspective could be detrimental to the interests of stakeholders, such as customers and shareholders, and as a result, could have a negative impact on our corporate value, profit, and reputation. This risk is called "Conduct Risk."



# 5

## Roles and Responsibilities of Managers

Managers have several additional roles and responsibilities. (“Manager” here refers primarily to all managers with responsibility for leading team members, head of department and head of divisions.)

- ① Lead by example and be proactive about acting ethically in accordance with the MUFG Way and the Code of Conduct.
- ② Work to ensure that colleagues under your supervision understand the content of the MUFG Way and the Code of Conduct in a manner appropriate to the respective organization.
- ③ Foster an environment where all colleagues feel comfortable speaking up to raise concerns when they are struggling to reach a work-related decision, facing a problem, or witness behavior that does not meet the Code of Conduct.
- ④ Strictly avoid any conduct that could be considered as an abuse of your position/role/authority.
- ⑤ Take appropriate, timely action when a problem has arisen, either addressing the issue directly or escalating appropriately.



### Managers’ role in creating psychological safety

The role of a manager is critical in creating a strong and high performing team, and one area of particular importance when considering the Code of Conduct is for all managers to consistently create a state of high psychological safety.

Psychological safety is “a state of comfort to express your thoughts, opinions, feelings openly to everyone within your organization”. This is an environment where you can provide challenge, where you are able to report mistakes without fear of unfair consequences. If you feel safe in the working environment, you will feel empowered to identify and implement change which enables innovative ideas to evolve.

Let’s work together to create an open, collaborative and inclusive workspace for everyone.



## Chapter 1.

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# Customer Focus

Our customers are at the center of everything we do, and should always be the focus of our thoughts. Our aim should be to win the trust and confidence of our customers at all times.

MUFG exists today because of the trust and confidence that customers have placed in us over many years.

Our role is to increase and strengthen this bedrock of trust and confidence.

Our activities are not driven by the prospect of short-term gains.

Instead, we look to build ongoing relationships with our customers to support their long-term growth.



Our customers are at the center of everything we do. We carry out fair and transparent corporate activities with honesty and integrity. We treat customer assets with care and respect and strive always to ensure that our actions do not unjustly damage our customers' interests.

## 1 Acting with Honesty and Integrity

- We place our customers at the center of everything we do. We work fairly and honestly to support our customers' long-term sustained growth.

## 2 Safeguarding Customer Assets (Including Information)

- Our customers entrust us with important assets such as cash and securities as well as information. We should safeguard customer assets, including information, as the loss, leakage, or misuse of our customers' information can not only cause serious damage to customer interests but can also seriously undermine the trust and confidence in MUFG.
- We treat our customers' financial assets with the utmost care and ensure that they are properly safeguarded at all times.
- We use and process customer information, only for necessary business processes reasons and within necessary areas. We also protect the confidentiality, security and customer privacy of information.

## 3 Protecting Customer Interests Properly

- To protect the interests of our clients, we act to treat our customers in a fair, ethical, and non-discriminatory manner with honesty and integrity and conduct our business transactions with responsibility and a high level of ethics.
- When conducting business with customers, we are sensitive to the possibility of conflicts of interest between customers or between a customer and an MUFG Group entity. We act appropriately at all times, in line with the guidelines on managing Conflicts of Interest.



### Dilemma about "Customer's trust" and "Business Objectives"

Have you ever felt a conflict between business objectives and maintaining the customer's trust?

As representatives of MUFG, we have responsibility and accountability to achieve our business objectives, however, these must be achieved by following correct procedures and building trust and a good reputation with our customers.

We must not prioritise business objectives where they may be detrimental to the trust we have built with customers.

Additionally, always have a mindset of asking yourself whether something is the right thing, rather than just doing it because it is longstanding practice or accepted process. Challenge where something doesn't feel right.

To build lasting relationships of trust and confidence with our customers, we should listen carefully to what our customers are telling us and maintain thorough quality control of all our products and services, from planning and development to provision and subsequent revisions, with a view to further enhancing quality.

## 1

## Best Possible Products and Services for Customers

- In order to build trust and lasting positive business relationships with customers, it is important to maintain thorough quality control at all stages during the development and delivery of our products and services.
- Quality control means developing and providing the best possible products and services for customers and ensuring accuracy and safety in all our business dealings .
- To this end, it is important to always keep in mind the following principles:
  - ① Clearly define the scope of customers to which products and services are going to be promoted and the needs of customers when planning and developing products.
  - ② Ensure that the risks associated with our products and services are understandable and acceptable to the customer.
  - ③ Ensure that products and services proposed and provided to customers match their purposes, needs, knowledge, experience, financial capabilities, and other relevant conditions.
  - ④ Provide clear and accurate explanations that enable customers to understand the nature and risks of our products and services.
  - ⑤ Be fair-minded, courteous, and sincere in all dealings with our customers.

## 2

## Continuous Work to Improve Quality

- We should regularly confirm that our products and services are meeting the needs of our customers, and we work constantly to review and improve the quality of all our products and services.



### Ensuring Quality

While the products and services which we offer to our customers are not physical, quality is just as important. A key element of the quality of a product for our customers is whether it is appropriate for them and meets their needs.

As well as ensuring that we have the technical knowledge and understanding of our products and services, we must understand the needs and objectives of our customers in order to provide them with high quality, appropriate products.

We aim to meet the diverse needs of our customers worldwide, and to provide services exceeding their expectations through the highest standards of professionalism, by leveraging our global network and the consolidated strengths of the entire Group.

## 1 Improving Expertise

- To provide our customers with the best possible products and services, every one of us should work to improve our professional knowledge and expertise.

## 2 Leveraging the Consolidated Strengths of MUFG

- From our customers' perspective, MUFG is a single organization. We should aim to provide services that exceed customer expectations by bringing our strengths and capabilities together and acting as an integrated group.

## 3 Using Our Global Network

- We should use MUFG's global network to provide outstanding products and services that are truly world-class.



### What is required in times of change?

Change and uncertainty are both a risk as well as an opportunity for our business. In times of significant change, it may not always be clear to us what the end state will be and this can make it challenging to know how best to react. Past practice may no longer be the right way to do things.

In such times, it's important that we look to our values to guide our behaviour. Being open minded to new ways of working and acting in accordance with the MUFG Way and Code of Conduct will provide us with direction and enable us to navigate change in a way that doesn't compromise our integrity or risk the trust we have built.



## Chapter 2.

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# Responsibility as a Corporate Citizen

As we develop our business globally, we comply with all the domestic and international laws and rules that may apply.

We do all we can to maintain stability and confidence in the global financial system, and we contribute to the sound and healthy growth of society.

Aware of the responsibility and accountability each of us has as a member of MUFG, we carry out fair and transparent corporate activities with honesty and integrity, in a manner that supports and strengthens the trust and confidence MUFG has earned from society over many years.



In addition to adhering strictly to all domestic and international laws, regulations and rules, we strive to do the right thing based on our strict code of ethics.

Violations of laws or rules damage the vital social infrastructure of the financial system and lead to a loss of trust in MUFG. We strictly abide by all laws and rules relating to our business, including the following areas:

## 1 Prohibition of Insider Trading

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- Insider trading is illegal in many countries and is strictly regulated, regardless of the amount of money involved. We must not engage in any activity which is or could be perceived to be insider trading.
- We manage material information rigorously and have no involvement in activities that use material nonpublic information to gain illegal profits.

## 2 Ban on Unfair Trading Practices

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- As a participant in a fair, transparent, and free competitive market, we must not have involvement with unfair trading practices (including cartels, abuse of dominant position, and market manipulation).
- We abide strictly with all the laws and rules (including all local tax and compliance requirements) in place to protect fair trading, including firewall regulations and the arm's length rule in the case of intercompany transactions between MUFG entities.

## 3 Prohibition of Inappropriate Gifts and Hospitality

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- Complying with the Global Gifts & Hospitality Procedure, we exercise good judgment and fair dealing to ensure that the giving or receiving of gifts and hospitality with third parties (e.g., clients, vendors) is:
  - For a legitimate business purpose (not to improperly influence business judgment)
  - Reasonable based on the facts and circumstances (not lavish or too frequent)

## 4 Accurate Recording and Appropriate Disclosure

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- We must ensure our business activities (including communication records), as well as financial information, are accurately recorded and properly maintained and managed.
- To ensure that MUFG is properly understood and evaluated in the wider society, it is incumbent on us to ensure that company information is disclosed in a timely and appropriate manner, including financial reports. Concealment or nondisclosure of information damages our trust and reputation. We will not be involved in any inaccurate or inappropriate disclosure of information, or in any attempt to conceal information.

We have zero tolerance for supporting or facilitating financial crime or any attempt to circumvent the rules and procedures aimed at preventing financial crime. We take all reasonable steps possible to prevent our products and services from being used by individuals or entities involved in illegal or improper activities such as money laundering and terrorist financing.

**1****Preventing Financial Crimes and Misuse of Financial Services**

- We remain alert to the possibility that the financial services provided by MUFG on a global basis may be misused to facilitate financial crimes as per below, and do everything in our power to prevent illicit activities involving our products and services such as;
  - Attempted or actual money laundering / terrorist financing
  - Violations of economic sanctions
  - Participation in or promotion of bribery and corruption
  - Facilitation of tax evasion
  - Fraud, which is defined generally as any action through which an individual or entity internationally attempts to secure an unfair or unlawful gain.

**2****Anti-Bribery and Corruption(“ABC”)**

- We adhere to the highest standards of ethical conduct. In particular, we prohibit:
  - Offering or giving anything of value<sup>1</sup> to anyone, directly or indirectly, if it is intended or it appears as intended to improperly obtain or retain business advantages
  - Soliciting or accepting anything of value from anyone, directly or indirectly, if it influences or could appear to influence decisions on behalf of MUFG
  - Falsifying or concealing any books, records accounts or other information in connection with MUFG’s business.
- We comply with ABC policy requirements that apply to certain activities (e.g., gifts and hospitality, hiring, engagement of intermediaries, donations), especially when they involve public officials.

**3****No Relationships with Criminal Elements**

- All relationships with any known criminal elements are strictly forbidden. We work closely with the police, legal counsel, and other relevant external organizations to protect the safety of all our colleagues.

<sup>1</sup> Anything of value for the purpose of this section will have the definition in the Global ABC Policy.





## Learning from failures

Corporate incidents are reported on a daily basis in various media, and MUFG have experienced our own. When a failure occurs, we must analyze the root cause and take necessary measures to prevent it from happening again, and embed those measures in our policies, procedures and controls.

Learning from the failures of other companies and our own, and demonstrating risk ownership by each individual, will help us to prevent such incidents and loss of trust.

We respect the history, cultures, and customs of different countries and regions around the world, and work to contribute to the development of diverse communities and the protection of the environment through our corporate activities and the social volunteer efforts of our colleagues.

## 1 Giving Back to Communities

- As good corporate citizens, MUFG is proactively engaged with local communities and contributes to their development.
- As members of regional communities and the global community, we volunteer actively to take part in activities that make a meaningful contribution to society.

## 2 Commitment to the Environment

- We work to minimize the environmental impact of our corporate activities, as well as strive to develop and supply products and services that contribute to addressing climate change, environmental conservation and protection, thus contributing to making a sustainable society a reality.



### Addressing environmental and social issues

You may have heard recent industry buzzwords such as "SDGs", "ESG", "Climate change and Carbon neutrality", "Declining birthrate and Aging population", "Poverty and Inequality" and "Human Rights Protection and Respect" on the daily news.

MUFG is working hard to realize a sustainable future society through the provision of financial products and services, our corporate activities and social contribution activities, starting with 10 priority themes\* which include "Climate change", "Environmental conservation" and "Inclusion and Diversity".

Along with society's increasing interest in sustainability, it looks toward organisations like MUFG to lead the way, so it is important for all of us to consider how we can contribute to customers and society, and take action where we can, no matter how small it may seem. Small daily actions create the biggest change.

\*please see [10 Priority Themes](#) or read our full [MUFG Sustainability Report](#) for more information.



## Chapter 3.

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# Behaviors in the Workspace

We strive to respond and adapt promptly to the diversifying and evolving needs of our customers and the rapidly changing environment in which we work.

The working environment at MUFG fosters mutual respect, enables individuals to make the most of their abilities as professionals, and maximizes the power of teamwork across regions and different areas of business, encouraging all colleagues to embrace new challenges.

We always work to protect and maintain the tangible and intangible assets and property that MUFG has accumulated.



We strive to enhance our knowledge, expertise, and potential and maximize the power of teamwork. We believe that the changing business environment represents opportunity and are always ready to embrace new challenges in new fields.

## 1 Personal Growth

- As the needs and businesses of our customers continue to evolve, it is essential that we too continue to grow professionally so as to provide the best possible products and services for customers.
- We endeavor to improve our individual skills, abilities, and potential, through our work and by conducting training and educational opportunities both inside and outside of MUFG. We proactively support the efforts of all MUFG colleagues toward personal growth.

## 2 Teamwork

- We share information, skills, and expertise within MUFG and continue to be committed to maximizing the power of teamwork in pursuit of our business.

## 3 Openness to New Challenges

- Monitoring developments in society and changes in the business environment, we embrace new challenges in the belief that change represents opportunity. We positively support and evaluate colleagues who actively take on challenges.



### Taking Action

No matter how good your thought process and intention is, if you don't actually take action, nothing changes.

It does not matter if the action you take is relatively small. The accumulation of your actions with the right intentions will lead to challenge, change and improvement of the organization.

Have you ever noticed a problem but did nothing about it because you had no instruction from your manager, or because you didn't believe it was the responsibility of you or your team?

In today's rapidly changing environment, where speed is important, the actions of all colleagues are more important than ever. Let's take a first step and be the change we want to see.

We respect the human rights and diversity of all MUFG colleagues. We do not engage in or tolerate any form of discrimination or harassment or any other behavior that infringes these beliefs.

## 1 Inclusion and Diversity

- As a global group, our workforce located globally over 50 countries is highly diverse in terms of ethnicity, race, national origin, birthplace, beliefs, religion, gender, sexual orientation, gender identity, age, physical or mental disability, as well as in other dimensions.
- Diversity is an essential element for MUFG's sustainable growth. A diverse group of colleagues results in broader ideas and a more rewarding work experience.
- All colleagues of MUFG will respect a diversity of values. Also, we do not tolerate discrimination, harassment or infringement of the rights of any individual, on any basis as may be set forth in applicable law and we provide fair employment opportunity accordingly.

## 2 Open Communication

- We strive to create an open and vibrant workspace in which colleagues deal with one another with sincerity and honesty, regardless of position, helping and respecting one another.

## 3 Prohibition of Harassment

- Harassment undermines the dignity of the recipient and seriously damages the operations of the organization. We do not commit or tolerate sexual harassment, "power" harassment (as may be described in the laws of some countries), or any other threatening or hostile behavior, including harassment from external sources.
- We do not tolerate any bullying or intimidation within the company.



### Building on our diverse foundation

As a global group MUFG is comprised of 180,000 colleagues in more than 50 countries representing different cultures, backgrounds, skill sets, perspectives, and experiences. We foster an inclusive and equitable culture that celebrates the diversity of our organization which reflects the customers and communities in which we live and serve.

We protect the tangible and intangible assets and property of MUFG and individual group entities and do not tolerate any behavior that might damage these assets.

- We all use corporate assets for legitimate company business and safeguard them against cyber-related risk, unauthorized access, theft, loss, waste, or abuse. Subject to company policies and applicable law, MUFG may inspect and monitor all use of MUFG technology, facilities, and other assets.
- We protect the confidentiality, security and privacy of information of our colleagues and third parties and use and process information only for necessary business processes reasons and within necessary areas in an authorized and secure manner.



#### **Strict handling of customer information is required.**

At MUFG we handle a large amount of confidential information, including information about customers and about MUFG. These information assets (intangible assets) must be treated in the same way as tangible assets such as customer's cash.

Some of this information may be particularly sensitive (e.g. Material Non-Public Information, also known as Inside information) and subject to strict laws and regulations on handling and sharing the information.

When handling customer information, it is essential not only to follow policy, procedures and rules, but also to follow the "Need to Know Principle" and properly communicate the appropriate information to the appropriate people.

This helps us to ensure we protect important customer information.

If you become aware of conduct that contravenes the law, company policies, or the provisions of this Code of Conduct, or any other problem situations, you must promptly report the matter and seek advice from a supervisor, Human Resources, Compliance Officer or issue a report via Compliance Helpline arrangements made available by MUFG.

- If you suspect there is any problem within the company, you must promptly report the matter to an appropriate person, for example a supervisor or senior manager, or you must use the various compliance helpline arrangements in place across the Group or other means available locally.
- Whether the compliance helpline reporting channels are utilized or not, the person who receives the report or information about any problem will treat it in the strictest confidence and MUFG is committed to ensuring that reporting colleagues do not suffer retaliation or other negative consequences.
- Reports of suspected violations made in good faith, including those made to law enforcement or a governmental agency, will not be subject to any adverse action based on such reporting.

### The MUFG Group Compliance Helpline/ Contact information for each region

#### **Nishimura & Asahi (Attention: MUFG Group Compliance Helpline)**

(Address) Otemon Tower, 1-1-2 Otemachi, Chiyoda-ku, Tokyo, Japan 100-8124

(Email Address) [mufg-group-helpline@nishimura.com](mailto:mufg-group-helpline@nishimura.com)

※Please note that the MUFG Group Compliance Helpline may not be available in some countries or regions, for example, due to data protection laws. Please refer to your local Compliance Helpline Policy for details of the escalation routes available to you.

#### **MUFG Audit Committee**

(Address) 2-7-1, Marunouchi, Chiyoda-ku, Tokyo, Japan 100-8388

(Email Address) [mufg-group-helpline\\_kansaiinkai\\_PF@mufg.jp](mailto:mufg-group-helpline_kansaiinkai_PF@mufg.jp)

※MUFG Audit Committee will contact you through an external law office.

**Asia** Please use the MUFG Group Compliance Helpline as referenced above, or your local helpline as set out in the local policy.

**Americas** [www.MUFGAmericasIntegrityLine.com](http://www.MUFGAmericasIntegrityLine.com)

**EMEA** For MUFG Bank and MUFG Securities offices please see the Whistleblowing Page on Kizuna: [Whistleblowing - KIZUNA \(kizunamufg.com\)](http://Whistleblowing - KIZUNA (kizunamufg.com))



### Speak Up

In line with company policies and the Code of Conduct, if you have concerns or questions immediately report it to your supervisor or Compliance Officer or contact the Compliance Helpline. Do not avoid reporting just because you think the matter is small or that maybe you are mistaken.

MUFG will not permit any negative consequences or retaliation for staff making reports in good faith. Management is responsible for ensuring all reports are appropriately investigated.

