

Policy and Program for Anti-Bribery and Corruption

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1. General Provisions

1.1 Objectives

Policy and Program for Anti-Bribery and Corruption (“this Policy”) is to serve as a basic framework for Ayudhya Development Leasing Co., Ltd. (“ADLC”) on anti-bribery and corruption outlining the basic program to which the Company is strictly adhered in its business operations. This Policy, therefore, is to be used to ensure proper and common practices for all activities undertaken in the course of the Company’s business.

1.2 Scope of this Policy

1.2.1 This policy applies to Ayudhya Development Leasing Co., Ltd. (“the Company”) Scope of enforcement; Company’s Directors, executives and all employees including other persons or juristic persons acting on behalf of or in the name of the Company such as outsourced staff, etc. shall also strictly adhere to this policy. And the Company shall refer to this policy as a guideline for formulating their policies rules and operating procedures related to the Policy for Anti-Corruption unless there are stricter or more stringent and more comprehensive requirements imposed.

1.2.2 In case this Policy has the collection, use, or disclosure of personal data or relates to personal data under the Personal Data Protection Act (the “PDPA”), it shall be complied by the Policy for Personal Data Protection and Work Instruction of Personal Data Protection.

1.3 Exception to compliance with this Policy

Request for policy exception must not result in violation of or contradiction to laws, regulations, requirements, or announcement of regulatory authorities. Persons requesting approval for exception shall submit their requests to Managing Director via the relevant Department Head and/or Group Head overseeing the staff and Department Head of Internal Audit & Compliance for consideration, respectively.

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1.4 Related Laws, regulations, and Policies

This Policy is related to laws, regulations, and Policies including but not limited to:-

- 1.4.1 Organic Act on Anti-Corruption B.E. 2561, and its amendments
- 1.4.2 Personal Data Protection Act B.E. 2562, and its amendments.
- 1.4.3 Personal Data Protection Committee's Notification: Security Measure of Data Controllers, B.E. 2565, and its amendments.
- 1.4.4 Personal Data Protection Committee Notification: Criteria to Erase, Destroy, or Anonymize Personal Data of the Data Subjects to be Non-identifiable Data B.E. 2567
- 1.4.5 BOT's Notification No. SorNorSor. 2/2566 Re: Roles, Responsibilities, and Composition of the Board of Directors of Financial Institutions and Companies within Financial Business Groups, dated 24 January 2023, and its amendments
- 1.4.6 Standards as per Self-Evaluation Tool (SET) for Countering Bribery by Thai Private Sector Collective Action Coalition Against Corruption (CAC), and its amendments.
- 1.4.7 MUFG Bank's Global Anti-Bribery and Corruption Standard, and its amendments
- 1.4.8 MUFG Bank's Global Anti-Bribery and Corruption Policy, and its amendments.
- 1.4.9 The Spirit & The Letter (S&L), and its amendments.
- 1.4.10 The Company's Policy for Social Contribution and Project Formulation, and its amendments.
- 1.4.11 The Company's Policy for Supplier Relationships, and its amendments.
- 1.4.12 The Company's Policy for Personal Data Protection
- 1.4.13 The Company's Policy for Governing Group Companies
- 1.4.14 The Company's Policy for Conflict of Interest

1.5 Effective date

This Policy shall be effective on 19th May 2025.

1.6 Frequency of review

This Policy shall be reviewed every 2 years or upon any substantial revision.

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1.7 Revision of this Policy

The substantial revision, including the regular review/renewal, of this Policy shall be approved by the Board of Directors. The non-substantial revision, however, shall be done subject to the approval by the Executive Committee and propose to the Board of Directors for acknowledgement.

1.8 Owner of this Policy

This Policy is under the administration of Internal Audit & Compliance Department.

2. Main Provisions

2.1 Definitions

Key Term	Definition
The Company	Ayudhya Development Leasing Co., Ltd.
ABC	Anti-bribery and Corruption.
ABC Procedure	Procedure for Anti-Bribery and Corruption Program.
Affiliates	Companies under the Bank's financial business group where the Bank holds 20% to 50% shares.
All Other Counterparties	<p>The following are some examples of All Other Counterparties:</p> <p>1) <u>Vendors</u></p> <p>Vendors who provide goods/services whether through bidding or non-bidding process to the Bank, including:</p> <ul style="list-style-type: none"> • Vendors and contractors of products, equipment and construction work; • Outsourcing Contractor who undertakes system development; • Suppliers and Providers of goods/service; • Brokers <p>2) <u>Customers</u></p> <ul style="list-style-type: none"> • The Company's clients (including Prospective Clients)

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Key Term	Definition
	<p>3) <u>Others</u></p> <p>Any Counterparty that does not fall under the other categories must be classified as All Other Counterparties.</p>
Anything of Value	<p>Anything of tangible or intangible value. This may include, but not limited to:-</p> <ol style="list-style-type: none"> 1) Gifts, 2) Entertainments, (e.g. meals, travel and accommodation, training and conference invitations); 3) Donations and Sponsorships; 4) Political Contributions; 5) Speaker fees and Honoraria; 6) Offers of Employment or Work Experiences (e.g. paid or unpaid Internship, contract work).
Bank	Bank of Ayudhya Public Company Limited.
Bribery	Any offer, promise, or giving of Anything of Value intended to improperly obtain or retain business or advantages. Bribes may be paid directly or indirectly or through third-party providers, and not limited to the giving or receiving of Cash or a Gift.
Business Management	The employee's direct manager or higher-level management in the employee's reporting line, such as the Department Head (or above)
CAC	Thai Private Sector Collective Action Coalition Against Corruption
Cash	<ol style="list-style-type: none"> 1) Bank notes, coins, cheques 2) Unlisted or listed stocks are classified as cash. Even if the value of stocks cannot be determined, they may realize future gains. Investment equity offered under private placement must be classified as cash, irrespective of the types of the investments.

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Key Term	Definition
Cash Equivalents	<ol style="list-style-type: none"> 1) Gift certificates, gift cards, gift vouchers, electronic money and other cash vouchers available for the purchase of goods and services. 2) Beer coupons, book coupon cards, hotel coupons, travel coupons, and other cash equivalent vouchers available for the purchase of any specifically identified products and services.
Close Familial Relationship	<p>A Close Familial Relationship includes:</p> <ol style="list-style-type: none"> 1) Parent, child(ren), adopter, or adopted child(ren). 2) Grandparent, grandchild, biological siblings, or step-siblings. 3) Spouse or de facto partner, and child of a spouse or de facto partner. 4) Spouse or de facto partner of individuals mentioned in points 1) or 2). 5) Guardian or ward.
Close Personal Relationship	<p>A Close Personal Relationship includes:</p> <ol style="list-style-type: none"> 1) An individual who controls or manages assets or other benefits on behalf of a candidate. 2) An individual who has a close relationship due to the establishment or continuation of a business relationship with a candidate.
Corruption	The misuse of entrusted power or public office for improper benefit / gain for your own or others. The term covers bribery of government officials as well as a range of other criminal offences including fraud, extortion, and money laundering.
Donations	Giving of money, goods, or any other benefits to individuals or legal entities, such as charitable entities, foundations, or funds, without business objectives or commercial gains and without intention to improperly obtain or retain business or any other advantage.
Employee	Permanent Employees, Short-term Employees, Advisors

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Key Term	Definition
Entertainment	Anything of Value (e.g., meals, entertainment, travel, accommodations, conference invitations, and training) provided for an event in which the provider also accompanies the recipient or participates in the event.
Facilitation Payment	Payments made to Public Officials to improperly secure or expedite the performance of a non-discretionary routine or necessary government action (e.g. processing a visa, providing police protection or mail service, or supplying utilities such as phone or electricity service, etc. The payer generally is entitled to the routine or necessary action irrespective of making the payment.
Gift	Anything of Value (e.g., goods, food, physical property, entertainment tickets, digital asset or a discount not available to the public) provided to a recipient in which the provider does not partake or participate.
Group Companies	All companies under the Bank's financial business group, including both Subsidiaries and Affiliates.
G&E Procedure	Procedure for Gifts and Entertainment
High-Ranking Public Official	<p>An individual entrusted with a prominent public function in Thailand, a foreign country, or Top 3 executives of an organization, e.g.</p> <ol style="list-style-type: none"> 1) Head of State or Government 2) Minister or Senior Official: Head of Departments or above (both in central/provincial governments and overseas) within the government, court, independent organizations, prosecutorial organization, or the military e.g., Permanent Secretary, Deputy Permanent Secretary, Director-General, Deputy Director-General, Provincial Governor, Deputy Provincial Governor, Inspector at Ministry Level, etc. 3) Senior Executive of a State Enterprise or Government Agency 4) Person Entrusted with a Prominent Function in an International Organization

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Key Term	Definition
	Equivalent Positions: Any person holding a position equivalent to those mentioned in 1) to 4).
High-Risk Candidate	<p>Candidate who is:</p> <ol style="list-style-type: none"> 1) referred to the Company by a Public Official, client, or Prospective Client; or 2) known to be a Public Official, client, or Prospective Client; or 3) known to have a Close Personal or Close Familial Relationship with a Public Official, client or Prospective Client. <p>The Public Official, Client, or Prospective Client in 1) 2) and 3) shall be a High-Ranking Public Official or Employee with a senior position which has a high potential to influence their employer's activity with the Company.</p> <p><u>Remark:</u></p> <ol style="list-style-type: none"> 1) The following senior positions are always assumed to have authority to influence their employer's activity: Managing Director, Group Head. 2) Candidates referred by retail clients, or who are retail clients themselves, are not considered High-Risk Candidate. 3) Entity-to-entity referrals are out of scope due to the negligible ABC risk (e.g., universities referring students to the Bank).
IOD	Thai Institute of Directors
MUFG Bank	MUFG Bank, Ltd.
Policy	Policy and Program for Anti-Bribery and Corruption.
Political Contribution	Any forms of financial assistance, including lending or providing goods or services; advertising, promoting, or supporting a political party; purchasing tickets for fundraising events; or Donations to entities closely associated with a political party in order to support political activities.

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Key Term	Definition
Prospective Client	A third party with whom the Bank is engaged in active discussions to become a client.
Public Official / Government Entity	<p>1) Any official, employee (regardless of rank or level), member, or representative of any of the following: -</p> <ul style="list-style-type: none"> National, regional, local, or municipal governmental bodies (e.g., executive, legislative, judicial), departments, agencies, or instrumentalities thereof (e.g., central Banks, sovereign wealth funds, state utilities). State-controlled companies. Generally, a company is deemed state-controlled if one or more government bodies, departments, or agencies has at least one of the following attributes: - <ul style="list-style-type: none"> a) More than 50% ownership b) Voting control c) Board control d) Other indicia of control International organizations, development Banks, and public health agencies (e.g., the United Nations, World Bank, or International Monetary Fund). <p>2) Under local law, members of a committee / sub-committee, or appointed members of forums or panels of local administration, and persons exercising or entrusted with exercising the state's administrative power in the performance of a particular activity under the law, whether established under the governmental bureaucratic channel or by a state enterprise or other state undertaking.</p> <p>3) Any individual who is known to be either an officer, employee, or representative of political party or a candidate for political office.</p>

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Key Term	Definition
	<p><u>Remark:</u></p> <p>1) Public Official is broadly defined to include Local / Foreign Public Officials and International Organization Officials collectively.</p> <p>2) This list is not exhaustive, as the term Public Official may extend to other individuals depending on the facts and circumstances.</p> <p>3) Public Officials under this Policy includes the case where related Business Divisions / Departments know or able to investigate that they are still during the 2 years cooling-off period. (As detailed in the Procedure for Gifts and Entertainment.)</p>
Regulator	Any employee or representative of a government or industry-based body with regulatory authority to supervise the Company's activities.
Sponsorship	<p>Financial support given for business undertakings, marketing and brand promotion, or reputation of the sponsor.</p> <p>Company Sponsorship of trade industry events is a common method of marketing the Company brand and networking with industry participants, clients, and prospective clients. Payments for Sponsorship typically are to third-party companies or industry groups that are not charitable entities.</p> <p>These Sponsorships provide benefits in return, such as advertising credits in media, events and publications, use of facilities, and opportunities to promote the Bank's name, products and services, etc.</p>
Subsidiaries	The companies under the Bank's financial business group where the Bank holds more than 50% of shares, either directly or indirectly through a subsidiary, or where the Bank has substantial control. This includes cases where more than half of the subsidiary's board of directors are personnel of the Bank or are nominated by the Bank.

Key Term	Definition
Third Party Intermediaries (TPIs)	<p>TPIs are any third-party service providers of goods or services (whether individuals or entities) engaged to interact substantively with any non-Bank individual or entity on behalf of the Company to help</p> <ol style="list-style-type: none"> 1) obtain or retain business, or any other business advantages; or 2) obtain government approvals or action. <p>TPIs may include agents, consultants, business introducers, , facilitators, suppliers, subcontractors, joint-venture partners, co-investors, lawyers, lobbyists, accountants, and real-estate brokers.</p> <p><u>Remark:</u></p> <ol style="list-style-type: none"> 1) Engagement of other Group Companies to provide services to the Company does not qualify as a TPI engagement. 2) Limited, non-substantive interaction will likely not qualify the third-party provider as a TPI. Examples of such interactions include, but are not limited to, delivering or submitting files, applications or documents. However, arranging business meetings or introductions likely would qualify as substantive interactions in this Policy. 3) Government action includes but is not limited to making introductions or arranging a meeting with Public Officials.

2.2 General principles

The Company is strongly committed to upholding the principle of business ethics. Bribery and corruption, in any forms, are Strictly prohibited even if they appear to offer business opportunities for the Company in its operations. Additionally, the Company's business opportunities shall not be unlawfully exploited for personal gain or the benefit of others through the misuse of Company property, information or authority. To ensure adherence to these commitments, the Company shall establish an Anti-Bribery and Corruption Compliance Program ("the Program") as described in this Policy.

2.3 Roles, Duties, and Responsibilities

Functions	Key Roles, Duties, and Responsibilities
Board of Directors (BOD)	<ol style="list-style-type: none"> 1) To approve and review this Policy and the Program 2) To oversee compliance with this Policy and the Program, 3) To take key role in promoting the Company's compliance with the Program in this Policy, and 4) To delegate clear authority and responsibility to the management to support implementation of the Program in this Policy.
Executive Committee (Excom)	<ol style="list-style-type: none"> 1) To approve for the regular review/renewal, revision of other policies which has changed non-substantially.
Managing Directors	<ol style="list-style-type: none"> 1) To review and oversee compliance with respect to anti-bribery and corruption measures. 2) To make recommendation on policies and strategies relating to the Company's compliance requirements, 3) To follow up, monitor, and report on the implementation of the Company's compliance policies and strategies, 4) To make recommendation on compliance practices in accordance with guidelines, policies, and strategies prescribed by the Company, and 5) To oversee that the employees attend Compliance training on a continuous basis.
Finance and Accounting Department	<ol style="list-style-type: none"> 1) To record and keep information and documents related to financial and accounting items, and 2) To set financial and accounting procedures which are in line with the Generally Accepted Accounting Principles and anti-bribery and corruption measures.

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Functions	Key Roles, Duties, and Responsibilities
Human Resources and General Admin department	To implement human resources management practices which are in line with anti-bribery and corruption measures of the Company, and ensure that recruitment and selection processes, onboarding program, training, and punishment support anti-bribery and corruption efforts.
Internal Audit and Compliance Department	<ol style="list-style-type: none"> 1) To ensure the Company's business operations are undertaken in compliance with the Program and applicable laws and regulations, 2) To provide advice and recommendations on control measures related to anti-bribery and corruption, 3) To supervise anti-bribery and corruption activities including pre / post clearance for activities with Anything of Value on risk-based approach, 4) To monitor and review anti-bribery and corruption practices including Policies and Procedures on a regular basis, 5) To facilitate training and knowledge dissemination related to anti-bribery and corruption, 6) To review processes and comprehensiveness as per the SET for Countering Bribery for a submission to the CAC Council every 3 years for the purpose of reviewing the Company's CAC Certification status in accordance with the procedures stipulated by the CAC Council / the IOD, and 7) To identify and assess the Company's corruption risk and propose measures and/or systems in order to control and prevent bribery and corruption risk. 8) To communicate, review, and report the outcomes of this Policy and the Program implementation to the BOD at least once a year.

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Functions	Key Roles, Duties, and Responsibilities
	<p>9) To coordinate with BAY's Internal Audit Group to conduct examination and evaluation of the adequacy and effectiveness of internal control system including the Program under this Policy</p> <p>10) To provide training and knowledge to the BOD related to anti-bribery and corruption measures.</p> <p>11) To communicate, disseminate and disclose the Company's anti-bribery and corruptions activities to the employees and the public.</p> <p>12) To provide compliance support in case of any question in relation to this Policy and the Program.</p>
Management	<p>1) To identify and assess the Bank's bribery and corruption risks and propose measures and/or systems to control and prevent bribery and corruption risks.</p> <p>2) To undertake control and oversight to promote practical implementation of this Policy and the Program,</p> <p>3) To identify, examine, and manage risks as well as ensure that measures which are adequate for appropriate, prompt, and timely problem-solving are in place,</p> <p>4) To provide support in terms of budgeting, process improvement, and personnel development to ensure the successful implementation of this Policy and the Program,</p> <p>5) To ensure that Employees strictly comply with applicable regulatory requirements, Policies, and any Company's documents,</p> <p>6) To review and report the outcomes of this Policy and the Program implementation at least once a year.</p>

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Functions	Key Roles, Duties, and Responsibilities
Employees	<ol style="list-style-type: none"> 1) To understand and comply with this Policy and the Program, including other programs (if any), 2) To build and promote the anti-bribery and corruption culture, and avoid actions that may pose risks of bribery and corruption, 3) To participate in relevant training sessions. 4) To promptly report any suspicions of bribery and corruption and cooperate with investigations as required, and 5) To adhere to control measures or operational procedures of their departments related to Anti-Bribery and Corruption.

2.4 Prohibited activities

The Company prohibits all forms of bribery and corruption. Employees are not allowed to engage in the following prohibited activities: -

- 2.4.1 Giving or receiving (Cash or Cash Equivalents in connection with the activities under this Policy, except Cheque which is issued by the Company with the payee's name included (A/C Payee Only) for local traditions and conventions such as funerals, weddings, and Buddhist ordinations
- 2.4.2 Offering, promising, or giving Anything of Value directly or indirectly to anyone or planning, supporting, or authorizing the same—if doing so is intended or could reasonably appear as intended to improperly obtain or retain business or any other advantage.
- 2.4.3 Soliciting or receiving Anything of Value, directly or indirectly, from anyone, if doing so is intended or could reasonably appear as intended to improperly influence an Employee in his or her activities on behalf of the Company.
- 2.4.4 Using personal funds (e.g. an employee's own money, which the Company will not reimburse) to provide Anything of Value to any counterparty in connection with the Company's business.

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2.4.5 Offering, promising, or Giving facilitation payment to government officials to improperly expedite or facilitate government actions or services.

2.4.6 Falsifying or concealing any books, records, accounts, or other information or data related to the activities of the Company, its clients, service providers, vendors, suppliers, or other business partners.

2.4.7 Violating any relevant laws, regulations, or the Company's Policies.

These requirements shall include reasonable exceptions that permit the Employees to proceed with an activity that would otherwise require pre-clearance, including in the following situations:

- **Personal Safety:** If an Employee believes his or her personal safety or the safety of others is at issue (e.g. when a payment must be made to ensure safe passage out of a particular situation or location), approval must be obtained from the Managing Director and report to Department Head of Internal Audit and Compliance Department after any proceeding. If the case is extremely necessary due to health, life, and safety concerns, the matter needs to be reported as soon as practicable with available and adequate documents and evidence to prove that such transaction is reasonably necessary and appropriate.
- **Payments Directly to a Government Entity:** Routine payments to government entities in the ordinary course of the Company's business (as opposed to a Public Official individually for their personal benefit), such as court fees / license fees, taxes, or utilities. The Company must maintain documentation demonstrating the purpose and recipient of such payments.

2.5 General Controls Requirements

2.5.1 Internal control framework is established to ensure that the Company's Program is appropriate, adequate, effective, and practical as well as support the prevention and examination of corruption and bribery in the organization ,thereby facilitationg the successful achievement of anti-bribery and corruption goals. This framework also ensure the accuracy of financial information and provides efficient and proper identification, measurement, classification, and reporting tools.

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- 2.5.2 The Program shall be established based on anti-bribery and corruption laws and standards. The BOD shall hold the ultimate responsibility concerned. In this regard, the formulation of Policies and any Company's documents shall be supported by the assessment of potential bribery and corruption risks associated with the organization. Guidelines and measures for preventing, managing, and controlling potential bribery and corruption risks shall also be developed and implemented to address each relevant risk. Regular examinations shall be conducted and adequate and appropriate reporting channels shall be made available.
- 2.5.3 Transaction which are related to the Company's business operations shall be governed by the general approval process or approved by executives who are specifically assigned. In addition, transactions that may expose the Company to bribery and corruption risks shall be subject to the approval from the Managing Director.
- 2.5.4 Access to information or properties of the Company shall be governed by the general approval process or approved by executives who are specifically assigned.
- 2.5.5 Transactions related to the Company's business operations shall be recorded based on necessity and made available for examination. This is particularly critical for transactions included in the financial statements which must be accurate, transparent, and compliant with the Generally Accepted Accounting Principles. There must be no off-the-books records or separate entries to conceal inappropriate payments.
- 2.5.6 Anti-bribery and corruption practices shall be promoted and encouraged. In addition, recruitment and selection processes, onboarding programs, training, and disciplinary measures,, etc., must support anti-bribery and corruption efforts. Employees who refuse to participate in corruption activities shall be protected and shall not suffer demotion, disciplinary measures, or any negative consequences ,even if such results may result in the Company losing aof business opportunity. Parties related to the business, third party representatives and counterparties shall be notified of the implementation of anti-bribery and corruption measures as deemed necessary and appropriate.

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- 2.5.7 High-level executives shall be act as role models and oversee operations to ensure the achievement of anti-bribery and corruption objectives.
- 2.5.8 Warning, reporting, and whistle-blowing systems as well as whistleblower protection measures shall be in place. There shall be easily accessible whistle-blowing channels for Employees and external persons to promptly report suspected violations of this Policy. The Company is committed to ensuring that Employees can speak up with confidence and without facing adverse consequences if they have any concerns or need guidance. The Company shall not retaliate or tolerate retaliation against any Employee who in good faith reports a suspected violation of this Policy, provides evidence, or participates in an investigation or review of a potential policy violation.
- 2.5.9 The Company is committed to fully investigating any reported or suspected violation of this Policy. In this regard, committee shall be established and appointed to investigate facts, address reported issues, provide responses, and report these issues to the Managing Director, and the BOD.
- 2.5.10 Communication procedures shall be established in order to disclose the availability of this Policy to the public and Employees.

2.6 Requirements and Preventive Measures on Anything of Value

While giving or receiving Anything of Value to or from anyone may be permissible, it can pose bribery and corruption risks and appearance concerns for both Employees and the Company. Therefore, Employees are expected to exercise good judgment and ensure that such activity serve a legitimate business purpose, are reasonable, accurately documented, and do not create a conflict of interest or violate of local laws and this Policy.

Employees who seek to give or receive Anything of Value to or from a counterparty are responsible for knowing whether the counterparty is a Public Official, client, Prospective Client, or other third party. As set forth below, under certain circumstances, Employees must obtain Pre-Clearance of Anything of Value given or received directly or indirectly to or from Public Officials, clients, Prospective Clients, or other third party.

2.6.1 Gifts and Entertainment

Giving and receiving Gifts and Entertainment shall obtain approval from Business Managements and above certain value thresholds require Compliance Pre-Clearance, as set forth in the G&E Procedure. However, overseas travelling opportunities for both business and training purposes with full or partial sponsorship (e.g. business events, business networking, business meeting, training events/seminars) sponsored by Public Officials and all Other Counterparties shall be approved by Department Head (or above) and Managing Director via Human Resources and General Admin Department prior to the travelling or confirmation to join the travelling.

The giving or receiving of Gifts and Entertainment, etc. must be appropriate in line with local cultures, traditions and conventions as well as comply with applicable laws including the laws of the counterparty's country.

2.6.2 Donations and Sponsorships

Donations and Sponsorships—even if made to legitimate organizations may create corruption and bribery risk and are prohibited if they are intended or could reasonably appear to be intended to improperly obtain or retain business or other business advantages.

Donations and Sponsorships requested by a Public Official/Government Entity, client, or Prospective Client, could pose heightened risk. Donations and Sponsorships must be evaluated by conducting due diligence on the individuals or entities receiving the Donations or Sponsorships. Additionally, all Donations and Sponsorships requested by a Public Official, client, or Prospective Client (i.e., not initiated by the Company) must be approved by the Business Management expressly assigned by the Company.

Donations and sponsorships above certain value thresholds require Compliance Pre-clearance as set forth in the ABC Procedure.

2.6.3 Political Contributions

Employees are not permitted to provide political contributions personally or on behalf of the Company, if they are intended to improperly influence any external party in connection with the Company's business, or in exchange for any improper business advantage., except as allowed

under the ABC Procedure on political contributions. Such contributions require approval by the BOD or assigned persons.

2.6.4 Speaker Fees and Honoraria

Speaker fees or honoraria paid to Public Officials may create the appearance that such payments are intended or appear intended to improperly influence the recipient so that such activity shall be avoided in principle.

In case, invitation of a Public Official as a speaker or the payment of speaker fees / honoraria to the Public Official requires approval from the Managing Director. And above certain thresholds value is requiring Compliance Pre-clearance from Head of Internal Audit and Compliance department as set forth in the ABC Procedure and corresponding procedures

2.6.5 Employment or Work Experience

Offers of Employment or Work Experience whether paid or unpaid are considered to be Anything of Value under this Policy. Providing an offer of employment or work experience to a candidate with the expectation that, as a result, the Company will obtain or retain an improper business benefit or advantage is prohibited.

High-Risk Candidates must be evaluated in the same manner as any other candidates (i.e. they must not receive any preferential treatment), Compliance Pre-Clearance are required prior to providing any offer of employment or other work experience to High-Risk Candidates, as set forth in the ABC Procedure and corresponding procedures.

2.6.6 Third Party Intermediaries (TPIs)

TPIs present heightened anti-bribery and corruption risk because they may provide Anything of Value to a Public Official, client, Prospective Client or another counterparty to obtain an improper benefit for the Company. . Bribes, whether provided by Employees or by third-party engaged by the Bank are strictly prohibited. A bribe paid by a TPI in connection with the Company's business can be as damaging as one paid by an employee. Therefore, engagement of TPIs requires a

full process of Identification, Risk Assessment, Approval, Compliance Pre-Clearance, Onboarding and Contracting, and Ongoing Monitoring as set forth in the ABC Procedure.

2.6.7 Mergers, Acquisitions, and Joint Ventures

The Company may be subject to legal and reputational risks after it has merged with, partnered with, or acquired a significant stake in, another company. To manage ABC risks related to mergers, acquisitions, joint ventures, and any other transactions in which the Company takes an influence or control position in another entity, the Company must have risk-based ABC due diligence procedures and controls as set forth in the ABC Procedure and corresponding procedures.

2.6.8 Other Business Transactions

In addition to the transactions stated in Section 2.6.7 (Mergers, Acquisitions, and Joint Ventures), more routine business activities in which the Company provides traditional banking services to its clients, such as underwriting, lending, and advisory services, may also present anti-bribery and corruption risk. Employees shall consider these business activities and ensure that they comply with this Policy.

2.7 Other Requirements (Anti-Bribery and Corruption (ABC) Compliance Program)

2.7.1 Risk Assessment and Annual Compliance Plan / Testing

The Company shall conduct risk assessment to evaluate measures related to anti-bribery and corruption. Annual Compliance Plan shall be developed based on the risk assessment results, including compliance checklist, onsite / offsite compliance testing, and planned initiatives to further reduce ABC-related risk exposures.

2.7.2 Issue Management and Board of Directors / Management Reporting

Business Management are responsible for monitoring and reporting of ABC-related issues to the Compliance Division that is responsible for monitoring and reporting periodically of ABC-related key reporting metrics to the management and relevant Committees.

2.7.3 Training and Awareness

The Company shall arrange training to provide Employees with knowledge relating to ABC. All Employees are required to regularly attend refresher courses related to ABC as well as relevant Policies and any Company's documents.

2.7.4 Recordkeeping and Record Retention

The Company must maintain records of all information collected and produced pursuant to this Policy for a minimum of seven (7) years (unless required otherwise by applicable law or regulation) and ensure that such information is readily accessible upon request from external or internal sector (if any).

2.8 Penalty

Employees who violate this Policy will be subject to disciplinary action according to the Company's rules and may be committed to an offence under other relevant laws, regulations, rules, or requirements.

2.9 Interim provision

Policies and any Company's documents that are not contrary or inconsistent or having measures which are more intense than this Policy shall remain effective; but if Policies and any Company's documents that are contrary or inconsistent or having measures which are inequivalent to this Policy, the functional Groups, Divisions, Departments, owner of products or services shall complete the amendment within 90 days from the effective date of this Policy.

Document Version Control Log

Version	Summary of Significant Revisions	Prepared By	Approved By/ Approval Date	Effective Date
1.0	Formulation of the Policy for Anti-Corruption	Internal Audit & Compliance Dept.	Board of Directors/ 23 May 2013	23 May 2013
2.0	Revised of the Policy for Anti-Corruption	Internal Audit & Compliance Dept.	Board of Directors/ 8 July 2015	8 July 2015
3.0	Revised of Policy for Anti-Corruption– Roles, duties and responsibilities	Internal Audit & Compliance Dept.	Board of Directors/ 5 July 2017	5 July 2017
4.0	Rename to Policy for Anti-Corruption	Internal Audit & Compliance Dept.	Board of Directors/ 13 June 2019	13 June 2019
5.0	1.2 Scope of the Policy	Internal Audit & Compliance Dept.	Board of Directors/ 20 August 2019	20 August 2019

Policy and Program for Anti-Bribery and Corruption

Version	Summary of Significant Revisions	Prepared By	Approved By/ Approval Date	Effective Date
6.0	Revision with substance <ul style="list-style-type: none"> - To rename to “Policy and Program for Anti-Bribery and Corruption” - To include Policy for Gift and Entertainment and Procedure for Anti-Corruption Program - To update as per the revised Policy template - To amend the contents as per MUFG 	Internal Audit & Compliance Dept.	Board of Directors/ 20 May 2021	20 May 2021
7.0	Revision with substance <ul style="list-style-type: none"> - Section 1.4 Related laws, regulations, and Policies - Section 1.7 Revision of this Policy - Section 2.1 To update definition “Donations”, “Sponsorship” - Section 2.3 To add Executive Committee (Excom) in Roles, duties, and responsibilities - Section 2.6 Requirements and preventive 	Internal Audit & Compliance Dept.	Board of Directors 19 May 2023	19 May 2023

Policy and Program for Anti-Bribery and Corruption

Version	Summary of Significant Revisions	Prepared By	Approved By/ Approval Date	Effective Date
8.0	<p>Revision with substance</p> <ul style="list-style-type: none"> - To revise item 1.3 Exception to compliance with this Policy - To update Related Laws, Regulations, and Policies - To revise and add Definitions - To revise Roles, Duties, and Responsibilities of EXCOM, Business Management and Employee - To revise Prohibited activities - To revise and update in items 2.6 Requirements and Preventive Measures on Anything of Value - To revise in item 2.7.4 Recordkeeping and Record Retention - To amend the contents as per MUFG Bank's Global Anti-Bribery and Corruption Policy and MUFG Bank's Global Anti-Bribery and Corruption Standard 	Internal Audit & Compliance Dept.	Board of Directors/ 24 April 2025	19 May 2025