

## **SMFG Group Policies for Anti-Bribery**

### **“Management’s Commitment to the Prevention of Bribery and Corruption”**

One of the key management principles of Sumitomo Mitsui Financial Group (“SMFG”) and its direct and indirect subsidiaries (the entire group is hereinafter referred to as the “Group”) provides that “we aim to maximize our shareholders’ value through the continuous growth of our business.” To achieve this principle, the Group set forth in our “Five Values”, which are to be shared by all Group members, that “As a professional, always act with sincerity and a high ethical standard.” The Group management believes that compliance with applicable laws and regulations will increase shareholder value and enhance our Group’s brand identity and positions the strengthening of compliance as a key issue.

To this end, we establish the following “SMFG Group Policies for Anti-Bribery” (the “Policies”) setting forth our Group’s fundamental policies for the prevention of bribery and corruption.

- As a general overarching principle, the Policies and other related rules and procedures expressly prohibit any involvement or participation in bribery or corrupt acts. In the event of a violation, the Policies clearly provide for disciplinary actions including punitive dismissal.
- The Policies and other related rules and procedures provide that the appropriateness of the circumstances, value and purpose shall be carefully weighed prior to the provision or receipt of Business Entertainment or Gifts and that the applicable approval procedures are strictly followed.
- The Policies and other related rules and procedures are not limited to interactions with public officials but also govern interactions with any other persons.
- The Policies and other related rules and procedures apply to each Group company and to third parties other than group companies that perform any business operations for any Group company.
- In the event that any employee or executive of any Group company discovers any activities that may constitute bribery or corruption, he or she should promptly report such activities to his or her supervisor, compliance officer, area compliance officer, or the Anti Money Laundering & Financial Crime Prevention Department. Employees or executives who feel uncomfortable or hesitant to report to these individuals may also

report to the office especially established for whistle-blowing in accordance with the Rules for Whistle-Blowing.

Becoming a world top tier financial group, complying with applicable laws and regulations is essential. To this end, we expect every employee or executive in the Group to fully and completely comply with the code of conduct and the Policies.

December, 2023

Toru Nakashima

President and Group CEO

## I. Purpose

The purpose of the Policies is to secure the soundness and appropriateness of our business operations by preventing business entertainment and the provision or receipt of anything of value in violation of applicable laws, regulations or social practices and customs.

## II. Basic Policies

### (1) Prohibition of Bribery

SMFG and its group companies strictly prohibit the acts of offering things of value (including, but not limited to, money, goods, services, entertainment, employment of family relatives, other tangible and intangible items having economic value regardless of their nature) with the intent of improperly influencing the recipient and the acts of receiving or demanding things of value with the intent of improperly providing benefits to the offeror.

### (2) Compliance with Applicable Laws and Regulations, Social Practices and Customs

SMFG and its group companies shall comply with any and all the applicable laws and regulations in Japan and in all relevant foreign jurisdictions concerning the prevention of bribery and corruption. Such compliance and implementation of the Policies shall be consistent with social practices and customs as well as the expectations of stakeholders including our shareholders, customers and the general public; provided that the adherence to local custom and practice can never serve as a justification or excuse for bribery or other violation of the Policies. For example, the small payment made for expediting the routine administrative process or so called “facilitation payment” must be strictly prohibited, whereas it is permissible and acceptable as a common practice in the relevant jurisdiction in which it operates.

### (3) Expense Management

SMFG and its group companies shall manage its expenses in strict accordance with the relevant procedures of the Group Company.

## III. Control System

(1) SMFG and its group companies shall enact decision criteria and control procedures to implement the Policies and relevant rules and regulations within respective companies, taking into account laws and regulations applicable to business operations, specific risks associated

with the business operations and social practices and customs.

- (2) SMFG shall establish and maintain the system necessary for the control in coordination with respective group companies and verify such system regularly through measures including advance approval of the decision criteria and control procedures enacted or revised by respective group companies, as well as holding training or seminars, etc. to ensure complete understanding and thorough practice for preventing bribery and appropriately control business entertainment and the provision or receipt of anything of value by group executives and employees. In addition, SMFG shall conduct the sufficient compliance due diligence from anti-bribery and corruption perspective prior to investment in or merger and acquisition of other entities in order to get control over or substantial ownership of the entities. Once it takes the control or ownership of such entities, as a part of appropriate PMI process, it shall manage to ensure that they develop their own robust compliance framework addressing bribery and corruption in due course.
  
- (3) SMFG and its group companies shall take all the necessary measures in order to prevent any bribery or corruption from occurring by way of outsourcing all or a part of its business activities to the intermediary third parties who may act for or on behalf of SMFG and its group companies. These measures include, but not be limited to, prior compliance due diligence for vendors, mandatory inclusion of anti-bribery clause in the contract, or monitoring of the service provided to ensure that there is no concern from anti-bribery and corruption compliance perspective. SMFG and its group companies, by sharing or publicizing the group-wide anti-bribery and corruption policies, shall endeavor to make them clearly understood by the relevant intermediary third parties, as needed.

#### IV. Preparation and Retention of Records

SMFG and its group companies shall promptly and accurately document business entertainment and the provision or receipt of anything of value, as well as the implementation of training or seminars in compliance with the Policies and other relevant rules and regulations.

#### V. Reporting, Investigation and Disciplinary Action

- (1) SMFG and its group companies shall ensure that their executives and employees, if they discover any activities that may constitute a violation of the Policies and other relevant rules and regulations, (i) should promptly report such activities to their supervisor, compliance

officer or compliance supervising division or (ii) may also report the matter to the office especially established for whistle-blowing in accordance with the SMFG Rules for Whistle-Blowing. No form of retaliation against a person who makes such a report in good faith will be allowed or tolerated.

- (2) SMFG and its group companies shall, immediately upon discovery, report to the Anti Money Laundering & Financial Crime Prevention Department (“AMLPD”) of SMFG any potential violations of applicable laws or regulations, or material violations of the Policies and other relevant rules and regulations; shall investigate such violations promptly; and shall impose an appropriate disciplinary action on executives and employees who are found to have violated applicable laws or regulations, the Policies and other relevant rules and regulations by disciplinary action, etc.

#### VI. Training and Declaration

SMFG and its group companies shall conduct internal training for all the employees on the content, purpose and operation of the Policies and other applicable external and internal rules and regulations to ensure paramount compliance with the Policies, rules and regulations in order to prevent bribery and appropriately control business entertainment and the provision or receipt of anything of value.

SMFG and its group companies shall obtain the declaration from all the employees on a regular basis, whereby the employees are committed to respecting and adhering to the relevant anti-bribery and corruption policies and procedures including this Policy and attest that they shall never engage in any bribery or corrupt activities.

#### VII. Monitoring

SMFG and its group companies shall monitor compliance with the Policies and other relevant rules and regulations and, on the basis of the results of such monitoring, take necessary measures including reviewing the Policies and other relevant rules and regulations.

#### VIII. Risk Assessment

SMFG shall conduct the regular risk assessment focusing on the bribery and corruption, targeting its group companies(including overseas offices) in order to identify and understand the relevant risks organizationally. The results must be appropriately escalated to the management for their

attention and, after going through sufficient analysis, must be reflected to the risk mitigating measures going forward.

#### IX. Scope of the policies

The policies cover the business entertainment and the provision or receipt of anything of value performed by SMFG and its group companies.

#### X. Reporting and Consultation concerning Irregularities

In the event that irregularities not specifically covered by the Policies or other relevant rules and regulations occur in connection with the prevention of bribery as well as business entertainment and the provision or receipt of anything of value, group companies shall report to and consult with the AMLPD of SMFG immediately.

#### XI. Management of the Policies

- (1) The revision and abolition of the Policies shall require the resolution of the Board of Directors of SMFG; provided, however, that minor revisions may be approved and executed by the executive in charge of the AMLPD of SMFG.
- (2) A secretariat for the operation and control of the Policies shall be established in the AMLPD of SMFG.
- (3) The words and terms in the Policies shall have the meaning as defined in the Rules for Anti-Bribery Compliance and Ethics unless specified or construed otherwise in the Policies.