Behavioral Guideline on Compliance and Risk

SMBC SUMITOMO MITSUI FINANCIAL GROUP

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Message from Group CEO

Today, the environment surrounding us is changing dramatically, and people's values are diversifying. Our business still depends on the trust of our customers, our shareholders, and society. To realize our vision of becoming “Globally connected. Rooted in Japan. Your most trusted Partner.”, SMBC Group shares the set of universal values known as the Five Values.

Among the Five Values, Integrity is the one I want you to make central in your everyday thoughts and actions. Integrity is nurtured by a spirit of fairness and unselfish honesty, combined with compliance as a matter of course. As financial professionals, each of you must not only comply with regulations and rules but also deal with customers in a fair and honest manner. The accumulation of such efforts will serve as the foundation for unwavering trust from our stakeholders and lead to recognition of SMBC Group as a financial group with integrity in society. To support your day-to-day efforts, we have established the “Behavioral Guideline on Compliance and Risk” that describes the attitude required of financial professionals and the behavior expected of them.

To ensure that SMBC Group remains strong in these uncertain times, I ask you to keep in mind another one of our Five Values: Team “SMBC Group.” A strong team that can unite diverse strengths is one that enjoys a sense of security (psychological safety) where individuals’ honest opinions are listened to and respected by their peers. At SMBC Group, we have systems in place that allow each of you to communicate any concerns you may have. I hope you will create environments in your workplaces that enable you to “Speak Up,” i.e., freely propose ideas and voice your concerns to each other.

Let us together build SMBC Group with robustness and integrity, where we carry out our daily tasks in a fair and honest manner, and help, encourage, and sometimes even raise each other up as proud members of the Group.

April 2026

Sumitomo Mitsui Financial Group
Director President and Group CEO

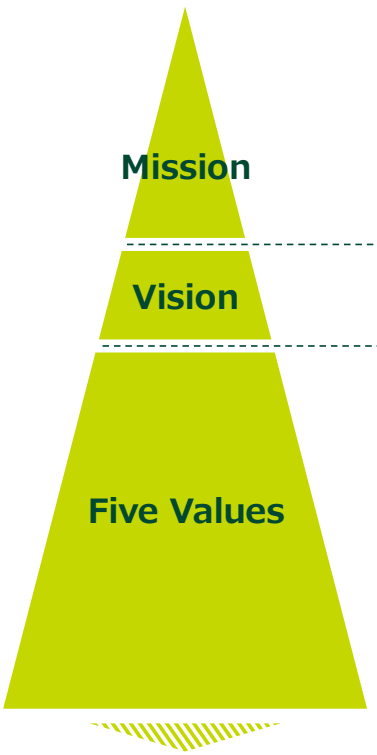
Toru Nakashima

What is “Behavioral Guideline on Compliance and Risk"

At SMBC Group, our group "Mission" which underpins our business activities outlines the mission we are committed to fulfilling for our stakeholders. In addition to our “Mission”, we have established the “Vision“, which defines long or medium goals we strive to achieve, and the "Five Values“, our Values are the guiding principals for our organization culture that all employees share.

Guided by this “Mission”, our goal is to achieve sustainable growth as “Globally connected. Rooted in Japan. Your most trusted Partner." To achieve this goal, it is crucial to embrace an enterprising spirit, decisively engage in sound risk-taking, and challenge ourselves proactively. At the same time, such risk-taking is only possible with appropriate risk management, including ensuring the compliance. It is especially important for a comprehensive financial group due to our public mission and societal responsibilities. It is especially important for a comprehensive financial group due to our public mission and societal responsibilities. We must therefore put greater emphasis on risk management compared to other businesses

The “Behavioral Guide on Compliance and Risk” provides a framework for all SMBC Group employees to exhibit behaviors and actions that reflect our 'Five Values,' ensuring adherence to compliance and risk while striving for sustainable business growth and enhancing our corporate and social value."



We grow and prosper together with our customers, by providing services of greater value to them.

We aim to maximize our shareholders’ value through the continuous growth of our business.

We create a work environment that encourages and rewards diligent and highly -motivated employees.

We contribute to a sustainable society by addressing environmental and social issues.

Globally Connected. Rooted in Japan. Your most trusted partner.

Integrity
As a professional, always act with sincerity and a high ethical standard.

Customer First
Always look at it from the customer’s point of view, and provide value based on their individual needs.

Proactive & Innovative
Embrace new ideas and perspectives, don’t be deterred by failure.

Speed & Quality
Differentiate ourselves through the speed and quality of our decision-making and service delivery.

Team “SMBC Group”
Respect and leverage the knowledge and diverse talent of our global organization, as a team.

Behavioral Guideline on Compliance and Risk	Framework for all SMBC Group employees to exhibit **behaviors and actions** that reflect our 'Five Values,' ensuring adherence to **compliance and risk**

Five elements of the guideline were established as criteria to guide in situations when unsure whether a behavior is right

Demonstrating Risk Ownership and Practicing Risk-Taking Soundly and Bravely

All employees should be aware that they are risk owners, diligently evaluating and controlling various business-related risks to earn the highest level of trust, while actively taking risks.

Complying with Laws, Regulations, Rules, and Social Norms

In addition to strictly adhering to laws and regulations, we strive to act correctly in line with social norms to meet the expectations and trust of our various stakeholders.

Pursuing the Best Interests of Our Customers

We prioritize safeguarding our customers' assets and information, striving to offer products and services that serve customers' best interests, thereby contributing to their sustainable and sound asset growth.

Fostering a Healthy, Secure, and Open Work Environment

We respect the diversity of all stakeholders, including customers, and aim to create an open workplace environment that encourages speaking up, allowing employees to fully manifest their abilities.

Practicing Fairness and Honestly

We contribute to realizing our group mission and creating social value, by maintaining high ethical standards and conducting business with fairness and integrity.

Demonstrating Risk Ownership and Practicing Risk-Taking Soundly and Bravely

【1】 Even in challenging situations where there is no precedent, we proactively and positively embrace challenges to propose more valuable products and services. Furthermore, we encourage and support such endeavors across the entire SMBC Group.

【2】 All employees remain aware that they are risk owners, proactively identifying and managing various associated with our businesses prior to be materialized and mitigating those risks.

Complying with Laws, Regulations, Rules, and Social Norms

【3】 We comply with laws and regulations regarding money laundering, terrorist financing, economic sanctions, and tax evasion, and respond resolutely to financial crimes and anti-social forces.

【4】 We maintain appropriate and balanced relationships with stakeholders, including proper entertainment and gift-giving practices.

【5】 We will not use confidential information in a way that is improper or inconsistent with its purpose, nor will we allow activities, such as insider trading, that result in unfair profit for ourselves or third parties.

【6】 We appropriately manage conflicts of interest to avoid unfairly harming customers' interests and protect the assets and credibility of both our customers and the company.

【7】 We never engage in unfair transactions*1 and strive to uphold the fairness and integrity of the market to maintain its reliability and contribute to its development.

【8】 We properly protect and utilize the intellectual property generated owing to our business activities while ensuring that we do not infringe on the intellectual property rights of others.

【9】 In accordance with relevant laws and standards*2, we establish sound management systems and conduct business management with consideration for all stakeholders.

【10】 In reports and publications we submit, file, or disclose, we ensure that clear, fair, accurate, and timely disclosures of all necessary and sufficient information are made.

【11】 We confirm that the activities of suppliers and external partners comply with SMBC Group's compliance and risk management policies.

*1 Unfair transactions: cartels, abuse of dominant bargaining positions, market manipulation, etc.

*2 Relevant laws and standards: laws and regulations related to corporations / financial institutions / economic and market order, international/Japanese accounting standards, internal policies and procedures, and etc.

Pursuing the Best Interests of Our Customers

【12】We will listen sincerely to our customers and accurately grasp their true needs through continuous communication.

【13】We aim to maximize the value we provide, by considering the diversified needs of our customers and the demands of laws and regulations, thinking about what their best interests are, and promptly proposing products and services that meet those needs throughout the SMBC Group.

【14】When providing products and services, we will always provide appropriate and sufficient explanations of the contents, risks, and fees, and will not misrepresent or exaggerate products that may mislead customers. In addition, we will thoroughly ensure quality control through regular monitoring.

【15】We will respond to the trust of our customers by strictly managing their assets and personal information and appropriately protecting them from risks increased by AI and cybercrime.

【16】When we receive a voice from our customers or stakeholders, we will immediately investigate the facts and take prompt and appropriate follow-up measures.

Fostering a Healthy, Secure, and Open Work Environment

【17】We will create a workplace where innovative ideas and challenge are respected and where everyone can engage in robust, interactive communication by creating an environment where speaking up is easy.

【18】We will develop human resources who can make decisions based on whether they are doing the right thing or not and conduct fair evaluations that reward them.

【19】We will take any concerns raised seriously and respond promptly to maintain our internal discipline. In addition, all officers and employees will fully cooperate with all internal investigations.

【20】We will establish a whistleblowing system to strictly deal with violations of internal discipline and strictly handle the information of officers and employees who raise concerns, and protect them from any retaliation.

【21】We will strengthen our compliance and risk management across SMBC Group by breaking down an inward looking mindset and sharing best practice.

Practicing Fairness and Honestly

【22】We will acknowledge society's expectations from us as a financial group and always display an honest attitude.

【23】We value the pursuit of transparency and decency, of our customers' interests and social development, as well as the realization of our management philosophy, while working toward a sustainable society*3

【24】We will respect the diversity*4 and rights of all stakeholders, including society and customers, in all aspects of our business activities, and will not engage in any discrimination. We will also refrain from words and actions that may make the other person uncomfortable and communicate with due consideration for how the other person feels.

【25】We will always make fair and transparent decisions when taking risk to avoid undermining social trust.

*3 SMBC Group's "Sustainability": creating a society in which today's generation can enjoy economic prosperity and well-being and pass it on to future generations

*4 A wide variety of backgrounds, such as race, nationality, place of birth, creed, religion, gender, sexual orientation, gender identity, age, disability, health status, way of thinking, etc.

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