

MUFG Bank (Europe) N.V. Supplier Code of Conduct

Version: 0.4

Date: 29/03/2022

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Section 1: Introduction

MUFG Bank (Europe) N.V. (“MBE”) understands the importance of having clear guidelines that set forth our expectations, principles, and values. All suppliers, vendors, and subcontractors engaged to provide products and services to MBE (“Suppliers”) are expected to act in accordance with this Supplier Code of Conduct (“Code”), including aligning their policies, procedures, and practices to ensure they have a consistent approach and effective measures in place.

MBE is committed to integrity and requires our Suppliers to comply with all applicable laws, regulations, and standards within the jurisdictions in which they operate. In instances where standards outlined within this document differ from local laws and customs, we expect suppliers to respect these standards within the context of the customs and the local laws of their specific jurisdiction.

This Code describes our expectations for all of our Suppliers related to: ethical business practices; regulatory compliance; human rights; environmental, social, and corporate governance (“ESG”) standards; gifts and hospitality; data protection; and whistleblowing. Any Suppliers who do not comply with this Code may face repercussions, up to and including termination of their relationship with MBE, and necessary steps will be taken to address any identified risks.

We expect our Suppliers to maintain high standards of ethics and integrity. In particular, MBE expects Suppliers to:

- Be honest, direct, and truthful in any direct or indirect interactions with regulatory agencies and any local or foreign government officials or officials of public international organizations, and to ensure that all such interactions follow applicable law;
- Never provide anything of value, directly or indirectly, to any person whatsoever (including but not limited to any MBE employee, any government official, or any employee of a state-controlled entity), with the intent to improperly influence that person in order to obtain or retain business or to secure any other improper business advantage or benefit;
- Obtain all necessary licenses and permits to conduct any business activity in compliance with applicable law;
- Ensure that all books, records (e.g., invoices), and reports of business information are complete and accurate, and comply with all applicable laws and accounting principles regarding the completeness and accuracy of such records;
- Maintain MBE’s confidentiality, security, and privacy procedures if given access to MBE data;
- Avoid the appearance of, or actually engaging in, any conduct giving rise to a conflict of interests, and duly report any potential situation that could result in a conflict of interest;
- Ensure that there is no misappropriation of MBE data; and
- Report any concerns.

Section 2: Ethical Business Practices

MBE and the MUFG Group are committed to becoming the world’s most trusted financial group and appreciate the importance of leading by example by adhering to its policies and procedures in practice, ensuring effective communication, taking responsibility, accountability, professionalism, trust, and mutual respect among MBE employees, clients, and Suppliers. We report any violations of laws and rules to relevant authorities, and we manage corporate assets appropriately and responsibly. Our Suppliers must do the same. We expect our Suppliers to follow all laws and regulations applicable to them, which may include, among others, the following:

- All relevant anti-bribery and corruption laws, including, but not limited to: Art. 177, 178, 363 and 364 of the Dutch Criminal Code; the U.S. Foreign Corrupt Practices Act; and the UK Bribery Act 2010;
- All applicable Anti-Money Laundering laws;
- All applicable Anti-Fraud laws;
- Antitrust and fair-competition laws and standards of fair dealing;
- Laws regarding the privacy of information (including personal and sensitive information);
- Laws and regulations related to data protection, intellectual property, cybersecurity, and cross-border data transfers;
- Trade restriction and sanctions laws;
- Laws relating to making political and campaign contributions;
- Laws and regulations governing export controls; and
- Laws prohibiting insider trading.

Our Suppliers should ensure their employees and subcontractors are aware of and comply with applicable laws and regulations.

Section 3: Cooperation with Regulators

MBE understands the importance of working with regulatory authorities, agencies, and government departments to support building and maintaining effective relationships. Any regulatory activities should be carried out in a way that is transparent, professional, accountable, proportionate, and consistent. Suppliers are expected to cooperate with regulatory authorities, including in connection with inquiries, audits, reviews, or investigations related to their relationship with MBE. Suppliers must inform MBE promptly (via mufg.ethicspoint.com) if contacted by a regulatory authority regarding their relationship with MBE to the fullest extent allowed by applicable laws.

Section 4: Human Rights

Our Principle - We respect each other, assume good intent, and listen reflectively.

MBE is committed to respecting human rights across all of our operations, including our employees and Suppliers, to ensure all individuals are treated fairly, honestly, and respectfully. MBE has zero tolerance for discrimination or harassment and complies with all laws related to human trafficking, child labor, or forced labor. MBE expects Suppliers to respect human rights and avoid human rights violations. MBE also works to respond in an appropriate manner to known cases of human rights violations by our Suppliers.

MBE adheres to the MUFG Bank Environmental and Social Policy Framework, which establishes a long-term commitment to building sustainable growth with its clients and society as a whole. The Framework explicitly prohibits the Group and core subsidiaries from entering into any transactions involving the use of child or forced labour, which aligns to, among other relevant laws, the Dutch Child Labour Due Diligence Law [Wet Zorgplicht Kinderarbeid] and the UK Modern Slavery Act.

Among others, MBE is guided by the following international principles for human rights:

- UN Universal Declaration of Human Rights;
- OECD Guidelines for Multinational Enterprises;
- UN Women’s Empowerment Principles;
- International Labour Organization’s Declaration on Fundamental Principles and Rights at Work; and
- UN Guiding Principles on Business and Human Rights

Section 5: Inclusion & Diversity

Our Vision – MBE’s vision for Inclusion & Diversity is to embrace our diversity and embed an inclusive culture where all perspectives, skills, and expertise are respected and valued.

As part of MBE’s vision, we are committed to the principle that individuals from all backgrounds should be treated fairly and employees should feel they belong, are engaged, and connected. MUFG believes all individuals should be given equal access to opportunities, resources, and have their voices heard. MBE expects Suppliers to support our vision and not to discriminate within their employment process, training programs, opportunities, or redundancies based on race, gender, age, religion, gender identity, physical or mental disability, political affiliation, sexual orientation, or any other characteristic protected by applicable laws or regulations. Suppliers should not knowingly employ individuals who are not authorized to work, as determined by governing law.

Section 6: Environmental, Social, and Corporate Governance (“ESG”) Standards

MBE supports efforts to improve sustainability, social responsibility, and environmental protection in our business operations. The Environmental and Social Policy Framework sets out our approach to managing the environmental and social risks arising from the business activities of the Group. MBE is part of the MUFG Group, which is member of the Net-Zero Banking Alliance and has adopted the Equator Principles and UN Principles on Responsible Banking in our operations. As noted above, MBE also operates in accordance with the MUFG Social and Environmental Policy Framework, which includes publishing an annual sustainability report. We expect our Suppliers to use best efforts to support, embrace, and enact policies consistent with the United Nations Global Compact initiative and Sustainable Development Goals. In addition, in accordance with obligations under the Dutch Non-Financial Reporting Directive and Corporate sustainability Reporting Directive, MBE reports on ESG, Anti-Bribery & Corruption (ABC) and human rights matters in its annual report. Where possible, agreements between MBE and its Suppliers will include detailed KPIs and/or SLAs related to ESG matters.

MBE's commitments include the following principles:

- Compliance with all applicable environmental, health, and safety regulations;
- Protecting employees and the general public from hazards inherent in processes and products;
- Using resources efficiently, applying energy-efficient and environmentally friendly technologies to reduce waste and emissions to air, water, and soil;
- Minimizing negative impact on biodiversity, climate change, and water scarcity; and
- Upholding freedom of association and rights to collective bargaining in accordance with applicable laws.

Section 7: Gifts and Hospitality

MBE is committed to complying with the letter and spirit of ABC laws (Anti-Bribery and Corruption) and has implemented procedures to reduce the risk and/or appearance of bribery or corruption by the Bank, its colleagues, and representatives – including Suppliers. Suppliers must not offer, promise, or directly or indirectly provide anything of value, including gifts, entertainment, meals, travel/accommodations, donations, or sponsorships, either to MBE employees or to third parties on behalf of MBE, where doing so would create an appearance of impropriety or otherwise give rise to a potential conflict of interest. To the extent that Suppliers do engage in such gifts and hospitality activities, they must have a bona fide business rationale, and must not be frequent, lavish, extravagant, or otherwise inappropriate. Providing cash or any cash equivalent as a gift is strictly prohibited.

Section 8: Data Protection

MBE is required to comply with data privacy and protection and cross-border data movement laws and regulations in connection with its activities. We are required to ensure we have technical and organisational measures to protect personal data and we expect our Suppliers to comply with the same standards in accordance with applicable laws. MBE management is committed to full Compliance with the laws and regulations governing the handling of confidential information and external information sharing in the jurisdictions in which it operates and expects our Suppliers to act the same. Our Suppliers also have the same responsibilities to ensure communications or actions do not raise an appearance of misuse of information. There are a number of minimum standards in place to mitigate as much risk as possible and our Suppliers must ensure they are also aware of additional policies reflecting local applicable law, which may place additional restrictions on information sharing.

Section 9: Raising a concern (Whistleblowing)

MBE has a culture of openness and is committed to ensuring that its activities are carried out ethically, honestly, and to high standards. It is fundamental that any concerns about suspected malpractice within MBE, either by its employees or Suppliers, are able to be aired and then dealt with in the correct manner.

Whistleblowing is the term which is used to describe the reporting of an ethics or conduct concern. MBE has in place an external disclosure process operated by the EthicsPoint service that is independent of MBE. The service is available at any time, 24 hours a day, 7 days a week. You can make a report either via the website or over the phone, and you can remain anonymous if you wish.

For further details, please visit the website: mufg.ethicspoint.com or contact the numbers below:

Country	Languages	Freephone Number	Access Code
Austria	English, German & Japanese	0-800-200-288	833-798-1153
Belgium	English, French, Dutch & Japanese	0-800-100-10	833-798-1153
Czech Republic	English, Czech & Japanese	800-142-241	833-798-1153
France	English, French & Japanese	Line 1: 0-800-99-0011 Line 2: 0805-701-288	833-798-1153
Germany	English, German & Japanese	0-800-225-5288	833-798-1153
Italy	English, Italian & Japanese	800-172-444	833-798-1153
Netherlands	English, Dutch & Japanese	0800-022-9111	833-798-1153
Poland	English, Polish & Japanese	0-0-800-111-1111	833-798-1153
Portugal	English, Portuguese & Japanese	800-800-128	833-798-1153
Spain	English, Spain & Japanese	900-99-0011	833-798-1153
UK*	English & Japanese	0-800-89-0011	833-798-1153

Section 10: Conflicts of Interest

MBE understands that due to the range of financial services it provides, situations may arise where there are conflicts of interest among different parties. MBE policy requires its employees to take all appropriate steps to identify, monitor, and prevent or manage conflicts of interest. The MBE Conflicts of Interest policy can be found on the MBE-website. We expect our Suppliers to act accordingly.

Section 11: Contractual Obligations

MBE will ensure that all Suppliers are properly vetted by any necessary risk functions before onboarding. Where possible, contractual agreements with MBE’s Suppliers will have adherence to this Code. Under the terms of agreements, all MBE Suppliers must conduct their employment practices and business operations in full compliance with all applicable laws and regulations, in addition to acting in accordance with MBE requirements set forth in this Code.