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MUFG Pension & Market Services Anti-Bribery and Anti-Corruption Policy

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1. WHAT IS THIS POLICY?

MUFG Pension & Market Services Holdings Pty Ltd and its subsidiaries (together **MUFG Pension & Market Services**) is committed to complying with all applicable laws and regulations and conducting our business with high standards of ethics and integrity. MUFG Pension & Market Services does not tolerate **bribery** and **corruption**. The MUFG Pension & Market Services Anti-Bribery and Anti-Corruption Policy (Policy) supports the Code of Conduct and Ethics that sets the standards for the way we work.

The Policy sets out the requirements, responsibilities and approach for the governance, prevention, deterrence, detection, investigation and reporting of instances of bribery and corruption involving employees, contingent workers and/or any other **third parties** in a business relationship with MUFG Pension & Market Services, including members, investors, customers, clients and vendors.

Words in **bold** have the meaning stated in Section 9 (Definitions) and appear in bold when first used.

2. WHY DO WE NEED THIS POLICY?

Bribery and Corruption have a detrimental impact on society and the integrity of markets. MUFG Pension & Market Services aims to act with the highest standard of integrity and honesty in all it does and is committed to drive an effective anti-bribery culture.

Adherence to anti-bribery and anti-corruption best practice governance, controls and compliance is essential to our business principles and is consistent with our values.

The Policy:

- Confirms we will comply at all times with legislation in the jurisdictions where it operates.
- Prohibits the promising, offering, giving, solicitation or receiving of **bribes** and **anything of value**, directly or indirectly through third parties, including local or foreign **public officials**, if intended to improperly influence a course of action or obtain a business or personal advantage.
- Prohibits falsifying or concealing any records or accounts that relate to the business or that of its customers, vendors and other business partners.
- Confirms that **facilitation payments**, **kickbacks** and **secret commissions** are not acceptable business practices.
- Enables staff to understand their roles and responsibilities in the identification, prevention, detection and escalation of bribery and corruption risk events.
- Reinforces that we will not enter into a business relationship with a new third party if there is concern of bribery, and will terminate a contractual relationship with an existing third party if they are found to have been involved in bribery and corruption activities.
- Prohibits all **political donations** to political parties and campaigns, directly and indirectly, and requires approval for attendance at selected **political party events**.
- Seeks to protect our reputation.

3. WHO DOES THE POLICY APPLY TO?

This Policy applies to MUFG Pension & Market Services and its subsidiaries directors, employees, contractors and all other people who represent MUFG Pension & Market Services and its subsidiaries (**Our People**) globally.

Compliance with the Policy is mandatory, and no exceptions are allowed. In jurisdictions where the local legislative and regulatory requirements exceed the requirements set out in this Policy, the businesses operating those jurisdictions must comply with such higher standard. The additional requirements must be documented in their jurisdictional standards, procedures or other documentations, supplementing this Policy.

4. HOW TO COMPLY WITH THIS POLICY?

4.1. Managing Bribery and Corruption risks

MUFG Pension & Market Services has adopted a risk-based approach to managing bribery and corruption which recognises that the threat posed varies across the jurisdictions and business sectors in which we operate, and the nature of the business we transact.

In addition to the key principles and prohibitions set out in section 2, other key measures include, but not limited to:

- Periodic risk assessments that include bribery and corruption risk, that consider the risk exposure associated with the business operation and jurisdictions MUFG Pension & Market Services operates in, and the control environment.
- Due diligence is conducted to confirm there is no concern of bribery before entering into a business relationship with a third party.
- Before onboarding a vendor, it needs to be confirmed that the vendor has established anti-bribery system/process in place.
- As part of recruitment process, employment screening is conducted on all prospective employees and directors to ensure their identity, honesty and integrity. Refer to the MUFG Pension & Market Services Employment Screening Policy for details.
- The MUFG Pension & Market Services Conflicts of Interest Policy prohibits the giving or accepting of gifts and hospitality that may improperly influence them or others, including public officials. Additionally, any exchange of gifts and hospitality with public officials must adhere to the relevant local laws. Our People must comply with the Conflicts of Interest Policy, including the approval and record keeping requirements within the policy, when giving or accepting gifts or hospitality, and take particular care when it involves a public official.
- The MUFG Pension & Market Services Whistleblower Policy encourages and supports the reporting of illegal or unethical conduct including bribery and corruption.

4.2. Training and access to the Policy

All directors, employees and contractors are required to undergo training on the Code of Conduct and Ethics, which includes bribery and corruption content, at the beginning of their employment and on an annual basis thereafter.

The Policy is available on our public website, intranet and on request from the Risk and Compliance team.

5. ROLES AND RESPONSIBILITIES

Roles	Responsibilities
Our People	<ul style="list-style-type: none">• Act with honesty and integrity and in the best interests of MUFG Pension & Market Services and those parties with which it has a business relationship, and not engage in bribery or any other corrupt behaviour• Comply with the Policy requirements, complete and follow the anti-bribery and anti-corruption training requirements• Declare all gifts and hospitality provided and received, in line with the reporting and approval requirements of the Conflicts of Interest Policy• Be alert to any suspected or actual unethical or corrupt activity and report promptly all behaviour that is unlawful, improper, unethical or criminal in nature.

	<ul style="list-style-type: none"> Attend political party events in their official capacity, only with the approval of the CEO & Managing Director (or Chairman in the case of a director), for commercial reasons and where the proposed amount to be paid must be fair and reasonable when compared to the market value for similar events. The Executive Director, Governance, Regulatory & Government Relations should be consulted prior to seeking approval from the CEO & Managing Director. Do not promise, offer, give, solicit or accept bribes and anything of value, directly or indirectly through third parties, including local or foreign public officials, if intended to improperly influence a course of action or obtain a business or personal advantage. Do not offer or accept facilitation payments, kickbacks and secret commissions. Do not make donations to political parties and campaigns, directly and indirectly, and obtain approval for attendance at selected political party events.
Board	<ul style="list-style-type: none"> Ultimately accountable for managing the risk of bribery and corruption and is committed that no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption practices, or because of reporting in good faith their suspicion that an actual or potential bribery or corruption offence has taken place or may reasonably occur in the future.
Chief Risk Officer	<ul style="list-style-type: none"> Sponsor the Policy, ensuring it aligns with MUFG Pension & Market Services' risk appetite and ethical standards. Reinforce MUFG Pension & Market Services' zero tolerance for bribery and corruption as part of the overall risk culture. Provide oversight of the effectiveness of anti-bribery risk controls and management practice. Oversee any bribery or corruption matters of a criminal nature and ensure material breaches of the Policy are reported to the Board or the Board Risk & Compliance Committee.
Executive Leadership Team (ELT)	<ul style="list-style-type: none"> Provide leadership on policies, processes and procedures relating to anti-bribery and anti-corruption. Promote and support MUFG Pension & Market Services' anti-bribery and anti-corruption stance and demonstrate a top-level dedication to preventing bribery and corruption. Foster a culture of integrity and a zero tolerance approach to bribery and corruption.
Business Management	<ul style="list-style-type: none"> Review the risk factors relevant to their business activities, jurisdictions of operations and business relationships with third parties, including public officials and carry out regular risk assessments Implement appropriate controls to mitigate identified risks Conduct proportionate due diligence on all business relationships and promote appropriate governance Only make or accept payments in accordance with contractual obligations Monitor that all sponsorships and charitable donations are approved in line with normal purchasing procedures, and that due diligence is carried out on recipient bodies to prevent real and perceived undue business or personal advantage being gained in this way

	<ul style="list-style-type: none"> • Report regularly to the relevant business unit Risk Committee regarding risks and risk events with appropriate escalation to the respective Divisional Head of Risk and Compliance. • Oversee the investigations of suspected or actual bribery and corruption risk events or misconduct. • Ensure staff undertake the required training. • Make all hiring decisions based solely on the candidates' capability, instead of on the candidates' personal relationships, e.g. close relationship with a public official
Divisional Heads of Risk and Compliance	<ul style="list-style-type: none"> • Assist with the Policy implementation by providing guidance and education to the business. • Oversee compliance with this Policy and jurisdictional requirements. • Advise Line 1 businesses and their management on their obligations in relation to anti-bribery and anti-corruption. • Assist Line 1 businesses and their management in identifying bribery and corruption risks and provide SME support on their risk assessment.
Enterprise Risk Management	<ul style="list-style-type: none"> • Establish group level frameworks and policies and provide guidance to assist with the understanding and implementation of the frameworks and policies. • Ensure the group level policies reflect the latest developments of applicable laws and regulations and are designed to set minimum standards across MUFG Pension & Market Services. • Partner with the divisional Risk and Compliance teams to ensure that MUFG Pension & Market Services group frameworks and policies remain effective and relevant.

5.1. What does MUFG Pension & Market Services expect from third parties?

Third parties, such as vendors, agents, or anyone engaged by them to act for or on behalf of the MUFG Pension & Market Services must not:

- Offer, give, request, agree to receive, or accept a bribe, or
- Do anything to circumvent controls in place to deter, prevent or detect bribery.
- Third parties are expected to have controls and processes in place that are:
 - Proportionate to the bribery risk
 - Communicated to all relevant parties, and
 - Reviewed regularly and reflect current legislation and best practice.

To the extent permitted under applicable law and in accordance with contractual requirements, third parties must, as soon as reasonably practicable, notify us if a person acting on their or our behalf is suspected of bribery or corrupt practices or prosecuted, charged with or convicted of any Bribery or Corruption related offences.

6. POLICY MONITORING AND REPORTING

Bribery and corruption breaches may be reported through a range of channels, including risk events and Suspicious Matters Reporting (via the GRC system), direct managers, divisional risk and compliance teams, the human resources team and the ELT.

In order to facilitate the process for reporting of bribery and corruption and any other disclosures of serious concerns, we have also established a Whistleblower Policy and has implemented various channels (internal and

external) through which employees and other eligible persons can report suspected or actual occurrence of bribery and/or corruption, incidents anonymously if they choose.

Any occurrence of bribery or corruption, or an event which could lead to such occurrence, needs to be reported by the Chief Risk Officer, in consultation with the Chair of the Board Risk & Compliance Committee, to the police and, if appropriate, other appropriate regulatory authorities.

Any material breaches of the Policy will be reported to the Board or the Board Risk & Compliance Committee.

7. NON-COMPLIANCE

Non-compliance with the Policy will be dealt with in accordance with established administrative or disciplinary procedures which may result in disciplinary action, including termination of employment or engagement.

The individuals who breached the Policy may also face civil or criminal actions. MUFG Pension & Market Services may be obligated to report to the regulatory authorities of the jurisdiction when such conduct is identified.

There may also be serious implications for MUFG Pension & Market Services, leading to enforcement actions, fines, criminal proceedings, and reputational damage.

8. RELATED DOCUMENTS AND SOURCES

This Policy should be read in conjunction with:

- MUFG Pension & Market Services Code of Conduct & Ethics
- MUFG Pension & Market Services Employment Screening Policy
- MUFG Pension & Market Services Conflicts of Interest Policy (including Gifts & Hospitality)
- MUFG Pension & Market Services Anti-Money Laundering and Counter-Terrorism Financing, Sanctions and Fraud Prevention Policy
- MUFG Pension & Market Services Risk Events Management Policy
- MUFG Pension & Market Services Whistleblower Policy
- MUFG Pension & Market Services Regulatory Interaction Policy

Related external sources include:

Jurisdictions	Anti-bribery & Anti-Corruption legislations
Australia	<ul style="list-style-type: none"> • Corporations Act 2001 (Cth) (Corporations Act) • Criminal Code Act 1995 • Australian Securities and Investments Commission Act 2001
New Zealand	<ul style="list-style-type: none"> • Crimes Act 1961 • Secret Commissions Act 1910 • Serious Fraud Office Act 1990
India	<ul style="list-style-type: none"> • Prevention of Corruption Act 1988 • Prevention of Money Laundering Act 2002 • Companies Act 2013
UK	<ul style="list-style-type: none"> • Bribery Act 2010 • SYSC 3.2.6R and SYSC 6.1.1R
Hong Kong	<ul style="list-style-type: none"> • The Prevention of Bribery Ordinance (Cap. 201) (POBO)
Isle of Man	<ul style="list-style-type: none"> • Bribery Act 2013
Guernsey	<ul style="list-style-type: none"> • Prevention of Corruption (Bailiwick of Guernsey) Law, 2003 • The Protection of Investors (Bailiwick of Guernsey) Law, 2020 (POI Law) • Licensees (Conduct of Business) Rules and Guidance, 2021

Jersey	<ul style="list-style-type: none"> Corruption (Jersey) Law 2006 Money Laundering (Jersey) Order 2008 Proceeds of Crime (Jersey) Law 1999
Ireland	<ul style="list-style-type: none"> Criminal Justice (Corruption Offences) Act 2018
Germany	<ul style="list-style-type: none"> German Criminal Code (StGB) Public Sector
France	<ul style="list-style-type: none"> French Criminal Code, Sapin II
South Africa	<ul style="list-style-type: none"> PRECCA (Prevention and Combatting of Corrupt Activities Act)
Papua New Guinea	<ul style="list-style-type: none"> OLICAC (Organic Law on the Independent Commission Against Corruption 2020)
Philippines	<ul style="list-style-type: none"> Republic Act 6713 (The Code of Conduct and Ethical Standards for Public Officials and Employees)
United Arab Emirates (UAE)	<ul style="list-style-type: none"> No comprehensive anti-corruption legislation. Anti-corruption and bribery provisions included in federal and local laws such as the UAE Federal Law No. 3 of 1987 (the Penal Code) and the Civil Service Laws

9. DEFINITIONS

Term	Definition
Anything of value	Examples included, but are not limited to: payments, gifts and hospitality, marketing sponsorships, donations, employment and work experience
Bribe	A financial or other advantage or benefit which is offered, promised, given or received by an individual. This may include cash payments or undue advantages in the consideration of the award of a contract or a tender. Gifts, invitations to corporate hospitality and entertainment events, or payments of expenses to attend conferences may also come under this category, provided there is the necessary intention to bribe / accept a bribe
Bribery	Bribery includes the offering, promising, giving, accepting or soliciting of any fee, gift, reward or other business or personal advantage as an inducement to do something in connection with MUFG Pension & Market Services' business that is illegal, unethical or a breach of trust. It includes the giving or receiving (either indirectly or directly) of anything of value that seeks to improperly influence a person's actions or decisions, or to gain or retain a business or personal advantage
Charitable donation	Supporting a charity or not for profit organisation with money, goods or services
Corruption	Corrupt behaviour refers to any conduct that lacks virtue or integrity, including usage or attempts to use one's position for personal advantage
Detrimental Treatment	Dismissal, disciplinary action, bullying, victimisation or other unfavourable treatment connected with raising a concern
Executive Leadership Team (ELT)	Executive Leadership Team comprising the MUFG Pension & Market Services CEO & Managing Director, Co-CEO and the leadership team listed on MPMS MUFG Our Team .

Facilitation Payment	A small Bribe also called a “facilitating”, “speed” or “grease” payment; made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement.
Kickback	A form of Bribery in which a proportion of the sales value from the award of a contract is illicitly paid to the person responsible for awarding the contract.
MUFG Pension & Market Services	MUFG Pension & Market Services Holdings Pty Limited and each of its subsidiaries.
Our People	MUFG Pension & Market Services and its subsidiaries’ directors, employees, contractors and all other people who represent MUFG Pension & Market Services and its subsidiaries globally.
Political Donation	Political donations include cash, gifts and gifts-in-kind. Gifts include any transfer or disposition of property or services for which no payment, or an inadequate payment, is received. Gifts-in-kind are goods, assets or services for which no payment (in cash or in kind) or a payment of less than true value is made e.g. free or discounted goods, services, use of premises, equipment or motor vehicles.
Political party event	<p>For the purposes of this Policy, a political party event is a function or venture that</p> <ul style="list-style-type: none"> • is organised by or for the benefit of a political party, a candidate, an elected member or an associated entity who is controlled by or primarily operates for the benefits of a political party, candidate or elected member (e.g. a campaign support organisation); • with the purpose to raise funds or promote political purposes; and • participation requires payment. <p>Examples include:</p> <ul style="list-style-type: none"> • Fundraising dinners or lunches • Ticketed events to promote political purposes • Campaign launches <p>Political party events do not include</p> <ul style="list-style-type: none"> • industry body or think tank events such as dinner events, forums or conferences (even if politicians or other government/regulatory stakeholders are in attendance) • government and regulatory stakeholder engagement, including formal or informal meetings • educational seminars, roundtables, or other events hosted by industry, government or regulatory bodies, even if they are ticketed • meetings with political stakeholders for the purposes of relationship-building, and • any other events that do not involve fundraising or benefiting to a political party, candidate, elected member or associated entity.
Public Official	A person whether elected or appointed or a candidate for, a legislative, administrative or judicial position locally or in a foreign jurisdiction. Examples include employees of government bodies (including local government, police force), persons holding public office, employees of regulators (e.g. FCA, HMRC, ACCC, ASIC, FMA) or officials or agents of a public international organisation, such as the United Nations or the World Bank.

Secret commission	A non-disclosed financial incentive (i.e. a monetary reward, gift or other benefit) given to a party to distribute interests in a product or to influence customers to acquire goods and services from the supplier.
Sponsorship	Supporting an organisation or activity by giving money or other non-financial help.
Third parties	Any external party in a business relationship with MUFG Pension & Market Services, including members, investors, customers, clients and vendors. Other examples include but are not limited to prospective or actual business partners, in country agents, suppliers, agents, consultants, subcontractors, joint ventures, legal advisers.

DOCUMENT CONTROL

Version	Purpose/Change	Author	Approved by	Date
1			Board	2022
2	<ul style="list-style-type: none"> References to the Chief Risk Officer have been replaced with Chief Financial Officer, as the new owner of this Policy. Political donations are now 'prohibited' as opposed to 'restricted' in the current Policy. Staff will still be able to seek approval to attend certain political events. 		Board	2023
3	Name change from MUFG Pension & Market Services Holdings Limited to MUFG Pension & Market Services Holdings Pty Limited.		Head, Enterprise Risk	November 2024
4	<ul style="list-style-type: none"> Listed the key measures used to manage bribery and corruption risks in a new section, including periodic risk assessments, and due diligence for third parties. To reinforce the existing expectations towards third parties, added an explicit requirement that due diligence must be conducted prior to entering into a business relationship to ensure no concern of bribery, that vendors need to have anti-bribery system/process in place. Updated the definition of public official to include candidates for public office as opposed to current officers. Updated the definition of bribery to include bribery for the purpose of obtaining a personal or business advantage, as opposed to business advantage only. Added definitions for Political Donation, Secret Commission and Political Party Events. Added a requirement to consult the Executive Director, Governance, Regulatory & Government 	Stephanie Shrinet	ERCC	July 2025

Relations before seeking approval for attending a political party event.

- Updated roles and responsibilities in accordance with the current operating model.