

Anti-Money Laundering and Countering the Financing of Terrorism Policy

The 77 Bank (hereinafter referred to as the “Bank”) and its subsidiaries have formulated the Anti-Money Laundering and Countering the Financing of Terrorism Policy as set forth below to prevent the money laundering and financing of terrorism (hereinafter referred to as the “ML/FT”), and shall conduct business appropriately.

1. Compliance with relevant laws, regulations, etc.

The Bank and its subsidiaries shall comply with laws, regulations, etc. in relation to the ML/FT prevention, and conduct business appropriately.

2. Implementation of measures in a coordinated manner

With the proactive involvement of management, all related departments in the Bank and its subsidiaries shall coordinate and collaborate with each other, and shall prevent the ML/FT as an organization.

3. Development of framework commensurate with risks

In order to address the ever-changing operating environment, such as international affairs and trends in the business regions, the Bank and its subsidiaries shall identify and assess risks in an appropriate and timely manner and shall mitigate the risks by developing a management framework commensurate with these risks.

4. Strict assessment at the time of the commencement of transaction

Whenever entering into a business transaction with a customer, the Bank and its subsidiaries shall strictly assess associated ML/FT risks.

5. Management of respondent institutions

The Bank and its subsidiaries shall regularly collect information on their respondent institutions, assess them appropriately and implement measures commensurate with the risks. Furthermore, the Bank and its subsidiaries shall never carry out a transaction with a shell bank with no actual business operations.

6. Implementation of internal audits

The Bank and its subsidiaries shall regularly conduct an internal audit and verify the appropriateness of the management framework for the ML/FT prevention, thereby further enhancing the framework.

7. Fulfillment of trainings

The Bank and its subsidiaries shall provide appropriate educations and trainings for all of their executives and employees to fully recognize the importance of the ML/FT prevention and to enhance their knowledge and expertise thereof.

Note: This Policy is prepared in Japanese and English. If there is any discrepancy between the two versions, the Japanese version shall prevail.