

Vendor Code  
of Conduct  
for MUFG  
in the Americas



# Overall principles of ethics and conduct

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As a proud member of Mitsubishi UFJ Financial Group, Inc. (“MUFG”), we are committed to conducting our business in accordance with applicable laws and the highest standards of ethical conduct. We expect the same of our vendors, suppliers, third-party service providers, and their subcontractors (“Vendors”<sup>1</sup>).

This Vendor Code of Conduct (the “Vendor Code”) sets forth our expectations for all our Vendors related to regulatory compliance, ethical business practices, labor and human rights, diversity and inclusion, health and safety, and environmental stewardship. All Vendors engaged in providing products and services to MUFG are expected to act in accordance with the Vendor Code, including aligning their policies, procedures, and practices with the Vendor Code. A violation of this Code may result in termination of our business relationship.

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<sup>1</sup> For purposes of this Code, a “Vendor” is any third party, person or form of legal entity (such as a corporation, partnership, limited liability company, trust, third party intermediary, or consultants, etc.) that performs business operations on behalf of MUFG. Vendor encompasses the terms “service provider” and “supplier” and other similar terms that a third party uses to support execution against any business arrangement between MUFG and the Vendor.



## **ETHICAL BUSINESS PRACTICES**

We are committed to creating a working environment that fosters mutual respect among MUFG employees and Vendors. We respect the diversity and human rights of MUFG employees. We do not engage in or tolerate illegal behavior, discrimination, harassment, intimidation, misrepresentation, bribery, corruption, extortion, embezzlement, or any other behavior or activity that is inconsistent with our core beliefs. We report any violations of laws and rules, and we manage corporate assets appropriately. Our Vendors must do the same. We expect our Vendors to follow all applicable laws and regulations in the appropriate jurisdictions, which may include, among others, the following:

- All applicable anti-bribery and corruption laws, including, but not limited to, the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, the Canadian Corruption of Foreign Public Officials Act, the Mexican Anti-Money Laundering Law and other laws comprised within the Mexican National Anti-Corruption System, the Colombian Anti-Corruption Statute and Transnational Corruption Act, the Peruvian Anti-Bribery and Anti-Corruption laws, the Argentine Anti-Corruption and Bribery Law 27.401, and the Brazil Clean Companies Act.
- Antitrust and fair-competition laws and standards of fair dealing.
- Laws regarding the privacy of information (including personal and sensitive information), 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.
- Laws prohibiting insider trading.

### **We expect our Vendors 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 a public international organization and to ensure that all such interactions are in compliance with applicable law.
- Never provide, directly or indirectly, anything of value to any person whatsoever, including, but not limited to, any MUFG employee or any government official or an 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.
- Avoid facilitation payments made to facilitate or expedite a routine, non-discretionary governmental action such as visa processing, mail service or customs entry, which are strictly prohibited.
- 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 MUFG's confidentiality, security, and privacy procedures if given access to MUFG Americas 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 MUFG Americas or MUFG customer records.

## **DIVERSITY AND EQUAL EMPLOYMENT OPPORTUNITIES**

A diverse network of people, with different cultural backgrounds, skill sets, and experiences, is important to the success of MUFG. We expect our Vendors to provide equal employment opportunities to all, to have zero tolerance for discrimination or harassment, to promote diversity and inclusion, and to comply with all laws related to human trafficking, child labor, or forced labor. Forced or indentured labor is prohibited. Vendors should pay applicable legal wages under humane conditions. Vendors should not knowingly employ individuals who are not authorized to work, as determined by governing law. We expect Vendors to be in compliance with all applicable laws, depending on country, region, or state.

## **COMMITMENT TO PROVIDING A SAFE WORKPLACE**

We are committed to providing everyone who interacts with us with a safe and secure work environment. We expect the same of our Vendors. Such an environment is important to the well-being of everyone. Vendors are responsible for complying with applicable country, federal, and state health and safety laws and regulations.

## **COMMITMENT TO OUR CUSTOMERS**

Trust is at the heart of every interaction with our customers. We must treat our customers with honesty, courtesy, and respect. We also treat our customers in a fair, ethical, and non-discriminatory manner in our dealings and communications with them. We expect the same of our Vendors. Vendors should not conceal information, abuse confidential information, misrepresent material facts, or engage in any other unfair, deceptive or abusive practices.

## **GIFTS, ENTERTAINMENT, AND RELATED INTERACTIONS WITH MUFG EMPLOYEES AND THIRD PARTIES**

Vendors must not, either directly or indirectly, provide anything of value, including gifts, entertainment, meals, travel/accommodations, donations, or sponsorships, either to MUFG employees or to third parties on behalf of MUFG, where doing so would create an appearance of impropriety or otherwise give rise to a potential conflict of interest. As a general matter, Vendors are discouraged from providing gifts or entertainment either to MUFG employees or to any third parties on behalf of MUFG. To the extent that Vendors do engage in such gifts and entertainment activities, those gifts or entertainment must have a bona fide business rationale, and must not be frequent, lavish, extravagant, or otherwise inappropriate. Cash or any equivalent to cash as a gift is strictly prohibited.



## **ENVIRONMENTAL STEWARDSHIP**

We believe that being a responsible business requires that we conduct business in a sustainable way, mindful of our resource consumption and our impact on the world. This requires a commitment to develop greener ways of doing business, while continually conserving our limited natural resources, and helping our customers and communities do the same. Vendors should also comply with applicable environmental laws and regulations regarding hazardous materials, air emissions, waste, and wastewater discharges, including the manufacture, transportation, storage, disposal, and release of such materials.

We support environmental sustainability and expect our Vendors to do the same.

Vendors should institute policies and practices that comply with applicable environmental laws and regulations and are also designed to minimize any impact a Vendor has on the environment. We encourage Vendors to have programs that foster a culture and practice of environmental stewardship and sustainability.

## **COOPERATION WITH REGULATORS**

Vendors are expected to cooperate with regulatory authorities, including in connection with inquiries, audits, reviews, or investigations related to their relationship with MUFG. Vendors must inform MUFG promptly if contacted by a regulatory authority regarding MUFG to the fullest extent allowed by applicable law.

## **MUFG AMERICAS INTEGRITY LINE**

The **MUFG Americas Integrity Line** provides individuals with a way to report—anonously or confidentially—violations of this Code or suspected violations of laws, regulations, or MUFG policy. The Integrity Line is operated by an outside firm that accepts telephone or online reports 24 hours a day, 7 days a week.

The Integrity Line telephone number in the United States and Canada is **(877) 384-4274**. Toll-free country-specific numbers for each non-U.S. office are located on the Integrity Line website at **[www.MUFGAmericasIntegrityLine.com](http://www.MUFGAmericasIntegrityLine.com)**.

We encourage our Vendors to share this information with all their employees. The Integrity Line website is also our Vendors' main point of reference for online reporting of integrity concerns. Vendors may not retaliate against any of their employees, agents, or other personnel who make a report to the **MUFG Americas Integrity Line**.

