

## **Anti-Money Laundering and Counter Financing of Terrorism Policy**

Kansai Mirai Financial Group, Inc. is an intermediate financial holding company affiliated with Resona Holdings, Inc., which comprising Minato Bank, Limited, Kansai Mirai Bank, Limited.

To enlarge the trust from its customers and the public, Minato Bank is strongly aware of the social responsibilities and public mission of financial institutions and defines compliance as the strict observance not only of laws and regulations but also social norms. Therefore, Minato Bank positions compliance as a key management issue and is working to implement effectively and enhance the compliance systems of Minato Bank as a whole.

To fulfil this commitment, Minato Bank has Anti-Money Laundering (“AML”) and Counter Financing of Terrorism (“CFT”) policies and procedures in place to comply with applicable laws, rules and regulations.

### **1 Organizational Structure**

Minato Bank’s Board of Directors has responsibility for establishing effective management system to prevent money laundering and counter the financing of terrorist activities.

In order to prevent money laundering and counter the financing of terrorist activities, Minato Bank has appointed a Chief Anti Money Laundering Officer and established the Anti Money Laundering Office (the “AMLO”) within the Compliance Division.

The AMLO, which plays a key role in managing the AML/CFT program and establishing the AML/CFT policies and procedures, reports to Minato Bank’s Board of Directors.

### **2 Risk Identification, Assessment, and mitigation**

Minato Bank identifies, assesses, and mitigates the risk of money laundering and the financing of terrorist activities at Minato Bank in an appropriate and timely manner under a risk-based approach.

### **3 Customer Due Diligence**

Minato Bank conducts customer identification and customer due diligence commensurate with the risk of customers, including, where necessary, identification of beneficial ownership.

In addition to conducting customer due diligence as part of the onboarding process for new customers, Minato Bank conducts ongoing customer due diligence in the course of ongoing customers relationships where necessary.

Minato Bank makes efforts to exclude transactions with inappropriate customers such as those who use a false identity in the course of customer due diligence.

### **4 Transaction Monitoring**

Minato Bank conducts transaction monitoring to prevent money laundering and counter the financing of terrorist activities.

### **5 Suspicious Activity Report (SAR)**

Minato Bank appropriately handles and escalates “suspicious activity report” detected through transaction monitoring within Minato Bank.

Minato Bank promptly files “suspicious activity report” detected through transaction monitoring to the authorities.

### **6 Sanctions and Freezing Asset**

Minato Bank understands the intent of applicable laws, rules and regulations concerning sanctions, and all directors and employees of Minato Bank comply with relevant policies and procedures promulgated by Minato Bank.

Minato Bank screens customers and transactions against applicable sanctions lists.

Minato Bank implements asset-freezing measures in respect of entities and individuals designated by the authorities, pursuant to applicable laws, rules and regulations concerning asset freezing.

## **7 Anti-Bribery & Corruption**

Minato Bank understands the purpose of applicable laws, rules and regulations concerning Anti-Bribery & Corruption, and all directors and employees of Minato Bank comply with relevant policies and procedures promulgated by Minato Bank.

## **8 Correspondent Banking and Shell Bank**

Minato Bank appropriately collects and analyzes information regarding correspondent banks, and implements appropriate risk controls in accordance with the risk of correspondent banks where necessary.

Minato Bank prohibits the establishment of relationships with shell banks.

## **9 Training**

Minato Bank conducts regular trainings for all directors and employees in order to ensure understanding and importance of Minato Bank's AML/CFT policies and procedures and relevant laws, rules and regulations.

## **10 Record Keeping**

Minato Bank has record keeping policies and procedures in place in accordance with applicable laws, rules and regulations.

## **11 IT Systems**

Minato Bank makes effective use of IT systems to prevent money laundering and counter the financing of terrorist activities.

## **12 Data Governance**

Minato Bank collects, stores and manages the necessary data properly to prevent money laundering and terrorist financing.

## **13 Audit**

In order to ensure the effectiveness of management system to prevent money laundering and counter the financing of terrorist activities, independent auditors conduct monitoring of compliance status of Minato Bank's AML/CFT policies and procedures and applicable laws, rules and regulations within Minato Bank.