

Sumitomo Mitsui Banking Corporation Europe Limited

Statement of Anti-bribery Principles

Sumitomo Mitsui Banking Corporation Europe Limited (the “**Bank**” or “**SMBCE**”)¹ is committed to preventing bribery and corruption and to consistently applying the letter and spirit of applicable anti-bribery legislation in all markets and jurisdictions in which it operates. This includes, but is not limited to, full compliance with the UK Bribery Act 2010 (the “**Act**”), in accordance with the Bank’s commitment to truth and fair dealing and the highest standards of business integrity.

The Bank has a zero tolerance policy with respect to the giving or receiving of bribes, including the making of facilitation payments. The Bank expects all Bank employees and third parties (including, but not limited to, its agents, representatives, intermediaries, introducers, brokers, contractors, suppliers, consultants and joint venture entities) (each a “**Third Party**”) to comply with these principles in the performance of their services for or on behalf of the Bank.

The Bank will not tolerate instances of a Bank employee or a Third Party engaging in, *inter alia*, the following activities:

- bribing, or attempting to bribe, any other person or accepting a bribe; or
- placing himself or herself in a position where (s)he is open to being bribed by another person ,

in each case, when on Bank business and/or when acting for and on behalf of the Bank.

It is to be emphasised that a bribe need not be financial and may extend to a gift, job, contract, position or unwarranted preferential treatment as well as the more obvious financial advantages such as inappropriate and/or disproportionate fees, commission, compensation or loans. To this end, Bank employees and Third Parties are required to exercise sound judgment as to what might be considered proportionate, and what might be considered excessive, in any given situation. In relation to facilitation payments, the Bank will not tolerate payment of these by Bank employees or Third Parties when attempting to obtain or retain a business advantage for the Bank. The only time the making of such payments may be permissible is where there is a genuine threat to life, limb or liberty.

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¹ In this Statement of Anti-bribery Principles, the term “Bank” is taken to cover the London, Paris, Milan and Amsterdam offices of SMBCE, together with the SMBCE representative office in Moscow and any additional offices and/or representative offices of SMBCE which may from time to time be opened, and “Bank employees” or “employees of the Bank” shall include all permanent, temporary or contract staff of an office or representative office of SMBCE, together with any employee of Sumitomo Mitsui Banking Corporation (or any of its affiliates or subsidiaries) seconded to SMBCE from time to time (and whether wholly or partly operating therefrom).