

Statement of anti-bribery principles 2022

SMBC Bank International plc, SMBC Nikko Capital Markets Limited and SMBC Nikko Derivative Products Limited, collectively referred to as “**SMBC UK**”, are committed to the highest standards of business integrity and to conducting business in a fair, truthful and transparent manner.

SMBC UK applies the letter and spirit of applicable anti-bribery legislation in all markets and jurisdictions in which it operates, including, but not limited to, full compliance with the UK Bribery Act 2010.

SMBC UK adopts a zero-tolerance approach to all forms of bribery and corruption and will take robust action against any employee found to disregard its policies, procedures, standards, or principles or be engaged in activity involving bribery and corruption.

SMBC UK Anti-Bribery and Corruption key principles

SMBC UK has an established Anti-Bribery and Corruption (“**ABC**”) control framework comprised of policies, procedures, standards, principles, and guidance in order to meet its regulatory obligations and to protect SMBC UK against bribery and corruption risk.

SMBC UK adheres to the following key principles. All SMBC UK activity and engagements must:

- not be made with any intent that could be, or could be perceived to be, a bribe;
- be proportionate, transparent, and accountable; and
- have appropriate senior management oversight.

All employees and those who provide services to, for or on behalf of SMBC UK including, but not limited to, agents, representatives, intermediaries, introducers, brokers, contractors, suppliers, consultants, and joint venture entities (“**Third Parties**”) are expected to uphold and comply with these principles, procedures, standards, and principles in the performance of their duties or services.

SMBC UK policies, procedures, principles, and standards provide detailed guidance on its requirements and controls with regard to bribery and corruption prevention which are subject to regular review to mitigate evolving ABC risk.

Employees receive training to recognise ABC risk and, if found to be in breach of SMBC UK’s internal policies, procedures, standards, principles or any applicable law or regulations, will be subject to appropriate disciplinary action, in accordance with applicable employment laws.

Training and compliance with SMBC UK’s policies and procedures are monitored regularly and reported to senior management.

Employees are encouraged to speak up and report any wrongdoing via Safe Call; a dedicated SMBC hotline. SMBC UK will not tolerate instances of, but not limited to, the following activities:

- offering, promising, giving or approving any offer of a bribe to another person;
- accepting, receiving, requesting, soliciting or agreeing to accept a bribe; or
- engaging in kickbacks or facilitation payments.

Third Parties

Third Parties are expected to adhere to the ABC principles and standards set out by SMBC UK and comply with all reasonable requests made by SMBC UK.

Third Parties are required to exercise sound judgment as to what might be considered disproportionate, advantageous or excessive in any given situation, in particular regarding any arrangement to gain or retain a business advantage when acting for, or on behalf of, SMBC UK. SMBC UK may decline or terminate a Third Party relationship where the ABC requirements are not met or where the risk of bribery and corruption cannot be sufficiently mitigated.

Raising concerns

If you believe this Statement of Anti-Bribery Principles has been breached, or suspect it may have been breached, in any way, please contact:

smbcbiabc@gb.smbcgroup.com or gblocmdpfccontrols@gb.smbcgroup.com.