

## **SMBC UK Statement of Anti-Bribery Principles 2024**

### **Introduction**

SMBC Bank International plc, Sumitomo Mitsui Banking Corporation London Branch, SMBC Leasing (UK) Limited, 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 adopts a zero-tolerance approach to all forms of bribery and corruption and will take robust action against anyone found to disregard its policies, procedures, standards, or principles or be engaged in activity involving bribery and corruption.

This SMBC UK Statement of Anti-Bribery Principles is approved by the Board of Directors and executive management of each SMBC UK legal entity, to reinforce the top-level commitment to establishing an anti-bribery culture within the organisation.

SMBC UK defines bribery as the 'intentional offer, promise, giving, request, receipt, acceptance, or transfer of anything of value, whether directly or indirectly, to or from any person, to induce, influence, or reward the performance of a function or an activity with improper intent, to obtain or retain business, or gain any other improper advantage.' SMBC UK defines corruption as the 'dishonest or illegal conduct by someone in relation to their position or authority. Corruption constitutes the abuse of an entrusted power for private gain, typically involving bribery but also includes other illicit activities.'

SMBC UK will not tolerate 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 kickback or facilitation payments.

### **Compliance with laws and regulations**

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, and also complies with relevant industry guidance.

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 policies, procedures, standards, and principles provide detailed guidance on its requirements and controls with regard to bribery and corruption prevention. These are reviewed annually and updated in line with regulatory changes, to mitigate evolving ABC risk.

### **SMBC UK Anti-Bribery and Corruption key principles**

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;
- not violate internal policy;

- 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.

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 to the relevant Money Laundering Reporting Officer or via Safe Call; a dedicated hotline that provides an independent way for employees to raise concerns regarding SMBC UK.

### **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](mailto:smbcbiabc@gb.smbcgroup.com) (SMBC BI London) or [gblocmdpfcontrols@gb.smbcgroup.com](mailto:gblocmdpfcontrols@gb.smbcgroup.com) (Nikko Capital Markets)