

# Basic Policy Regarding the Prevention of Money Laundering, Financing of Terrorism, and Financing of Proliferation

Ogaki Kyoritsu Bank, Ltd. (hereinafter, “OKB”) has positioned the prevention of money laundering, financing of terrorism, and financing of proliferation (hereinafter, “money laundering, etc.”) as a management-related issue of top importance and has established the following basic policy in order to establish a risk management system related to money laundering, etc. that utilizes a risk-based approach.

## **1. Organizational Structure**

OKB shall work to prevent money laundering, etc. through cross-organizational cooperation centered on related departments under the leadership of the Board of Directors and other members of the executive team.

## **2. Legal Compliance**

OKB shall comply with the Act on Prevention of Transfer of Criminal Proceeds, the Foreign Exchange and Foreign Trade Act, and related laws and regulations, and it shall take the necessary measures to prevent money laundering, etc., including checks at the time of transaction and the freezing of assets.

## **3. Customer Due Diligence Measures**

OKB shall take customer due diligence measures, including ongoing customer due diligence, that are appropriate to the risks involved, through identification and verification at the time of transaction, filtering, transaction monitoring, and other activities in a timely and appropriate manner.

## **4. Suspicious Transaction Reporting**

OKB shall handle suspicious transactions reported by branches and detected through monitoring at the head office in an appropriate manner, and it shall promptly report suspicious transactions to the authorities.

## **5. Management of Correspondent Banks**

OKB shall endeavor to gather sufficient information on correspondent banks, conduct appropriate evaluations of them, and take appropriate measures in accordance with the risks of correspondent banks. OKB shall also block transactions with fictitious banks that do no actual business and with banks that conduct transactions with fictitious banks.

## **6. Training of Executives and Employees**

OKB shall conduct ongoing training of executives and employees in order to deepen their knowledge and understanding with regard to the prevention of money laundering, etc., and to secure and cultivate personnel who are compatible with their roles and who possess expertise suited to their roles.

## **7. Compliance Verification and Auditing**

OKB shall periodically and as necessary verify its state of compliance with preventative measures related to money laundering, etc. Additionally, an independent and internal audit division shall conduct audits on a regular basis or as needed, and OKB shall strive to further improve its systems on the basis of the results of those audits.

## **8. Group Company Management**

OKB shall share information related to money laundering, etc. with its group companies as necessary in order to prevent money laundering, etc. throughout the group.