

Anti-Money Laundering Policy

The Higashi-Nippon Bank (hereinafter The Bank) will establish an integrated internal control system, adopting the following policies for preventing money laundering and counter-terrorism financing (hereinafter, the "Anti-Money Laundering, etc.").

1. (Organizational Structure/Officer)

The Bank appoints the officer in charge of the Risk Management Department as the operating officer of Anti-Money Laundering, etc. and the Risk Management Department as the business administration department of Anti-Money Laundering, etc.

2. (Customer Management Policy)

The Bank will take appropriate measures in line with the concept of risk-based approach through, among others, implementing countermeasures according to customer attributes such as public positions in verifying the identity of the customer.

Moreover, The Bank will keep records of the results of periodic research and analysis of customer transactions, and review its countermeasures by making use of such records.

3. (Correspondent Management Policy)

The Bank will collect and properly evaluate information of correspondents, and take appropriate countermeasures depending on the risk of a correspondent, as necessary. Furthermore, The Bank will sever any relationship with any fictitious bank that does not conduct business in fact (so-called "shell bank").

4. (Employee Training Policy)

The Bank will provide ongoing training for its employees to ensure the appropriate customer management including customer identity verification and preparation of transaction records.

5. (Internal Audit Policy)

The Bank will conduct internal audits on the status of Anti-Money Laundering, etc. on a regular basis, and work to further improve its systems based on the results of such audits.

6. (System for Reporting of Suspicious Transactions)

The Bank will establish a system to properly deal with suspicious customers and transactions, etc. detected as a result of daily monitoring through its internal rules and well-developed systems depending on the business content, and promptly notify the competent authority.

End.