

反洗钱方针

瑞穗银行（中国）有限公司

瑞穗银行（中国）有限公司（以下简称“本行”），充分认识防范洗钱、恐怖融资以及扩散融资（以下简称“洗钱和恐怖融资”）的重要性，会尽最大的努力来防止我行总行及分支行（包括我们的客户以及员工）参与或协助洗钱和恐怖融资活动。本行致力于维护和协助全球金融体系的健全和稳定。

（政策）

- 本行遵从所有适用本行的关于防范洗钱和恐怖融资的法律和法规。
- 本行不接受任何涉及洗钱和恐怖融资的客户和交易。
- 本行建立了适当的管理框架并采取以下措施以防范洗钱和恐怖融资，其框架包括：
 - 对洗钱和恐怖融资等进行风险评估
 - 进行客户尽职调查防范洗钱和恐怖融资，例如“了解你的客户”（KYC）
 - 提交可疑交易报告和采取适当的控制措施，例如进行资产冻结。

（管理框架）

为了建立适当的防范洗钱和恐怖融资的管理框架，本行采取以下措施：

- 建立和发展防范洗钱和恐怖融资的组织架构、制度规程。
- 通过培训来确保所有的管理者和员工了解反洗钱和恐怖融资的重要性，了解在整个组织架构中各自的角色和职责。
- 对防范洗钱和恐怖融资的管理框架进行合规评估，根据评估结果，对该框架不断地作出改进。

（洗钱风险管理原则）

本行洗钱风险管理应当遵循以下主要原则：

- 全面性原则。洗钱风险管理覆盖各项业务活动和管理流程，分支机构和相关人员。
- 独立性原则。洗钱风险管理应有独立的报告路线，对业务经营和管理决策保

持合理制衡。

- 匹配性原则。洗钱风险管理应根据银行风险特征、业务规模和产品复杂程度等投入相应资源，并根据具体情况变化及时调整。
- 有效性原则。根据实际风险情况采取有针对性的控制措施，将洗钱风险控制在自身风险管理能力范围内。

(洗钱风险管理策略)

- 遵守最高标准；
- 自上而下，人人有责；
- 保密；
- 与反洗钱监管机构、司法机关和行政执法机关全面配合。

Anti-Money Laundering Policy

Mizuho Bank (China), Ltd.

We, *Mizuho Bank (China), Ltd.*, hereby acknowledge an importance of preventing money laundering, terrorist financing, and financing of proliferation (hereinafter referred to as “ML/TF”) and shall make our best effort to prevent ourselves and our group companies (hereinafter referred to as “*The Bank*”), including our customers and our employees, from engaging and/ or providing assistance to engage in ML/TF in order to contribute to maintain a stability and assist a development of the sound global financial system.

(Policy)

- *The Bank* shall comply with any laws and regulations related to preventing ML/TF that apply.
- *The Bank* shall not accept any customers or transactions involved with ML/TF.
- *The Bank* shall establish an appropriate framework to prevent ML/TF and conduct the following measures:
 - Risk assessment of ML/TF
 - Customer Due Diligence such as KYC for preventing ML/TF
 - Suspicious activity reporting and implementing applicable measures such as Asset Freeze

(Management Framework)

In order to establish an appropriate framework to prevent ML/TF, *The Bank* shall implement the following measures:

- Establishment and development of the organizational structure, policies and procedures for preventing ML/TF
- Trainings to ensure all directors and employees understand the importance of preventing ML/TF and awareness of each role and responsibility in the framework
- Assessment of compliance status of the framework for preventing ML/TF and sustained improvement of framework, based on the results of the assessment

(The principle of Anti-Money Laundering and Counter Terrorist Financing)

The following principles should be observed:

- **Comprehensiveness:** Ensure Anti-Money Laundering and Counter Terrorist Financing control should be embedded in the whole operating activities and management processes at Mizuho(China) Head Office and its subsidiaries;
- **Independence:** Ensure an independent reporting line in Anti-Money Laundering and Counter Terrorist Financing to check and balance the business decisions;
- **Compatibility:** Ensure adequate resources that are compatible to the risk characteristics, business portfolio and product complexity.
- **Effectiveness:** Ensure the risks are controllable by implement the effective and efficient Anti-Money Laundering and Counter Terrorist Financing approaches.

(Anti-Money Laundering and Counter Terrorist Financing strategy)

- The Bank applies to higher standard;

- Anti-Money Laundering and Counter Terrorist Financing starts from top and is every staff's responsibility;
- Confidentiality;
- Full cooperation with Financial Regulators, Judicial Authorities and Government Bodies.