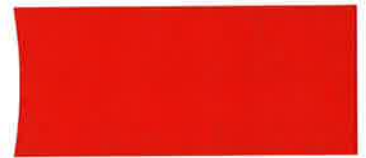


**Mitsubishi UFJ
Investor Services & Banking
(Luxembourg) S.A.**



Diversity Policy



**Human Resources
Version 4.0**

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1. General

1.1. Purpose

This Policy sets out the policy of Mitsubishi UFJ Investor Services & Banking (Luxembourg) S.A. (hereinafter, referred as "the Bank") on diversity and inclusiveness in the workplace and details our commitment in relation to equality of opportunity.

This policy aims to foster diversity throughout the Bank, including within the Management Body, to draw on a broad range of experiences, skills, talents, and knowledge. It aligns with Article 38-2(8) of the amended law of April 5, 1993, on the financial sector. It adheres to the joint EBA and ESMA guidelines on assessing the suitability of Management Body members and key function holders (EBA/GL/2021/06) and considers the CSSF Note from May 15, 2024, on review of policies promoting diversity.

1.2. Introduction

We are committed to being an equal opportunities employer and oppose all forms of unlawful discrimination.

We believe that individuals should be treated on their merits and that employment-related decisions should be based on objective job-related criteria such as aptitude, work ethics, behavior, and skills. For these reasons, all employees, and particularly Heads of Departments with responsibility for employment-related decisions, must comply with this Policy.

We embrace and encourage our employees' differences in ethnicity, age, disability, family status, gender identity, geographical provenance, health condition, race, religion, sexual orientation, socio-economic status, and other characteristics that make our employees unique.

This Policy is intended to highlight several of the ways in which the Bank aims to encourage a diverse and inclusive workplace.

1.3. Scope and application

This Policy applies to the entire staff of the Bank including the Management Body (i.e. the Board of Directors).

The owner of the Policy is the Human Resources Department, which ensures that this Policy is effective and updated.

1.4. Equal Opportunity Employer

The Bank is an equal opportunity employer and complies with all applicable fair employment practices laws. The Bank strictly prohibits and does not tolerate discrimination against employees, applicants, interns, or any other covered persons because of their religion, convictions, disability, age, sexual orientation, geographical provenance, race, ethnicity, and any other characteristics mentioned in Article L. 251-1 of the Labor Code or in any other legal or statutory provision. All employees, other workers, and representatives are prohibited from engaging in unlawful discrimination.

This Policy applies to all terms and conditions of employment, including, but not limited to selection, hiring, training, performance assessment, promotion, discipline, compensation, benefits, and termination of employment.

The Bank will aim at improving any potential underrepresented gender among the identified members of the staff exercising management functions by supporting the underrepresented gender to take more senior roles (i.e.: granting trainings, focusing on the gender neutrality during the hiring process).

The Bank will set qualitative objectives of equality by fostering the characteristics of the Management Body (i.e., age, gender educational professional background).

The Bank aims at a gender balanced composition of the workforce with 50% men and 50% women.

The Bank set a strong example for diversity in the workplace by having promoted locally hired employees to become member of the executive Management, such decision was made based on their accomplishments and to promote diversity in the Bank.

Moreover, the Bank is dedicated to enhancing diversity within its Management Body and is keen to hire more qualified women, particularly when they are underrepresented and meet the position's qualifications and requirements.

1.5. Our Policies

Our diversity initiatives are applicable, but not limited to, our practices on recruitment, pay and benefits, promotion and training, and disciplinary and performance improvement procedures.

1.6. Recruitment

All advertising and recruitment literature should reflect our commitment to equal opportunities and not enhance stereotypes.

The recruitment process should not disadvantage disabled people and reasonable adjustments to the process, and particularly at any interview, should be considered.

The criteria for selection should be fair and appropriate.

Questions at interviews should relate to the requirements of the job. Where it is necessary to assess whether personal circumstances will affect performance of the job, for example where it involves extensive travel, this should be discussed openly and objectively with all candidates without assumptions based on marital status, gender, or any other protected characteristic.

Selection procedures should be objective. Each candidate should be assessed according to his or her capability to carry out the job.

Regarding the Management Body, the Bank has put in place a Suitability Policy that describes the principles for the selection, monitoring and succession planning of its members and for re-appointing existing members.

As set in the Bank's Suitability Policy, the recruitment of new members of the Management body considers the Bank's diversity objectives without jeopardizing the suitability requirements. The main standards used by the Bank for assessing and measuring the diversity, both within the management body and key functions are listed below,

- Gender;
- Age;
- Geographical provenance; and
- Educational and professional background.

When re-assessing both the individual and collective suitability assessment, the Bank considers among different aspects, the degree to which the composition of the Management Body has met the objectives set in the institution's diversity policy.

When considering a disabled candidate's suitability for the job, he/she should be assessed on the assumption that any reasonable adjustments have been made. For example, if a candidate needs a special keyboard and this is a reasonable adjustment, his/her ability to do the job compared with other candidates should be assessed on the assumption that the keyboard has been provided.

1.7. Pay and Benefits

Equal pay should be paid for work of equal value, unless there is an objective justification that accounts for the variation.

Benefits should be offered to all employees equally unless there is an objective justification for not doing so.

In light of the new directive on pay transparency, the Bank is committed to ensuring compliance once it is transposed into local legislation, anticipated for June 2026. The Bank will align its HR policies and processes with the Pay Transparency principles and reporting requirement.

1.8. Performance, Promotion and training

The Bank evaluates the employees' performance through the 'questionnaire "performance management"'. The questionnaire measures in an objective way the main achievements of the employees. Based on the results of such assessment, decisions about employees' promotion, salary increment, and other HR matters, are made. The Heads of Department discuss their performance with the CEO of the Bank.

Employees should have equal opportunities for promotion and training and all employees should have the opportunity to discuss their future development and promotion prospects with their Head of Department.

When general ability and personal qualities are the main requirements for promotion, care should be taken to properly consider candidates with differing career patterns and general experience. There should be no stereotypical assumptions about the ambitions or otherwise of any individual from a particular group.

Regarding the training, the Human Resources department offers a comprehensive library of training resources accessible to all employees of the Bank, designed to enhance both technical and soft skills to support their professional growth. This library is available on a permanent basis, allowing employees to fully benefit from its offerings. Additionally, employees are encouraged to suggest new training topics and may request HR to enroll them in specific courses if these are not already available in the library.

Specifically, every employee is eligible to complete a training on topics such as discrimination, harassment, and violence prevention. The training offering contains programs to counteract bias throughout the talent cycle, such as Inclusion training for leaders.

Training and professional development should not stop because someone is pregnant or has childcare responsibilities. Nor should it be assumed that such employees are not interested in promotion.

1.9. Disciplinary, performance improvement & layoff procedures

No employee may be sanctioned or dismissed for the reasons mentioned in Article L. 251-1 of the Labour Code.

2. In case of complaint

In case someone believes that discrimination is taking place, he/she speaks informally to whomever he/she wants within the Bank including the staff representatives, the person responsible, your Head of Department or a member of the HR team.

2.1. Responsibilities

While overall responsibility for this Policy rests with the Human Resources Department, all Heads of Departments are responsible for ensuring that this Policy is applied within their own area, group, or team.

As an employee, you have a personal responsibility to comply with this Policy and do your best to ensure that it is adhered to in your day-to-day work. You must not discriminate or help others to do so in contravention of this Policy. Breaches of this Policy will be taken seriously and are likely to result in disciplinary action, up to and including dismissal for gross or serious misconduct. You may also be personally liable towards anyone you unlawfully discriminate against.

2.2. Maintenance and review

Human Resources are responsible for monitoring regulatory requirements related to this policy, and when appropriate, working together with other departments to address requirements, in accordance with other policies, such as the Suitability Policy.

This policy is owned and maintained by Human Resources department and reviewed and evaluated by the Executive Management for presentation to Board.

This Policy may be amended at the sole and absolute discretion of the Bank at any time.

