

SinoPac Financial Holdings Company Limited
Measures of Prevention, Correction, Complaint, and Punishment of
Sexual Harassment

□ **Not in response to external regulations**

■ **Established in response to external regulations**

Formulation unit: Human Resources Division

Formulated by: President

Article 1 To provide Company personnel (including employees, contractors, job seekers, technicians, and interns) a workplace and service environment free of sexual harassment, and to adopt proper preventive, corrective, punitive, and handling measures to maintain the rights and privacy of those directly involved in such incidents, the Company has formulated the Measures of Prevention, Correction, Complaint, and Punishment of Sexual Harassment (hereinafter "these Measures") in line with Paragraph 1, Article 13 of the Act of Gender Equality in Employment, the Regulations of Sexual Harassment Prevention, and the "Regulations for Establishing Measures of Prevention, Correction, Complaint and Punishment of Sexual Harassment at Workplace" decreed by the Ministry of Labor in addition to other relevant laws and regulations.

Article 2 Sexual harassment referred to in these Measures shall mean: In the course of an employee executing his or her duties, any one makes a sexual request, uses verbal or physical conduct of a sexual nature or with an intent of gender discrimination, causes him or her a hostile, intimidating and offensive working environment leading to infringe on or interfere with his or her personal dignity, physical liberty or affects his or her job performance; or an employer explicitly or implicitly makes a sexual request toward an employee or an applicant, uses verbal or physical conduct of a sexual nature or with an intent of gender discrimination as an exchange for the establishment, continuance, modification of a labor contract or as a condition to his or her placement, assignment, compensation, evaluation, promotion, demotion, award and discipline. Specifically, conduct construed as sexual harassment can include any of the following:

1. Attitude and behavior that is insulting, contemptuous, or discriminatory due to gender differences.
2. Inappropriate, unpleasant, or offensive language, physical, touching, or requests of a sexual nature.
3. Demand for sexual behavior or sex-related behavior by means of threat or punishment.
4. Nonconsensual sex and sexual offense.

5. Display of images and text with sexual connotations or seduction.

Article 3 The Company shall prevent the occurrence of sexual harassment at the workplace, protect employees from threats of sexual harassment, establish a friendly workplace environment, and enhance the awareness for gender equality among its managers and employees. In case of sexual harassment or suspected incident, it shall immediately review and improve its preventive measures. The Company shall identify the risks of sexual harassment of the work environment and provide necessary prevention measures for employees working at workplaces where the Company cannot direct or manage; in addition, the Company shall thoroughly inform employees of such information beforehand.

Article 4 The Company shall implement educational programs for preventing and correction of sexual harassment at the workplace, and to reasonably plan courses related to gender equality and sexual harassment preventions during employees' on-the-job training or workshops. Relevant information shall also be publicly disclosed at clearly visible locations at the workplace.

Article 5 The Company shall formulate complaint channels for sexual harassment at the workplace, and relevant information shall also be publicly disclosed at clearly visible locations at the workplace.

Dedicated complaint hotlines: ((02)81618769 and (02)81618750

Dedicated fax for complaint: (02)81618496

Dedicated complaint mailbox: 885.H@sinopac.com

In case changes occur to the preceding complaint channels, the Head of Human Resources Division will be authorized to adjust and announce the channels. When the sexual harassment offender is an employer, the personnel referred to in Article 1 in these Measures may also file a complaint to the local competent authority in addition to filing a complaint to internal channels.

Article 6 The Company shall use a variety of information dissemination methods including meetings, broadcast, and printed materials to strengthen the advocacy of sexual harassment preventive measures and complaint channels to its employees.

Article 7 The Company shall immediately take effective corrective measures when becoming aware of the occurrence of sexual assault crime or sexual harassment, and pay attention to the following aspects:

1. Protecting victim's rights and privacy.
2. Maintaining and improving the safety of the surrounding environment.
3. Punishments to the offenders.

4. Other prevention and improvement measures.

Article 8 For the purpose of dealing with the complaint on sexual harassment, the Company shall establish a Sexual Harassment Complaint Investigation Committee comprised of employer and employee representatives. The committee shall have a convener who will also preside over its meetings. In case the convener cannot act as a meeting chair for any reason, the convener may appoint another member as chair. The committee shall have three to seven members, in which the ratio of female members shall be no less than the majority of the number of all members, and experts and scholars may be appointed as members as needed. The preceding committee members and convener shall be appointed by the President of the Company, and in case a member cannot attend a meeting, a proxy may not be delegated. In case a dispatched or leased employee is subjected to sexual harassment while carrying out his/her duty, the Company shall accept the complaint and investigate the incident together with the contracting business unit, and both that aforesaid business unit and those directly involved will be informed of the result of the investigation.

Article 9 The complaint of sexual harassment shall be filed orally or in writing. For orally filed complaints, the personnel or unit in charge of receiving these complaints shall put them in record. After clearly announcing them to the complainant or let him/her read and ascertain the correctness of their contents, the complainant shall sign his/her name or imprint his/her seal on the record. The written form referred to in the preceding paragraph shall be signed or sealed by the complainant and shall contain the following items:

1. Name, service unit and position title, address or residence, contact telephone number of the complainant and the date of filing the complaint.
2. If he/she has an agent, a commission form shall be forwarded and the name, address or residence and contact telephone number of the agent shall be listed.
3. Facts and contents of the complaint.

If the complaint form or documented verbal application does not meet the requirement of the preceding paragraph, for those situations that could be remedied, the applicant shall be asked to rectify with fourteen days. If the applicant fails to rectify the complaint form by the due date prescribed in the preceding paragraph, the complaint of sexual harassment will not be accepted.

Article 10 Before the Sexual Harassment Complaint Investigation Committee informs those directly involved of the investigation result, the applicant or a designated proxy may retract the complaint via writing. Once a sexual harassment incident has been retracted, a complaint may not be filed against the same incident.

Article 11 A Sexual Harassment Complaint Investigation Committee meeting shall be convened with the majority of the committee members present, and a resolution may only be made with the majority of the vote from attending members. When the number of approval and veto are equal, the committee convener may make a judgment call on the matter.

Article 12 Investigations from the Sexual Harassment Complaint Investigation Committee may ask those directly involved and the interested parties arrive upon the scene to give explanation and also invite people with related knowledge and experience to assist.

Article 13 While the Sexual Harassment Complaint Investigation Committee investigates a complaint, the process shall not be open, and it shall protect the privacy and other personality of those directly involved. Personnel involved in the handling, investigation, and resolution of the complaint of sexual harassment shall keep confidential of all knowledge regarding the incident that he/she becomes aware of. The involvement of those who violate the obligation of confidentiality in the handling procedures shall be terminated by the committee convener, and subjected to penalties including dismissal in accordance with pertinent regulations.

Article 14 In investigating a sexual harassment incident, the Company shall adhere to the following investigation principles:

1. The investigation of the sexual harassment incident shall not be open, and shall protect the privacy and other personality of those directly involved.
2. The investigation of the sexual harassment incident shall be based on the principle of objective, justice and professional and provide those directly involved with chance to make statements and opportunity for defense.
3. If the description of the victim is clear and further inquiry is not required, the redundant inquiry shall be avoided.
4. The investigation of the sexual harassment incident may ask those directly involved and the interested parties arrive upon the scene to give explanation and also invite people with related knowledge and experience to assist.
5. If there is power imbalance between those directly involved or witness, confrontation(s) shall be avoided.
6. When necessary, written information may be produced without infringing the obligation of confidentiality, and be provided to those directly involved, or be summarized and read to those directly involved.
7. The names and other information that may lead to the identification of those directly involved of a sexual assault incident shall be kept confidential, except

for the necessity of investigation or public safety concerns.

8. In its investigation of sexual assault incident, the Company shall transfer those directly involved to related institutions or provide psychological counseling and legal consultation, according to his or her physical and mental condition.
9. When proceeding with appeal, investigation or examination of sexual harassment incidents, the Company should propose lawsuit, act as witness and provide help for appeals and legal complaints and accusations and also need to have a fair mind without discrimination.

Article 15 The Company should start making investigation within seven days of receiving the complaint or arrival of the transferred case and also complete the investigation within two months. If necessary, the length of the investigation may be extended by another one month.

Only one extension may be made and those directly involved shall be notified. The Sexual Harassment Complaint Investigation Committee shall render its decision with grounded reasons. It may also offer punishment or other proposals for solving the compliant. The decision referred to in the preceding paragraph shall be informed to the complainant, the respondent of the complaint and the Company in writing. It shall also specify that if those directly involved do not feel satisfied with the result of the investigation, he or she may submit an appeal to the Sexual Harassment Complaint Investigation Committee within twenty days of receiving the decision. Nevertheless, in case the cause of the appeal becomes known at a later date, the twenty days will begin from the date that the person becomes aware of the cause. A reason for appeal shall be stated in writing, and the Sexual Harassment Complaint Investigation Committee will convene another meeting and come to a resolution over the handling of the appeal. Once the case aforesaid is closed, neither party may file a complaint for the same incident. The handling procedures of complaint incidents shall be documented in writing, and sealed and stored for at least five years after the case closure.

Article 16 Those directly involved may file an appeal against the resolution of the Sexual Harassment Complaint Investigation Committee in any of the following circumstances:

1. The resolution for the complaint and the reason specified are obviously contradictory.
2. The organization of the Sexual Harassment Complaint Investigation Committee is illegal.
3. Committee member(s) who are required to be recused in line with regulations from Article 15 of the Regulations of Sexual Harassment Prevention have engaged in the decision-making.

4. Committee members who participated in the resolution over the complaint has violated his/her role, and committed a criminal offense and has been convicted by a guilty verdict.
5. The evidence or identification used as the basis in resolution by the witness or expert witness has been identified as false statement.
6. The evidence on which the decision was based on is either forged or altered.
7. The civil, criminal, administrative litigation or judgment or administrative sanctions on which the decision was based on and the subsequent judgment or administrative sanction is determined, has been amended.
8. Discovery of previously unconsidered evidence or use of such evidence.
9. Material evidence that could affect the resolution was not considered in the original resolution.

Article 17 After a conduct of sexual harassment is investigated and proved to be taken place, an employer shall make an appropriate punishment or render other corrective measures to the respondent of the complaint in accordance with the seriousness of the incident, including admonishment, demerit, job transfer, demotion, or salary and compensation reductions and more. In case criminal liability is involved, the Company shall also assist the complainant to file a complaint. If the fact of false reporting is proved, the Company shall make an appropriate punishment or render other corrective measures to the complainant based on relevant regulations including the Work Rules in accordance with the seriousness of the incident.

Article 18 The Company shall adopt follow-up monitoring, evaluation and supervision measures to ensure the effectiveness of the implementation of punishment and other related corrective measures. He/She shall avoid the recurrence of the same incident or the occurrence of retaliatory activities.

Article 19 If the Company regards that it is necessary to provide counseling or medical treatment for the parties involved, it may refer them to professional counselors or medical institutions.

Article 20 The Company may not terminate, transfer or take any disciplinary action that is adverse to employees who personally file complaints or assist other persons to file complaints pursuant to these Measures.

Article 21 In case the offender of a sexual harassment is not a Company employee, the Company shall provide necessary protection in line with these Measures.

Article 22 These Measures and any amendments hereto will be enacted upon approval and

announcement from the President.

Approved by the President on November 12, 2015

Amendment approved by the President on April 1, 2018

Amendment approved by the President on March 3, 2021

Amendment approved by the Head of Human Resources Division on October 8, 2021