

SinoPac Holdings Co.,  
Ltd.

Whistleblowing Policy

- Not formulated in accordance with external regulations
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Established by: Legal & Compliance Division      Approval level: The Board of Directors

Article 1      Purpose and basis of adoption

The Policy are established pursuant to Paragraph 2, Article 34 of the "Implementation Rules of Internal Audit and Internal Control System of Financial Holding Companies and Banking Industries."

To foster ethical management and sound development, the Company shall establish a whistleblowing system and designate an independent unit with functional rights to be in charge of accepting and investigating whistleblowing cases.

Article 2      Scope of application

The Policy shall be applied to the Company and its subsidiaries, but each subsidiary may establish other regulations pursuant to laws from their respective competent authorities.

Article 3      Definition of whistleblower

A "whistleblower" as referred to in the Policy is defined as someone who files for a whistleblowing report in accordance with Articles 5 to 7 in the Policy, in which the content of the whistleblowing or complaint does not involve matters stipulated in Article 8.

Article 4      Accepting and Investigating Unit

The Company's Legal & Compliance Division will coordinate the acceptance of all whistleblowing cases. Should another unit or personnel within the Company receives whistleblowing information, the case shall be transferred to this unit for handling.

The Company's Audit Division is the investigating unit for all whistleblowing cases, and shall invite other units or personnel to participate in investigations according to the nature of the case.

Article 5      Whistleblowing channels

The Company or external consultant shall establish whistleblowing channels such as an independent mailbox, hotline, or platform. A whistleblower shall submit a report through written form, email, phone, fax, or via the platform.

Article 6      Whistleblowing information

The whistleblower shall furnish the following information on a

whistleblowing report:

- I. The whistleblower's name and an address, telephone number and e-mail address where it can be reached.
- II. Name or other identifiable information of the person being reported (defendant).
- III. Clear and convincing evidence with reasonable doubt that can be investigated.

Article 7 Categories of whistleblowing

The Company accepts the following categories of whistleblowing reports:

- I. Misappropriation or embezzlement of company funds.
- II. Unlawful use or unauthorized disposal of company property.
- III. Forgery that causes loss or damage to the company.
- IV. Disclosing confidential data of company, employees, or clients by intention.
- V. Taking bribes, committing jobbery, or profiting from improper benefits directly or indirectly when executing managerial or supervisory duties.
- VI. Other suspected criminal act, fraud, or violation of regulations.

Article 8

Conditions in which a report will not be accepted or investigation shall be terminated. In case of any of the following matters, a whistleblowing report will not be accepted, except the content of the report shall be recorded in the whistleblowing report:

- I. Anonymous report. However, the content of the report shall be specific and clear, and information or direction is attached to the report for verification. A case which is deemed necessary by the accepting unit to be investigated shall still be accepted.
- II. Evidence of reasonable doubt of either illegal or malpractice means has not been provided.
- III. The matters reported are not covered within the categories listed in Article 7.
- IV. The matter is either under investigation, being investigated or handled by another institution, or has already been filed by someone else but new evidence has not been presented, except when a subsequent whistleblower has presented key evidence more conducive to the investigation.
- V. It has been decided that the reporting case will not be accepted, or the case has been investigated and closed, except when a whistleblower has submitted material new evidence proving that the case shall be re-investigated.
- VI. This shall not apply if a whistleblower fails to provide suggestions or improvement opinions on matters to be reported which are matters to be managed or supervised within the scope of a whistleblower's duties during the relevant meetings held by the

Company or in compliance with the Company's relevant systems, or if a whistleblower provides his/her suggestions or improvement opinions but the Company does not have any justification for not handling the evidence.

While the Company has accepted and is currently investigating a reported case, the Company shall terminate its investigations in case a whistleblower files the same case to a prosecution entity.

#### Article 9 Case Filing Principles and Handling Procedures

- I. Whistleblowing reports shall be handled in a confidential manner, and the Company shall maintain confidentiality over the identity of the whistleblower, reporting content, or personnel involved in the investigation to prevent any unfair treatment or retaliation.
- II. When a report is received, the accepting unit shall confirm whether to accept the report within one month from the date of receiving the report. After confirming that the report has been accepted, the report shall be immediately filed and transferred to the investigating unit for investigation.
- III. In case the alleged perpetrator of a whistleblowing case is a director, supervisor, or president of the Company or its subsidiary, the case shall be filed immediately after confirming that the case has been accepted, and members of the Company's Ethical Management Committee shall be notified of the case.
- IV. The whistleblower shall be given appropriate notice with respect to the progress of the reported case, and also be notified of the results if the case has not been accepted or has been closed.
- V. In case the alleged perpetrator is personnel of a subsidiary, the case shall be transferred to the accepting unit of the company to which the alleged perpetrator belongs, in accordance with the whistleblowing rules, and this unit shall reply to the whistleblower. In case the alleged perpetrator is the vice president of the subsidiary or holds a position of higher level, or the alleged perpetrator claims to distrust the subsidiary in handling the case, or it is advisable not to have the subsidiary, to which the alleged perpetrator belongs, handling the case due to other reasons, the case shall still be accepted and investigated by the Company, unless otherwise stipulated in local laws and regulations or specified by the supervisory authority.

#### Article 10 Investigation Procedures

- I. Whistleblowing cases shall be verified by telephone, in writing or through interview. The verification procedures and contents shall be recorded and kept in full. The files provided by whistleblowers shall be encrypted and protected. Transmission of and access to these files

shall be limited to those who participate in investigation only.

- II. An investigation report shall be completed within two months after a case has been filed, and shall be submitted to the Chairman for review. If it is necessary to extend the investigation period before the expiration of the investigation period, the investigating unit shall state the reason and submit the reason to the Chairman for approval.
- III. The investigation report issued by the auditing unit shall be handled in accordance with the Company's "Implementation Rules for Internal Control and Auditing System".

#### Article 11 Subsequent Processing of Investigation Report

- I. In case the alleged perpetrator is a director of the Company or a role above the position of vice president, after the investigation report is submitted to the Company's Ethical Management Committee for review, it shall be submitted to the Audit Committee for subsequent review and submitted to the Board of Directors of the Company for future reference. The Company's Ethical Management Committee can request the whistleblower and the alleged perpetrator to attend related meetings for explanations.
- II. In case the alleged perpetrator is a director or supervisor of the subsidiary or holds a management role equivalent to the Company's vice president (inclusive) or above, the investigation report shall be verified by the responsible unit of the subsidiary, and submitted to the Company's Ethical Management Committee for future reference after verification.
- III. If material breach or material loss or damage to the Company has been found after investigating a whistleblowing case, the relevant unit shall handle the case as soon as possible, and members of the Company's Ethical Management Committee shall be notified of the case, while the case shall be submitted to the Board of Directors of the Company or the subsidiary. If the case is found to be a material contingency matter or posed illegal conduct, the Company shall actively alert or report to the relevant competent authority.
- IV. If an alleged perpetrator is confirmed to have indeed violated the applicable laws and regulations, the Company shall immediately make dispositions in accordance with relevant regulations. The Company shall provide chance(s) for the alleged perpetrator to express his/her opinions or to appeal against the decision before making punitive decisions.

#### Article 12 Principles for Recusal Due to Conflict of Interests

Personnel participating in an investigation and targets listed in the investigation report who are people listed below, shall recuse themselves:

- I. The alleged perpetrator, and the spouse or relative of the alleged perpetrator.

- II. Persons who have been sufficiently proven based on specific facts to be related to the alleged perpetrator.
- III. Persons who have been sufficiently proven based on specific facts to be biased in the performance of duties, other than the circumstances indicated in the preceding two paragraphs.

Article 13 Protection of the Whistleblower

- I. Those who know of the identity of the whistleblower or the content from the execution of duties shall not divulge such information; the whistleblower shall also maintain confidentiality over the whistleblowing report. Those who breach the Policy shall be subjected to the Company's relevant punitive measures.
- II. The Company promises that a whistleblower may not be terminated, dismissed, demoted, or experience reductions in compensations or incentives, or to be subject to any damage or loss of its legal, contractual, or customary rights, or other adverse treatment due to the whistleblowing case and its related matters. When a whistleblower believes it has been subjected to adverse treatment due to the whistleblowing, a file or appeal can be made to the Company's Human Resources Division. The Human Resources Division shall submit the report to the most recent meeting of the Ethical Management Committee.

Article 14 Regular Reporting and Record Retention

- I. The accepting unit shall regularly monitor the Whistleblowing Case Files and subsequent acceptance status, and report to the Company's Ethical Management Committee.
- II. The accepting unit shall store the acceptance of reported case, investigation process, investigation results, records of relevant document preparation in either written or electronic format for five years. If litigation related to the whistleblowing content arises, relevant information shall continue to be retained until the conclusion of the litigation.

Article 15 Education and training

The Company shall hold regular promotional program and education training of the whistleblower system for the relevant personnel.

Article 16 Incentives and disincentives associated with whistleblowing

If the reported incident has been verified to be true, incentives may be provided based on the circumstances of the report. If the whistleblower is a Company employee, and has been verified to have intentionally leaked the content of the whistleblowing report, the content has been found to be untrue, or filing of the report has been malicious, impacting rights of the Company or others, the Company may undertake disincentive actions

pursuant to relevant regulations and in consideration of the circumstances of the report. In such case, Paragraph 2, Article 13 of the Policy may not be applied.

A manager who is notified of or is found to be suspected of fraud or violation of the law due to performance of duties before a whistleblowing report shall be investigated according to his/her duties. When necessary, the relevant units shall be invited to assist in investigation. Should be negligence in processing the case, the Company may handle the situation according to the relevant punishments.

Article 17 Other matters

Any other matters not set forth in the Policy shall be dealt with in accordance with applicable laws, rules, and the Company's internal regulations.

Article 18 Enforcement or amendment

The Policy shall be implemented under the approval of the Board of Directors, and the same shall be applied to any amendments.

The Policy have been approved at the fifth meeting in 2018 of the Sixth-Term Board of Directors on May 25, 2018.

The Policy have been approved at the fifth meeting in 2019 of the Sixth-Term Board of Directors on May 24, 2019.