



# **Fubon Financial Holding Co., Ltd.**

## **Whistleblowing Policy**

Approval Date: 2021/4/29

Effective Date: 2021/5/17

Organizer: Compliance Department of the Compliance and Legal Affairs Division

Edition No.: 3rd edition

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## **Article 1 Purpose**

The "Whistleblowing Policy of Fubon Financial Holding Co., Ltd." (hereinafter referred to as the "Policy") is developed in accordance with Article 34-2 in the "Implementation Rules of Internal Audit and Internal Control System of Financial Holding Companies and Banking Industries," Article 36-2 in the "Corporate Governance Best Practices of Financial Holding Companies" and Article 23 in the "Ethical Corporate Management Best Practice Principles for TWSE/GTSM Listed Companies" to create a reporting system and establish reporting channels and handling procedures.

## **Article 2 Scope of Application**

This Policy apply to all units of Fubon Financial Holding Co., Ltd. (hereinafter referred to as the "Company").

The Company's subsidiaries listed in its business license (hereinafter referred to as the "Subsidiaries") shall refer to the provisions of this Policy, consider factors such as the scale and nature of their branches and business or other applicable regulations to develop appropriate rules and seek an approval from the Compliance Department of Compliance and Legal Affairs Division (hereinafter referred to as the "Compliance Department") in advance. The Subsidiaries shall supervise their subsidiaries (hereinafter referred to as "Sub-subsidiaries") in accordance with this Policy.

## **Article 3 Definition**

The reported cases referred to in this Policy are the specific whistleblowing cases filed by anyone against crimes, frauds and violations of law committed by the directors, supervisors, personnel at or above the rank of vice president (hereinafter referred to as the "Responsible Person") or personnel other than the Responsible Person of the Company, the Subsidiaries or Sub-subsidiaries.

The term "major cases" mentioned throughout this Policy shall refer to misconduct reports that involve any Responsible Person of the Company or pose any major violation of law (e.g., to the extent that significant losses or compromises of the internal control system of the Company are caused) and are supported with relevant evidence; the term "general cases" shall refer to all misconduct reports other than major cases.

## **Article 4 Reporting Channels**

The Compliance Department is the unit that handles the reported cases for the Company (hereinafter referred to as the "Handling Unit"), and a whistleblower may file a report with the Handling Unit through the reporting channels established on the official website.

## **Article 5 Recusal from Conflict of Interest**

If the Company's personnel who are responsible for handling reported cases, assigning investigators, conducting investigation and/or review, writing reports from the investigation results and resolving cases (hereinafter referred to as "Case Handling Personnel") have one of the following circumstances, they shall provide reasons, facts and explanations to declare recusal from conflict of interest with the Handling Unit. The Case Handling Personnel involved shall stop the relevant procedures before the Handling Unit decides whether to approve or reject the recusal; however, the Case Handling Personnel shall still conduct necessary procedures if there is an urgent situation.

1. The person or the spouse, the blood relative within the 3rd degree or the in law within the 2nd degree is the whistleblower or the reported person or is an interested party of the reported case.
2. Specific facts that may prove the investigation is biased.

In situations where the Case Handling Personnel does not recuse themselves from investigation when required to do so, the reported person or the whistleblower may submit a request, along with explanations and evidence, to the Company's Handling Unit for the recusal of the abovementioned personnel.

If the Company's chairman or the president shall recuse from the case in accordance with the first paragraph of this Article, the audit committee shall appoint another appropriate person to perform the duties of the chairman or the president required in this Policy. In situations where the Company's chief internal auditor is subject to recusal under the first paragraph of this Article, the Company's chairman shall appoint another person of appropriate role to perform the duties of the chief internal auditor under this policy.

## **Article 6 Non-Acceptance**

Cases that do not have specified contact information or do not state the specifics of the reported cases will not be accepted.

The Handling Unit may state the reasons for non-acceptance of the above cases and report them to the Chief Compliance Officer of the Company for the approval of case closing.

## **Article 7 Case Referrals**

This Policy does not apply to employment disputes, customer complaints, sexual harassment, management of employee conduct, and any matters that are governed by separate rules or fail to meet the definitions of reported cases specified in Article 3 of this Policy. Cases that meet such definitions shall be approved at the following levels of authority and referred to the responsible unit of the entity concerned:

Case Category	Level of Authority
Cases involving the Responsible Person of the Company, the Subsidiaries or Sub-subsidiaries or Cases are extremely important or sensitive.	Chairman of the Company
Cases involving a specific person other than the Responsible Person of the Company, the Subsidiaries or Sub-subsidiaries or are important.	President of the Company
Inquiries, customer complaints or other cases where the personnel of the Company, the Subsidiaries or Sub-subsidiaries is not specifically named.	the Chief Compliance Officer of the

## Article 8 Reports Involving Personnel of Subsidiaries or Sub-Subsidiaries

Reports that involve personnel of a Subsidiary or Sub-subsidiary shall be referred to the responsible unit of the respective entity, unless instructed otherwise by the competent authority or under special circumstances where it is inappropriate to involve the Subsidiary or Sub-subsidiary, in which case the reports should be handled by the Company instead.

Cases that are referred under the first paragraph or deemed appropriate to be handled by the Company according to the Policy shall be approved at the following levels of authority:

Case Category	Level of Authority
Cases where the Company's other units, the Subsidiaries or Sub-subsidiaries have established acceptance and handling procedures.	President of the Company
Cases involving the Responsible Person of the Subsidiaries or Sub-subsidiaries.	Chairman of the Company
Cases involving the personnel other than the Responsible Person of the Subsidiaries or Sub-subsidiaries.	President of the Company

All reports involving the responsible person of a Subsidiary or Sub-subsidiary as mentioned in the second paragraph that are handled internally by the responsible unit of the respective entity shall report the outcomes to the Company's Handling Unit upon case closure.

This Policy does not apply to reported cases that have been referred according to the first paragraph.

## Article 9 Investigation Procedures

Upon receiving a misconduct report, the Company's Handling Unit shall follow the procedures outlined below except for non-acceptance cases mentioned in Article 6, referred cases mentioned in Article 7, or cases to be handled by the responsible unit of the respective entity as mentioned in Article 8:

1. For major cases (including general cases that are later reclassified as major cases upon investigation), seek approval from the Company's chairman and have the Company's Auditing Division conduct investigations.
2. For general cases, the Company's president shall either assign a specific department or assemble an independent investigation panel comprising at least three members, depending on the circumstances, to conduct investigation. The Company's Handling Unit may recommend members for the investigation panel.

Lawyers, accountants, or consultants/experts with relevant expertise from outside the organization can be invited to assist with the investigation, subject to approval

of the Company's chairman (for cases described in the first subparagraph of the first paragraph) or president (for cases described in the second subparagraph of the first paragraph).

The investigation panel is required to produce an investigation report within three months from the day after case assignment or assembly of the panel. However, a one-time three-month extension can be granted if the investigation fails to be completed within the aforementioned period due to complexity or other reasons, subject to approval at the abovementioned levels of authority.

All relevant departments and personnel of the Company, Subsidiaries, and Sub-subsidiaries shall cooperate when inquired or asked to retrieve documents, data, or items by the investigation panel.

During the investigation procedures, the Company's Investigation Unit shall give the reported person or the related personnel an opportunity to make a statement.

### **Article 10 Ending Investigation Procedures**

The Company's Investigation Unit shall comply with the following procedures after producing an investigation report in accordance with the requirements of Article 9:

1. For cases where the reported person is the Responsible Person of the Company, the outcome of the investigation report shall be presented to the Company's audit committee for review, forwarded to the chairman, and subsequently circulated to the president before handing over to the Handling Unit for filing.
2. For cases where the reported person is the Responsible Person of a Subsidiary or Sub-subsidiary, the outcome of the investigation report shall be presented to the Company's chairman and subsequently circulated to the president (for cases that are not investigated by the Company's Auditing Division, the report shall instead be presented to the president followed by the chairman), then forwarded to the supervisor or audit committee of the reported person's entity, before handing over to the Company's Handling Unit for filing.
3. For cases where the reported person is someone other than the Responsible Person of the Company, Subsidiaries, or Sub-subsidiaries, the outcome of the investigation report shall be presented to the Company's chairman and subsequently circulated to the president (for cases that are not investigated by the Company's Auditing Division, the report may be presented up to the president only), then forwarded to the chairman of the entity concerned before handing over to the Company's Handling Unit for filing.

For cases described in the second subparagraph of the first paragraph where investigation is to be conducted by the Company's Auditing Division, the investigation report shall also be forwarded to the internal audit unit of the reported person's entity (if no internal audit unit exists, the investigation report

shall be forwarded to the entity's Handling Unit instead); for cases where investigation is not conducted by the Company's Auditing Division, the investigation report shall be forwarded to the Handling Unit of the reported person's entity.

If the reported cases are determined factual after investigation, the Company's Investigation Unit may request the involved responsible unit to stop the behaviors of the reported person, implement punishment in accordance with the Company's regulations or discuss improvements to the internal control system and operating procedures.

The Company's Investigation Unit shall immediately produce reports and notify the independent directors in writing if it finds that there are major violations of rules or that the Company may experience significant damage.

#### **Article 11 Notifying Whistleblower**

The Company's Handling Unit shall duly and appropriately notify the whistleblower of all outcomes in relation to Articles 6 to 8 and Article 10 of this Policy, if a contact method has been specified.

#### **Article 12 Notification and Reporting to Outside of the Organization**

Reported cases determined to be major incidents or illegal cases upon the investigation conducted by the Company shall be referred to or reported to the relevant competent authorities or judicial authority.

#### **Article 13 Education and Training**

The Company's Human Resources Division shall regularly conduct promotion, education and training of this Policy and the related regulations for the Company's internal staff.

#### **Article 14 Others**

From the time when the Handling Unit receives a report (including but not limited to procedures such as handling, investigation, review and approval), any personnel involved in or knowing the reported case (including but not limited to the Case Handling Personnel) shall keep the content details of the reported case and th

or where it is no longer necessary to maintain confidentiality, no information sufficient enough to identify the whistleblower shall be disclosed. Violators will be punished according to the internal regulations of the Company.

The Company, the Subsidiaries and Sub-subsidiaries shall not dismiss the whistleblower, relieve the whistleblower of duties, demote and reduce salary and wage of the whistleblower or damage the rights and interests that they are entitled



to in accordance with law, contracts or general customs or carry out other unfavorable punishment. However, exception can be made if the investigation finds that the reported case is untrue and involves malicious attacks on the Company, the Subsidiaries and Sub-subsidiaries and their personnel.

The Company may reward the whistleblower as appropriate if the reported cases are found true and significant.

The Company's Handling Unit shall retain all documents relevant to the acceptance, investigation, and outcome of reported cases for a total of five years starting from the day after the approval of the investigation report, the day after report is made to the competent authority, or the day after relevant judicial procedures have ended, whichever occurs later.

### **Article 15 Supplementary Articles**

Any outstanding matters are subject to the laws and regulations of the authority and the Company's standards. The Company's Compliance Department reserves the right for the final interpretation of the Policy.

### **Article 16 Implementation and Revision**

The Policy is to be approved by the board of the Company and implemented in accordance with the Company's "Regulations Formulation Policy" and likewise for the revision.

### Schedule: Revision History

<b>Edition</b>	<b>Approval Date</b>	<b>Effective Date</b>	<b>Level of Authority</b>	<b>Remarks</b>
01	2018/08/27	2018/09/12	Board of Directors	Approved by the 7th meeting of the 7th term of the Company's board of directors.
02	2019/11/21	2019/12/18	Board of Directors	Approved by the 14th meeting of the 7th term of the Company's board of directors.
03	2021/04/29	2021/05/17	Board of Directors	Approved by the 6th meeting of the 8th term of the Company's board of directors.