



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

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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.

## **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.

If the reported person or the whistleblower finds that the Case Handling Personnel handling the case fails to recuse from the case where he/she shall, he/she may clearly state the concerns and attach evidence to the Handling Unit to request the recusal of the Case Handling 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.

#### **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 Non-Whistleblowing Cases**

This Policy does not apply to non-whistleblowing cases, and the cases are handled after being escalated to the appropriate level of Company's authority listed below.

| 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 |

|  |         |
|--|---------|
|  | Company |
|--|---------|

## Article 8 Transferring Cases

Reported cases under the following circumstances shall be transferred to the Company's responsible unit or handled in accordance with the Policy based on the approval of the Company's authority listed below:

| 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 |

If the abovementioned cases involve the Responsible Person of the Subsidiaries or Sub-subsidiaries and are transferred to the responsible unit of the company involved, the company shall notify the Handling Unit after the closing of the cases.

This policy does not apply to the reported cases that are transferred in accordance with the first paragraph of this Article.

## Article 9 Investigation Procedures

After the Handling Unit receives reports, except for the circumstances described in Article 6, 7 and 8, the Company's president shall assign a dedicated unit or an investigation committee consisted of more than three people with independent functions and powers (hereinafter referred to as the "Company's Investigation Unit") to conduct investigation.

The Company's Investigation Unit may invite external lawyers, accountants or other professional consultants or experts to assist the investigation upon the approval of the President of the Company.

The Company's Investigation Unit shall submit a report of the investigation results within three months from the date of assignment or the establishment of the Company's Investigation Unit. An extension of three months can be made due to the complicated nature of the cases or other reasons, but the extension can be made one time only.

Related units or personnel involved in the investigation shall try their best in providing documents, information and objects to and making themselves available for inquiry by the Company's Investigation Unit.

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. If the reported person is the Responsible Person of the Company, the Subsidiaries or Sub-subsidiaries, the report of investigation results shall be submitted to the President and the Chairman of the Company and transferred to the supervisors or audit committee of the involved company for secondary review and approval, before being delivered to the Handling Unit for filing.
2. If the reported person is the personnel other than the Responsible Person of the Company, the Subsidiaries or Sub-subsidiaries, the report of investigation results shall be submitted to the President of the Company and the Chairman of the Subsidiaries for approval, before being delivered to the Handling Unit for filing.

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 Handling Unit shall notify the whistleblower who has left contact information of the results of Article 6 and 8 and the responsible unit in Article 7 in an appropriate manner. The Company's Investigation Unit is responsible for notifying the whistleblower of the results of Article 10 of this Policy.

#### **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 Handling Unit shall retain the documents of reports, investigation procedures and investigation results for three years from the date of the verification of investigation report, notification sent to the relevant competent authority or the conclusion of judicial proceedings, 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. |