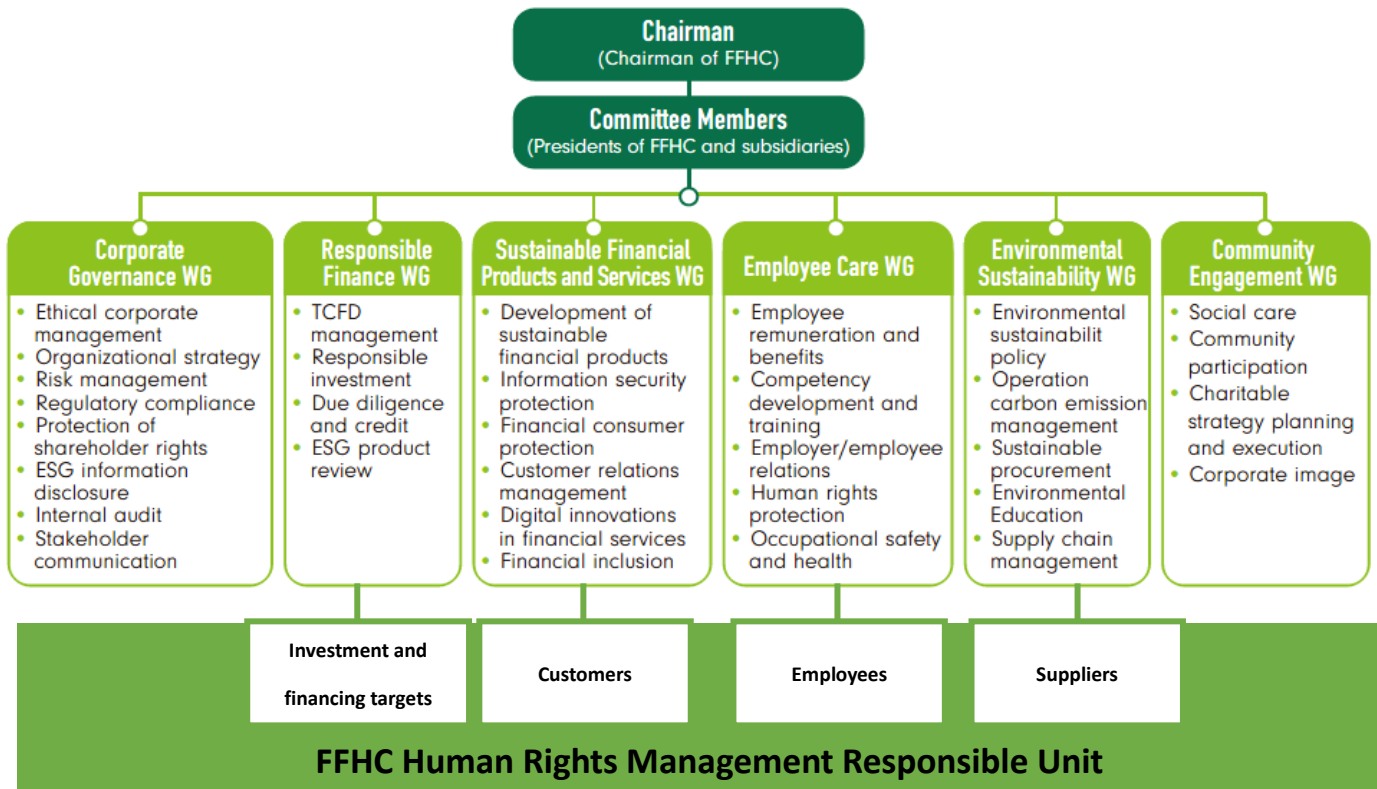


## First Financial Holding Co., Ltd. (FFHC) Human Rights Management Framework

### A. Structure and process

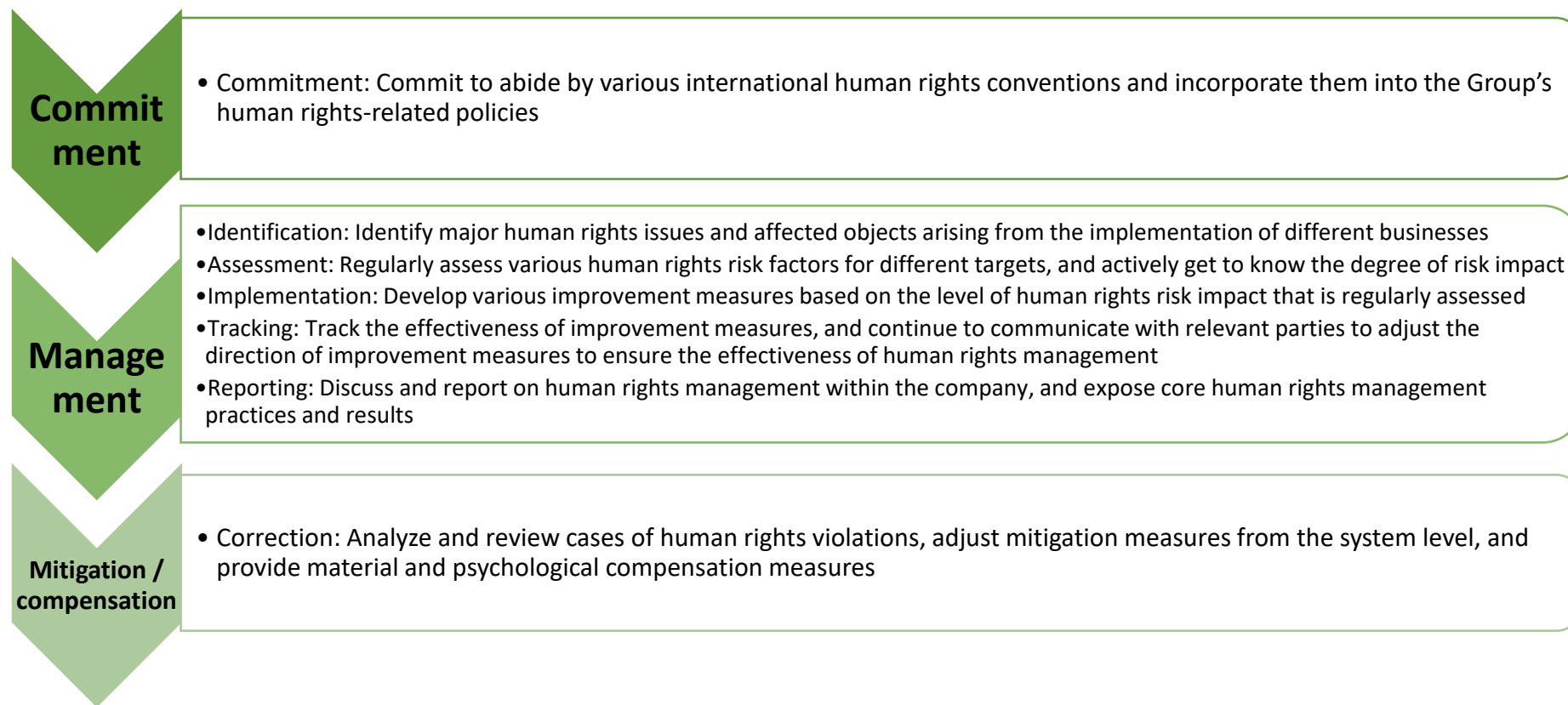
#### 1. Human rights management structure

FFHC has established the “Sustainable Development Committee” as the core organization of the Group to promote sustainable governance. It consists of “Corporate Governance”, “Responsible Finance”, “Sustainable Financial Products and Services”, “Employee Care”, “Environmental Sustainability”, and “Social Engagement” six teams and other cross-company executive units. Different teams are responsible for the human rights management of different targets, ensuring that the human rights of the Group’s employees, suppliers and customers are protected.



## 2. Human rights management process

In order to strengthen the human rights protection of FFHC employees, suppliers and customers, three relevant human rights management processes have been formulated in accordance with the “Framework of the United Nations Guiding Principles on Business and Human Rights”.



### B. Stage I - Commitment

#### 1. Human rights related policies

Policies	Description
<ul style="list-style-type: none"> <li>• <b>First Financial Holding Human Rights Commitment</b></li> </ul>	FFHC and its subsidiaries respect and support internationally recognized human rights norms and principles. We uphold the value of putting people first, promote corporate sustainable development and adhere to

	<p>internationally recognized labor human rights norms and principles. We also support human rights issues advocated by the non-profit organization Business for Social Responsibility (BSR), formulate human rights policies, and pay close attention to ESG-related issues to protect and safeguard the basic human rights of all employees, atypical employees, and interns, reduce the impact of human rights risks and promote sustainable economic, environmental and social development. Meanwhile, suppliers, partners and customers are required to jointly abide by the human rights protection spirit of this commitment.</p>
<ul style="list-style-type: none"> <li>• <b>FFHC Sustainable Development Policy</b></li> </ul>	<p>While the Company and subsidiaries provide the full-spectrum of financial products and services to facilitate financial transactions and investments by our customers, we shall be committed to the practice and concept promotion of sustainable development, giving back to society, improving rights and living environment quality of laborers, and enabling environmental, social and governance (ESG) progress in a more efficient manner. This policy is thus formulated as the principle and direction for the Group to promote sustainable development.</p>
<ul style="list-style-type: none"> <li>• <b>FFHC Sustainable Development Code of Conduct</b></li> </ul>	<p>In order to practice corporate social responsibility and promote economic, environmental and social progress and achieve the goal of sustainable development, FFHC and its subsidiaries have formulated the “Sustainable Development Code of Conduct” with reference to the “Sustainable Development Best Practice Principles for TWSE/TPEX Listed Companies”, which requires all subsidiaries to abide by relevant laws and regulations and follow the Universal Declaration of Human Rights, such as gender equality, the right to work and the prohibition of discrimination.</p>
<ul style="list-style-type: none"> <li>• <b>Directions for Supplier Management of FFHC and its Subsidiaries</b></li> </ul>	<p>FFHC has formulated the “Supplier Management Guidelines” as a policy and guiding principle for each company of the Group to manage suppliers, asking suppliers to agree to abide by the relevant regulations of the Guidelines and strengthen conveyance when signing contracts with the companies. The content of the regulations that involves human rights includes that suppliers shall comply with domestic and foreign human rights-related norms, establish a fair and just human resources policy, not deprive workers of the freedom of association and collective bargaining rights, eliminate all forms of forced labor, and ensure the right to work and employment right of persons with disabilities, etc.; in addition, suppliers are required to sign the “Declaration on Human Rights and Environmental Sustainability Clauses”, and it is stipulated that companies shall urge suppliers to truly follow the relevant specifications of the Guidelines through on-site visits, audits, and other methods.</p>
<ul style="list-style-type: none"> <li>• <b>First Bank Sustainable</b></li> </ul>	<p>The main subsidiaries of FFHC refer to FFHC’s sustainable development policies and codes, and follow the</p>

<p><b>Lending Policy</b></p> <ul style="list-style-type: none"> <li>• <b>First Bank Sustainable Lending ESG Operating Procedure Directions</b></li> <li>• <b>First Bank Sustainable Investment Guidelines</b></li> <li>• <b>First Securities Inc. Sustainable Investment Operating Directions</b></li> <li>• <b>First Securities Investment Trust Co., Ltd. Sustainable Investment Policy</b></li> <li>• <b>First Life Insurance Co., Ltd. Responsible Investment and Stewardship Operating Directions</b></li> </ul>	<p>Equator Principles (EPs), the United Nations’ Principles for Responsible Banking (PRB), the Principles for Responsible Investment (PRI), the Principles of Sustainable Insurance (PSI) and the Stewardship Principles, and incorporate environmental, social and governance (ESG) related issues into investment and financing decision-making and analysis, while paying attention to the human rights issues and risks of investment and financing targets, so as to achieve the goal of common sustainable development of enterprises, and enhance the long-term value of investment and financing targets and the Group.</p>
<ul style="list-style-type: none"> <li>• <b>FFHC and Subsidiaries’ Personal Information Protection Policy</b></li> </ul>	<p>FFHC and its subsidiaries attach great importance to the protection rights of all customers to their own personal information, and follow Taiwan’s “Personal Information Protection Act”, “Personal Information File Security Regulations for Non-Governmental Institutions Designated by the Financial Supervisory Commission”, and EU’s General Data Protection Regulation (referred to as “GDPR”) and the relevant regulations of the competent authority to formulate the Personal Information Protection Policy, specifying relevant employees’ access to personal information set by the Company and its subsidiaries and the control and management of such employees’ access, and agreeing on confidentiality obligations with the employees.</p>

**2. Reference regulations for human rights-related policy formulation**

International	Domestic
Universal Declaration of Human Rights	Labor Standards Act
UN Guiding Principles on Business and Human Rights	Act of Gender Equality in Employment

The Ten Principle of UN Global Compact	Employment Service Act
International Labour Organization Core Labour standards	Sustainable Development Best Practice Principles for TWSE/TPEX Listed Companies
ISO 26000 Guidance on Social Responsibility	Stewardship Principles
Convention on the Elimination of All Forms of Discrimination against Women	Four major plans for labor health protection (maternal health protection in the workplace, human-factor hazard prevention, abnormal workload-triggered diseases prevention, and prevention of illegal infringement at work)
OECD Guidelines for Multinational Enterprises	Occupational Safety and Health Act
Equator Principles	
Principles for Responsible Banking	
Principles for Responsible Investment	
Principles of Sustainable Insurance	

## C. Stage II - Management

### 1. Major human rights issue

Material Issue	Affected targets	Risk Description
<b>Employees as the target</b>		
Employment discrimination, equal work rights, gender equality	All employees	Discrimination against job applicants or employees on the grounds of race, class, language, thought, religion, political affiliation, ancestry, place of birth, gender, sexual orientation, age, marital status, appearance, facial features, physical or mental disabilities, or previous union membership
Sexual harassment	All employees	In the performance of their duties, any person (including supervisors at all levels, employees, customers, etc.) has sex or gender-related behavior against their will
Hiring of child labor	All employees	Employ child labor, deprive children of childhood growth, interfere with normal school attendance, and pose mental, physical, social or moral threat or damage
Abnormal work load	All employees	In response to market changes and business needs, employees may suffer from abnormal workload, long-term stress and accumulation of work fatigue. If they do not get proper rest and adequate sleep, it may cause work-life imbalance, physical and mental harm, affect health and mental state, and even stimulate

Material Issue	Affected targets	Risk Description
		cardiovascular disease
Illegal infringement	All employees	Employees being treated inappropriately by supervisors or colleagues taking advantage of their jobs or positions in the workplace, or being subject to bullying or violent incidents such as physical attacks, verbal insults, intimidation, and threats by customers, clients, or other relevant persons, causing mental or physical harm
Maternity protection	Female employees who are pregnant or one year postpartum	Avoid affecting the physical and mental conditions of pregnant female colleagues and the health of female colleagues and fetuses due to the working environment and work type, and care for the physical and mental health of postpartum female employees
<b>Suppliers as the target</b>		
Workplace safety and abnormal work load	Employees of clothing suppliers	Garment sewing is highly dependent on labor, there is often the problem of excessive working hours and is prone to causing musculoskeletal disorders of laborers
	Employees of moving, landscaping and solar power engineering suppliers	Workers are prone to musculoskeletal disorders
	Employees of renovation and fire protection suppliers	Construction-related occupational safety accidents are prone to occur
	Employees of water and electricity suppliers	Accidents such as electric shock are prone to occur
<b>Financing customers as the target</b>		
Employer/employee relations	All employees of the financing target	Due to labor disputes such as wage arrears, improper employment, protests and strikes, the reputation, legal, operational and financial risks may occur to the financing target
Workplace safety	All employees of the financing target	Occupational disasters and other damage to the safety and health of workers, resulting in reputation, legal, financial and other risks to the financing target

<b>Material Issue</b>	<b>Affected targets</b>	<b>Risk Description</b>
Gender equality	All employees of the financing target	Due to gender discrimination, workplace harassment, etc., there are reputation and legal risks to the financing target
Stakeholder communication	All employees of the project financing target	During the development of the project, due to the lack of external communication and grievance mechanisms, stakeholders have reputation and social risks against protests
<b>Invested customers as the target</b>		
Abnormal work load and labor disputes	All employees of the investees	Reputation risks due to labor disputes, strikes, vicious layoffs without warning, forced labor and other labor dispute incidents, which have a negative impact on the operation of the invested enterprises.
Employment discrimination, illegal infringement, workplace safety, sexual harassment	All employees of the investees	Due to occupational negligence, death from occupational accident, violation of occupational safety and health related laws and regulations and other incidents endangering labor health and labor safety, there are legal risks or suspension of work, business suspension, etc., causing major negative impact on the operation of the invested enterprise
Occupational accidents	All employees of the investees or residents of the surrounding communities	If an unexpected major occupational accident occurs in the workplace, which affects the personal safety of the employees of the company or the surrounding communities, leading to reputation, legal and financial risks, and causing the price of the investment target to drop
<b>General customers as the target</b>		
Personal information protection	All customers	Due to insufficient internal business policies and procedures of the company, personnel conduct committed intentionally or negligently, or loopholes in the information system, the personal information of customers is improperly collected or used, or is stolen, tampered with, damaged, lost or leaked, etc.
Information security risk	All customers	Being hacked or infected by virus, or lack of information security awareness of internal staff, resulting in the company operating data or customer data being leaked or tampered with

Material Issue	Affected targets	Risk Description
Anti-money laundering and countering the financing of terrorism (AML/CFT)	All customers	Due to the company's failure to implement standard operating procedures for AML/CFT, some customers have conducted money laundering or terrorism financing transactions, affecting the order of the financial market
Embezzlement of customer funds	All customers of First Bank and First Securities	Employee embezzlement of customer funds, or abnormal financial transactions with customers

## 2. Human rights risk matrix

High			
Medium	· Maternity protection	· Abnormal work load	
Low	· Diversity and inclusiveness · Hiring of child labor · Indigenous people · Persons with disabilities · Employment discrimination · Equal work rights · Sexual harassment	· Gender equality · Workplace violence · Illegal infringement · Labor disputes · Right of privacy · Workplace safety · Occupational accidents · Stakeholder communications · Personal information protection · Information security risk · Anti-money laundering and countering the financing of terrorism (AML/CFT) · Embezzlement of customer funds	
		Impact on company operations	
	Low	Medium	High



### 3. Human rights risk assessment

Risk assessment methods	Risk assessment frequency	Assessment factors	Source
<b>Employees of own operation and joint ventures as the target</b>			
<p>Based on FFHC Human Rights Commitment, and with reference to various international conventions such as the “United Nations Universal Declaration of Human Rights”, “UN Guiding Principles on Business and Human Rights” and “International Labour Organization Core Labour standards”, formulate material human rights issues and measurement indicators, conduct human rights risk assessment for all employees, and draw a risk matrix according to the characteristics of the Group’s employees (such as age and gender), identify potential risks and impacts, and propose mitigation and compensation measures.</p>	<p>Once a year</p>	<ol style="list-style-type: none"> <li>1. Sexual harassment: Number of sexual harassment complaints received by the Company in the current year / total number of employees</li> <li>2. Hiring of child labor: Review the resume or registration information</li> <li>3. Freedom of Association: Guarantee the freedom of employees to join the trade unions</li> <li>4. Underemployment rate of employees with disabilities: Number of units with underemployment of persons with disabilities / total number of insured units.</li> <li>5. Illegal infringement: Number of illegal infringements established / total number of employees</li> <li>6. Maternity protection: Female employees who are pregnant or one year postpartum, and have been assessed at risk level 2 or above (inclusive) / total number of employees</li> <li>7. Workplace health: Abnormal workload</li> </ol>	<ul style="list-style-type: none"> <li>● Complaint cases from employee sexual harassment complaint channel and workplace illegal infringement</li> <li>● Verification of applicant’s resume and ID submitted upon arrival</li> <li>● Number of people joining labor insurance</li> <li>● Workplace environment and occupational hazard assessment, health assessment</li> <li>● Health check for work-hour statistics overwork scale</li> <li>● Labor inspection key points and overtime hours report</li> </ul>

Risk assessment methods	Risk assessment frequency	Assessment factors	Source
		<p>identified as high risk / total number of employees</p> <p>8. Abnormal work load: The daily working hours exceed 12 hours, the weekly working hours exceed 40 hours, and the monthly overtime hours exceed 46 hours.</p>	
<b>Suppliers as the target</b>			
<p>1. According to the pre-screening in the three steps of supply chain management, check whether the bidding suppliers have violated occupational safety and health, employment of child labor, forced labor and other labor human rights laws and regulations or endangered social welfare, etc. before opening the bid. If a supplier passes the review, it is included in the database of qualified suppliers which is provided to procurement units for conducting inquiries and selecting preferred suppliers.</p> <p>2. Before construction, jointly survey the operating environment with the contractor, require them to inform the hazardous factors of the working</p>	Quarterly	<p>1. Whether the supplier is a rejected account listed in the government e-procurement system.</p> <p>2. Whether the supplier has involved in environmental pollution, violation of labor laws or social harm in the past three years; if so, whether it has been improved.</p> <p>3. If the supplier has relevant experience in undertaking the Company's procurement case, whether its follow-up maintenance service has received complaint.</p>	<ul style="list-style-type: none"> <li>● Vendor information checklist</li> <li>● Government penalty record</li> </ul>

Risk assessment methods	Risk assessment frequency	Assessment factors	Source
<p>environment, and formulate and implement a hazard prevention plan.</p> <p>3. Audits of qualified suppliers are regularly conducted to check for occupational hazards, and labor rights violations. In the event that a compliance violation is identified, the supplier will be requested to provide an improvement plan, otherwise the cooperation will be terminated and the supplier will be added to the monitoring list.</p>			
<b>Financing customers as the target</b>			
<p>Handle in accordance with “First Bank Sustainable Lending Policy” and “First Bank Sustainable Lending ESG Operating Procedure Directions”:</p> <p>1. Risk assessment shall be conducted for all corporate borrowers according to the “ESG Risk Factor Checklist” when applying for loans, with particular emphasis on the human rights-related risk factors listed under the social aspect.</p> <p>2. In the case of an Equator Principles case, the Bank’s task force shall classify the risks according to the degree of impact of</p>	<p>Upon every loan application</p>	<p>1. All corporate borrowers: Penalty records for violations of the Labor Standards Act, Occupational Safety and Health Act, and other relevant laws and regulations</p> <p>2. Cases where the Equator Principles apply: Whether the project site has any impact on local residents, labor relations, occupational health and safety, communication channels and complaints mechanisms, social disputes, etc.</p>	<ul style="list-style-type: none"> <li>● Joint Credit Information Center</li> <li>● Taiwan Economic Journal Corporate Social Responsibility Information Section</li> <li>● Inquiry page for enterprises (employers) of violations of labor laws and regulations</li> <li>● News</li> </ul>

Risk assessment methods	Risk assessment frequency	Assessment factors	Source
the case development on the environment and society, and the factors assessed include human rights-related risks.			
<b>Invested customers as the target</b>			
<p>Handle according to “First Bank Sustainable Investment Guidelines”, “First Securities Inc. Sustainable Investment Operating Directions”, “First Life Insurance Co., Ltd. Responsible Investment and Stewardship Operating Directions”, and “First Securities Investment Trust Co., Ltd. Sustainable Investment Policy”:</p> <ol style="list-style-type: none"> <li>1. It is prohibited to invest in the “do-not-invest list for violation of sustainable development” listed by the Group.</li> <li>2. Before investing, an ESG checklist shall be filled out, and ESG assessment shall be conducted through self-designed items or ESG scoring results of external organizations, and be disclosed in the investment analysis report.</li> <li>3. Track and review ESG risks regularly after investing, and re-run the ESG screening process if there is any doubt.</li> </ol>	<ol style="list-style-type: none"> <li>1. Update the “against sustainable development do-not-invest list” on a monthly basis</li> <li>2. Conduct ESG risk assessment of the target before each investment</li> <li>3. Regular follow-up after investment (review at least once a</li> </ol>	<ol style="list-style-type: none"> <li>1. Violation of laws and regulations related to human rights such as the Labor Standards Act, the Act of Gender Equality in Employment, the Occupational Safety and Health Act, and the Employment Service Act.</li> <li>2. Occupational accidents, lost time caused by accidents, accident fatality number, etc.</li> <li>3. Material human rights or labor disputes such as vicious layoffs without warning and forced labor.</li> <li>4. Other major human rights controversies.</li> </ol>	<ul style="list-style-type: none"> <li>● Taiwan Economic Journal Corporate Social Responsibility Information Section</li> <li>● Public company’s sustainability reports and annual reports</li> <li>● IR platform of Taiwan Depository &amp; Clearing Corporation</li> <li>● Inquiry page for enterprises (employers) of violations of labor laws and regulations</li> <li>● News</li> <li>● Bloomberg</li> <li>● Dow Jones Database</li> <li>● Website of the United States Department of the Treasury</li> </ul>

Risk assessment methods	Risk assessment frequency	Assessment factors	Source
	year)		
<b>General customers as the target</b>			
<b>Personal information protection</b>			
<ol style="list-style-type: none"> <li>1. Regularly review internal regulations related to personal information protection</li> <li>2. Personal information inventory and self-assessment of personal information risks</li> <li>3. Personal information protection testing or assessment performed by an external agency: Every year, Bank and Life Insurance conduct “BS10012: Personal Information Management System” continued review verification operation</li> </ol>	<ol style="list-style-type: none"> <li>1. Review internal regulations related to personal information protection every year</li> <li>2. Conduct personal information inventory and self-assessment of personal information risks every year</li> <li>3. Every year, conduct</li> </ol>	<ol style="list-style-type: none"> <li>1. Changes in laws and regulations, practice and international trends, or items that are important to the competent authority</li> <li>2. Conduct an inventory of personal information for the Company’s internal business, examine the nature of personal information, collecting and retention basis, and storage methods, etc.; and then carry out risk assessment according to the personal information held.</li> <li>3. Business or service processes involving personal information shall comply with the requirements of international standards for personal information protection management</li> </ol>	<ul style="list-style-type: none"> <li>● Regulatory change search</li> <li>● Domestic and foreign penalty cases</li> <li>● Internal and external audit</li> <li>● Operational risk event personal information risk self-assessment</li> <li>● Personal information impact analysis form</li> <li>● Personal information inventory and risk assessment</li> </ul>

Risk assessment methods	Risk assessment frequency	Assessment factors	Source
	“BS10012: Personal Information Management System” continued review operation		
<b>Information Security</b>			
Information security testing or assessment performed by an external agency: 1. ISO 27001 re-certification 2. Financial institutions’ computer information security assessment 3. Information security implementation status self-assessment (in accordance with the Implementation Rules of Internal Audit and Internal Control System of Financial Holding Companies and Banking Industries) 4. Mobile application security detection 5. Emergency response plans and drills	1. Twice a year 2. Annual assessment 3. Once a year 4. At least once a year, and new apps or major changes to existing apps are tested before they are launched 5. Once a year	1. According to the specification requirements of ISO 27001:2013 2. Handle information security assessment operations according to the type of computer system 3. Access, processing, transmission, storage of customer data, security of personnel and device, and network, system, and website security 4. Mobile application security detection and consumer rights protection 5. Information system backup drill and information security emergency situation drill	<ul style="list-style-type: none"> <li>● External certification</li> <li>● Internal self-assessment and professional third-party assessment</li> <li>● Drill plan and drill record</li> </ul>
<b>Anti-money laundering and countering the financing of terrorism (AML/CFT)</b>			
1. Strengthen AML/CFT mechanism	Once a year	1. Appoint an independent third party	● Operation directions

Risk assessment methods	Risk assessment frequency	Assessment factors	Source
<p>assurance project inspection and self-inspection</p> <p>2. Check for operational deficiencies according to the self-checklist</p>		<p>and conduct self-inspection every year to check whether various operating procedures are handled in accordance with the regulations.</p> <p>2. In view of FSC’s annual AML/CFT key check points and major inspection deficiencies, examine whether there are similar deficiencies in various operations.</p>	<ul style="list-style-type: none"> <li>● Internal control report</li> <li>● AML/CFT self-inspection working papers</li> <li>● Self-checklist</li> </ul>
<b>Embezzlement of customer funds</b>			
<p>1. Incorporate into the risk type of “product service damage to stakeholders (misconduct by wealth management personnel)” in the ethical behavior risk assessment report for evaluation.</p> <p>2. Standardize the relevant penalties for major violations of business personnel, implement the principle of honest customer treatment for employees, and formulate relevant codes of conduct for business colleagues.</p>	<p>1. Annual risk assessment</p> <p>2. Monitor behavior of the business personnel on a daily / monthly / quarterly basis</p>	<p>1. Check whether the wealth management personnel and their clients use the same IP or device to conduct online transactions on different days, so as to prevent the wealth management personnel from improperly obtaining the client’s online banking password to conduct transactions on behalf of the client.</p> <p>2. Check whether there are any personnel who use or take advantage of their duties or positions to conduct transactions with conflicts of interest with customers.</p> <p>3. Check customers whose losses from</p>	<ul style="list-style-type: none"> <li>● Internal control report and audit mechanism</li> <li>● Internal management and external reporting mailbox mechanism</li> </ul>

Risk assessment methods	Risk assessment frequency	Assessment factors	Source
		<p>securities transactions exceed a certain percentage and activate relevant control mechanisms.</p> <p>4. For customers whose monthly securities transaction amount exceeds NT\$ 50 million, the transaction reconciliation and confirmation shall be handled by registered hard copy.</p> <p>5. Every quarter, for the securities business colleagues with higher performance and customer complaints, the “Goodwill Care Customer Interview Operation” mechanism will be activated, and random customer care interviews will be conducted.</p>	



**D. Phase III - Mitigation / compensation**

Mitigation measures	Remediation measures
<b>Employees as the target</b>	
<ul style="list-style-type: none"> <li>➤ Training:               <ol style="list-style-type: none"> <li>1. Hold sexual harassment prevention regulations, complaint channels and gender equality education courses every year.</li> <li>2. Include courses on the illegal infringement in the training programs for new employees and current employees and conduct “hazard identification and risk assessment form for prevention of illegal infringement in the workplace” every year.</li> </ol> </li> <li>➤ Communication:               <ol style="list-style-type: none"> <li>1. Convene employer-employee meetings and meetings of the Occupational Safety and Health Committee to promote benefits, improve the work environment, and facilitate cooperation and communication between labor and management.</li> <li>2. Post promotional posters for “ban on sexual harassment” in all units, promulgate the “Regulations on Sexual Harassment Prevention, Complaints and Investigation” on the official website and internal website, and set up sexual harassment complaint hotlines and emails.</li> <li>3. Recruitment phase: Applicants are required to specify the correct date of birth in the CV and affix their signatures to guarantee the accuracy of the information; Reporting for duties phase: Employees are required to provide their identity documents on the day they report for duties to ensure that the Company does not hire child labor.</li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>➤ System:               <ol style="list-style-type: none"> <li>1. Implement the “Prevention of Illegal Infringement at Work Plan”, “Abnormal Workload-Triggered Diseases Prevention Plan”, “Maternal Employee Health Protection Plan”, and “Human-Factor Hazard Prevention Plan”.</li> <li>2. The senior management signed and issued the “Written Statement for Preventing Illegal Infringement in the Workplace”, by arranging safe workplaces, properly assigning manpower, providing stress relief information and free psychological counseling and other measures, reducing the probability of internal and external illegal infringement in the workplace. Furthermore, the representatives of both labor and management established the “Illegal Infringement Complaint Investigation Team” to investigate cases of illegal infringement, implementing the concept of preventing illegal infringement in the workplace. If the Company receives a report of illegal infringement, the Company shall assist employees in addressing the issue immediately and actively provide psychological counseling and legal assistance in accordance with the Company's internal rules and regulations based on the physical and mental state of the employees.</li> <li>3. All insured employer units appoint the full number of employees with disabilities based on legal requirements.</li> <li>4. Implement inspections on overtime work every six months and dispatch staff to spot check in due course depending on the overtime situation of each unit to help units manage overtime work.</li> </ol> </li> </ul>

Mitigation measures	Remediation measures
<p>4. Through the overtime report form, supervisors are reminded to care for employees in a timely manner, and to assist colleagues who work longer hours by properly allocating work and manpower.</p>	<ul style="list-style-type: none"> <li>➤ Compensation:               <ol style="list-style-type: none"> <li>1. For cases of illegal infringement, discrimination and harassment, assist colleagues to promptly deal with problems and provide psychological counseling according to the Company’s internal regulations. If civil compensation cases are involved, lawyers will also be hired to assist in legal actions such as compensation for damage.</li> <li>2. Provide relevant consultation and medical services to those identified as at-risk in the “Prevention of Illegal Infringement at Work Plan”, “Abnormal Workload-Triggered Diseases Prevention Plan”, “Maternal Employee Health Protection Plan”, and “Human-Factor Hazard Prevention Plan”.</li> </ol> </li> <li>➤ Punishment:               <ol style="list-style-type: none"> <li>1. In the event of illegal infringement and harassment, mediation and negotiation shall be conducted in accordance with internal procedures, and appropriate punishment shall be given to the offender according to relevant internal regulations, and the offender shall be transferred from his / her original position to avoid contact with the victim again.</li> <li>2. Administrative deductions will be given to units with deficiency in the overtime spot checks, which will affect the units’ appraisal and bonus; for those punished in labor inspection, relevant personnel will be transferred for punishment.</li> </ol> </li> </ul>
Suppliers as the target	
<ul style="list-style-type: none"> <li>➤ Management:               <ol style="list-style-type: none"> <li>1. According to the three steps of supply chain management - pre-screening, in-process commitment, and post-management, a procurement management mechanism is</li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>➤ System:               <p>If a purchasing demand is put forward where the “budget amount is more than 1 million (inclusive)”, it shall be reviewed and the “Vendor Information Checklist” shall be filled out before purchasing to ensure the</p> </li> </ul>

Mitigation measures	Remediation measures
<p>implemented. When drawing up contracts, suppliers are asked to sign the “Declaration on Human Rights and Environmental Sustainability Clauses” and abide by the “Directions for Supplier Management of FFHC and its Subsidiaries”.</p> <p>2. Advocate to suppliers and request them to pledge to comply with fundamental labor and human rights protections stipulated in the Universal Declaration of Human Rights, promise to implement human resources policies which are fair and equitable, protect the environment, and seek to achieve environmental sustainability.</p> <p>➤ Communication: Supplier conference is held to convey the importance of labor rights to suppliers, and to provide explanation for the “Safety and Health Management Precautions for Contractors” and “Supplier Management Guidelines”; working hand-in-hand with suppliers to implement them to reduce the risk of violating labor rights in advance.</p>	<p>implementation of the labor safety and environmental protection by the supplier. After the acceptance of the purchase case, fill in the “Vendor Service Record Form” to facilitate the assessment of the vendor’s service quality.</p> <p>➤ Compensation: In the event of a major human rights incident at the supplier, the Company may terminate or cancel the contract or cooperation and request punitive liquidated damages.</p> <p>➤ Punishment: If a major human rights incident occurs to a supplier, the Company will put it on the supplier blacklist and set the rejection period according to the severity of the situation.</p>
Investment and financing customers as the target	
<p>➤ Training: For credit investigation and extension personnel and investment personnel, regular education and training shall be provided to urge relevant personnel to carefully review and evaluate the human rights issues and risks of the investment and financing customers when handling business.</p> <p>➤ Management and communication:</p>	<p>➤ System and compensation:</p> <p>1. If borrowers are assessed as needing to be improved by the “ESG Risk Factor Checklist”, the reasons shall be explained when applying for credit extension, and an improvement plan shall be proposed. When renewing the subsequent credit line, make sure to pay attention to the improvement situation to be considered as a credit extension condition.</p>

Mitigation measures	Remediation measures
<ol style="list-style-type: none"> <li>1. Borrowers are required to sign a letter of commitment for sustainable development, agreeing to abide by the relevant provisions of Universal Declaration of Human Rights on gender equality, the right to work and the prohibition of discrimination.</li> <li>2. If the borrowers and the invested companies have major violations of human rights issues that cannot be rectified, or are assessed as having high ESG risks, in principle, they may be cautiously assessed to not be accepted.</li> <li>3. Controversial industries such as: tobacco and alcohol, gaming, sex and other industries are prohibited from investing.</li> <li>4. If it is an Equator Principles credit extension case and is assessed as a higher risk case, a task force shall conduct the environmental and social risk review and make recommendations on a case-by-case basis. It may also be included in the written instruction conditions and post-loan monitoring items.</li> <li>5. Engagement with investee companies every year, such as through Email, telephone interviews, questionnaires, road shows, shareholders meetings or actual visits</li> <li>6. Those in the “do-not-invest list for violation of sustainable development” will be eliminated from the investment white list and cannot be traded under system control.</li> </ol>	<ol style="list-style-type: none"> <li>2. If during the credit extension period, the borrower has major legal lawsuits or infringements, or a large number of employees leave, protest, strike, or has closed business, suspended work, or owed wages to employees, etc., the crisis handling report for credit extension case shall be handled, or early warning account notification shall be performed, so as to propose countermeasures (such as: termination of credit line) to ensure creditor’s rights while taking into account human rights and public welfare.</li> <li>3. If post-loan monitoring items are listed for the Equator Principles credit extension case, the “environmental and social risk monitoring report” issued by an independent third-party institution shall be regularly requisitioned from the borrower every year for post-loan monitoring. If there are any non-compliant post-loan monitoring items, the improvement shall be completed within a certain period of time.</li> </ol> <p>➤ Punishment:</p> <ol style="list-style-type: none"> <li>1. After investing, if the investment is tracked and turned into a high-risk ESG target, for those that have not improved after continuous follow-up for one year, we will no longer invest or will gradually withdraw investment.</li> <li>2. After investing, if the investment is tracked and falls into the “do-not-invest list for violation of sustainable development”, or the total score of its Bloomberg ESG rating does not meet the standard, it will be eliminated from the shareholdings.</li> </ol>
<b>General customers as the target</b>	

Mitigation measures	Remediation measures
<b>Personal information protection</b>	
<ul style="list-style-type: none"> <li>➤ Training: Regularly hold personal information protection education and training to enhance employees' awareness and knowledge of personal information protection.</li> <li>➤ Management and communication: Establish a dedicated personal information incident handling procedure and organization, so that when a personal information incident occurs, the personal information incident can be handled as soon as possible, corresponding measures can be taken to reduce losses, and customers and competent authorities can be notified according to regulations.</li> </ul>	<ul style="list-style-type: none"> <li>➤ System: According to the types of personal information leakage cases, adjust the content and mode of education and training, and strengthen the function of employees' personal information protection.</li> <li>➤ Compensation: In the event of a personal information incident resulting in the leakage of customer information, the customer will be notified and a contact person will be provided to discuss follow-up matters.</li> <li>➤ Punishment: Violations of the Company's personal information protection regulations will be punished in accordance with the Company's personnel regulations.</li> </ul>
<b>Information Security</b>	
<ul style="list-style-type: none"> <li>➤ Training: For all employees, regularly conduct information security education and training courses, and remind employees to pay attention to information security protection matters through the education, training and testing of email social engineering drills.</li> <li>➤ Management: The Group's banking, securities and life insurance subsidiaries have all obtained ISO 27001 certification, and continue to review the information security management system every year to confirm that the certificates are still valid.</li> </ul>	<ul style="list-style-type: none"> <li>➤ System: In order to reflect government laws and regulations, information security incidents, information technology and company business development, and to ensure the effectiveness of internal controls for various information operations, the information security policy is reviewed at least once a year.</li> <li>➤ Compensation: The Group's banking subsidiaries have taken out the "information system illegal conduct insurance". In the event of an information security incident, in addition to reporting major incidents to the relevant competent authorities, compensation measures will be assessed on a case-by-case basis.</li> <li>➤ Punishment: If an information security incident occurs and causes the Company and</li> </ul>

Mitigation measures	Remediation measures
	subsidiaries to be imposed a severe penalty by the competent authority, the incident will be included as a deduction in points for related personnel in the annual ESG performance evaluation in accordance with the Employee Bonus Rules, resulting in a reduced performance bonus that year.

## E. Complaint channel and mechanism

Employees as the target
<ul style="list-style-type: none"> <li>➤ Strengthen the communication mechanism for employee complaints, establish a transparent reporting mechanism, and set up transparent, equal and convenient complaint channels such as “General Manager's Mailbox” and “complaint mailbox” on the internal website, and handle and respond properly.</li> <li>➤ Hold regular “employer-employee meetings” or monthly meetings.</li> <li>➤ Conduct employee commitment surveys to provide channels for employees to express their opinions.</li> <li>➤ All companies have established the “Sexual Harassment Prevention Complaints and Disciplinary Regulations” along with the telephone, fax and e-mail for filing sexual harassment complaints.</li> <li>➤ All companies have established reporting channels such as reporting hotline, fax, and email, and the internal audit unit / self-inspection supervisor accepts complaints and assigns cases to units that have independent power for investigation based on the nature of the cases to effectively process complaints.</li> </ul>
Suppliers as the target
<ul style="list-style-type: none"> <li>➤ FFHC website has whistleblowing section under “Stakeholder Communications” for filing complaints</li> <li>➤ Tel: 02-23481458</li> <li>➤ Complaint mailbox: <a href="mailto:compliance@fhc.com.tw">compliance@fhc.com.tw</a></li> </ul>
Customers as the target
First Financial Holding
<ul style="list-style-type: none"> <li>➤ Set up customer service hotline: 02-2348-5322</li> <li>➤ Complaint mailbox: <a href="mailto:fhc-service@fhc.com.tw">fhc-service@fhc.com.tw</a></li> </ul>
First Bank
<ul style="list-style-type: none"> <li>➤ Set up customer service hotline: 0800-031-111 / 02-2348-1111</li> <li>➤ Branch business locations</li> <li>➤ Online customer service e-mail: <a href="http://www.firstbank.com.tw/e">www.firstbank.com.tw/e</a> service counter</li> </ul>
First Securities
<ul style="list-style-type: none"> <li>➤ Set up customer service hotline: 0800-538-080 / 02-2563-6262</li> <li>➤ Branch business locations</li> </ul>

➤ Customer service e-mail: [service@firstsec.com.tw](mailto:service@firstsec.com.tw)

**First Securities Investment Trust**

➤ Set up customer service hotline: 0800-005-908 / 02-2504-1000

➤ Branch business locations

➤ Customer service e-mail: [service@fsitc.com.tw](mailto:service@fsitc.com.tw)

**First Life Insurance**

➤ Set up customer service hotline: 0800-001-110 / 02-8758-1000

➤ Branch business locations

➤ Online customer service e-mail: <https://chat.firstlife.com.tw/uimclient>