

# First Financial Holding Co., Ltd. Implementation Rules of the Whistleblower System

## **Article 1 (Objective and basis)**

In order to establish a whistleblowing system to promote sound management, First Financial Holding Co., Ltd. (“the Company”) has established the Implementation Rules of the Whistleblower System (hereinafter referred to as the Rules) in accordance with Article 34-2 of the "Implementation Rules of Internal Audit and Internal Control System of Financial Holding Companies and Banking Industries" and Article 18 of the "First Financial Holding Co., Ltd. Code of Conduct for Ethical Management".

## **Article 2 (Scope of application)**

The Rules are applicable to the Company and its subsidiaries, but each subsidiary may specify their own whistleblower system pursuant to the laws and regulations of its competent authority.

## **Article 3 (Types of whistleblower reports)**

Any person who discovers that the Company’s employees are under any of the following circumstances may submit a report to the Company:

1. Fraud, embezzlement or misappropriation of public funds.
2. Illegal possession and unauthorized disposal of Company property.
3. Forgery that causes damage to the Company.
4. Disclosure of the Company’s internal secrets or the information of customers or employees.
5. Accepting bribes or engaging in collusion for personal gain directly or indirectly for the benefit of oneself or others in their managed or supervised affairs.
6. Other suspected crimes, corruption, illegal acts, or violations of laws and regulations.

## **Article 4 (Receiving unit)**

The Company’s receiving unit for whistleblower reports is the Compliance Division. If the report specified in the preceding article (including the competent authority accepting citizen complaints and petitions) is received by other units of the Company, it shall be transferred to the processing unit for handling.

## **Article 5 (Whistleblower Report Review Committee)**

The Company shall set up a “Whistleblower Report Review Committee” (hereinafter

referred to as “the Committee”), and the Compliance Division shall serve as the administrative unit of the Committee.

1. The members of the Committee are as follows:

The president serves as the convener, and the head of legal compliance at headquarters or the chief auditor serves as the deputy convener. If the convener is unable to exercise his/her power for any reason, the deputy convener shall act on his/her behalf.

Committee members: the heads of the Board of Directors' Audit Division, Compliance Division, and the Business Development Division. The convener may, subject to the circumstances of the whistleblowing reports, designate other appropriate persons to serve as committee members or invite other personnel to attend as non-voting delegates.

2. If the reported person is the director or the president of the Company, the chairman shall serve as the convener, and suitable personnel may be invited to serve as committee members.
3. If the reported person is the chairman of the Company, the independent directors shall recommend one person from among them to be the convener, and suitable persons may be invited to serve as committee members.
4. Resolution methods of the Committee: The Committee is chaired by the convener, and motions for the filing and investigative assignments shall be resolved with the consent of more than half of all the committee members.
  - (1) An independent responsible unit of the Company or its subsidiaries or personnel without any job conflict shall be assigned to assemble an investigation panel to conduct the investigation. (hereinafter referred to as “the Investigation Panel”)
  - (2) If the reported case involves a subsidiary of the Group, the case may be transferred to the subsidiary to process in accordance with its whistleblower system and the results shall be reported to the Company.
  - (3) If the reported person is a manager with duties equivalent to the vice president or higher, the investigation shall be conducted by an Investigation Panel appointed by the Company or the independent responsible unit of the parent company of the unit under investigation. The independent responsible unit of the unit under investigation may be invited to assist with the investigation.
  - (4) If necessary, an external independent agency may be commissioned to investigate.

## **Article 6 (Reporting methods and principles of acceptance)**

The Company shall set up and announce reporting channels to process reports. The reporting methods are as follows:

1. The whistleblower may file reports to the receiving unit through the published telephone numbers, fax number, email address, and mailing address.
2. Reports filed in writing through email, fax, or mail must contain the whistleblower's real name, contact method, and specific matters of the incident. The whistleblower must also provide related evidence.
3. Reports may be filed verbally through means such as telephone and personal visits. The receiving unit shall formulate records and specify the reported items, real name, and contact method.

In order to prevent the abuse of resources, the Committee may decide not to accept the whistleblowing reports if it falls under any of the following circumstances:

1. The whistleblower has not provided his/her real name and contact information. However, in cases where the content of the whistleblowing report is specific and there are verifiable materials, it still can be processed with care and discretion.
2. The reported matters do not fall within the recognized types of whistleblowing reports prescribed in Article 3, or it is irrelevant to business execution.
3. The whistleblowing report is obviously made with malicious intent, is obviously false, or has no substantial content.
4. The whistleblower was requested to provide or supplement the evidence materials within a certain period of time. However, the whistleblower failed to do so, which hindered the investigation.
5. The reported matter is regarded as the same as a case that has already been investigated to completion, and the whistleblower has failed to present new facts or new evidence.
6. The reported matter has been investigated by relevant judicial agencies, or is already under investigation by a court of law, or has been subject to non-prosecution or deferred prosecution, or has already received a verdict therein.

#### **Article 7 (Report processing procedures)**

The procedures for processing whistleblowing reports are as follows:

1. Upon receiving whistleblowing reports, the receiving unit shall report the method for processing the case to the Committee in accordance with regulations.
2. The case shall be established and filed as confidential after the Committee decides to accept the whistleblowing report. Based on the type and content of the case, the investigation shall be assigned and conducted pursuant to Article 5, Paragraph 1, Subparagraph 4. The Investigation Panel is required to produce an investigation report within thirty days from the day after receipt. The investigation report shall

be sent to the receiving unit within thirty days after the report is completed; this deadline may be extended if necessary.

3. The methods for investigating a reported case include, based on the necessity of the case, telephone, written review, or interviews. When an investigation is conducted, related units shall cooperate with the investigation and provide necessary documents and data. The information involving related parties in the reported contents and the data or information they provide must be kept strictly confidential and may not be leaked.
4. During the process of processing, investigating, deliberating, reviewing and reporting the whistleblowing reports, any person who has interests in individual whistleblower reports or other persons that may affect a fair investigation shall recuse themselves. For whistleblowing reports submitted to the Committee, the investigators shall list personnel who must recuse themselves in the checklist (as the attached table). Where personnel do not recuse themselves from investigation when required to do so, subject to the circumstances, points will be deducted for each case in accordance with the relevant regulations of the Company's audit work evaluations.
5. The Investigation Panel may give the reported person an opportunity to make a statement verbally or in writing, which shall, in principle, be processed in a non-public manner.
6. The receiving unit shall update the whistleblower on the status of the investigation in writing or by other means within ten days after the investigation report is completed and approved. Where the whistleblowing report is transferred to a subsidiary for processing, the said subsidiary shall notify the whistleblower and submit a copy to the Company.
7. The receiving unit shall send the investigation result to the head of the responsible unit of the reported person, and the unit head shall inform the reported person and take corrective action. If the reported person is the chairman, its supervisors/independent directors shall be notified.
8. To encourage reports on illegal and unethical conduct, if a report is verified as true in an investigation, the Company shall grant a reward based on the severity of the reported violation. Where a whistleblower files a false report or a malicious accusation, the whistleblower shall be processed in accordance with related HR management rules.
9. Documentation of case acceptance, investigation processes, and investigation results shall be retained in complete written format or digital files for at least five years. In the event of litigation related to the whistleblowing case before the retention period expires, the documentation shall continue to be retained until the

conclusion of the litigation.

**Article 8 (Whistleblower protection measures)**

Relevant personnel of the Company who processing the whistleblowing reports shall keep the identity of the named whistleblower and the contents of whistleblowing report confidential.

Named whistleblowers may not be subject to inappropriate treatment for their reports such as dismissal, relief of duty, demotion, salary cut, any loss of benefit that they are entitled to under laws, contracts or customary practices, or adverse treatments of any kind.

**Article 9 (Follow-up procedures)**

The following procedures shall be conducted after the investigation report is completed:

1. The receiving unit shall submit the investigation report to the president for verification.
2. For cases where the reported person is a director or supervisor or a manager with duties equivalent to a vice president or higher, the receiving unit shall present the investigation report to the independent directors (Audit Committee) or supervisors for review, and then submit it to the chairman for verification.

Where a whistleblowing report is verified to be true or with an audit opinion, the inspected unit and the Company shall report it at the next month's board of directors meeting or the next board of directors meeting, submit it to the Company's dedicated unit (Ethical Management Committee) for future reference, and comply with the following procedures:

1. Related units shall be assigned to review the internal control system and operating procedures, propose improvement measures. A copy shall be submitted to the audit unit.
2. The audit unit shall include the whistleblowing report in the most recent business audit items.

Major incidents or illegal cases shall be referred to or reported to the Company and relevant authorities in accordance with the "FFHC Incident Reporting Guidelines" and "First Financial Group Compliance Notification Guidelines".

**Article 10 (Education and training)**

The Company shall regularly provide information on the implementation rules of the whistleblower system to the employees and provide training so that they understand the whistleblowing channels and the principle of protection.

**Article 11 (Appendix)**

Any outstanding matters not covered in these Rules shall be subject to applicable laws and

regulations of the authority and the Company's relevant rules and standards.  
These Rules shall take effect after the review and approval of the board of directors. The same applies to all subsequent amendments.

**Article 12 (Dates of enforcement and amendment)**

These Rules were established on August 23, 2018.

The first amendment was made on March 25, 2021.

The second amendment was made on August 26, 2021.

The third amendment was made on November 25, 2021.