

United Taiwan Bank

Whistleblowing Policy

Approval Log

Reviewed/ revised by the Management Committee	Approved/ Acknowledged by the Board	Remarks
20.03.2026	12.05.2026	No changes.
20.03.2025	14.05.2025	No changes.
05.12.2024	12.12.2024	Based on the NBB AML/CFT website update on 17.10.2024, as outlined in Circular NBB_2024_15, amend Article 10 to include: <ol style="list-style-type: none"> 1. New protections for whistleblowers under the Anti-Money Laundering Law and other favorable provisions. 2. Clarification that, in certain cases, the National Bank may be legally required to share whistleblower information with third parties while ensuring compliance with data protection laws. 3. An expanded external reporting mechanism covering not only financial institution employees but also agents, subcontractors, intermediaries, distributors, and other third parties.
05.04.2024	15.05.2024	No changes.
12.04.2023	25.04.2023	<ol style="list-style-type: none"> 1. The external reporting of breaches is now added to comply with Article 36/7/1 of the organic law of the NBB, the Law of 28 November 2022 on the protection of persons who report breaches and title 4.3.5 of the NBB Governance Manual (version 11.10.2022) 2. As the Deputy Managing Director or above of the bank are directors, the description is therefore simplified. 3. Add the review frequency.
23.02.2022	12.05.2022	No changes.
10.03.2021	10.05.2021	No changes.
12.03.2020	25.03.2020	No changes.
01.04.2019	07.05.2019	No changes.
07.09.2018	26.09.2018	The policy is established.

Article 1.

In order to avoid irregularities, to promote a robust operation and to protect the whistleblower, the Bank has set up the policy in accordance with Article 34-2 of the “Implementation Rules of Internal Audit and Internal Control System of Financial Holding Companies and Banking Industries” of the Financial Supervisory Commission of the ROC, Article 21, § 1, 8° of the Belgian Banking Law, Article 36/7/1 of the Law of 22 February 1998 establishing the organic statute of the National Bank of Belgium, the Law of 28 November 2022 on the protection of persons who report breaches and title 4.3.5 of the NBB Governance Manual (version 11.10.2022). This policy also reflects the NBB AML/CFT website update on 17.10.2024 regarding external whistleblowing outlined in Circular NBB_2024_15.

Article 2.

With whistleblower is meant the bank insiders and outsiders who provide evidence of undetected relevant wrongdoing or irregularity and who are assisting the bank to investigate in accordance with the measures and the procedures of the policy.

Article 3.

Anyone may file a report to the compliance officer when discovering that a bank staff is involved with any of the following wrongdoings or irregularities during the business operations via the designated email or direct line:

1. In order to acquire or maintain advantage, directly or indirectly provides, accepts, promises or requests any illegitimate interest, or engages in other conducts that violate integrity or breach the fiduciary duty.
2. Any crime, corruption, or potential legal violation.

The Bank shall set up and announce the email and direct line for the whistleblower on the bank’s website.

The reported case from email or direct line will be reviewed by the Compliance Officer. The case will be either investigated by himself or the designated independent personnel member based on its type, specificity and pattern.

Article 4.

The reported case referred in paragraph 3, Article 3 shall be handled in accordance with the following procedure:

1. The Compliance Officer will be in charge of the investigation when a Director of the bank is involved in the reported case;
2. The designated personnel member referred in paragraph 3, Article 3 will be in charge of the investigation when a manager or the staff member is involved in the reported case.

The reported case referred in 2nd subparagraph, if necessary, will be investigated by the Compliance Officer directly.

The whistleblower shall at least provide the following information:

1. Name, ID number and the reachable contact details such as address, telephone number and email of the whistleblower.

2. Name of the accused person or other information which can be used to identify the accused person's identity.
3. Supporting facts available for investigation.

Except for the information referred to in the 2nd and 3rd subparagraph of the previous paragraph and provided by the whistleblower, the bank will not accept any case reported in an anonymous, impersonative and false way.

Article 5.

The bank shall do the necessary investigation about the reported case referred to in Article 4. The related department and staff of the bank shall cooperate with the investigation and provide assistance.

Any person with conflict of interests shall recuse himself from the acceptance and investigation of the reported case.

The bank will not investigate or cease the investigation if the reported case meets any of the following criteria :

1. No supporting facts;
2. The reported case is a malicious attack or false.
3. The reported case is the same case as the one where the investigation process is ended and the whistleblower can not provide any new facts or new evidence.
4. The reported case has been under judicial investigation, brought to trial by the judiciary, or not prosecuted, deferred prosecution or a final judgement.
5. Unrelated to the operations of the bank.
6. Related to the private moral of the bank staff, the gender equality in employment, the working conditions, other stipulations from related law and regulation or the bank policy or the reported case does not meet the criteria referred in Article 3.

In case there are different reported cases for the same accused person and the facts are identical, the bank may investigate the cases simultaneously.

If the accused person is a Director, the Compliance Officer must prepare the investigation report and submit it to the Audit and Risk Committee for deliberation and report it to the Board of Directors and the parent bank.

When material misconduct or likelihood of material impairment to the bank comes to the awareness upon investigation, the bank shall immediately prepare the report and notify the Audit and Risk Committee, the Board of Directors and the parent bank in a written form. The bank shall report or file the major incident, or material violation discovered with the relevant authorities. Except in case the whistleblower cannot be reached, the bank must notify the whistleblower of the results in writing or otherwise within 30 days after the investigation is concluded. The notification also has to be done for the cases not to be investigated or ceased from investigation referred to in the 3rd paragraph of this article.

The investigation report, including the reported case, the investigation processes and the follow-up of the improvement measures taken, must be submitted to the Audit and Risk Committee and the Board of Directors.

Article 6.

The bank shall keep the documentation of the case acceptance, investigation process, investigation results and relevant documents in either hard copy or electronic form for 10 years.

In the event of a lawsuit with respect to the reported case before the retention period expired, the relevant information shall continue to be retained until the conclusion of the litigation.

Article 7.

1. The identity of the whistleblower shall be kept confidential. No information that may be used to identify that person shall be disclosed.
2. The whistleblower shall not be terminated, dismissed, downgraded/ relocated, given a reduction in pay, impairment to any entitlement under the law, contract or customs, or other unfavorable disposition due to the reported case.

Article 8.

The bank shall remind the staff on an annual basis of the existence of the whistle blowing policy and give training about the whistle blowing procedure system for its personnel.

Article 9.

If the reported case is identified to be true, the bank shall give the accused person and the persons involved the necessary disciplinary actions in accordance with the related regulations, and give reward to the whistleblower based on the reported case. Insiders who have made a false report or malicious accusation shall be subject to punishment.

Article 10

In accordance with Article 36/7/1 of the Law of 22 February 1998 establishing the organic statute of the National Bank of Belgium, the Law of 28 November 2022 on the protection of persons who report breaches, including Articles 90, paragraphs 4 and 5 of the Anti-Money Laundering Law and, insofar as they are more favourable, the provisions of Chapters 6 and 7 of the Act of 28 November 2022 on the protection of persons who report breaches (see the Circular NBB_2024_15), and title 4.3.5 of the NBB Governance Manual (version 11.10.2022) , every member of the personnel of the bank can also report directly to the National Bank of Belgium any potential or actual breach or violation of the provisions of the Belgian laws and European regulations, including all their statutory implementing provisions, concerning the status and supervision of financial institutions and the prevention of the use of the financial system for the purpose of money laundering or terrorist financing, over which the National Bank of Belgium is responsible for exercising supervision, without being subject to any civil, penal or disciplinary proceedings, any professional sanctions and any unfavourable or discriminatory treatment, and any termination of the employment contract of the person raising the alert. Should the reporting person be subject to unfavourable or discriminatory treatment, they may submit a new external report to inform the NBB. The National Bank of Belgium may impose an administrative sanction on any financial

institution breaching that prohibition, as long as it is acting in good faith.

Below is the link of the National Bank of Belgium describing the reporting procedure and form to be used.

<https://www.nbb.be/nl/financieel-toezicht/algemeen/een-inbreuk-melden>

Furthermore, the National Bank of Belgium will use the information supplied in the breach report exclusively for the purpose of performing its legal tasks. That information is subject to the rules on professional secrecy laid down in the Law of 22 February 1998 establishing the organic statute of the National Bank of Belgium. The protection of the person reporting the breach and of the person accused in the report is therefore guaranteed. However, the NBB cannot rule out the possibility that it may in certain circumstances and by virtue of a statutory obligation, have to disclose these data to other persons, in which case it will notify the person concerned beforehand. The data relating to persons claimed to be in breach are identically processed in accordance with applicable legislation on personal data protection.

In carrying out its supervisory tasks, the National Bank of Belgium analyses the information which it receives and takes the action that it deems appropriate, including in relation to its duties to supervise AML/CFT prevention mechanisms.

Since the National Bank of Belgium and the persons involved in the performance of its supervisory tasks are bound by professional secrecy, the person reporting a breach cannot be informed of the action taken on the information received. The external reporting mechanism is accessible not only to members of a financial institution's staff, its agents or subcontractors, but also to intermediaries, agents, distributors, and any other third party.

Article 11

This policy and any amendments hereto, shall come into in force after adoption by a resolution of the Board of Directors and shall be reviewed every year.