中國信託
CTBC

Code of Conduct

English Version

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Contents

Preface

The terms “the Company” and “CTBC” in this Code refer to CTBC Financial Holding Co., Ltd., its subsidiaries, and branches. “Employees” in this Code refers to all individuals who work at CTBC under any form of employment, appointment, contract, or other contractual relationship, including but not limited to managerial officers, general full-time staff, and temporary personnel.

The Code of Conduct serves as the fundamental standard of employee conduct. It outlines the legal regulations that employees must comply with and the obligations they must fulfill in their work. It also serves as a basic standard of conduct for all employees when engaging in business-related activities, representing a shared commitment that all personnel are expected to uphold.

The Code of Conduct applies to everyone who works at the Company. Upon joining the Company, every employee is required to comply with this Code as well as the law and the policies and regulations of their respective business unit. When facing situations not covered by existing rules, employees should follow ethical principles as their final standard of conduct. If a situation involves a moral judgment, they should first consult colleagues or supervisors for further guidance.

1. Our Culture

Since CTBC was established, we have striven to realize our "Born in Taiwan, serving the globe" mission. We have done this by fostering corporate governance and pursuing corporate social responsibility in order to create the greatest benefits for our customers, employees, shareholders, and society, in turn cementing our status as “Taiwan Champion, Asia Leader” and becoming the most trusted financial institution.

Our corporate spirit is embodied by “Humility builds harmony, honesty inspires trust” and “We are family,” and the guiding principles of CTBC employees are “Ambition, Proactivity, Resilience, and Devotion.” We are courageous in pursuing our ideals and are determined to dream big. We take the initiative and strive wholeheartedly. We face challenges fearlessly until we succeed. And we work as a team and nurture talent in order to reach new heights of excellence for sustainable development.

Item	Content	Meaning
Corporate spirit	Humility builds harmony, honesty inspires trust	Do business with integrity to earn customers’ trust
	The ‘We are family’ spirit	Treat everyone like family
Guiding principles	Ambition	Pursue excellence and promote innovation
	Proactivity	Fulfill our responsibilities and take initiative
	Resilience	Always persevere and never be afraid to fail
	Devotion	Embrace teamwork and nurture each other

2. How We Do Business

2-1. Business Ethics and Legal Compliance

As a member of the Company, employees shall faithfully execute business and fulfill the duty of care as a bona fide manager, and exercise the function and power with high self-discipline and prudent attitude, and shall comply with the principles of corporate governance, integrity management and fair treatment of shareholders; Shall keep information related to the customers of the Company and each subsidiary confidential, and shall not engage in any competition relations or improper acts damaging the operating income, business secret, as well as shareholders' equity of the Company and each subsidiary.

1. Employees shall be loyal to the Company and willingly accept job assignments.
2. Employee shall undertake the responsibility to safeguard any tangible and intangible assets of the Company. He or she must understand that any misuse of assets will put the Company at risk and may damage its reputation or financial situation.
3. All tangible resources (Include but not limited to office space, facilities, vehicles, computer hardware and software equipment, articles and devices) and intangible resources (Include but not limited to company brand, image, human resources, working hours, network resources, budget and funding) of the Company shall only be used for the Company purpose or approved business affairs, and cannot be used in private or used to benefit others. There shall be a clear separation between business and private affairs.
4. Employees must fully understand and be familiar with all business-related and applicable laws, orders and regulations. Should there be any question, employees should consult with experienced colleagues, HR, or the Legal/Compliance Department as soon as possible.
5. Any amendment, deletion, or revision of this Code will be announced directly after approval, and all employees agree to comply with the latest announced version.
6. In addition to this Code, employees should firmly comply with all operational procedures or internal rules. Furthermore, all directors, independent director, supervisors and managerial officers shall adhere to the "Code of Ethical Conduct".

2-2. Ethical Corporate Management Principles

As members of CTBC, employees shall abide by the provisions prescribed in the "Ethical Corporate Management Best Practice Principles" and the "Procedures for Ethical Management and Guidelines for Conduct".

When engaging in business activities, CTBC employees shall follow the principles of fairness, honesty, faithfulness, and transparency; and shall not provide, accept, promise, or request, either directly or indirectly, any improper benefit (improper advantage) or commit any unethical conduct against ethics, the law, or their duty to obtain or maintain benefits.

Parties referred to in the preceding paragraph include public officials, political candidates, political parties or their staffs, and government-owned or private-owned businesses or institutions and their directors, supervisors, managerial officers, employees, persons having substantial control, or other interested parties.

2-3. Managerial Responsibilities

Managers play a critical role in promoting organizational culture and leading teams. As leaders, managers are expected to lead by example, demonstrating the organization's values and behaviors, and setting a positive example for their teams. They are also expected to fulfill their supervisory and managerial duties, guide their teams to achieve organizational goals, and take responsibility for both individual and team performance.

In executing their work responsibilities, managers should establish clear objectives, allocate tasks and resources appropriately, and continually monitor progress to ensure that goals and quality standards are met. When teams encounter difficulties or make mistakes, managers should take responsibility, proactively seek breakthroughs and solutions, and work toward improvement rather than shifting blame.

In managing personnel, managers should ensure that employees comply with relevant policies and procedures. They are expected to provide guidance and support to employees, conduct fair and objective performance evaluations, and administer rewards or disciplinary actions based on performance. Managers must also prevent unlawful workplace conduct, including workplace violations and abuse of authority. By exercising appropriate delegation and fostering mutual trust, managers can lead their teams toward positive development, enabling every employee to realize their potential, grow together with the Company, and create a shared future.

3. Obligation to Report and Rights for Grievance

3-1. Report Channel and Procedure

1. CTBC attaches great importance to fostering an honest, transparent corporate culture and promoting sound business operations. Anyone who discovers any instance of crime, fraud, violation of a law or regulation, or violation of the Ethical Corporate Management Best Practice Principles or Code of Ethical Conduct by any member of the Company has the responsibility to report it to a supervisor or through the reporting channels below.

   (1) CTBC Holding

   - Tel: +886-2-55732220
   - Email:

     CTBC Holding Whistleblowing Mailbox：

     whistleblowing.fh@ctbcholding.com

     CTBC Holding Chairman Mailbox：

     ctbcfhcchairman@ctbcholding.com
   - Mail Address: 26F, No.168, Jingmao 2nd Rd., Nangang Dist., Taipei City 11568, Taiwan; Attention: Petitions Reporting Mail Box, Compliance Department, CTBC Financial Holding Co., Ltd.

   (2) In cases involving personnel from other subsidiaries, reports shall be submitted through the whistleblowing channel of the entity to which the reported individual belongs. If such a channel is not available, the whistleblowing channel of its immediate parent entity may be used.

2. To facilitate a speedy investigation, the informant who reports a complaint shall provide concrete evidence. The Company may not accept the complaint if no concrete substance or evidence is provided; the complaint is found to be a malicious attack, fraudulent or without merit; or the complaint has already been investigated or considered.

3. Person who accept, investigate or otherwise engage in the handling of the complaint shall keep confidential the informant's identity and the content of the complaint; In case of any violation, the Company may terminate their

engagement in the investigation and impose punishment to such persons and look into relevant liabilities thereof depending on the seriousness of the case.

4. The Company shall not adversely treat any employee who reports a complaint under the Rules or assists others with a complaint. Notwithstanding the foregoing, the Company may give the informant any treatment that is non-vindictive due to reorganization, consolidation or closure in response to business or operational needs, and may meter out punishment pursuant to relevant regulations to the informant if it verifies and proves any illegality or impropriety of the informant.

5. If the informant is threatened, intimidated, or experiences any adverse actions due to their whistleblowing, they may seek the Company's assistance to report the matter to police.

6. Other relevant rules are subject to the provisions of the" Procedures for Handling Whistleblowing Cases".

3-2. Grievance Channel and Procedure

1. To create a harmonious work environment and protect the fair rights of employees, if an employee's rights are violated or they experience unfair treatment at work, they may file a complaint with the Complaint Center through the complaint channels.

2. Employees are required to provide a precise description of the suspected violations, including the informant’s and accused person’s name, department and title, violation date and event. Employees shall supplement the violation case with printed description, if the case is reported first by phone.

3. Reporting Channel:

   (1) CTBC Holding

   - Tel: +886-2-33278804
   - Email: 0885@ctbcholding.com
   - Mail: Employee Communication Center

   (2) Employees of other subsidiaries shall use their own channels to file a grievance. If no grievance channel built yet, they may use the ones of CTBC Holding.

4. The process of investigation for grievance shall be confidential at all time. The investigator handling the grievance shall not disclose the name or other relevant information of the informant and the content. In case of any violation, the Company shall impose punishment.

4. Our Company

4-1. Maintenance of Employee Relations

☐ **Employee Privacy**

1. The Company may, based on management and business needs and for specific, predefined purposes, collect, process, retain, transmit, and use employees' personal data, and shall implement appropriate security controls.

2. To ensure business secrecy, employees agree to authorize the Company to implement its management right to review or record employees' emails, messages, or other related communication activities conducted in the course of performing their duties.

3. To the extent practicable and permitted by law, employees agree that the Company can collect or use employees' personal data for the purpose of legal compliance or business necessity from the Joint Credit Information Center or institutions assigned by the Financial Supervisory Commission.

4. Discussion of anyone's (including the employee's own) compensation package with others is prohibited; every employee's compensation package shall be kept highly confidential.

☐ **Safe and Healthy Work Environment**

The Company commits to provide and maintain a safe and healthy work environment, while employees are required to support this commitment to help create an equal opportunity workplace.

1. Involvement in any drug abuse, including use, sale, manufacture, distribution or possession of illicit drugs, is prohibited.

2. Involvement in any extramarital affairs, sexual harassment or any kind of discriminative, harassing, intimidating or offensive behavior is prohibited.

3. Entry into disreputable places, such as red-light districts, is prohibited. If the entry is for business necessity and unavoidable, employees shall report to their direct supervisor before or within one day after accessing such

prohibited places.

4. Deliberately causing trouble and damage to the Company's possessions and reputation is prohibited. Violence, threats, and humiliation are also prohibited at the workplace.

☐ Non-discriminative Environment

The Company values employees' differences and devotes itself to creating a diverse work environment that is free from intimidation and harassment.

1. Fair treatment for customers

   To keep our promise of "integrity and warm service", any unfair practice, such as harassment, intimidation or discrimination, against customers based on their economic status, race, gender, age, religion or other reasons is prohibited.

2. Fair employment environment

   （1） The Company commits to create a diverse workplace that is free from harassment and discrimination, under which employees trust, respect and work with each other for organization performance and reputation.

   （2） The Company commits to utilize fair employment practices, such that employees are recruited, selected and hired based on their knowledge, skills and abilities. The Company also commits to work together with employees to advance their job-related capabilities.

3. To ensure a workplace free from sexual harassment and to improve gender equality, the following actions are prohibited:

   （1） Making a sexual request in the course of executing employment duties.

   （2） Using verbal or physical conduct of a sexual nature or with gender discrimination to intimidate or infringe upon another employee.

   （3） Offending, interfering with, or affecting another employee's personal dignity, physical liberty, or performance.

（4） Explicitly or implicitly making a sexual request in exchange for the establishment, continuance, modification or assignment of a labor contract or as a condition of another employee’s designation, remuneration, personal evaluation, promotion, demotion, reward or punishment.

4. Any harassing, discriminative, and threatening behavior toward supervisors, subordinates, colleagues or customers based on their age, race, marital status, disability, sexual-orientation, gender, military service or economic status is prohibited.

5. Use of the Company’s communication systems, such as email or internal mail delivery, to transmit images or text of sexual nature or containing ethnic slurs, racial epithets or any other harassing, offensive or lewd material is prohibited.

6. Employees shall file to HR through the official employee communication channel to report any suspicious or factual violation of the non-discriminative policy.

4-2. Avoidance of Outside Employment and Conflicts of Interest

Employees must be alert to any outside employment that might affect performance at the Company, and avoid any kind of conflict between personal interests and those of the Company. Employees shall never take advantage of their position at the Company to create improper interests.

1. Employees shall prioritize their work for the Company and shall not have any outside employment or part-time work except with prior approval.
2. Employees shall not violate the following principles for approved outside employment or part-time work:
    (1) Do not violate laws or regulations, the Company's Code of Conduct, work rules, or other internal management regulations that may affect the interests of the Company or its customers or cause them a significant loss.
    (2) Avoid conflicts of interest with the interests of the Company.
    (3) Avoid conflicts of interest with the employee’s duties for the Company and the execution of those duties.
3. Operating any business or activity through a third party, including family members, partners or friends, to evade this Code, official regulations and principles is prohibited.
4. Owning, managing or investing in any business similar to or the same as the Company either under employees’ names or on behalf of others is prohibited. Employees should not take any position, such as employee, appointee, consultant or others, at any company whose business is similar to or the same as the Company.
5. Promoting, selling or passing on any non-Company product or service by using the position at the Company or information learned during employment is prohibited. If there is any need to introduce a family member to the Company to provide services or products, the employee shall report to the concerned parties and get prior approvals.
6. Use of employees’ own accounts to execute a customer’s private transactions is prohibited. In addition, personally executing transactions for accounts of

employees, their spouses and relatives on the Company computer system is prohibited.

7. It is not appropriate for an employee to be the guarantor for a personal or corporate loan application other than the said application is applied by the employee's direct relatives or siblings. Employees shall also avoid approving loans or executing other transactions when the customer is their relative.

8. Personal transactions related to Company business should be restricted to long-term investments. When performing personal transactions, employees shall avoid the possibility of conflicts of interests with the Company, especially avoiding speculation in securities.

4-3. Provisions Governing Endowments, Hospitality, and Sponsorship

☐ No offering or acceptance of unreasonable presents or hospitality, or other improper benefits.

Neither officers nor employees of CTBC shall offer or accept, either directly or indirectly, unreasonable presents or hospitality, or other improper benefits of any kinds for establishing business relationships or influencing business transactions. However, gift receiving or giving will be allowed under the circumstance of expressing appreciation or for the purpose of maintaining a good business relationship. All these activities shall comply with the rules listed below:

1. Soliciting or asking for any monetary or non-monetary gifts, rewards, or interests, other than as permitted by company regulations, for any reasons, from customers or other third parties, is prohibited. Employees should not have any personal loan or monetary relationship with those parties and shall not ask for bonus sharing.

2. Accepting gifts or the conveyance of anything with value, such as cash, commissions or other monetary equivalents, including gift coupons or stocks, investing in a customer's or supplier's business, and taking unfair advantage of current or prospective customers, suppliers, or business-related individuals or enterprises, are prohibited.

3. Employees are prohibited from having a family member, such as a spouse, parent, child, cousin, in-law, or other relative, accept gifts, monetary equivalents or other preferential treatment, or perform any prohibited behaviors listed in the above item, and then transfer such treatment to the employee in order to evade this Code or relevant business operation regulations.

4. Gifts may be accepted when permitted under applicable rules if 1) they are occasionally given for the purpose of business etiquette or social custom with the value of or under USD 100; or 2) the value of the gifts is under USD 160 cumulatively from the same grantor per year.

5. If the gift is to be given to maintain a normal business relationship, employees should use a company-approved and logo-printed gift. Arrangements of gifts or entertainment shall not be excessively luxurious or too often result in

unnecessary expenses.

- ☐ No improper charitable donations or sponsorship.

When making or offering donations and sponsorship, CTBC officers and employees shall abide by relevant laws and the “Donations and Sponsorships Management Policy”, and shall not surreptitiously engage in bribery.

4-4. Maintenance of Information Completeness and Accuracy

The records, data, and information owned, collected, used and managed by the Company must be accurate and complete.

1. Employees should not conceal any mistake made on the job and shall report to the concerned parties about customer risky situations to avoid any possible disadvantage the Company may suffer.
2. Employees shall be cautious as to the content and wording of documents, which may be cited or kept by others, and avoid any possibility of misleading. Employees are also required to keep copies or records of documents according to relent policies.
3. Employees should not deliberately make mistakes resulting in reputation damage or financial loss to the Company.
4. Making unauthentic statements or misleading customers when processing business-related transactions is prohibited. Also, employees are prohibited from providing explanations or promises that are beyond their authority to customers. In addition, employees are prohibited from making any inappropriate promise to affect a customer's or the Company's liability.
5. Attempting to lead a customer to make unauthentic statements, provide fabricated information or forge documents is prohibited. If such actions from a customer or colleague are discovered or rationally suspected, an immediate report to a supervisor is required.
6. Suggesting any investment product to a customer prior to risk disclosure and investment analysis is prohibited.
7. Employees shall strictly adhere to the rules and controls of the Company in maintaining information. All records shall accurately reflect the underlying transactions in a timely manner and shall be immediately corrected in the event an incorrect or misleading entry is detected.
8. Financial statements and related disclosure information must always be prepared in accordance with generally accepted accounting principles and fairly present, in all material respects, the financial position of the Company. Employees are

prohibited from improperly influencing any internal independent auditor, legal counsel, security personnel, or other properly authorized person during the review of any financial statement of the Company.

9. Employees shall properly safeguard and use their official seals (including overlapping seals). They must not entrust their seals to others for safekeeping or use. When leaving the office after work or temporarily during work hours, employees shall securely store their seals in their personal desk drawers.

4-5. Intellectual Property

CTBC employees shall respect the intellectual property (IP) of the Company and others and shall ensure that their use of IP adheres to CTBC's Intellectual Property Management Plan.

☐ **Business Secrets**

All employees shall safeguard Company assets and make sure assets are properly and legally used. Prior approval is required if there is a need to use Company resources, services, facilities or other properties for non-business purposes.

1. Any information or material, which has actual or potential economic value, directly or indirectly acquired during employment, is strictly confidential and should be kept secret.
2. The following items are considered confidential information or business secrets: information not known to persons generally familiar with information of this type; information with economic value, actual or potential, due to its secretive nature; research reports and technical data for which public protection cannot be applied; and information, the secrecy of which the Company has taken reasonable measures to maintain, or which is required to be kept secret due to legal compliance.
3. Business secrets acquired during employment are important assets of the Company and should be kept with efficient protection. Use, release, or passing on of any business secret to any third party is prohibited. Employees shall advise the Company immediately upon disclosure of the same resulting from their negligence or if they become aware of another party's disclosure of the same. These obligations to keep trade secrets confidential and advise of their disclosure shall survive termination of the contractual relationship between employees and the Company.
4. Employees shall return trade secrets, including Company data and documents in their possession, to the units in which they hold office, and strictly complete all handover requirements, if any, prior to their resignation, transfer, or retirement.

5. Control, concealment, misuse or misleading use of confidential information in order to seek improper interests is prohibited. Also, employees are prohibited from spreading unapproved or unconfirmed business related information.
6. When answering inquiries from outsider, employees shall take full responsibility about the content provided, and the information provided should not exceed authorization set by the Company.
7. CTBC has policies for public announcement and information disclosure, with which all employees shall firmly comply. Also, employees are prohibited from spreading unapproved or unconfirmed business related information.

☐ **Trademark, Copyright, Patent**

1. Employees can create, invent, or design when performing duties or utilizing information or resources available during employment. Publications, documentation, training materials, computer code, and other works of authorship employees develop for the Company are protected by copyrights. To the extent permitted by law, employees agree that all works of authorship, inventions, improvements, derivatives, designs, technologies, written materials, programs or any other work, whether patentable or protectable by copyright, business secret or trademark, are the Company’s assets.
2. Employees are required to assign the entire right, title, and interest to the Company or its assigned parties without any condition when they complete any patent, trademark, or copyright related to their job worldwide. Employees are also obligated to assist in completing the application for any invention, design, or creation and in providing defense in legal proceedings if the application is rejected.
3. The registered CTBC trademarks shall be used on commodities, instruments, advertisements, and websites related to the Company’s business.
4. Employees are prohibited from using Company logos on media,

advertisements, promotions or websites without prior written permission from a supervisor.

5. Issuing any certificate or document to customers using the name of the Company, or publishing or giving any document or speech related to the job is prohibited. Also, employees are prohibited from promotion through the use of unapproved business cards or any type of advertisement.

☐ **Other Intellectual Property Rights**

1. To prevent the Company from infringing the intellectual property rights of others, employees are prohibited from using pirated software or other illegal computer products.

2. When introducing any new technology, the non-infringement of the technology upon any other party's IP shall be the top priority. The contract the technology's supplier shall stipulate that the technology be free from any infringement upon another party's rights and interests, and that the provider shall be liable for any damage caused by a violation of said requirements, if any, to the Company.

4-6. Information Security Protection Requirement

As a member of CTBC, employees shall diligently protect the Company's various information assets and comply with information security-related regulations when using information equipment provided by the Company to protect the safety of our information assets and environment.

1. Only use information assets authorized by the Company, including computer equipment, mobile devices, office automation equipment, application software, electronic files, and paper documents.
2. Do not attempt to obtain or guess unauthorized information system accounts or passwords.
3. In order to reduce the risk of data leaks, employees are prohibited from using their private external mailboxes to send, receive, or handle internal and above official information.
4. Do not permit or assist unauthorized personnel to use the Company's information assets or equipment or to connect to the Company's internal network.
5. Do not connect private devices to the Company's internal network without prior approval.
6. The integrity of the Company's information assets shall be maintained; prior approval shall be obtained before any changes, including disassembling, replacing, or adding any components with network connection or storage function to the information equipment; and information security control software installed on the information equipment shall not be changed, removed, or stopped without authorization.
7. Employees shall protect information equipment, system accounts, and passwords held by them and protect the Company's information assets from unauthorized use or access.
8. Information equipment provided by the Company shall be used for business only and shall not be used for private purposes, such as using the Company's email account to apply for non-business related services or using the Company's equipment for private transactions.
9. Do not use information assets provided by the Company for illegal activities,

including but not limited to the installation and use of pirated software and the creation or distribution of computer viruses or malicious programs.

10. Be cautious when receiving a suspicious email or message; don't access links, download attachments, or provide sensitive information to the sender without verifying their identity.

4-7. Termination of Employment Relationship

CTBC may dismiss an employee without advance notice if one of following conditions exists:

1. Where material misrepresentation by the employee at the time of hiring and cause the employer to sustain damage therefrom.
2. Where violence or gross insults by the employee against the employer, his or her family members, agents, or colleagues.
3. Where the employee has been imprisoned.
4. Where the employee has committed a gross breach of the labor contract or work rules.
5. Where the employee has deliberately ruined property of the employer or deliberately disclosed technological or confidential business information of the employer, with damage resulting.
6. Where the employee is absent without cause for three days in a row or six days in a month.

For categories 1,2,4,5, and 6, the employer must terminate the employee within 30 days after the employer becomes aware that such circumstances exist.

5. Our Industry

5-1. Principles of Fair Competition

The Company believes that vigorous and fair competition will make the whole industry more prosperous. Information provided should be kept in a transparent, fair and accurate manner to avoid any behavior or activity that may damage the fairness of transactions.

1. Infringing a customer's will or interests when competing with other competitors is prohibited.
2. Demeaning other competitors when serving customers is prohibited.
3. Promising customers or vendors a business transaction, which is not permitted by government financial supervisory commission or bureaus, is prohibited. Also, promising or executing unauthorized transactions, altering exchange rates at employees' own will to attract customers, or promoting business with inappropriate methods is prohibited.
4. Evading Company regulations or operating procedures to execute transactions, for example, forging information on application forms for the customer, with the excuse of catering to the customer, is prohibited.
5. Cooperating with unapproved agents to increase a certain employee's performance or seize, exchange, transfer or merge with other employees' performance achievement is prohibited.

5-2. Insider Trading Regulations

1. In the course of working at CTBC, employees may learn or acquire certain material non-public information regarding the Company or companies listed on the Taiwan Stock Exchange, Taipei Exchange (“TPEx”), or TPEx Emerging Stock Market, including:

   (1) Non-public information that has a material impact on the stock price of the Company or a listed company (collectively with the Company, hereinafter “Listed Companies”): This includes any information, such as financial reports or information regarding operating performance, relating to the finances or operations of a Listed Company, the supply and demand of the securities of a Listed Company, or a tender offer of the securities of a Listed Company, the content thereof would materially impact the securities price of the Listed Company or the investment decision of a reasonably prudent investor.

   (2) Non-public information that has a material impact on the ability of a Listed company to pay principal and interest: This includes any information relating to the loss of creditworthiness, a material loss likely to result in financial difficulty, or the suspension or termination of business, etc.

   Please refer to Articles 2 to 4 of the” Regulations Governing the Scope of Material Information and the Means of its Public Disclosure Under Article 157-1, Paragraphs 5 and 6 of the Securities and Exchange Act” for detailed regulation.

2. The following actions are prohibited：

   (1) Upon having actual knowledge of any non-public information that has a material impact on the securities price of a Listed Company, employees shall neither trade the shares of the relevant Listed Company nor trade any other equity-type securities of the Listed Company, in their own name or that of another person, until 18 hours after the disclosure of the aforementioned material non-public information.

   (2) Upon having actual knowledge of any non-public information that has a material impact on the ability of a Listed Company to pay principal or

interest, employees shall not trade any non-equity-type corporate bonds of the relevant Listed Company on any exchange or over-the-counter market, in their own name or that of another person, until 18 hours after the disclosure of the aforementioned material non-public information.

3. Directly or indirectly disclosing aforementioned material non-public information to people not involved in handling the business is prohibited.

4. Other relevant rules are subject to the provisions of the Insider Trading Prevention Policy and other related internal regulations.

5-3. Anti-Money Laundering, Countering the Financing of Terrorism, Counter-Proliferation Financing, and Fraud Prevention

1. Employees are responsible for complying with regulations related to anti-money laundering (AML), countering the financing of terrorism (CFT), counter-proliferation financing (CPF), and fraud prevention.

    (1) Employees share responsibility with the Company to help combat financial crime. Employees shall comply with relevant domestic and international laws and regulations related to AML, CFT, CPF, and fraud prevention. Employees shall adhere to the Company’s internal policies and procedures established for addressing relevant risks, fully understand the risks and operational procedures of the business they are responsible for, and must not advise, conceal, or assist others in converting illegal gains into seemingly legitimate funds, nor engage in or facilitate any illegal financial activities. If employees are involved in the aforementioned illegal acts, they may not only bear criminal liability but also face claims for compensation of damages by the Company in accordance with relevant regulations.

    (2) Given the ever-evolving techniques for money laundering, terrorism financing, proliferation financing, and fraud, employees shall be vigilant and attentive to unusual circumstances, especially the signs of potential money laundering or fraud, such as unclear transfer purposes, transactions inconsistent with a customer’s financial profile, the use of nominee accounts, and transactions conducted according to unusual third-party instructions. Furthermore, employees must perform customer due diligence and ongoing transaction monitoring in daily business operations. If a customer or transaction is suspected of involvement in illegal activities, the transaction may be declined or the incident reported to a supervisor or the relevant authorities in accordance with relevant regulations. Employees must maintain strict confidentiality regarding any suspicious transaction reports filed with financial intelligence units and may not disclose such information to unauthorized parties.

2. Managerial Oversight and Responsibilities

Managers shall be alert to whether employees maintain a standard of living not commensurate with their present or past official remuneration, and should understand their backgrounds. Should an anomaly be observed, the manager shall selectively check the transactions the employee has engaged in and may seek assistance from the audit unit if necessary. Managers must also remain alert to any involvement of subordinates in money laundering, terrorism financing, proliferation financing, or fraudulent activities, in order to protect customers' interests and safeguard the Company’s reputation.

5-4. Bribery Prohibition and Restrictions on Political Donations

CTBC employees shall not offer bribes or commit crimes for the convenience of business transactions.

1. When conducting business, CTBC employees shall not directly or indirectly offer, promise to offer, request, or accept any improper benefits in whatever form to or from clients, agents, contractors, suppliers, public servants, or other stakeholders.

2. When directly or indirectly offering a donation to political parties or organizations or individuals participating in political activities, CTBC employees shall comply with the Political Donations Act and the “Donations and Sponsorships Management Policy”, and shall not make such donations in exchange for commercial gains or business advantages.

6. Our Community

6-1. Protection of Customer Privacy

Unless authorized by customers or by applicable law or legal regulations, employees are responsible for protecting customer privacy, confidentiality and security entrusted to the Company.

1. To protect the Company and its customers, employees are prohibited from making arbitrary inquiries of customer information, including trading records, or using or disclosing such information to any unrelated third party, except when legally required to do so. If it is necessary to bring this confidential information outside the Company, a supervisor's approval is required.
2. Employees shall carefully store each customer's documents or trading records. Employees are prohibited from misusing, changing or revising a customer's documents or information without the customer's written approval.
3. Whether approval is obtained or not, imitating the seals or signatures of any customer, colleague, or supervisor, or further stamping or signing on any documents is prohibited.
4. Putting a customer's payment under an employee's custody, paying for a customer, depositing or withdrawing unclassified money to or from a customer's account is prohibited.
5. Privately keeping any documents with a customer's signature or seal on it, or keeping a customer's password, except as permitted by current regulations, is prohibited.
6. Employees are prohibited from disclosing confidential information or business secrets of customers, colleagues or the Company, except for business requirements. In addition, disclosing the confidential information acquired by computer system or other telecommunication facilities is prohibited.

6-2. Support for Human Rights

CTBC abides by the laws and regulations in all locations where it operates worldwide, and it recognizes and supports relevant internationally recognized human rights standards, including the Universal Declaration of Human Rights, U.N. Global Compact, Children's Rights and Business Principles, U.N. Guiding Principles on Business and Human Rights, and International Labour Organization's Declaration on Fundamental Principles and Rights at Work. Each member of CTBC should conscientiously fulfill their responsibility to respect human rights.

CTBC human rights implementation policy:

1. Provide a safe and healthy work environment.
2. Eliminate discrimination to ensure equality in opportunity for work and abide by the " Gender Equality in Employment Act " and " Sexual Harassment Prevention Act " to prevent workplace sexual harassment.
3. Prohibit forced or compulsory labor, hiring child labor, trafficking human.
4. Help employees maintain physical and mental health and balance work and life.
5. Maintain unimpeded communication with employees and promote labor-management harmony.
6. Regularly review and access relevant systems and actions.