



## **O-Bank Co., Ltd. Anti-Corruption Policy**

Approved by the 10<sup>th</sup> meeting of the 9<sup>th</sup> Board of Directors on June 27, 2024

### Article 1: Purpose of Implementation and Scope of Application

O-Bank Co., Ltd. (hereinafter "the Bank"), given its commitment to building a corporate culture of ethical management to prevent any forms of corruption, and "zero tolerance" on unethical acts of corruption, hereby adopts this Policy that spells out clearly defined anti-corruption and anti-bribery guidelines to ensure ethical management and proactively prevent unethical acts.

Corruption acts include but are not limited to: bribery, facilitation fees, money laundering and with intent to improperly influence others who may intend to benefit himself or herself or damage the company.

### Article 2: Applicable Subjects

The Bank's directors (including independent directors), managerial officers, employees, mandatary of the Company, and substantial controller shall abide by this Policy.

### Article 3: Compliance With Applicable Laws and Regulations

The Bank endorses and complies with international conventions, including the United Nations Convention Against Corruption, the Act to Implement United Nations Convention Against Corruption, and the World Economic Forum's Partnering Against Corruption Initiative (PACI), as well as antitrust and other relevant regulations in different countries. The Bank also abides by Taiwan's Company Act, Securities and Exchange Act, Business Entity Accounting Act, Political Donations Act, Anti-Corruption Act, Government Procurement Act, Act on Recusal of Public Servants due to Conflicts of Interest, relevant regulations applicable to TWSE/TPEX-listed companies, and other laws and regulations governing business conduct.

### Article 4: Prohibited Acts

#### 1. Offering and accepting bribes

The Bank prohibits any bribery in business transactions, whether conducted directly or through third parties. The Bank prohibits all forms of bribery, including the acceptance of contract kickbacks or provision of benefits to customers, agents, contractors, suppliers, and employees.

#### 2. Illegal political donations



All political donations made by the Bank shall be transparent and comply with applicable laws and regulations. They shall be handled in accordance with the Bank's Regulations for Reviewing External Donations and shall not be used to seek commercial benefits or transaction advantages.

3. Improper charity donations or sponsorships

All charity donations and sponsorships made by the Bank shall be transparent and comply with applicable laws and regulations. They shall be handled in accordance with the Bank's Regulations for Reviewing External Donations and shall not be used as a means of indirect bribery.

4. Unreasonable gifts and entertainments or improper benefits

The Bank prohibits any unreasonable or pretextual gifts and entertainments or other improper benefits that may have a bearing on procurement, business transactions, or establishment of business relations.

5. Facilitation payment

The Bank shall not offer or pledge any facilitation payment.

#### Article 5: Business Relations

Before establishing a business relationship with others, the Bank shall assess the legality, corruption risks and integrity management policies of business counterparties, and whether have a record of corruption or dishonesty to ensure that their business operations are fair and transparent, and do not ask for, offer or accept bribes.

While the Bank establishes a commercial relationship with a business counterparty, both parties shall promise not to involve corruption or dishonesty and agree to abide by relevant regulations.

Business dealings include but are not limited to: suppliers, customers, agents, outsources or others intermediaries. And the Bank's representative or act on behalf of the Bank including agents, outsources or other intermediaries who should be aware of and abide by the Bank's anti-corruption policy.

#### Article 6: Whistleblowing Mechanism

Anyone who discovers any violation of this Policy or any other incidents of corruption and bribery within the Bank may file a report to the Bank in accordance with its Whistleblowing Policy.

#### Article 7: Education and Training

The Bank shall provide education, training, and awareness programs to directors



(including independent directors), managerial officers, employees, mandatary of the Company, and substantial controller on a regular basis to ensure that they have a thorough understanding of the Bank's anti-corruption and anti-bribery resolve and requirements, as well as the consequences and risks associated with the violations thereof.

#### Article 8

The Bank will persist with effective controls to prevent corruption and bribery in business operations, thereby mitigating potential risks and impacts and ensuring implementation of ethical management. The implementation of the anti-corruption policy is supervised by the Bank's Corporate Governance and Nomination Committee.

#### Article 9

This Policy shall be implemented upon approval of the Board of Directors; the same shall apply to any amendments thereto.