

## **O-Bank Co., Ltd.**

### **Directives for Sexual Harassment Prevention, Complaints, and Disciplinary Action**

Implementation upon approval by the General Manager on August 17, 2026

#### **Article 1**

##### **Basis and Purpose**

O-Bank Co., Ltd. (the “Bank”) is committed to providing a work and service environment free from sexual harassment for its personnel (including employees, dispatched workers, job applicants, technical students, and interns), and to implementing appropriate preventive, corrective, complaint-handling and disciplinary measures, and protect the rights and privacy of the persons concerned. The Bank hereby establishes these Directives in accordance with the Sexual Harassment Prevention Act, the Regulations of Sexual Harassment Prevention, the Enforcement Rules of the Sexual Harassment Prevention Act, the Gender Equality in Employment Act, the Regulations for Establishing Measures on Prevention of Sexual Harassment in the Workplace, and other applicable laws and regulations. and the Ministry of Labor's promulgated "Directives for Preventing Sexual Harassment in the Workplace."

#### **Article 2**

##### **Definition**

The term 'sexual harassment' as used in these Directives includes:

1. Sexual harassment as defined by the Gender Equality in Employment Act refers to any of the following situations:

- (1) Where any person, in the course of an employee's performance of duties, any person makes sexual requests, words or conduct of a sexual nature, or gender-discriminatory language or behavior to create a hostile, threatening, or offensive work environment, thereby infringing upon or disturbing their personal dignity or personal freedom, or affecting their work performance.
- (2) An employer makes explicit or implicit sexual requests, makes sexually suggestive remarks or engages in conduct of a sexual nature, or engages in gender discrimination toward employees or job applicants, which serve as conditions for the formation, existence, modification, assignment, allocation, remuneration, performance evaluation, promotion, demotion, rewards, or penalties of employment contracts.
- (3) The term “abuse of power sexual harassment” refers to using power or opportunity to harass individuals who are under one's direction or supervision due to hiring, job seeking, or official duties.
- (4) The provisions of these Directives shall also apply to any of the following circumstances:
  - (4.1) If an employee is sexually harassed outside working hours by the same

person from the same business unit, it constitutes ongoing sexual harassment.

(4.2) If an employee is sexually harassed outside working hours by the same person from another business unit with which the employee has joint work or business dealings, it constitutes ongoing sexual harassment.

(4.3) If an employee experiences sexual harassment during non-working hours from the highest-ranking official or employer, the provisions of these Directives shall apply.

2. The term “sexual harassment” as defined in the Sexual Harassment Prevention Act refers to acts related to sex or gender against the will of others, other than sexual assault crimes, and where any of the following circumstances apply:

(1) Whether explicitly or implicitly, through discriminatory or insulting words or actions, or by other means, the act harms the personal dignity of others, creates situations that cause fear, hostility, or offense, or improperly affects their work, education, training, services, plans, activities, or normal life.

(2) Obeying or refusing the act by the other person as a condition for themselves or others to obtain, lose, or diminish their rights and interests related to learning, work, training, service, plans, or activities.

The handling and prevention of sexual harassment incidents shall be governed by the Sexual Harassment Prevention Act. However, depending on the location of the incident and the identity relationship of the parties involved, if the Gender Equality Education Act and the Gender Equality in Employment Act have separate provisions for handling and prevention, the respective laws shall apply.

The determination of sexual harassment as referred to in these Directives should be based on specific facts such as the background of the incident, work environment, the relationship between the parties, the perpetrator's words, actions, and the other party's awareness. In addition to determining sexual harassment according to Article 12, Paragraphs 1 to 4 of the Gender Equality in Employment Act, the following circumstances may also be comprehensively considered:

1. Inappropriately staring at, touching, hugging, kissing, or smelling any part of another person's body; the same applies to forcing another person to engage in such conduct toward any part of one's own body.

2. Mailing, holding, displaying, or broadcasting text, drawings, sounds, images, or other items with sexual demands, sexual connotations, or gender discrimination.

3. Repeated or persistent acts of following or pursuing against one's will.

### **Article 3**

#### **Education and training**

The Bank shall instruct unit managers to appropriately use gatherings, broadcasts, emails, internal documents, and other opportunities and methods to convey messages, and strengthen awareness among their employees about sexual

harassment prevention measures and complaint channels.

The Bank shall provide education and training on preventing sexual harassment to the following individuals:

1. Employees shall receive education and training on workplace sexual harassment prevention.
2. Personnel holding supervisory positions and personnel participating in the handling, investigation, and decision-making of sexual harassment complaints shall receive relevant education and training annually.

Priority for the training referred to in the preceding paragraph shall be given to personnel responsible for handling sexual harassment complaints, directors, independent directors, managers, and those holding supervisory positions at the Bank.

#### **Article 4                      Complaint channels**

The Bank provides the following channels for filing complaints regarding sexual harassment:

Telephone hotline: (02) 8752-7166

Telefax hotline: (02)2798-6755

Email address: [hrapeal@o-bank.com](mailto:hrapeal@o-bank.com)

After the Bank accepts a sexual harassment complaint, designated personnel shall be responsible for receiving, investigating, and handling the complaint.

If the respondent in a sexual harassment case is the highest-ranking official of the Bank, employees of the Bank, dispatched workers, or job applicants may file complaints through internal channels or directly with the local competent authority in accordance with the Gender Equality in Employment Act.

#### **Article 5                      Measures to prevent sexual harassment**

When the Bank becomes aware of sexual harassment, it shall take the following immediate and effective corrective and remedial measures:

1. When the Bank becomes aware of a sexual harassment incident through a complaint or other means:
  - (1) Taking into account the wishes of the complainant, appropriate measures shall be taken to separate the parties to prevent recurrence of sexual harassment, and adverse changes to the complainant's salary or other working conditions are prohibited.
  - (2) Provide or refer complainants for consultation, medical or psychological counseling, social welfare resources, and other necessary services.
  - (3) Initiate an investigation and conduct interviews or other appropriate investigative procedures with individuals involved in sexual harassment incidents.

- (4) If the respondent holds a position of power and the circumstances are significant, and it is necessary to suspend or adjust their duties during the investigation, the respondent's duties may be temporarily suspended or adjusted; If sexual harassment is not confirmed after investigation, any salary withheld during the suspension period shall be restored.
  - (5) If sexual harassment is substantiated, appropriate disciplinary action or handling will be taken depending on the severity of the case. In serious cases, the Bank may, in accordance with Article 13-1, Paragraph 2 of the Gender Equality in Employment Act, terminate the employment contract without prior notice.
  - (6) If malicious fabrication is confirmed, appropriate disciplinary action or handling will be taken against the complainant.
2. When the Bank becomes aware of a sexual harassment incident other than through the circumstances described in Item 1 above:
- (1) Interview relevant personnel to clarify and verify the facts as necessary.
  - (2) Inform victims of their rights and various remedies, and assist them in filing complaints according to their wishes.
  - (3) Appropriately adjust the work content or workplace for relevant personnel.
  - (4) Provide or refer the victim for consultation, medical or psychological counseling, social welfare resources, and other necessary services according to the victim's wishes.

If the Bank becomes aware of the sexual harassment incident after receiving the victim's statement, but the victim does not wish to file a complaint, the Bank shall still take immediate and effective corrective and remedial measures in accordance with Item 2 of the preceding paragraph.

The Bank shall provide at least two psychological counseling sessions upon request from the complainant or victim.

## **Article 6**

### **Joint operations or business dealings**

If the victim and the alleged perpetrator belong to different business units and have joint operations or business dealings, or if the respondent is not an employee of the Bank, or if the complainant is a dispatched worker or job applicant, the Bank, upon becoming aware of the sexual harassment, shall take the immediate and effective corrective and remedial measures set out in the preceding Article, including the following:

1. Notify the other party's employer, by written notice, fax, oral communication, electronic transmission, or other appropriate means, and coordinate on a solution or remedial measures.
2. Protect the privacy and other personal rights and interests of the parties involved.

**Article 7****Risk identification and protective measures**

If the Bank's employees perform work at workplaces or other locations not controlled or managed by the Bank, the Bank shall, depending on the situation, identify the type of sexual harassment risk, provide necessary protective measures, and inform employees in detail in advance.

If the Bank becomes aware of sexual harassment under the Sexual Harassment Prevention Act or stalking under the Stalking and Harassment Prevention Act occurring outside the workplace that is work-related or disrupts workplace order, the Bank shall identify the relevant risks and provide timely preventive and assistance measures.

**Article 8****Complaint handling unit**

The Bank shall handle sexual harassment complaints and make decisions confidentially, ensuring that complainants are protected from any retaliation or other adverse treatment.

Sexual harassment complaints must be handled privately, and a Sexual Harassment Complaint Handling Committee (hereinafter referred to as the "Committee") may be formed as the complaint handling unit to decide on the matter.

The Committee mentioned above shall consist of five to seven members, appointed or selected by the General Manager based on the complaint case, from among current employees of the Bank and professionals with gender awareness. Female members shall make up at least half of the members.

The General Manager may designate one member of the Committee as the Chairperson, who shall preside over Committee meetings. If the chairperson is unable to preside over the meeting for any reason, another member may be appointed to act as their proxy. A Committee meeting can only be held if more than half of the members are present, and resolutions can only be made with the consent of more than half of the members present. In case of a tie, the Chairperson shall have the casting vote.

When the Committee convenes meetings, it may notify the parties and related parties to attend and provide explanations, giving the parties ample opportunity to present their opinions and respond. Except when necessary, repeated questioning should be avoided, and persons with relevant knowledge and experience may be invited to assist.

The Committee shall refer to the findings of the complaint investigation team to make a decision with reasons, and may make recommendations for disciplinary action or other measures; The resolution shall be notified in writing to both the complainant and the respondent.

If dispatched workers are sexually harassed by employees of the Bank, the Bank shall accept complaints and jointly investigate with the dispatching business units,

notifying the dispatching business units and the parties involved.

#### **Article 9**

##### **Filing and recording of complaints**

Complainants of sexual harassment may file complaints verbally, via email, or in writing. For complaints made verbally or via email, the reception window shall assign a designated person to record the matter and have it read aloud or provided to the complainant for review to confirm its accuracy.

Written complaints and records of verbal or email complaints mentioned in the preceding paragraph shall be signed or stamped by the complainant and shall indicate the following items:

- 1.The complainant's name, service unit and job title, residence, contact phone number, location and date of the incident.
- 2.If there is a legal representative or authorized agent, the name, residence, and contact phone number of the legal representative or authorized agent must be provided; a letter of authorization must also be attached.
- 3.The date of the complaint, the content of the facts, and relevant evidence.

If a complaint or the record of a verbal complaint is inconsistent with the requirements listed in the preceding paragraph and if such inconsistency can be corrected, the complainant shall be given notice to correct it within 14 days. If correction fails to be made within the aforesaid period, the complaint will not be accepted for handling.

Upon receiving the complaint mentioned, the Bank shall notify the local competent authority in accordance with the content and method stipulated by the Ministry of Labor.

#### **Article 10**

##### **Withdrawal of Complaint**

Before the Committee makes a resolution, the complainant or their authorized representative may withdraw the complaint by issuing a "Notice of Withdrawal of Sexual Harassment Complaint"; If a complaint is withdrawn, no further complaint may be filed for the same reason. However, if the complainant withdraws the complaint and new facts arise or new evidence is discovered on the same issue, they may still file another complaint.

#### **Article 11**

##### **Complaint investigation**

After receiving a complaint, the Bank shall conduct an investigation based on principles of objectivity, fairness, and professionalism, and must protect the privacy of the parties involved and other personal legal interests during the investigation.

When handling the complaints mentioned in the preceding paragraph, the Bank shall not only establish a complaint handling unit as stipulated in Article 8, but also form a complaint investigation team to investigate, whose members must include external professionals with gender awareness.

The results of the complaint investigation should include the following items. After the investigation is completed, the findings shall be prepared in writing and forwarded to the complaint handling unit for review and handling.

1. The background and circumstances of the sexual harassment complaint, including the party's statement.
2. Records of the survey interview process, including dates and interviewees.
3. Findings of fact and reasoning.
4. Recommendations for disposition.

Personnel involved in the handling, investigation, and decision-making of sexual harassment complaints shall protect the privacy of the parties involved and those invited to assist in the investigation, as well as other personal legal interests; Except for the need for investigation or public safety considerations, their names or other information sufficient to identify them shall be kept confidential, and evidence of workplace sexual harassment incidents shall not be forged, altered, destroyed, or concealed.

If the preceding provision is violated, the chairperson shall terminate their participation in the sexual harassment complaint case. O-Bank may, depending on the severity, impose penalties and pursue related responsibilities according to relevant regulations, and remove them from the positions assigned by the committee.

## **Article 12**

### **Recusal**

Persons who are the parties involved or their spouses, former spouses, relatives by blood within the fourth degree of relations, relatives by marriage within the third degree of relations, parents, or family members shall recuse themselves from the handling, investigation, and resolution of sexual harassment complaints.

If a person required to recuse themselves under the preceding paragraph fails to do so, or if there are other specific facts indicating that the person may be biased in performing their duties in the same complaint case, the complainant or respondent may submit a written request for recusal to the Committee, stating the reasons and supporting facts. The person whose recusal is requested may submit a written opinion on the request.

The person whose recusal is requested shall cease handling, investigating, or participating in the decision on the complaint until the Committee decides whether to grant or reject the request. However, necessary measures may still be taken in urgent circumstances.

If a person required to recuse themselves under the first paragraph fails to do so and neither the complainant nor the respondent requests recusal, the Committee shall order that person to recuse themselves.

**Article 13****Acceptance and Closure of Complaints**

Upon receipt of a sexual harassment complaint, the designated complaint-handling unit shall decide whether to accept the complaint within seven working days from the date of receipt. If the complaint is not accepted, the complainant shall be notified of the reasons. If the complainant disagrees with the decision, they may request reconsideration in accordance with Paragraph 4 of this Article.

The complaint case shall be closed within two months from the day after the complaint is filed; If necessary, the period may be extended by one month and the parties involved must be notified. If the complainant or respondent has objections to the resolution of the complaint, they may file a request for reconsideration with the Committee within twenty days from the day after receiving the written notice. However, if the ground for reconsideration arises later, the period shall run from the date on which the party becomes aware of that ground.

A request for reconsideration shall state the reasons in writing and shall be decided by the Committee at a separate meeting. Once the case has been closed following reconsideration, no further request for reconsideration may be made on the same grounds.

If the complainant believes that the Bank failed to handle the matter or disagrees with the Bank's investigation or disciplinary results, they may file a complaint with the local competent authority in accordance with Article 32-1 of the Gender Equality in Employment Act.

If the complainant believes that the Bank failed to take immediate and effective corrective and remedial measures upon becoming aware of the sexual harassment, they may file a complaint with the local competent authority in accordance with Article 34, Paragraph 1 of the Gender Equality in Employment Act.

**Article 14****Grounds for Non-Acceptance**

If a complaint falls under any of the following circumstances, the Committee may decline to accept it:

1. The complaint method did not follow the procedures specified in Article 9.
2. The same incident has been finally decided by the Committee, or a complaint that was previously withdrawn is filed again, and no new facts have arisen or new evidence has been discovered in relation to the same matter.
3. Filing complaints for cases that do not fall within the scope of sexual harassment.
4. The complainant is not a party to the sexual harassment incident or their legal representative or authorized agent.

**Article 15****Suspension of Investigation and Decision**

For sexual harassment complaints that have entered judicial proceedings, the committee may, with the complainant's consent, decide to suspend investigation and

resolution, and the period is not subject to the restrictions stipulated in Article 13, Paragraph 2.

**Article 16      Disciplinary action and compensation**

If sexual harassment is confirmed after investigation, the Bank may, depending on the severity of the circumstances, impose appropriate disciplinary or other measures on the perpetrator in accordance with the Bank's "Work Rules" and other related regulations, and notify the local competent authority in the manner and with the information prescribed by the Ministry of Labor. If criminal liability is involved, the Bank shall assist the complainant in pursuing appropriate legal remedies. If a sexual harassment allegation is confirmed to be a false accusation, the Bank may, depending on the severity of the circumstances, take appropriate disciplinary or other action against the complainant in accordance with the Bank's "Work Rules" and other relevant regulations.

When the Bank is jointly liable with the perpetrator for damages to the victim under Article 27, Paragraphs 1 and 2 of the Gender Equality in Employment Act, the Bank shall, after compensating the victim, have the right to seek reimbursement from the perpetrator.

**Article 17      Follow-up and Supervision**

The Bank shall follow up on, assess, and supervise the implementation of disciplinary or other handling measures taken in response to sexual harassment, so as to ensure their effective implementation and prevent similar incidents or retaliation.

**Article 18      Others**

Unless otherwise provided by law, O-Bank's measures to prevent sexual harassment and handle complaints shall be carried out in accordance with these Directives.

**Article 19      Approval and implementation**

These Directives shall be implemented upon approval by the General Manager, and the same applies to any amendments. However, if the change only involves the organization name or the name of a cited law or regulation and does not involve internal operational procedure adjustments, authorization may be granted to the division-level executive who supervises the Human Resources Department. Amendments limited to the attachments may be authorized by the Human Resources Department supervisor.