

# O-Bank The Principles of Fair Customers Treatment

April 19, 2016: Approved and implemented by the Board of Directors of O-Bank.

December 28, 2016: Renaming of the Principles, passed by resolution of the 23rd session of the 6th Board of Directors of O-Bank, and took effect on 1 Jan. 2017.

April 29, 2020: Revision passed by resolution of the Board of Directors of O-Bank. November 4, 2020: Revision passed by resolution of the Board of Directors of O-Bank. February 23, 2022: Revision passed by resolution of the Board of Directors of O-Bank August 23, 2022: Revision passed by resolution of the Board of Directors of O-Bank.

# **Chapter 1 General Provisions**

# **Article 1 (Sources of Law)**

In order to establish a corporate culture of financial consumer protection, enhance financial consumers' confidence in our company, and ensure that financial consumers are treated fairly and reasonably in the process of providing financial products or services, the Company formulated O-Bank The Principles of Fair Customers Treatment in accordance with the "Principles of Fair Treatment in the Financial Services Industry" promulgated by the Financial Supervisory Commission.", "Assessment Mechanism for the Principle of Fair Customers Treatment in the Financial Services Industry" and "Matters Financial Institutions Should Pay Attention to Strengthening in Implementing the Principle of Fair Customers Treatment".

#### **Article 2 (Corporate Culture)**

Our company's core values are "Integrity, Professionalism, Teamwork, Innovation, and Honor", and we uphold the concept of "Sincerity and Friendly Treatment" and the "Principle of Fair Customers Treatment" as our company's core corporate culture, aiming to make "Fair Customers Treatment" become the key value and code of conduct that the entire company follows.

# **Article 3 (Organizational Structure)**

In order to strengthen the implementation of the "Principle of Fair Customers Treatment", the company has the Board of Directors as the highest supervisory unit and a "Fair Customers Treatment Implementation Committee" led by the President to be responsible for the planning and implementation of the Principle of Fair Customers Treatment and to regularly report the implementation results to



the Board of Directors.

The organization and operation of the of Fair Customers Treatment Implementation Committee are also handled in accordance with the "Organizational Rules of the Fair Customers Treatment Implementation Committee" of the company.

# **Chapter 2 Principles and Policies of Fair Customers Treatment**

#### **Article 4 (Principle of fairness and good faith in contracting)**

The contract concluded between the Company and financial consumers to provide financial products or services shall be based on the principles of fairness, reasonableness, equality, reciprocity and good faith, and shall not limit or exempt the Company's liability to financial consumers in advance. If there is any doubt about the terms of the contract, it shall be interpreted that is beneficial to financial consumers.

### **Article 5 (Principle of Duty of Care and Fidelity)**

When the Company provides financial products or services, it shall fulfill the duty of care of a good administrator; if the financial products or services provided are of a trust or entrustment nature, it shall bear the obligation of loyalty in accordance with applicable laws and regulations or contractual agreements.

#### **Article 6 (Principle of Truth in Advertising and Solicitation)**

When publishing and broadcasting advertisements and conducting sales solicitation or sales promotion activities, the Company shall not engage in falsehood, fraud, concealment, or other matters that may cause others to misbelieve, and shall ensure the authenticity of its advertising content and its obligations to financial consumers. It shall not be less than the information or descriptions provided in advertisements and when conducting business solicitation or business promotion activities, nor shall it be used to promote individual financial products or services through financial education.

# **Article 7 (Principle of Product or Service Suitability)**

Before entering into a contract with a financial consumer to provide financial products or services, the company should fully understand the relevant information of the financial consumer to ensure the suitability of the product or service for the financial consumer.



The company's initial sales of complex and high-risk products must be submitted to the board of directors for approval.

#### **Article 8 (Principle of Notification and Disclosure)**

Before the company enters into a contract to provide financial products or services with financial consumers, it shall fully explain to the financial consumers the important contents of the financial products, services and contracts, and fully disclose the risks thereof, in a manner that the financial consumers can fully understand. Written or otherwise, its contents should include important contents on the rights and interests of financial consumers.

For complex and high-risk products provided by our company, the explanations and disclosures related to the preceding paragraph shall be audio or video-recorded, except for non-over-the-counter automated channel transactions or where financial consumers do not consent.

Those involved in the collection, processing and utilization of personal data in paragraph 1 of this Article shall fully explain to financial consumers their rights related to the protection of personal data and the possible disadvantages of refusing to consent.

### **Article 9 (Principle of Equitable Remuneration and Performance)**

The company should formulate a remuneration system for business personnel and submit it to the board of directors for approval. The formulation of the remuneration system should take a balanced consideration of the various risks that may arise to the company and customers from the rights and interests of customers and financial products or services, and should not only consider the achievement of performance targets for financial products or services.

### **Article 10 (Principles of Complaint Protection)**

In order to improve the efficiency and quality of consumer dispute handling, the company should establish a consumer dispute handling system, which should at least include the scope of consumer disputes, organizational structure, acceptance methods, processing procedures, processing timeliness, progress inquiry, tracking and auditing, education and training and regular review, etc., and should be submitted to the board of directors for approval.

#### **Article 11 (Principles of professionalism of sales personnel)**

The Company's personnel engaged in financial products or services must comply



with regulatory requirements to obtain relevant licenses, log in, and receive education and training.

# **Article 12 (Principle of Friendly Service)**

In all stages of financial products and services from design to sales, including ideation, development, testing, launch, sales, review, etc., the company should consider the needs of the elderly and people with disabilities and be friendly to these groups.

The company should proactively plan and implement policies, strategies or other detailed implementation standards for treating the elderly, people with disabilities and other groups fairly according to its business characteristics; and implement monitoring and evaluation of whether the financial products and services provided meet customer needs, and review fairness and effectiveness of procedures and policies for treating customers such as the elderly and people with disabilities.

The Company encourages all units to formulate policies, strategies, and internal guidelines for financial products and services that are superior to current regulations in order to promote sustainable innovation and inclusive financial services.

# **Article 13 (Implementing the Principle of Integrity Management)**

The company should promote a culture of integrity management from top to bottom, proactively plan and implement relevant measures based on business characteristics, such as accountability systems, employee codes of conduct, measures to prevent conflicts of interest, provide appropriate reporting channels, conduct relevant education and training, and establish and improve risk management measures. Establish an assessment mechanism for the risk of dishonest behavior, specify operating procedures, violation punishment and appeal systems in the plan to prevent dishonest behavior, implement and regularly review and amend the disclosure plan.

In order to implement integrity management, the company should establish an effective internal control system, and the audit department should formulate relevant audit plans based on the assessment results of dishonest behavior risks, and use them to check the compliance with the plan to prevent dishonest behaviors, or entrust external accountants perform audits.



# **Chapter 3 Principles and Strategies of Fair Customers Treatment**

#### **Article 14 (Compliance of Products and Services)**

When each unit of the Company provides financial products or services, it should adopt appropriate procedures to evaluate whether the products or services meet customer needs, including the design, advertising, sales, contract fulfillment, service consultation and customer complaint handling, etc., all of which should consider customers. For example, the characteristics of products or services are suitable for customers, designing a sales process that meets customer needs, reviewing customer complaint information, allowing employees to give feedback to improve customer treatment processes, reviewing the effectiveness of processes and policies for treating customers fairly, etc. to ensure that products and services meet customer requirements. Customer needs, and should comply with relevant laws and regulations on financial consumer protection to achieve the purpose of treating customers fairly.

The formulation, revision or abolition of the company's various operating and management guidelines should involve the participation of Legal & Compliance, Internal Audit and Risk Management departments and other relevant units when necessary.

When each unit launches a new product or new business and is required to conduct a product review meeting in accordance with the company's relevant guidelines, the proposing unit should fill in the "New Product/New Service Fair Customers Treatment Principles Evaluation Form" (as attached) and submit it to the Legal and Compliance department's final review. The evaluation form is one of the documents that the product review team should review.

Before the company launches various new products and services and applies to the competent authorities to start new types of business, the Chief Compliance Officer of the head office should issue and sign an opinion that complies with regulations and internal guidelines.

# **Article 15 (Necessity of review and adjustment)**

When customer complaints or financial consumption disputes occur, each unit shall handle them promptly and properly in accordance with the company's relevant dispute resolution system and regulations. The Fair Customers Treatment Implementation Committee shall also examine whether there are any violations



of the principles of fair customers treatment or financial consumer protection laws and regulations, timely request amendments to relevant regulations or operating procedures.

The Financial Business Division, Financial Markets Division, Operations Management Division, Technology Division, and Strategic Development Divisionh should regularly refer to the examples listed in "Matters Financial Institutions Should Pay Attention to Strengthening in Implementing the Principle of Fair Customers Treatment" and related deficiencies or businesses at least annually, submit the report to the Fair Customers Treatment Implementation Committee for review and examine whether there is any need to adjust.

# **Chapter 4 Execution of the principle of Fair Customers Treatment**

### **Article 16 (Execution of the principle of Fair Customers Treatment)**

Each unit of the company should follow the policy and strategy of treating customers fairly and formulate relevant norms in internal business management guidelines or operating manuals to facilitate employees' compliance and execution.

The company's operational risk units should, in accordance with relevant regulations, review whether each unit's implementation of the principle of fair customers treatment is appropriate, identify possible violations, and formulate specific solutions.

The company's implementation of the principle of fair customers treatment is handled by the Fair Customers Treatment Implementation Committee in accordance with the "Organizational Rules of the Fair Customer Treatment Implementation Committee" and the execution status is reported to the board of directors on a regular basis. According to regulations, the members of Fair Customers Treatment Implementation Committee must review bank's performance assessment results on Treat Customer Fairly of the previous year. The self-assessment results are then submitted to the Board of Directors for review and then to the Financial Supervisory Commission before the end of April each year.



In addition to the relevant business training of each unit, in order to specifically implement the policies and strategies of the principle of fair customers treatment and enhance the awareness and professional knowledge of the company's staff in complying with the regulations and treating financial consumers fairly and reasonably, this code should be included in education and training courses. Course types including regulation introduction to financial consumer protection, case studies and consumer response simulation training types, at least three hours of physical or online education and employee training courses are regularly conducted every year.

### **Article 17 (Internal Control and Audit System)**

The formulation and implementation of policies and strategies related to the "Principles of Fair Customers Treatment" should be incorporated into the company's internal control and audit system.

# **Chapter 5 Supplementary Provisions**

# **Article 18 (Regulatory updates)**

The company should always pay attention to the amendments to the laws and regulations listed in this policy, and update the policies and strategies on the principle of fair customers treatment according to the latest amendments.

#### **Article 19 (Supplementary Provisions)**

This policy shall be submitted to the Board of Directors for approval, including revisions. The revision of the appendix "Evaluation Form on the Principles of Fair Customers Treatment for New Products/New Services" is authorized for approval by the President.