



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

Approved by the 2nd meeting of the 9th Board of Directors on June 29, 2023

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 and zero-tolerance stance on unethical acts such as bribery and 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.

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 and ethical management policy of agents, suppliers, customers, and other business counterparts. This assessment shall also ascertain if there is any record of involvement in unethical activities. The objective is to ensure that their business operations are fair and transparent and do not involve asking for, offering, or accepting bribes.

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, mandatarly 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.

Article 9

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