# **Chang Hwa Bank Complaint Handling Regulations**

Established in 16th Meeting of 25th Term of Board of Directors Meeting dated September 28, 2018

Revised in 26th Meeting of 27th Term of Board of Directors Meeting dated May 15, 2025

### Article 1 (Purpose of establishment and basis)

The Bank explicitly discloses in the Ethical Corporate Management Best Practice Principles, Codes of Ethical Conduct and Employee Code of Conduct that all directors, managerial officers and employees shall comply with the highest personal and ethical standards in the scope of business activities, and shall comply with the laws and the conduct policies of the Bank.

To establish ethical and transparent corporate culture, to promote sound management, the Bank establishes these Regulations according to Article 34-2 of the "Implementation Rules of Internal Audit and Internal Control System of Financial Holding Companies and Banking Industries", in order to provide complaint channels for the Bank, thereby actively preventing any illegal actions.

# Article 2 (Complainant)

The term "complainant" as used in the Regulations refers to an insider or outsider who files a complaint against the Bank personnel in any of the matters listed in Article 3 in accordance with the procedures and methods prescribed in the Regulations.

### Article 3 (Scope of complaint)

The type of complaint matters accepted under these Regulations are as follows:

- I. Conducts related to violation of laws:
  - (I) Conducts in violation of financial related laws (such as the Banking Act, Securities and Exchange Act etc.) and regulations.
  - (II) Conducts of misappropriation of trade secrets and infringement of trademark rights, patent rights, copyrights, and other intellectual property rights.
  - (III) Conducts involving crime or violation of other laws, such that the rights and interest of the Bank are affected.
- II. Conducts related to corruption and unfair competition:

- (I) Conducts related to offering or accepting bribes, including offer or acceptance of unreasonable presents or hospitality, or other improper benefits.
- (II) Conducts of improper donation or sponsorship.
- (III) Conducts engaging in unfair competition practices.

### III. Conducts related to violation of ethical management:

- (I) Conducts of execution of duties involving forgery, alternation, destruction, concealing important business information or other deceptive statements.
- (II) Conducts failing to comply with the policies and regulations of the Bank for conflict of interest, internal authority, non-disclosure obligation.
- (III) Providing or selling of products and services, directly or indirectly damages the rights and interest of consumers or other stakeholders.
- (IV) Conducts of other frauds or violation of ethical management such that the rights and interest of the Bank are affected.

For complaint cases not belonging to the type of complaints described in the preceding paragraph or classified as appeals or consumer complaint, except for special circumstances, such cases shall be transferred to the responsible unit according for handling within ten business days after receipt according to the nature of the case.

# Article 4 (Acceptance and investigation unit)

The Compliance Division of the Bank acts as the complaint acceptance unit (referred to as the "acceptance unit") and is responsible for the complaint case acceptance affairs.

The Bank shall establish the "Complaint Review Committee" formed by the members listed under Paragraph 1 of Article 5, and after cases has been accepted, the convener of the "Complaint Review Committee" shall submit to the President for approval for forming investigation team (at least 3 members), or appoint the Compliance Division of the Bank shall be the investigation unit (referred to as the "investigation unit") in order to be responsible for performing investigation on complaint cases accepted under the preceding paragraph.

If the case complies the criteria outlined in the Bank's "Material Contingencies Handling Procedures" or involve material dishonest behavior, acceptance unit will submit it to the Chairman for approval and transfer it to the Internal Auditing Division for investigation.

### Article 5 (Complaint Review Committee)

# Members of "Complaint Review Committee":

- I. The Chief Compliance Officer acts as the convener, and the Executive Vice President of Human Resource Superintendent acts as the deputy convener.
- II. Committee members: The Head of the Audit Division, Human Resource Division and Compliance Division shall act as the committee members. The convener may also designate other additional the Division's Head involved in the complaint content and appropriate personnel to act as the committee members or to invite other personnel to attend the meeting depending upon the complaint case.
- III. Cases referred to the Internal Audit Division pursuant to Paragraph 3 of the preceding article shall be handled in accordance with the Bank's "Internal Audit System Implementation Rules" and related regulations.

# Resolution method and procedure for proxy of "Complaint Review Committee":

- I. The convener shall act as the chair for the "Complaint Review Committee", and the proposals shall be agreed by a majority of attending committee members and the number of attending committee members shall be more than half of the total number of committee members in order to achieve a resolution.
- II. In the event that the convener cannot exercise his/her authorities due to reasons, the deputy convener shall act as a proxy thereof. If the deputy convener cannot exercise his/her authorities due to reasons, the committee members shall elect one member to act as the proxy thereof.

# Responsibilities of "Complaint Review Committee":

- I. After the investigation those investigated by the team formed by the convener's submission is completed, review the investigation and make resolution therefor.
- II. For those cases which accountability procedures should be initiated in accordance with the Bank's Responsibility Map System Management Measures shall be submitted to the Accountability Committee for review.
- III. In case where a complaint involves matters described in the posterior section of Item (2), Subparagraph 3, Paragraph 1 of Article 7 or Subparagraph 1, Paragraph 3 of Article 7, after the review of the investigation report, submit to the Audit Committee for second review.

#### IV. Other matters related to the complaint case.

The acceptance unit is the secretariat unit of the "Complaint Review Committee", and it is responsible for the meeting notice, mailing of meeting agenda, meeting minutes etc. related affairs as well as matters related to the amendment of these Regulations.

### Article 6 (Complaint channel)

The Bank shall establish and publicize reporting channels such as dedicated telephone number, e-mail and mailing addresses (hereinafter collectively referred to as Complaint Channels). Anyone who aware any of the types of cases listed in Article 3 may use the Complaint Channels to file a complaint to the Bank.

Internal complainant shall file the complaint on the complaint system of the Bank along with his/her name indicated on it, or by using other Complaint Channels.

Other units or personnel of the Bank shall transfer the case to acceptance unit for handling in a confidential manner once the units or personnel become aware of the complaint matter. If a director or independent director of the Bank receives a complaint, he/she may directly assign the acceptance unit or designated unit to handle it.

# Article 6-1 (Principle of acceptance)

After receiving the complaint, the acceptance unit shall assign a specific personnel to handle it as confidential and conduct a formalities examination. The complaint shall at least furnish the following information before it is accepted:

- I. The complaint's name and national I.D. number, and an address, telephone number and e-mail address; if the complaint is a foreign national, he/she shall provide other I.D. number that can be verified.
- II. The party's name being complained or other information sufficient to distinguish its identifying features.
- III. Specific facts available for investigation, include but not limited to the object, content of event and date.

If the party or the matter being complained in the preceding paragraph is subsidiary's personnel or business, the acceptance unit shall transfer the complaint case to the subsidiary for handling in accordance with its complaint mechanism and request the subsidiary to feedback its processing, findings and improvement measures (if any) to the acceptance unit.

If the complaint does not fall under the category of Article 3, or the content of the complaint is obviously a private dispute, malicious slander, false and malicious accusation, or it is a repeated complaint of the same case that is under investigation or closed and without new evidence, or the party or the matter being complained is not the Bank's personnel or business, or if any of the following conditions are met, the acceptance unit may decide to render the decision of rejection of acceptance, and may indicate the complaint case to be rejected on the complaint system of the Bank, followed by archiving the complaint case according to Article 11:

- Where a complaint case is filed without the name of the complainant, filed with an alias, name of others or is found to be filed on behalf of others, and the contact method of the complainant is not provided;
- II. The required information specified in Paragraph 4 for the complaint report is missing, or other noncompliance with the procedures specified in these Regulations, and correction is not made within the time-limit after the notice for correction is issued.
- III. Where the complainant submits the Withdrawal of Complaint Report (format as shown in Attachment 2, same below) before the investigation unit completes the investigation report. However, when the case is already under the investigation of the investigation unit and is found to be true, the withdrawal of complaint filed by the complainant shall have no binding effect on the investigation unit to continue the investigation.
- IV. Any matters satisfying the conditions described in all paragraphs of Article 9.

In general, anonymous complaints will not be accepted unless the complaint's content or the evidence presented is specific and substantial enough to warrant further investigation.

#### Article 7 (Complaint handling procedure)

# **Acceptance review and receipt report:**

I. When the acceptance unit receives a Complaint Report and complaint documents forwarded from other units or personnel of the Bank, except for the decision of case rejection rendered according to the preceding Article, if the case meets the acceptance principles after review and the case is indeed necessary for investigation, it shall be handled according to the following respectively:

- (I) The acceptance unit shall report to the convener of the "Complaint Review Committee", and the investigation unit shall start the investigation process immediately.
- (II) If the party being complained is a person above the rank of Executive Vice President of the Bank, an investigation team shall be formed to perform investigation and the convener of the "Complaint Review Committee" shall convene a meeting to make resolution for subsequent handling.
- II. The internal complainant may inquire the handling progress of his/her complaint case on the complaint system of the Bank.

# Investigation process and relevant matters requiring attention:

- The investigation unit shall complete the investigation within two months after receiving a complaint case, and such time-limit may be extended if necessary. During the investigation performed by the investigation unit, relevant units may be requested to provide assistance if necessary, and the unit being requested shall not refuse to provide assistance.
- II. The party being complained shall have the obligation to accept the investigation by the investigation unit, including interview, checking of magnetic records on the computer distributed by the Bank, obtaining or saving and telephone recording, listening or storage etc. performed according to relevant regulations of the Bank.
- III. During the investigation process of the investigation unit, relevant personnel may be requested to provide comments, and during interview, it shall be handled in a non-public method in principle, and the opportunity for the party being complained to provide statements shall be provided. When it is considered necessary, external professionals (including attorneys, accountants etc.) may be hired to provide assistance or consultation opinions, and attentions shall be paid to relevant laws and interest of personnel (such as the Personal Information Protection Act and labor interest etc.).
- IV. During the investigation process, the investigation unit shall pay attention to the following conditions:
  - (I) Where it is found to be a major violation or where the Bank has the likelihood of subject to major damages, report shall be made immediately, and after the review by the "Complaint Review Committee", a written report shall be submitted to the Audit Committee and the Board of Directors.

- (II) Where it is found to be a major contingent event or violation of law, it shall be reported to or prosecuted by relevant agency actively.
- (III) Where there is sufficient evidence indicating that the complaint is true, to prevent occurrence or expansion of damages, appropriate measures may be adopted.

# **Subsequent handling:**

- I. After the investigation unit completes the investigation, an investigation report shall be prepared, and the report prepared by the investigation team shall be submitted to the "Complaint Review Committee" for consideration and shall be presented to the President for approval. If the party being complained is a director (including independent director) or management level at a rank above Executive Vice President, the investigation report shall be submitted to the Audit Committee for review and shall also be submitted to the Board of Directors for resolution.
- II. Where a complaint case is signed, reviewed or resolved to confirm to be true, the subsequent handling required to be performed by the acceptance unit is as follows:
  - (I) Relevant unit shall be requested to review its internal control system and operational procedures, and shall submit improvement measures in order to prevent identical actions from re-occurrence again.
  - (II) The party being complained and relevant personnel involving in the case shall be requested to stop their relevant conducts, and shall be subject to appropriate handling according to relevant personnel management regulations. When it is considered necessary, damage indemnification may be claimed according to the legal procedures or may be transferred to prosecution agency for handling.
  - (III) Relevant information including the investigation report, review result and improvement measures proposed by relevant units etc. shall be periodically summarized for reporting to the Audit Committee and Board of Directors. (IV) Other matters specified in the resolutions of "Complaint Review Committee" or instructions of the second review of Audit Committee.
- III. Acceptance unit shall appropriately inform the complainant about the complaint case handling status in writing or other methods.

# Article 8 (Recusal for Conflicts of Interest)

During the process of acceptance, investigation, review and second review of a complaint case, the person in conflict of interest with the individual complaint case or other persons possibly affecting the fairness of the investigation shall recuse from the case.

In case where the convener is subject to the condition requiring recusal described in the preceding paragraph, another convener shall be specified according to Subparagraph 2 of Paragraph 2 of Article 5.

### Article 9 (Res judicata)

Where one identical complainant re-files a complaint based on one identical fact, the handling principles for the acceptance and investigation units are as follows:

- I. A decision of case rejection shall be made according to Subparagraph 1 to Subparagraph 2 of Paragraph 3 of Article 6-1, and except where the complainant files according to the complaint procedure according to these Regulations, the complaint shall not be filed again based on the same fact.
- II. A decision on case rejection shall be made according to the anterior section of Subparagraph 3 of Paragraph 3 of Article 6-1, and except where the complainant describes reasonable grounds for resubmission after withdrawal, and it is reviewed by the acceptance unit to have the need for accepting the case, a complaint shall not be filed again based on the same fact.
- III. Where a complaint case is investigated and closed, investigated to be inconsistent with the fact, or found to be fictitious and false, if the complainant fails to further submit new evidence reviewed by the investigation unit, a complaint shall not be filed again based on the same fact.

#### Article 10 (Protection for complainant and confidentiality of complaint content)

Except regulatory compliance or cooperation with government agency's investigation or information known by the public, the Bank shall maintain the confidentiality of the identity of the complainant and the complaint content.

The Bank guarantees to protect the complainant such that the complainant shall not be terminated, dismissed, downgraded/relocated, given a reduction in pay, impairment to any entitlement under the law, contract or customs, or other

unfavorable disposition due to the reported case. However, where the complainant is subject to improper or illegal matters, including being clearly aware of the deceptiveness of the complaint, such restriction shall not be applied.

Any units or employees of the Bank shall not hinder the investigation work with actions or omission of actions, and shall not use any method to harass, revenge or attack the complainant.

# Article 11 (File archive and preservation)

After the investigation of a complaint case is complete, relevant documents shall be archived and preserved by the acceptance unit in a confidential method for five years, and the preservation may be made in an electronic method. If before the end of the preservation period, any litigation arises in connection with the complaint content, relevant documents shall continue to be preserved until the litigation is concluded.

### Article 12 (Educational training)

The Bank shall include the education course of these Regulations in the orientation training for new employees, and shall periodically organize educational trainings and promotions related to the complaint system.

#### Article 13 (Violation handling)

In the event that other units or personnel of non-acceptance unit receiving complaint report or relevant evidence but fail to forward to acceptance unit for handling, such that the incident expands to cause damages of the Bank, the acceptant unit may report the person attributable to such incident to the Personnel Evaluation Committee of the Bank for resolution and handling.

# Article 14 (Unspecified matters)

Any matters not specified in these Regulations shall be handled according to relevant laws, internal regulations of the Bank and other rules.

#### Article 15 (Approval hierarchy)

These Regulations shall be reviewed and agreed by the Audit Committee first, and shall be submitted to the Board of Directors' meeting for resolution and approval,

followed by implementation of these Regulations. The same requirements shall be applied to amendments of these Regulations.