

Mega Financial Holding Co., Ltd. Whistleblower Case Handling

Guidelines

Established at the 36th meeting of the 6th Board of Directors on November 28, 2017
1st amendment made at the 3rd meeting of the 7th Board of Directors on August 28, 2018
2nd amendment made at the 17th meeting of the 7th Board of Directors on October 22, 2019
3rd amendment made at the 29th meeting of the 7th Board of Directors on October 27, 2020
4th amendment made at the 29th meeting of the 8th Board of Directors on June 12, 2023
5th amendment made at the 15th meeting of the 9th Board of Directors on June 24, 2025

Article 1 (Basis and Purpose of Establishment)

These Guidelines (hereinafter referred to as "the Guidelines") have been established in accordance with the "Implementation Rules of Internal Audit and Internal Control System of Financial Holding Companies and Banking Industries" , "Mega's Principles for Ethical Management " , and other relevant regulations, to establish a corporate culture of integrity and transparency, promote sound management, and provide the basis for Mega to handle whistleblowing cases.

Article 2 (Responsible Unit)

The Compliance Department shall be the responsible unit of the Guidelines.

Article 3 (Types of Whistleblowing Cases)

The types of whistleblowing cases accepted by Mega are as follows:

- I. Fraud, embezzlement or misappropriation of public funds.
- II. Illegal possession and unauthorized disposal of company property.
- III. Forgery of documents leading to losses for the company or its employees.
- IV. Disclosure of internal company secrets and information related to customers or employees.
- V. Receiving bribes or engaging in collusion for personal gain, directly or indirectly benefiting oneself or others unlawfully regarding company-related matters under one's supervision or management.
- VI. Matters reported to Mega under the Public Interest Whistleblower Protection Act.
- VII. Other actions that violate laws or Mega's regulations and may affect its rights and interests.

Article 4 (Whistleblowing Channels)

Individuals who identify any case types enumerated in Article 3 may submit reports to Mega through the following channels:

- I. Whistleblowing hotline: (02)2395-6128
- II. Whistleblowing email: law@megaholdings.com.tw
- III. Written reports: Can be submitted via Mega's Compliance Department whistleblowing mailbox (14F, No. 123, Section 2, Jhongsiao E. Rd., Jhongjheng Dist., Taipei City 10058) or in writing to Mega's directors or independent directors.

Should a report be filed against a director or independent director of Mega by a whistleblower, the reported individual may assign the case to the relevant accepting unit or deal with it directly.

Mega shall announce its whistleblowing channels on its public and internal websites. These channels, which comprise a hotline, email address, and postal address, are provided for the use of both internal and external personnel.

Article 5 (Handling Units of Whistleblowing Cases)

The following Mega units are responsible for handling whistleblowing cases:

- I. Accepting unit: Compliance Department.
- II. Investigation unit: Auditing Office under the Board of Directors.
- III. Review unit:
 - (I) General cases: Shall be reviewed by the Whistleblowing Case Review Committee.
 - (II) Special cases: Whistleblowing cases involving directors or management personnel with responsibilities equivalent to Executive Vice President or above shall be reviewed by the Audit Committee.

Article 6 (Composition and Operation of the Whistleblowing Case Review Committee)

The Whistleblowing Case Review Committee shall be formed by:

- I. President: Shall serve as the convener and chair of relevant meetings.
- II. Chief Compliance Officer.
- III. The Executive Vice President, supervising the Administration Department.

IV. Compliance Department Manager.

V. Administration Department Manager.

VI. The convener shall designate the unit heads and their supervising Executive Vice Presidents from departments relevant to the case's nature.

Meetings shall comprise the Chief Auditor and additional personnel as designated by the convener. Should the President be unable to convene or chair a meeting, an individual designated by them may serve as their proxy.

Resolutions by the Whistleblowing Case Review Committee require the consent of over half of the members present. These resolutions are to be recorded and sent to the accepting unit for implementation.

The Compliance Department serves as the secretariat for the Whistleblowing Case Review Committee. It is responsible for preparing agendas, issuing meeting notices, facilitating proceedings, recording minutes, and handling other related administrative tasks.

Article 7 (Acceptance Principles)

Upon receiving a report, the accepting unit must assign a dedicated individual to process it confidentially and conduct a formal review. The unit may also request the whistleblower to provide the following information:

- I. The whistleblower's name, national ID number, contact address, telephone number or email address.
- II. The reported individual's name or any other data sufficient to identify them.

The whistleblower should provide specific, verifiable evidence (including, but not limited to, the subject, content, and date) of the alleged illegal or improper conduct. If such evidence is provided, Mega shall accept the report, even if it is anonymous. If the required information is not provided, Mega will issue a notification of supplementation. Should the whistleblower fail to provide it within ten days of the notification, or if notification is not possible, the accepting unit may, with the Chief Compliance Officer's approval, decline to accept the report.

The accepting unit may, with the Chief Compliance Officer's approval, decline to accept reports that do not fall under the case types listed in Article 3. This also applies if the report's content is clearly a personal dispute, a malicious attack, false, a repetitive submission of a case already under investigation or submitted without new evidence, or if the reported individual or matter is unrelated to Mega's personnel or business. However, all relevant documents and data must still be recorded for reference.

If the reported individual or matter mentioned in the preceding Paragraph pertains to a Mega subsidiary's personnel or business, the accepting unit shall, in principle, transfer the case to the subsidiary for processing under its own whistleblowing system. The subsidiary will then be required to report its handling methods, investigation results, and any improvement measures to Mega. However, this does not apply if, based on an individual case assessment, it is deemed inappropriate to transfer the case to the subsidiary, and the Chairman approves the investigation unit to handle it.

Special cases that have been accepted after formal review by the accepting unit must be reported to all independent directors.

If a whistleblowing case's content is determined to be outside Mega's purview, it shall be transferred to the relevant external authority and the whistleblower would be notified. This notification requirement does not apply to anonymous reports or when notification is otherwise impossible.

Article 8 (Investigation Principles)

If the accepting unit's review confirms that a reported case meets the acceptance principles in Article 7, it should be submitted to the investigation unit to assess the necessity of an investigation. Should the investigation unit determine an investigation is indeed necessary, it must then seek the Chairman's approval to proceed with a special audit or other relevant investigative actions.

Article 9 (Investigation Procedure)

The investigation unit shall conduct relevant investigations, and if necessary, may officially request

assistance or information from relevant Mega units or subsidiaries. It may also question related personnel, who are not permitted to refuse without a legitimate reason.

Should a reported case present unique circumstances or if the investigation unit lacks appropriate internal personnel to conduct the inquiry, the unit may, upon obtaining the Chairman's approval, engage an external professional or impartial individual to assist with the investigation. Mega shall cover all associated costs.

During the investigation of a whistleblowing case, investigators interviewing related personnel must strictly observe boundaries, avoiding any coercion or inducement.

Once the investigation unit completes its report, it should be submitted to the accepting unit. If it is a special case investigation report, the accepting unit must then report it to the Audit Committee.

Article 10 (Case Review, Immediate and Appropriate Handling Methods, and Submission Procedures)

After receiving the investigation report, the accepting unit shall promptly submit it. For general cases, the investigation report is to be submitted to the President, who will subsequently call for a meeting of the Whistleblowing Case Review Committee. Special cases, however, shall be submitted to the Chairman, followed by a report to the Audit Committee.

If the Whistleblowing Case Review Committee determines that the reported individual has violated relevant laws or Mega regulations, they must be immediately required to cease the conduct or take other appropriate corrective action. The case may also be referred to the Personnel Review Committee for disciplinary review. If necessary, legal action for damages may be pursued to protect Mega's reputation and rights. Before a disposition or disciplinary decision is finalized, however, the reported individual must be given an opportunity to present their views or appeal.

For general cases, once the review unit approved the resolution, the results shall be submitted to the Chairman. For special cases, after approval, the review results shall be submitted to the Board of Directors for appropriate handling.

Article 11 (Conflicts of Interest and Recusal)

During the acceptance, investigation, and review of any whistleblowing case, related personnel handling or participating in the case who have a conflict of interest must proactively request recusal, or the relevant handling unit shall request their recusal. If such personnel knowingly or with gross negligence fail to recuse themselves when the recusal is mandatory, Mega shall take appropriate action based on the circumstances.

The conflict of interest mentioned in the preceding Paragraph applies if the related personnel, or their interested parties, are either the whistleblower or the reported individual, or if the report's content directly concerns the related personnel or their interested parties.

The scope of interested parties for the related personnel is as follows:

- I. Spouse, blood relatives within the third degree of kinship, or relatives by marriage within the second degree of kinship.
- II. Parents or family members who live with the related personnel other than those mentioned in the preceding Subparagraph.
- III. Those who have common interests or potential interest connections with the related personnel.

Article 12 (Notices and Processing Time Limits for Whistleblowing Cases)

The accepting unit must respond to the whistleblower within thirty days of receiving a report, informing them whether it has been accepted. For cases that the investigation unit decides to pursue after assessment, the review unit shall complete its review within three months of the report's receipt.

If a whistleblowing case, as mentioned in the preceding Paragraph, cannot be completed within the specified time limit due to its special nature or complexity, the accepting unit can request an extension with the President's approval.

For cases transferred to subsidiaries under Article 7, Paragraph 4 of the Guidelines for handling via their whistleblowing systems, the subsidiaries must report their progress every thirty days to Mega. They shall also submit investigation results and any improvement measures to Mega within three months. If an investigation cannot be completed within three months due to its unique nature

or complexity, the subsidiary may request an extension by writing to Mega's Compliance Department for approval.

The accepting unit shall suitably inform the whistleblower, via written notice or other methods, regarding the handling progress and results of the reported case.

Article 13 (Subsequent Actions for Substantiated Whistleblowing Cases)

If a whistleblowing case is substantiated, the accepting unit must, in accordance with the review unit's resolution, officially notify Mega's relevant units to take necessary actions against the related personnel. They shall also review the internal control system and operating procedures, and propose improvement measures to prevent the same situation from recurring.

If a whistleblowing case involving a subsidiary is proactively investigated and substantiated by Mega, the accepting unit must, following the review unit's resolution, officially notify the subsidiary. The accepting unit may also require the subsidiary to take necessary actions against the related personnel and review its internal control system and operating procedures. The notified subsidiary shall report its corrective actions and progress to Mega within three months.

If an investigation of a whistleblowing case uncovers a major violation or a significant risk of harm to Mega, the accepting unit must immediately prepare a report for the Board of Directors. If it is a major contingency or a regulatory violation case, it shall be handled in accordance with Mega's "Major Contingency Operating Procedure Guidelines" and notified or reported to the relevant authorities.

The accepting unit shall periodically compile and report to the Ethical Management Committee and the Board of Directors the following: the total number of whistleblowing cases, the number of substantiated cases, their handling methods, and subsequent review and improvement measures.

Article 14 (Retention of Relevant Information)

All documentation, whether written or electronic, related to the receipt, investigation process, and outcomes of a whistleblowing case must be retained for at least seven years. If the case involves litigation, however, relevant records must be preserved until the legal proceedings conclude.

Article 15 (Whistleblower Protection Measures)

Mega maintains a zero-tolerance policy towards retaliation and implements the following protective measures for whistleblowers:

- I. The identity and content of whistleblowing cases must remain confidential. No identifying information should be revealed, thereby protecting whistleblowers from unfair treatment or retaliation.
- II. The whistleblower 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.

Article 16 (Rewards and Penalties for Whistleblowing Cases)

If a whistleblowing case that meets the acceptance principles is not handled or delayed by the accepting unit or its personnel without a valid reason, or if the supervisor of the reported person knows that there is a violation of laws and regulations prior to the report and fails to handle the case, the case shall be handled according to Mega's internal disciplinary regulations.

A whistleblower will be rewarded if their report is found to be true and has contributed to Mega in one way or another.

If an internal whistleblower is found to have made false accusations, false statements, or malicious allegations, the case shall be referred to the Personnel Review Committee for disciplinary review.

Article 17 (Training)

The Compliance Department shall conduct publicity and training on the whistleblowing system for all personnel in Mega at least once a year.

Article 18 (Other Matters)

Any matters not covered in the Guidelines shall be handled in accordance with law and Mega's relevant regulations.

Article 19 (Level of Approval Authority)

The Guidelines shall become effective upon resolution by the Ethical Management Committee and

subsequent approval by the Board of Directors. The same shall apply for any amendments or repeals.