E.SUN Financial Holding Company, Ltd.

FY2025 Tax Contribution Report

Contents

Introduction

In recent years, tax authorities worldwide have intensified their focus on tax matters, with corresponding expectations for robust tax governance. As the first financial holding company in Taiwan to publish a Tax Contribution Report, E.SUN has continued this disclosure for 8 consecutive years. This report is intended to enhance tax transparency, reinforce stakeholder confidence, and address tax-related concerns by providing a clear articulation of our tax governance framework and our approach to responsible tax practices.

In 2025, we conducted overseas tax reviews in selected jurisdiction, performed tax due diligence in connection with acquisitions, and enhanced our effective tax rate monitoring framework to comply with the Global Minimum Tax. We will continue to engage constructively with stakeholders and contribute to the advancement of sustainable and responsible tax practices.

Key figures 2025

NTD 40,931 M	NTD 7,005 M	NTD 4,092 M	NTD 3,967 M
Profit before tax	Income tax paid	Other taxes paid	Withholding tax

Key figures 2024

NTD 32,259 M	NTD 6,022 M	NTD 3,665 M	NTD 3,929 M
Profit before tax	Income tax paid	Other taxes paid	Withholding tax

A.Tax policy and strategy

GRI 207-1

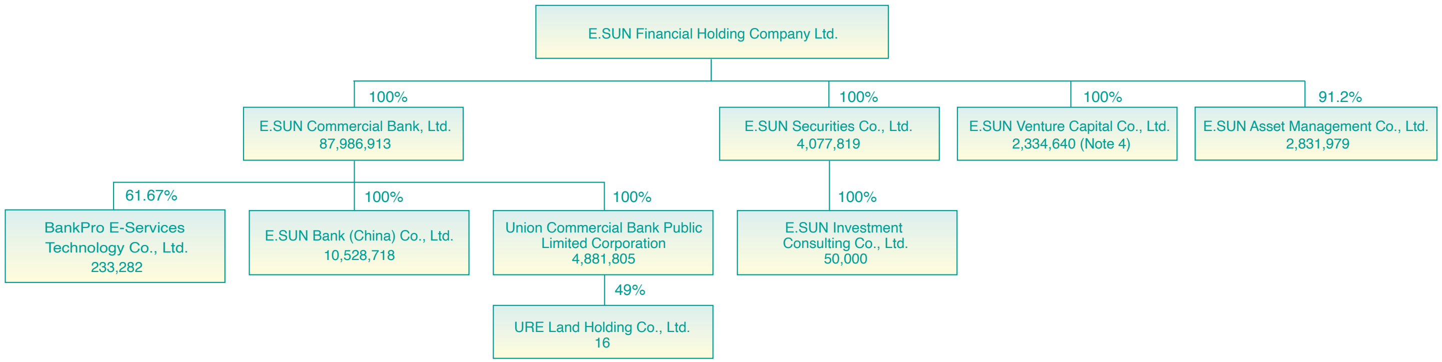
A Tax policy and strategy

A.1 Business overview

To expand the business in financial industry, E.SUN FHC was established on January 28, 2002 and the shares have been listed on the Taiwan Stock Exchange since then. To provide comprehensive financial services, E.SUN FHC integrates the resources of E.SUN Bank, E.SUN Securities and E.SUN Venture Capital. In March 2025, E.SUN FHC acquired PGIM Securities Investment Trust Enterprise. The asset management business is expected to be closely integrated with the Bank's wealth management and private banking business.

As of December 2025, E.SUN Bank maintained 35 overseas business locations spanning 11 tax jurisdictions. Other entities within the Group operate exclusively in Taiwan. The Group's primary sources of revenue comprise interest income and commission income. The Asia-Pacific region has been designated as the Group's primary target market.

Structure of the Group



1. Actual invested amount on December 31, 2025

2. Union Commercial Bank (UCB) Public Limited Corporation (PLC) holds 49% of shares for URE Land Holding Co., Ltd. However, according to the Company Charter of URE Land Holding Co., Ltd., UCB is entitled to control the composition of the Board of Directors of URE Land Holding Co., Ltd., and UCB PLC holds at least of 90% of economic benefits of URE Land Holding Co., Ltd. Thus, it has been listed as a subsidiary.

3. UCB PLC initially invested US$490 in URE Land Holding Co., Ltd.

4. Subsidiary E.SUN Venture Capital holds 2.4% of shares for BankPro E-Service Technology Co., Ltd., totaling NT$3,250,000. E.SUN Group holds 64.07% stake in BankPro E-Service Technology Co., Ltd.

Tax jurisdictions where E.SUN Bank operates

Entity type	Tax jurisdiction
Parent company	Taiwan
Subsidiary	Taiwan, China, Cambodia
Branch	Hong Kong, Singapore, Vietnam, Australia, Myanmar, Japan, the United States
Representative office	Vietnam, Thailand, Malaysia, the United States

A.2 Tax principles

The Tax Governance Policy and the Transfer Pricing Policy set out the formal principles that guide the Company's tax practices. The policies are approved by, and are subject to oversight from, the Board of Directors (the Board). All entities within the E.SUN Group are required to comply with these policies and the principles. The policies are reviewed annually, and updated as appropriate, in response to changes in tax legislation and relevant international tax initiatives, to ensure continued alignment with global tax developments. The key principles are summarized below.

1. Tax Compliance
We comply with the letter and the spirit of tax laws and regulations to file tax returns accurately and prepare related documents timely.

2. Comprehensive Decision
We make tax strategies comprehensively in accordance with local and international tax trends.

3. Information transparency
We disclose tax information in financial reports and annual reports regularly and publicly.

4. Proactive communication
We develop open and transparent dialogues with tax authorities and work together with governments to improve tax systems.

5. Tax incentives
We only accept legal and transparent tax incentives. We don't seek abusive tax results violating the spirit of tax laws to decrease tax burden.

6. Business structure
Business structure and transactions are aligned with economic substance. We don't make special arrangements to avoid paying tax.

7. Risk management
We evaluate potential tax risks before making tax strategies.

8. Commercial substance
Related-party transactions shall reflect economic reality and the decision-making party shall take the profits correspondingly.

9. Arm's length principle
The condition of the commercial and financial relations of related-party transactions shall be similar to non-related-party's.

Tax Governance Policy and Transfer Pricing Policy are publicly available; please refer to the Appendix and our official website.

Note: The board is the highest governance body in tax governance framework. Our tax governance policy and transfer pricing policy are approved by the Board.

A.3 Anti-tax avoidance declaration

The Board reviews and approves tax governance report every 6 months and ensures that our tax policy is in accord with international tax trends and OECD standards. To support the development of a fair tax system, we put anti-tax avoidance articles into our internal tax governance guidance. The outline of the guidance are as follows:

Comply with the spirit as well as the letter of the tax laws	We are committed to complying with both the letter and the spirit of the tax laws applicable in the tax jurisdictions in which we operate. “Tax compliance” is set out in Article 4 of E.SUN Tax Governance Policy. When there are grey areas in the relevant tax rules, we proactively engage with tax authorities, industry peers, and external consultants to assess the applicable law and evaluate the potential impacts of alternative tax positions.
Not transferring value created to low tax jurisdictions. Not using tax havens / secrecy jurisdictions for tax avoidance.	Based on Article 4 of E.SUN’s Transfer Pricing Policy, we are committed to not transferring value to the low-tax jurisdictions and not using secrecy jurisdictions or so-called tax havens for tax avoidance. According to Global Minimum Tax framework and Taiwan tax law, a low-tax jurisdiction is defined as 15% and 14%, respectively. Based on this standard, we don’t have any branches, subsidiaries or multiple layers of SPVs located in low-tax jurisdictions. Regarding our operations in Hong Kong, Hong Kong was officially removed from the EU tax "Grey List" in February 2024 following its tax reforms. E.SUN has consistently adhered to sustainable tax responsibility standards.
Not using tax structure without commercial substance	Based on article 4 of Tax Governance Policy, we are committed to not using tax structures for tax avoidance. From the shareholding structure to the transactions, we don’t seek abusive tax results, and we also don’t hide specific information from the tax authorities. We make transactions that are in line with commercial substance and pay reasonable tax in every tax jurisdiction we operate.
Undertake transfer pricing using the arm’s length principle	In Taiwan, every transaction between related parties should be in line with arm’s length principle in accordance with Financial Holding Company Act. The conditions of the commercial and financial relations shall be determined by market forces which is same as the principle of OECD. Based on article 5 of E.SUN transfer pricing policy, every related-party transaction should reflect the economic reality and the trade terms should be similar to those non-related–party’s.

A.4 Tax incentives

Responsible tax is the cornerstone of government public expenditure. E.SUN Group pays an appropriate amount of tax in each jurisdiction in which we operate. Our overseas locations currently provide a limited range of services, primarily credit services, wealth management and credit card services, and our overseas operating model is therefore relatively straightforward. Apart from Taiwan, Japan and our Los Angeles Branch, our other locations do not benefit from tax incentives.

Japan	• Deduction of subordinate bond interest expense: If the head office pays interest on subordinate bonds, the Japan branches may recognize a portion of this interest expense in their annual tax filing by allocating the expense using a reasonable basis. In 2025, we claimed approximately TWD 15 million.
Los Angeles	• Deduction of headquarter allocation costs: When filing the annual tax return for the Los Angeles branch, we may claim head office allocated costs by allocating a portion of head office costs using a reasonable basis. In 2025, we claimed approximately TWD 21 million.
Taiwan	• Offshore banking unit: To facilitate financial activities, income derived from OBU is treated as tax-exempt under Taiwan's Income Tax Act. However, unlike other tax incentives, OBU income is still included in the tax base for calculating Taiwan's alternative minimum tax (AMT). The AMT rate is 12%. In 2025, we claimed approximately TWD 2,371 million. • Deduction of Undistributed Earnings for Substantial Investment: To encourage companies to make substantial investments using current-year earnings, qualifying expenditures used to construct or purchase buildings, hardware, software, or technology for in-house production or business purposes may be deducted from the retained earnings of that year, provided the total actual expenditures reach at least NTD 1 million. In 2025, we claimed approximately TWD 54 million.

B.Tax management and advocacy

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B Tax management and advocacy

B.1 Tax governance framework

Under tax governance framework, the Board and Financial Planning Division oversee tax matters and propose possible plans to strengthen internal control.

The Board of directors

The Board serves as the highest governance body within E.SUN's tax governance framework, and is responsible for, including but not limited to, approving tax governance reports, setting tax strategy, and approving amendments to the framework.

Financial Planning Division (tax function unit)

The Financial Planning Division reviews the tax self-assessment of each entity in the group and regularly evaluates the tax burden and tax risk. The Division prepares a tax governance report for the Board every 6 months.

All Entities within the E.SUN Group

All entities within E.SUN Group comply with internal tax policy and submit a tax self-assessment to the parent company every 6 months. In addition, to ensure that tax treatments comply with both the letter and the spirit of applicable laws and regulations, entities consult with the Financial Planning Division when there is uncertainty regarding the appropriate tax treatment.

Q&A

Q: **How can the board of directors oversee and control tax risk?**

A: The board reviews tax reports every 6 months. Besides, tax function unit would be asked to evaluate tax risk for significant transactions. .

Q: **How do we ensure the tax personnel equipped with right level of expertise?**

A: We employed qualified tax staff having tax background. Tax function unit also holds internal online tax seminar to update the latest tax trend.

B.2 Tax risk management

E.SUN has established a tax risk control mechanism to reduce the potential impact and likelihood of tax controversies. The Board reviews the tax governance report to oversee the effectiveness of tax risk management and to identify the potential tax risks.

For **SPECIAL OR SIGNIFICANT** transactions/arrangements, we put the following components into consideration when we evaluate tax risk.

1. If the amount of the transaction is significant
2. If similar transactions were made before
3. If it is a cross-border transaction
4. If it is a related-party transaction
5. If the tax authorities audited similar transaction or issue before
6. Others

Q&A

Q: **Does E.SUN have whistleblower mechanism?**

A: Yes, we have internal and external mailbox for reporting unethical or unlawful behavior related to tax.
The external mailbox: AuditCommittee@esunbank.com

Q: **Please indicate the procedure after identifying tax risks.**

A: We promptly assess the tax implications and develop improvement plans to reduce the likelihood of tax controversies.

For **ROUTINE** tax matters, we use the following steps to control tax risk:

step 1

Risk identification

The responsible division identifies risks and makes improvement plans based on the historical records of the occurrence time and reason of controversial cases.

step 2

Risk assessment

We use a standard tax risk evaluation process to evaluate the likelihood of occurrence and extent of damage.

step 3

Risk monitoring

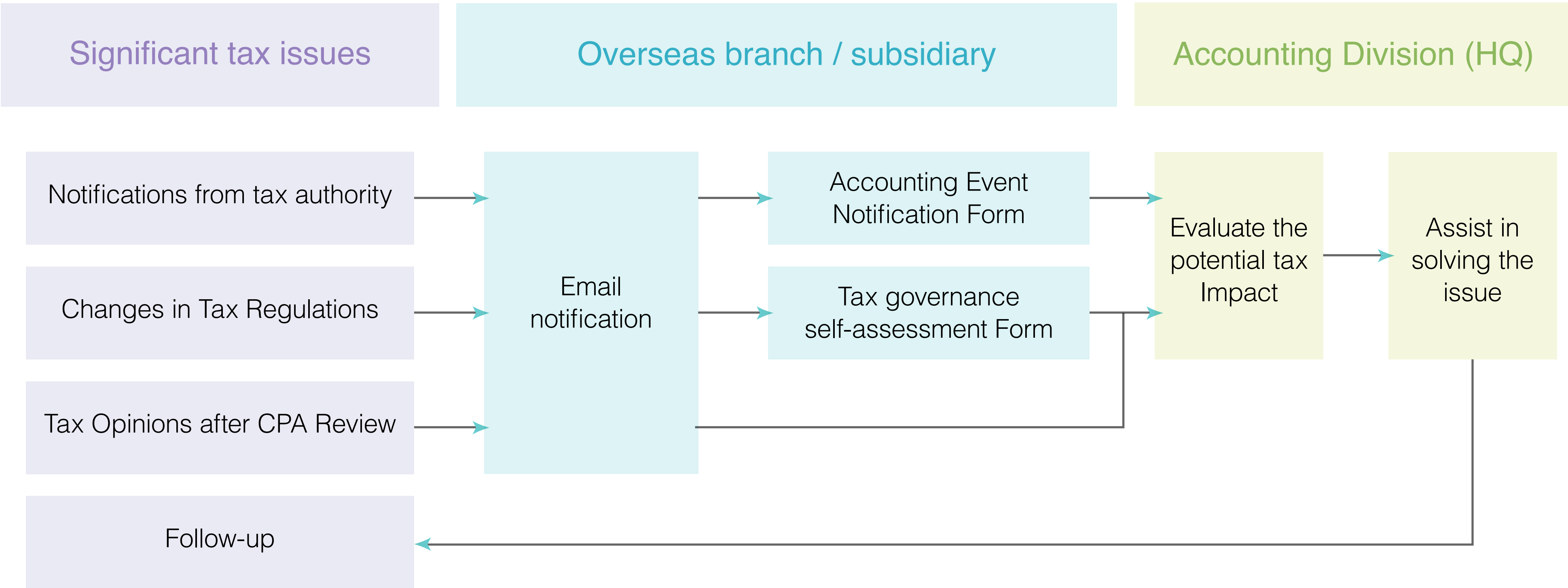
Through internal risk control mechanism, the Board and relevant senior workers assess tax risks regularly.

step 4

Stakeholder engagement

We exchange opinions about tax risks with stakeholders to develop tax strategies to reduce risks.

To manage tax risks at overseas sites, when special events occur (e.g. notifications from tax authorities, changes in tax regulations, etc.), overseas sites are required to report to the parent (head) company in accordance with the notification timetable set out in the chart and table below.



Items	Notification to Head Office		Report Content
	Email	others	
Notifications from tax authority(Tax audit/ Tax refund/Additional tax)	within 24 hours	Accounting Event Notification Form	1.Occurrence Time 2.Case description, tax impacts, resolution plan 3.Attachments(Official Document)
Significant Changes in Tax Regulations	within 7 days	Tax Governance Self-assessment Form	
Tax Opinions after CPA Review	within 24 hours	NA	

B.3 Tax governance highlights in 2025

To support the FHC 2.0 strategy and respond to the rapidly evolving international tax landscape, E.SUN has continued to enhance and strengthen its tax governance framework in 2025. Through our governance mechanism, we aim to further improve the quality of tax compliance while balancing fair tax contributions and the Group's long-term sustainable value.

Tax due diligence and integration for M&A

During the Group's acquisition of PGIM Securities Investment Trust Enterprise (E.SUN Asset Management) in 2025, we applied rigorous tax governance principles throughout the transaction. From the outset, we conducted tax due diligence to identify potential tax exposures and tax risks, thereby enhancing the transparency and robustness of the purchase consideration. As the counterparty to the M&A transaction is a major publicly listed company in the United States, we also evaluated the relevant U.S. tax exposure and compliance filing obligations to ensure adherence to applicable regulatory requirements.
Following the acquisition, in addition to fulfilling our securities transaction tax payment obligations, we initiated a tax governance integration program. Through ongoing engagement with E.SUN Asset Management financial team, we aligned its accounting treatments and tax filing processes with the Group's sustainable tax policy, and key tax management information is reported to the Board on a regular basis.

Two-Line-of-Defense Tax Risk Framework for Overseas Operations: Pre-Assessment and Post-Review

To support the Group's global expansion, we have established a dual-track "pre-assessment and post-review" mechanism for overseas operations, which supports effective management of tax costs.

1. Pre-assessment: During the location assessment phase, we perform an initial review of the applicable local tax rates and key features of the tax regime. We then work closely with local tax consultants during the set-up phase to conduct an in-depth analysis of material tax issues and the level of tax authority scrutiny and enforcement, enabling us to more accurately assess the expected operating costs and tax compliance requirements for each overseas location.
2. Post-review: Through regular monitoring of effective tax rate movements, we identified that the effective tax rate in Japan was significantly higher than the statutory tax rate, primarily due to thin capitalization. In response, the branch, head office, and local tax advisers worked closely in 2025 to optimize the business structure, significantly mitigating its impact and demonstrating the effectiveness of the Group's tax governance framework. Furthermore, we engaged Deloitte & Touche to conduct a comprehensive tax health check program for the Tokyo and Fukuoka branches, further strengthening tax management.

Tax management in response to Global Minimum Tax (GMT/Pillar Two)

In response to the challenges arising from the GMT, although Taiwan had not yet formally introduced GMT regulations, we had already proactively assessed the potential implications and established a management framework to meet the filing obligations in jurisdictions where our overseas operations are located.

1. External consultation and internal training: To ensure the accurate and timely filing of the GMT return, we continue to work with PwC to enhance the data preparation process. In parallel, we provide GMT training to accounting teams across our subsidiaries and branches to ensure the quality and reliability of the data used for GMT filings.
2. Effective tax rate monitoring and financial statement disclosure: We use a two-step effective tax rate (ETR) management framework, dynamically monitoring changes in the ETR across our global operating locations monthly. Based on an assessment using FY2025 financial information, no additional top-up tax is identified. The assessment results are disclosed in our financial statements and are reported to the Board quarterly.

Tax jurisdiction	Step 1 CbCR safe harbor test (simplified ETR>16%)	Step 2 Full ETR test
Taiwan	-	V (Note1)
China	-	V (Note2)
Hong Kong, Singapore, Japan, Australia, Vietnam, the United States, Myanmar, Cambodia	V	-

Note:
1. Taiwan is the tax jurisdiction in which the ultimate parent entity (UPE) of the E.SUN Group is located; accordingly, Taiwan is eligible for the UTPR safe harbor in 2025 and no top-up tax arises.
2. Although China did not meet the simplified ETR test, its ETR under the full computation exceeds 15%; therefore, based on FY2025 data, no additional tax liability arises.

B.4 Stakeholder engagement related to tax

To strengthen public trust, we proactively engage with stakeholders to address tax matters and participate in tax-related public policy advocacy to shape a fair and equitable tax environment.

Tax authorities

E.SUN FHC and its subsidiaries maintain open and honest communication with tax authorities. In 2025, E.SUN Bank proactively engaged in consultations with the tax authorities regarding the applicable VAT rates for export services. Following ten rounds of supplemental submissions and detailed explanations, the authorities obtained a comprehensive understanding of the nature of the transactions and ultimately approved the zero-rated application, thereby reducing uncertainty in tax compliance.

Peers and Banker Association

In 2025, E.SUN FHC exchanged views with domestic peers through the bankers' association on the impacts of the OBU tax incentive to keep abreast of policy changes in time. Besides, E.SUN Bank applied for R&D investment tax credits and proactively engaged the Industrial Development Bureau, the Financial Supervisory Commission, and the tax authorities to facilitate cross-agency, two-way communication.

Clients

In the course of clients' inheritance proceedings, the Bank is required to amend prior-year tax filings with respect to reported interest income. Accordingly, E.SUN Bank exchanged views with peer on tax return amendment practices in 2025, with a view to strengthening client relationships and improving operational efficiency.

Public advocacy -NGO

E.SUN FHC continues to participate in the tax-focused online exchange sessions hosted by the global tax initiative organization, The B Team, leveraging regular tax meetings to stay abreast of OECD legislative developments and tax issues of concern to stakeholders.

Independent Directors and Investors

E.SUN FHC discloses tax-related information and provides explanations for year-on-year movements in the effective tax rate on its official website on an annual basis. Besides, independent directors with accounting and tax expertise review the quarterly financial statements to ensure timely control of tax costs and related risks.

C. Tax figures

GRI 207-4

C

Tax figures

C.1 Tax reporting (Country-by-Country Report)

Taiwan, where the Group's headquarters is located, accounted for 79.28% of our total revenue. Across the jurisdictions in which we operate, we maintain sufficient employees and physical offices aligned with our business activities. Our public country-by-country reporting enhances transparency and helps stakeholders better understand the Group's tax profile and global tax contribution.

Financial figures of E.SUN FHC-2025

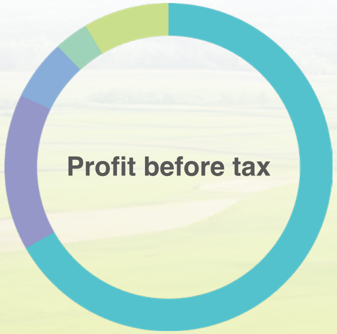
Unit: TWD millions/person

Tax jurisdictions	Revenue	Profit before tax	Income tax accrued (current year)	Income tax paid	Other taxes paid	Number of employees
Taiwan	$134,029	$29,621	$4,774	$4,952	$3,853	9,458
Hong Kong	12,586	5,119	884	888	-	204
China	3,843	908	102	70	187	360
Cambodia	1,735	474	81	35	24	503
Singapore	5,829	1,920	318	291	1	92
The United States	3,633	1,083	284	302	-	31
Australia	3,866	646	200	196	9	49
Myanmar	852	360	82	48	-	29
Japan	1,874	429	194	144	13	50
Vietnam	809	371	75	80	5	90
Total	$169,056	$40,931	$6,994	$7,006	$4,092	10,866

Note:
1. According to the Country-by-Country report guideline released by Taiwan tax authority, investments accounted for using equity method should not be included in the amount of revenues and profit before tax.
2. Profit before tax and income tax paid are reported on consolidated basis, while revenue, income tax accrued and other taxes paid are reported on aggregated basis.

The proportions of revenue, profit before tax and income tax paid by tax jurisdiction-2025

79.28%	Taiwan
7.44%	Hong Kong
3.45%	Singapore
2.29%	Australia
7.54%	Others



72.43%	Taiwan
12.48%	Hong Kong
4.68%	Singapore
2.64%	The United States
7.77%	Others

70.77%	Taiwan
12.64%	Hong Kong
4.29%	The United States
4.14%	Singapore
8.16%	Others

Names of all the resident entities & primary activities

Tax jurisdictions	Statutory tax rate	Name of the resident entities	Primary activities
Taiwan	20%	1.E.SUN Financial Holding Company, Ltd. 2.E.SUN Commercial Bank, Ltd. (E.SUN Bank) 3.E.SUN Securities Co., Ltd. 4.E.SUN Venture Capital Co., Ltd. 5.E.SUN Investment Consulting Co., Ltd. 6.BankPro E-Service Technology Co., Ltd. 7.E.SUN Asset Management Co., Ltd.	1.Holding shares 2.Banking 3.Securities 4.Venture Investment 5.Consulting 6.Information technology 7.Asset Management
Cambodia	20%	1. Union Commercial Bank Plc. 2. URE Land Holding Co., Ltd.	1. Banking 2. Leasing industry
China &Hong Kong	China 25% Hong Kong16.5%	1. E.SUN Bank (China) 2. E.SUN Bank- Hong Kong Branch	Banking
Singapore	17%	E.SUN Bank - Singapore Branch	Banking
The United States	21%	E.SUN Bank - Los Angeles Branch	Banking
Vietnam	20%	E.SUN Bank - Dong Nai Branch	Banking
Japan	30.62%	E.SUN Bank - Tokyo & Fukuoka Branch	Banking
Australia	30%	E.SUN Bank - Sydney Branch & Brisbane Branch	Banking
Myanmar	22%	E.SUN Bank - Yangon Branch	Banking

C.2 Tax jurisdiction highlights

Tax transparency, fair taxation and measures against base erosion and profit shifting are 3 main aspects EU uses to assess whether a tax jurisdiction is cooperative on tax matters. To dispel the doubts regarding certain tax jurisdiction of our group, we outline the local business of Taiwan, Hong Kong and Singapore.

Taiwan

Taiwan is our primary tax jurisdiction for business development, accounting for 79.28% of the Group's revenue in 2025. While income generated by the Offshore Banking Unit (OBU) is treated as tax-exempt under Taiwan's Income Tax Act, such income is still included in the taxable income base for purposes of calculating Taiwan's alternative minimum tax (AMT). The AMT rate is currently 12%. In response to the Global Minimum Tax, the Ministry of Finance plans to amend the AMT rate to 15%.

Hong Kong

Hong Kong is regarded as one of the most important leading regional centers in the world, therefore E.SUN has maintained a presence in Hong Kong for more than two decades. We offer corporate banking and wealth management services in Hong Kong to address our clients' diverse needs.
In 2021, Hong Kong was placed on the EU's grey list in connection with its foreign-source income exemption regime; it was subsequently removed from the list in 2024. While we maintain an operating presence in Hong Kong, our profits are generated from local business activities and are supported by appropriate economic substance. In addition, we do not generate any foreign-source income that is exempt in Hong Kong; accordingly, there is no concern that we are using the relevant regime in a manner that could facilitate tax avoidance.

Singapore

Singapore is one of the Group's top three revenue-generating jurisdictions. Our operations in Singapore are broadly similar to those in Hong Kong. Although Singapore was temporarily included on the EU's grey list due to tax transparency concerns, the Singapore government promptly enhanced its tax framework. Our profits in Singapore are derived from local business activities. We do not generate any foreign-source income that is exempt in Singapore, nor do we benefit from tax incentives; accordingly, there is no concern that our Singapore operations could be used to facilitate tax avoidance.

C.3 Effective tax rate (two-year income tax information)

E.SUN FHC's reported tax rate for 2025 was 16.02%, which is below the statutory tax rate of 20% and the global average banking effective tax rate of 21.29% reported in the CSA handbook released by S&P Global. The variance is primarily attributable to tax-exempt income generated by the Offshore Banking Unit. Year-on-year movements in the reported tax rate are likewise mainly driven by fluctuations in the amount of tax-exempt income.

Unit: TWD millions/%

	2025	2024	Calculated averages	Reference
Earnings before tax (a)	$40,931	$32,259	$36,595	Appendix E.4
Reported taxes (b)	6,557	6,111	6,334	Appendix E.4
Reported tax rate (b) / (a)	16.02%	18.94%	17.31%	
Adjustments (c)				
Timing -Deferred tax	437	181	309	Financial statements p.67
Prior year's adjustments	390	160	275	
Tax-exempt income	2,371	873	1,622	
Effective tax rate (b+c) / (a)	23.83%	22.71%	23.34%	
Cash taxes paid (d)	7,006	6,022	6,514	Appendix E.4
Cash tax rate (d) / (a)	17.12%	18.67%	17.80%	

Note:

1.Timing difference-deferred tax

Deferred tax assets in both 2025 and 2024 primarily arose from temporary differences related to unrealized revaluation adjustments of financial instruments, which resulted in a decrease in reported tax rate in each year.

2.Prior year's adjustments

Prior-year adjustments represent differences arising from notice of assessment issued by the tax authorities, primarily attributable to timing differences in the recognition of foreign tax credits.

3.Tax-exempt income

Income derived from the Offshore Banking Unit (OBU) is exempt from income tax under Taiwan's Income Tax Act, which reduces the Group's effective tax rate.

4.Cash tax rate difference

Under Taiwan's Income Tax Act, companies are required to file annual income tax returns in May of the following year. Accordingly, income tax paid in May generally relates to the prior year's taxable income, which may result in a mismatch between the period of profit before tax and the period to which cash taxes paid relate.

D. Self-Assessment

D. GRI-207 – Tax standard

Global Reporting Initiative (GRI) Sustainability Reporting Standards are designed to be used by organizations to report their impacts on the economy, environment, and society. GRI 207 addresses the topic of tax. It illustrates the disclosure standard. Organizations have an obligation to comply with tax legislation, and a responsibility to their stakeholders to meet expectations of good tax practices.

Tax disclosures	Requirement	Remarks
Disclosure 207-1 Approach to tax	A description of the approach to tax, including: i. Whether the company has a tax strategy which is publicly available. ii. The governance body within the organization reviews the strategy. iii. The approach to regulatory compliance. iv. How the approach is linked to the business and sustainable development.	Yes, we meet this requirements.
Disclosure 207-2 Tax governance, control, and risk management	The reporting organization shall report the following information: i. The tax governance and control framework. ii. The mechanism for reporting unethical and unlawful behavior. iii. The assurance process for disclosure on tax.	Yes, we meet this requirements.
Disclosure 207-3 Stakeholder engagement and management of concerns related to tax	The reporting organization shall report the following information: i. The approach to engagement with tax authorities. ii. The approach to public policy advocacy on tax. iii. The processes for collecting the views and concerns of stakeholders.	Yes, we meet this requirements.
Disclosure 207-4 Country-by-country reporting	The reporting organization shall report the following information: i. All tax jurisdictions where the entities included in the organization's audited consolidated financial statement. ii. The requirement of disclosure (country-by-country disclosure) iii. The time period covered by the information reported in this disclosure.	Yes, we meet the reporting requirements of GRI 207. For the reporting recommendation, we put it as future disclosing item.

E. Appendix

E Appendix

E.1 Tax Governance Policy

Chapter I. General Provisions

Article 1

This tax governance policy (hereinafter referred to as the "Policy") is established by E.SUN Financial Holding Co., Ltd. ("E.SUN FHC") in response to the international trend of adopting tax governance, aims to integrate resources and achieve stable growth by realizing high standard of tax compliance and incorporating the Policy into business policies and financial goals.

Article 2

The Policy, considered the economic and social impacts and provided tax risks are controllable, requires that deployment of tax strategies and management of tax costs be consistent with the pursuit of stability, the philosophy of sustainable development, and the goal of increasing shareholders' value while fulfilling E.SUN FHC's obligations as a socially responsible corporate citizen.

Article 3

Every subsidiary and branch, which constitutes the consolidated financial statements of E.SUN FHC, shall comply with the Policy for tax governance purposes.

Chapter II. Tax Governance Principles

Article 4

Tax Governance Principles:

1. Tax compliance: E.SUN FHC is committed to complying with the local tax laws and the spirit in all tax jurisdictions we operate, and meeting the tax obligations by statutory deadlines.
2. Comprehensive decision: To conduct overall impact evaluation on the changes in local and international tax laws and quickly develop strategies in response to such changes.
3. Information transparency: Tax-related information is disclosed regularly to stakeholders in financial reports and annual reports or via other public channels to ensure transparency.
4. Proactive communication: E.SUN FHC is committed to maintaining an open and honest communication pipeline with tax authorities and proactively providing practical perspectives and insights into the industry, which in turn enhances the tax environment and taxation system.

5. Tax incentives: E.SUN FHC is committed to only using tax incentives offered by the governments and in line with regulatory frameworks as well as economic substance, not using aggressive tax planning for tax avoidance.
6. Business structure: E.SUN FHC is committed to only using business structures and transactions that are in line with commercial substance, not undertaking transactions whose sole purpose is to create a tax benefit.
7. Risk management: In accordance with the legislation and international trends, we evaluate tax risks before making or executing tax strategies.

Enforcement Rules of the Tax Governance Policy are established in accordance with the first paragraph of article 4 of the Policy, the tax laws and the business strategy. The Rules shall become effective upon approval of the General Manager.

Chapter III. Management Structure

Article 5

The organization and authority of tax governance are described as follows:

1. Board of Directors

(1) The Board of Directors has the ultimate monitoring authority in establishing the effective tax risk management mechanisms of E.SUN FHC.

(2) The Board of Directors approves overall tax governance policies based on holistic operating strategies and business environment in order to ensure the effective implementation of tax management mechanisms.

2. Tax management unit

(1) The Financial Planning Division is named the tax management unit and shall regularly report tax management related matters to the Board of Directors every half year.

(2) The staff of tax management unit develop talents and enhance the expertise by taking tax training courses. The succession-planning for positions within the section is executed by sharing the experiences regularly.

Chapter IV. Supplementary provisions

Article 6

Transactions between related parties should comply with the arm’s length principle, as well as the Transfer Pricing Policy of E.SUN FHC.

Article 7

The Policy shall be reviewed and amended accordingly in response to changes in international and domestic laws and regulations.

Article 8

The Policy shall become effective upon approval of the Board.

E.2 Transfer Pricing Policy

Chapter I. General Provisions

Article 1

This transfer pricing policy on related-party transactions (hereinafter referred to as the "Policy") is established by E.SUN Financial Holding Co., Ltd. ("E.SUN FHC") in response to the international trend of anti-tax avoidance and the publication of Base Erosion and Profit Shifting (“BEPS”) action plan by OECD, aiming to establish systematic rules for E.SUN FHC intra-group transactions.

Article 2

With the pursuit of business stability, when E.SUN FHC intra-group transactions are conducted by related parties, tax avoidance shall not be regarded as the purpose, and rather the commercial reality, corporate social responsibility, risk monitoring and sustainable development shall be considered to fulfill E.SUN FHC’s obligations as a world socially responsible corporate citizen.

Article 3

Any domestic and overseas subsidiary and overseas branch, which constitutes the consolidated financial statements of E.SUN FHC, shall comply with the Policy for tax governance purpose.

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Chapter II. Principles for Transfer Pricing on Related-Party Transactions

Article 4

Commercial Substance Principle:

Related-party transactions shall be in accord with rational commercial purpose with the transfer price reflecting economic reality and the actual decision-making party taking risks derived from such transactions and generating corresponding returns.

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Article 5

Arm’s-length Principle:

Related-party transactions shall be assessed individually by the optimal arm’s-length method of transfer pricing regulations agreed in each country so as to ensure the contractual terms are similar to those of other non-related-party transactions alike

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Article 6

Tax Compliance Principle:

Any domestic and overseas subsidiary and overseas branch of E.SUN FHC shall comply with the taxation laws of its location to prepare or file the related-party transaction details, transfer pricing documents, etc.

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Chapter III. Management Structure

Article 7

The organization and authority of transfer pricing on related parties are described as follows:

1. Board of Directors

(1) The Board of Directors has the ultimate monitoring authority in establishing the effective related-parties transfer pricing management mechanisms of E.SUN FHC.

(2) The Board of Directors approves overall transfer pricing policies on related parties based on holistic operating strategies and business environment in order to ensure the effective implementation of transfer pricing management mechanisms.

2. Implementation unit

The Financial Planning Division is named the implementation unit and shall regularly or non-regularly report related-parties transfer pricing related matters to the Board of Directors every year.

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Chapter IV. Supplementary provisions

Article 8

This policy shall be reviewed and amended accordingly in response to changes in international and domestic laws and regulations

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Article 9

This policy shall become effective upon approval of the Board.

E.3 Responsible tax principle

The Responsible Tax Principles were developed by The B Team and were launched at the United Nations Headquarters in New York in February 2018. We have endorsed the Responsible Tax Principles since 2020. The Principles comprise 7 core principles and 37 underlying items.

Principle	Item
Governance	A. We have a tax strategy and set of principles approved by the Board B. The Board is accountable for the tax strategy and responsibility for tax risk management is clearly delegated to key individuals. C. We put mechanisms in place to ensure awareness of and adherence to our tax strategy and principles and provide opportunities for employees to raise confidentially any issues of concern. D. We have clear procedures in relation to tax risk management and carry out risk assessments before entering into any tax planning on significant transactions. E. We report at least annually to the Board on tax risks and adherence to the tax strategy. F. Our tax strategy and principles apply to all our local tax practices in all jurisdictions, subsidiaries and entities. G. We employ appropriately qualified and trained tax professionals with the right levels of expertise and understanding.
Compliance	A. We prepare and file all tax returns required, providing complete, accurate and timely disclosures to all relevant revenue authorities. B. Our tax planning is based on reasonable interpretations of applicable law and is aligned with the substance of the economic and commercial activity of our business. C. We will not undertake transactions whose sole purpose is to create a tax benefit which is in excess of a reasonable interpretation of relevant tax rules. D. We aim for certainty on tax positions, but where tax law is unclear or subject to interpretation, we evaluate the likelihood and where appropriate seek an external opinion, to ensure that our position would, more likely than not, be upheld. E. We use the arm's length principle, pricing in-line with best practice guidelines issued by the OECD, and apply this consistently across our businesses.

(Continued)

Principle	Item
Business structure	A. The Group is transparent about the entities that it owns around the world and about who owns them. B. We do not use so-called 'tax havens' to avoid taxes on activities which take place elsewhere. Entities which are based in low or nil-rate jurisdictions exist for substantive and commercial reasons. C. We pay tax on profits according to where value is created within the normal course of commercial activity; we do not use artificially fragmented structures or contracts to avoid establishing a taxable presence in jurisdictions where we do business. D. Our tax principles extend to our relationships with employees, customers and contractors. We will not engage in arrangements whose sole purpose is to create a tax benefit.
Relationships with tax authorities	A. We follow established procedures and channels for all dealings with tax authorities, government officials, ministers and other third parties, in a professional, courteous and timely manner. B. We are open and transparent with tax authorities, responding to relevant tax authority enquiries in a straightforward and timely manner to assist in the evaluation of tax liability. C. We endeavour to build relationships of cooperative compliance with tax authorities where both parties engage in a proactive and constructive dialogue to discuss tax planning strategy, risks and significant transactions. D. Where there are misunderstandings of fact or law, we will seek to work with tax authorities to identify the issues and explore options to resolve any misunderstandings or disagreements. E. If we seek rulings from tax authorities to confirm an applicable tax treatment, we do so based on full disclosure of all of the relevant facts and circumstances. F. We will seek to enter into an early dialogue with tax authorities, wherever possible, where there is significant uncertainty about how the tax rules apply to our business. G. We will not bribe or otherwise induce tax officials, government officials or ministers with the aim of obtaining more beneficial outcomes with respect to tax matters.

(Continued)

Principle	Item
Tax incentives	A. Where we accept tax incentives offered by a government authority, we will seek to implement these in the manner intended by the relevant statutory, regulatory or administrative framework. B. We will only use tax incentives where they are aligned with our business and operational objectives and where they require economic substance. C. Ideally, tax exemptions and reliefs should be specified by law and generally available to all market participants. Where there are exceptions, we will work with relevant authorities to encourage publication of those incentives and contracts. D. We will make data available for governments to assess the revenue and economic impacts of specific tax concessions.
Supporting effective tax systems	A. We give constructive input to industry groups, governments and other external bodies and engage with civil society on tax issues in order to contribute to the development of future tax legislation and practice. B. We support initiatives to help develop the capability of tax authorities and systems if requested. C. We promote responsible tax practices which are in line with The B Team Responsible Tax Principles through our relationships with suppliers, contractors and customers and so on.
Transparency	A. A tax strategy or policy, including details of governance arrangements, our tax risk management strategy and our approach to dealing with tax authorities. B. A regular update on our progress and key issues related to our tax strategy and principles. C. An overview of our group structure and a list of all entities, with ownership information and a brief explanation of the type and geographic scope of activities. D. An explanation of why we have subsidiaries, branches and joint ventures operating in low tax jurisdictions. E. Annual information that explains our overall effective tax rate and gives information on the taxes we pay at a country level, together with information on our economic activity. F. Information on financially-material tax incentives, where appropriate, including an outline of the incentive requirements and when it expires. G. An outline of the advocacy approach we take on tax issues, the channels through which we engage in regard to policy development and the overall purpose of our engagement.

E.4 Consolidated statements of comprehensive income and cash flows

E.SUN FINANCIAL HOLDING COMPANY, LTD. AND SUBSIDIARIES

CONSOLIDATED STATEMENTS OF COMPREHENSIVE INCOME

FOR THE YEARS ENDED DECEMBER 31, 2025 AND 2024

(In Thousands of New Taiwan Dollars, Except Earnings Per Share)

	2025		2024		Percentage Increase (Decrease)
	Amount	%	Amount	%	%
INTEREST REVENUE (Notes 4, 33 and 40)	$ 107,496,725	117	$ 100,215,518	132	7
INTEREST EXPENSE (Notes 4, 33 and 40)	(66,557,463)	(72)	(66,218,071)	(87)	1
NET INTEREST	40,939,262	45	33,997,447	45	20
NET REVENUES AND GAINS OTHER THAN INTEREST					
Service fee and commission income, net (Notes 4, 34 and 40)	31,538,252	34	28,158,844	37	12
Gains on financial assets and liabilities at fair value through profit or loss (Notes 4, 8 and 35)	14,813,465	16	9,544,777	13	55
Realized gains on financial assets at fair value through other comprehensive income (Notes 4 and 9)	2,380,185	3	1,825,404	2	30
Foreign exchange gains, net (Note 4)	1,685,047	2	1,747,564	2	(4)
Reversal of impairment losses (impairment losses) on assets (Note 4)	10,183	-	(27,227)	-	137
Other noninterest gains, net (Notes 4 and 17)	343,441	-	897,736	1	(62)
Total net revenues and gains other than interest	50,770,573	55	42,147,098	55	20
TOTAL NET REVENUES	91,709,835	100	76,144,545	100	20
BAD-DEBT EXPENSES AND PROVISION FOR LOSSES ON COMMITMENTS AND GUARANTEES (Notes 4 and 14)	(6,357,277)	(7)	(4,146,556)	(6)	53
OPERATING EXPENSES (Notes 4, 16, 17, 18, 19, 30, 36 and 40)					
Employee benefits	(20,057,877)	(22)	(17,155,146)	(22)	17
Depreciation and amortization	(3,795,671)	(4)	(3,763,998)	(5)	1
General and administrative	(20,567,701)	(22)	(18,819,506)	(25)	9
Total operating expenses	(44,421,249)	(48)	(39,738,650)	(52)	12

(Continued)

(In Thousands of New Taiwan Dollars, Except Earnings Per Share)

	2025		2024		Percentage Increase (Decrease)
	Amount	%	Amount	%	%
INCOME BEFORE INCOME TAX	$40,931,309	45	$32,259,339	42	27
INCOME TAX EXPENSE (Notes 4 and 37)	(6,557,093)	(7)	(6,110,615)	(8)	7
NET INCOME FOR THE YEAR	34,374,216	38	26,148,724	34	31
OTHER COMPREHENSIVE INCOME					
Items that will not be reclassified subsequently to profit or loss (Notes 4, 30 and 37)					
Remeasurement of defined benefit plans	341,483	-	286,276	-	19
Changes in the fair value attributable to changes in the credit risk of financial liabilities designated as at fair value through profit or loss	(32,052)	-	451,863	1	(107)
Unrealized gains (losses) on investments in equity instruments at fair value through other comprehensive income	643,626	1	4,157,713	5	(85)
Income tax relating to items that will not be reclassified subsequently to profit or loss	(59,142)	-	70,943	-	(183)
Items that will not be reclassified subsequently to profit or loss, net of income tax	893,915	1	4,966,795	6	(82)
Items that may be reclassified subsequently to profit or loss (Notes 4 and 37)					
Exchange differences on the translation of financial statements of foreign operations	(1,424,927)	(2)	2,989,647	4	148

(Continued)

(In Thousands of New Taiwan Dollars, Except Earnings Per Share)

	2025		2024		Percentage Increase (Decrease)
	Amount	%	Amount	%	%
Unrealized gains on investments in debt instruments at fair value through other comprehensive income	$4,227,607	5	$2,417,741	3	75
Income tax relating to items that may be reclassified subsequently to profit or loss	85,430	-	(1,128,330)	(1)	108
Items that may be reclassified subsequently to profit or loss, net of income tax	2,888,110	3	4,279,058	6	(33)
Other comprehensive income for the year, net of income tax	3,782,025	4	9,245,853	12	(59)
TOTAL COMPREHENSIVE INCOME FOR THE YEAR	$38,156,241	42	$35,394,577	46	8
NET INCOME ATTRIBUTABLE TO					
Owners of ESFHC	$34,342,232	38	$26,127,505	34	31
Non-controlling interests	31,984	-	21,219	-	51
	$34,374,216	38	$26,148,724	34	31
TOTAL COMPREHENSIVE INCOME ATTRIBUTABLE TO					
Owners of ESFHC	$38,124,007	42	$35,372,202	46	8
Non-controlling interests	32,234	-	22,375	-	44
	$38,156,241	42	$35,394,577	46	8
EARNINGS PER SHARE (NEW TAIWAN DOLLARS; Note 38)					
Basic	$2.12		$1.62		
Diluted	$2.12		$1.61		

The accompanying notes are an integral part of the consolidated financial statements. (Concluded)

CONSOLIDATED STATEMENTS OF CASH FLOWS
FOR THE YEARS ENDED DECEMBER 31, 2025 AND 2024

(In Thousands of New Taiwan Dollars)

	2025	2024
CASH FLOWS FROM OPERATING ACTIVITIES		
Income before income tax	$40,931,309	$32,259,339
Adjustments for:		
Depreciation expenses	3,192,004	3,178,355
Amortization expenses	603,667	585,643
Expected credit losses/bad-debt expenses	6,221,414	4,178,003
Gains on financial assets and liabilities at fair value through profit or loss	(14,813,465)	(9,544,777)
Interest expense	66,557,463	66,218,071
Interest revenue	(107,496,725)	(100,215,518)
Dividend income	(1,629,038)	(1,163,564)
Provision for losses on guarantees	125,680	(4,239)
Salary expenses on share-based payments	1,034,774	784,077
Losses on disposal of properties and equipment	123	12,753
Gains on disposal of properties and equipment	-	(619,357)
Gains on disposal of investments	(751,147)	(661,840)
Others	(18,733)	115,192
Net changes in operating assets and liabilities		
Due from the Central Bank and call loans to other banks	(61,113,843)	(48,678,205)
Financial assets at fair value through profit or loss	41,213,017	22,044,415
Financial assets at fair value through other comprehensive income	(28,016,516)	(7,353,114)
Investments in debt instruments at amortized cost	(41,811,566)	(4,872,632)
Receivables	(13,317,077)	(13,796,139)
Discounts and loans	(295,912,405)	(251,208,463)
Other financial assets	730,241	(6,159,924)
Other assets	352,453	(971,883)

(Continued)

(In Thousands of New Taiwan Dollars, Except Earnings Per Share)

	2025	2024
Net changes in operating assets and liabilities		
Deposits from the Central Bank and other banks	(12,273,028)	35,055,394
Financial liabilities at fair value through profit or loss	(31,797,704)	(41,840,100)
Derivative financial liabilities for hedging	2,207,700	-
Securities sold under repurchase agreements	(2,963,173)	13,579,422
Payables	2,190,449	4,272,040
Deposits and remittances	433,612,481	323,565,866
Provision for employee benefits	511	47
Other financial liabilities	12,158,054	9,979,053
Other liabilities	(567,872)	1,183,833
Cash generated from (used in) operations	(1,350,952)	29,921,748
Interest received	111,152,072	99,781,893
Dividends received	1,774,492	1,285,513
Interest paid	(68,009,100)	(65,673,290)
Income tax paid	(7,005,501)	(6,021,732)
Net cash generated from (used in) operating activities	36,561,011	59,294,132
CASH FLOWS FROM INVESTING ACTIVITIES		
Net cash outflow on acquisition of subsidiary	$(1,727,818)	-
Payments for properties and equipment	(2,238,137)	(1,655,197)
Proceeds from disposal of properties and equipment	1,705	1,215
Increase in settlement fund	(270,094)	(55,931)
Decrease in settlement fund	228,142	29,483
Increase in refundable deposits	(1,740,302)	(5,768,396)
Payments for intangible assets	(315,178)	(396,556)
Payments for right-of-use assets	(460)	(426)
Proceeds from disposal of investment properties	-	721,723

(Continued)

(In Thousands of New Taiwan Dollars, Except Earnings Per Share)

	2025	2024
CASH FLOWS FROM INVESTING ACTIVITIES		
Increase in other assets	-	(1,836)
Net cash used in investing activities	(6,062,142)	(7,125,921)
CASH FLOWS FROM FINANCING ACTIVITIES		
Increase in short-term borrowings	5,500	-
Decrease in short-term borrowings	-	(32,118)
Increase in commercial paper issued	4,170,000	15,630,000
Proceeds from issue of corporate bonds	16,000,000	3,800,000
Repayments of corporate bonds	(2,000,000)	(4,000,000)
Proceeds from issue of bank debentures	5,620,000	2,700,000
Repayments of bank debentures	(20,450,000)	(3,300,000)
Repayments of long-term borrowings	-	(36,248)
Increase in financial liabilities designated at fair value through profit or loss	-	1,457,272
Decrease in financial liabilities designated at fair value through profit or loss	-	(2,747,927)
Increase in guarantee deposits received	-	2,270,466
Decrease in guarantee deposits received	(1,833,651)	-
Repayments of the principal portion of lease liabilities	(1,285,934)	(1,254,202)
Cash dividends paid	(19,194,960)	(18,796,800)
Cash dividends paid to non-controlling interests	(16,167)	(16,167)
Net cash generated from (used in) financing activities	(18,985,212)	(4,325,724)
EFFECTS OF EXCHANGE RATE CHANGES ON CASH AND CASH EQUIVALENTS	2,604,402	(9,067,852)
NET INCREASE IN CASH AND CASH EQUIVALENTS	14,118,059	38,774,635
CASH AND CASH EQUIVALENTS AT THE BEGINNING OF THE YEAR	164,113,499	125,338,864
CASH AND CASH EQUIVALENTS AT THE END OF THE YEAR	$178,231,558	$164,113,499

(Continued)

(In Thousands of New Taiwan Dollars, Except Earnings Per Share)

	December 31	
	2025	2024
RECONCILIATIONS OF THE AMOUNTS IN THE CONSOLIDATED STATEMENTS OF CASH FLOWS WITH THE EQUIVALENT ITEMS REPORTED IN THE CONSOLIDATED BALANCE SHEETS AS OF DECEMBER 31, 2025 AND 2024		
Cash and cash equivalents in the consolidated balance sheets	$43,839,304	$62,593,270
Due from the Central Bank and call loans to other banks in accordance with the definition of cash and cash equivalents under IAS 7 “Statement of Cash Flows”	107,608,982	72,253,587
Securities purchased under resell agreements in accordance with the definition of cash and cash equivalents under IAS 7 “Statement of Cash Flows”	26,783,272	29,266,642
Cash and cash equivalents at the end of the year	$178,231,558	$164,113,499

The accompanying notes are an integral part of the consolidated financial statements.

(Concluded)

E.SUN FHC