

E.SUN Bank Stakeholder Transaction Policy

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Chapter I General Provisions

Article 1 Purpose

This Stakeholder Transaction Policy (referred to as the Policy below) has been established to ensure the fairness of transactions of the Company with stakeholders, and thereby improve the stability of the Company's operations.

Article 2 Definitions

The term "stakeholders" as referred to in the policy means the stakeholders defined by Article 44, Article 45 of the Financial Holding Company Act, Articles 32, 33, and 33-1 of the Banking Act, and related regulations.

The term "transactions" as referred to in the policy means credit and non-credit transactions as defined by Article 44, Article 45 of the Financial Holding Company Act, Articles 32, 33 of the Banking Act, and related regulations.

Chapter II Code of Conduct

Article 3 Principle of good faith

All personnel at E.SUN Bank handling transactions with stakeholders must ensure that the conditions are not more favorable than those provided to other similar entities. Furthermore, they should conduct business affairs with honesty and ethical behavior on behalf of the company.

An honest conduct is an action taken without fraud, deception and concealment.

A moral conduct is an action taken in compliance with professional standards, and handling conflict of interest in a fair manner.

Article 4 Principles of Priority

All personnel at E.SUN Bank handling transactions with stakeholders should prioritize the interests of the bank and its parent financial holding

company, as well as its subsidiaries, above all else. They must ensure that decisions are not biased due to personal interests and must not abuse their positions to sacrifice the interests of the bank and its parent financial holding company or subsidiaries for personal gain, in order to avoid conflicts of interest.

Article 5 Duty of Confidentiality

All personnel at E.SUN Bank who become aware of any information as a result of handling transactions with stakeholders shall have an obligation to maintain confidentiality, except where authorized, or as otherwise provided by law or regulatory authorities.

Article 6 Compliance with Laws and Regulations

All personnel at E.SUN Bank handling transactions with stakeholders must comply with the " E.SUN Employee Service Code of Conduct and Behavior Standards" as well as other job specifications, and adhere to relevant laws, regulations, and company policies.

Article 7 Fair Trade

All personnel at E.SUN Bank handling transactions with stakeholders must not engage in the following behaviors:

- I. Accepting or offering inappropriate gains, such as kickbacks.
- II. Spreading false or inappropriate comments.
- III. Intentionally making false comments or providing false information.
- IV. Manipulating, concealing or abusing information gained in relation to job duty for unfair trade advantage and illegitimate gains.

Chapter III Preventing Conflicts of Interest

Article 8 Preventing Conflicts of Interest

All personnel at E.SUN Bank handling transactions with stakeholders must adhere to the principle of fairness and avoid any engagement of personal interests that may interfere with the overall interests of the bank, thereby resulting in the following conflicts of interest:

- I. Unable to perform their duties in an objective and efficient manner.
- II. When a person in such a position takes advantage of their position in the company to obtain improper benefits.

Personnel must proactively disclose any potential conflicts of interest with the bank. In cases where there is an interest by themselves or parties related to them, they should abstain from participation in discussions and

voting.

Article 9 Avoidance of Improper Gains

All personnel at E.SUN Bank handling transactions with stakeholders must uphold the legitimate and lawful interests of the bank and avoid the following situations:

- I. Seeking an opportunity to pursue personal gain by using company resources or information or taking advantage of their positions.
- II. Competing with the Company to engage in activities within the scope of the Company's business for him/herself or on behalf of another person.

Chapter IV Processing Procedures

Article 10 Stakeholder Identity Control Procedures and Database Supplement

We shall establish a stakeholder information system managed by a dedicated unit to maintain its accuracy for the purpose of transaction inquiries and control.

All personnel at E.SUN Bank must remain highly vigilant regarding stakeholder data, actively verify and confirm the scope of stakeholders. If they identify any potential discrepancies in the data, they should promptly confirm with the stakeholders. In cases of underreporting, stakeholders should be requested to provide the necessary information according to regulations, and the dedicated unit must be immediately informed to update the records.

Article 11 Control Procedures for Stakeholder Transactions

Before conducting any transactions, units at E.SUN Bank must first verify whether the transaction counterparties are stakeholders, and maintain relevant inquiry records for future reference. However, units that have established internal operating regulations or control mechanisms are exempt from this requirement.

When units at E.SUN Bank engage in transactions with stakeholders, they must create complete documentation for record-keeping purposes. They should report transaction information, including amounts and other relevant details, to the dedicated unit for limit management. Units that conduct control according to the aforementioned exceptions are not subject to this requirement.

Article 12 Board Reporting Procedures

When units at E.SUN Bank engage in transactions with stakeholders that require reporting to the board of directors for approval, the proposing unit must clearly outline the transaction details and stakeholder information in the proposal. Additionally, they should provide comprehensive written documentation demonstrating that the credit conditions or transaction terms are not more favorable than those offered to other similar entities for the board's reference.

When the Board convenes its meeting, the proposing department shall have relevant information ready for use at directors' request.

Article 13 Resolution by Board of Directors (I)

When the board of directors at E.SUN Bank makes decisions regarding transactions with stakeholders, they shall conduct an independent and prudent assessment to ensure the fairness of the transactions.

For transactions that present potential conflict of interest with a certain director, the Board shall make its decision in compliance with laws, with particular regards to the avoidance of involvement by the concerned director and the calculation of votes. The remaining directors, who are free of conflicting interest, shall ensure that the decision is made without compromising the safety and stability of the Company and its subsidiaries, and free of violation against directors' duty of loyalty.

According to Article 5 of the Company's Audit Committee Foundation Policy, transactions that concern directors' personal interests are subject to the consent of more than half of Audit Committee members, and require the approval of the Board.

Article 14 Resolution by Board of Directors (II)

Before making decisions on transactions with stakeholders, the board of directors at E.SUN Bank must disclose any existing or potential conflicts of interest to all directors. Directors with potential conflicts of interest must disclose all relevant facts related to the transaction, and such disclosures must be included in the meeting minutes of the board of directors.

Article 15 Avoidance of Conflicting Interests

When the Board of Directors of E.SUN Bank perform review on stakeholder transaction, the directors shall recuse themselves when the following matters are being reviewed:

- I. When a director has a personal interest in the transaction, which

may impair the interest of the Company.

II. When a director deems him/herself as being involved in the situation described in the preceding paragraph.

III. When the Board of Directors resolves that a director is involved in the situation described in the first subparagraph.

The recused director may not vote during the final resolution and may not vote on behalf of another director. However, the recused director is counted as one of the attending directors.

Article 16 Blanket Transaction Authorization

The Boards of Directors are permitted under Article 45 of the Financial Holding Company Act to grant the management departments a blanket authorization to approve transactions according to internal policies. The authorized departments shall pay particular attention not to grant stakeholders more favorable terms than those offered to other similar counterparties, and shall proceed in strict accordance with the abovementioned rules and the Company's "E.Sun Financial Holding Co., Ltd. and Subsidiaries Internal Operating Rules for Article 45 of Financial Holding Company Act."

Article 17 Parties that Hold Actual Stakes in the Company

All personnel at E.SUN Bank handling transactions with substantial related parties shall also be subject to the relevant provisions of this policy.

The scope of substantial related parties and their credit operation regulations shall be governed by the provisions set forth in the bank's guidelines for credit operations with substantial related parties.

Chapter V Supplementary Provisions

Article 18 Punishment

All personnel at E.SUN Bank handling transactions with stakeholders who violate this policy must have the relevant departments immediately report to the internal audit supervisor for verification. Additionally, such incidents should be reported to the Chairman and the General Manager. For serious cases, the matter should be submitted to the board of directors and the audit committee.

E.SUN Bank shall hold accountable any individuals who violate the prescribed conduct under this policy according to the nature of the violation, and may take appropriate legal measures against them.

Article 19 Principles concerning execution of the Policy shall be covered in a separate document. Any matters that are not addressed in this Policy shall be governed by the Financial Holding Company Act, the Banking Act, and relevant regulations.

Article 20 The Policy shall become effective upon approval of the Board of Directors.