

Code of Conducts and Ethics of E.SUN

2021.06

~Named after the highest mountain, committed to be the best bank.

E.SUN emphasizes ethical management and has established guidelines for the entire personnel to follow.

The Corporate Governance and Nomination Committee is the unit in charge of ethical management practices. The committee is responsible for assisting the Board of Directors and the management in formulating and supervising implementation of ethical management policies and prevention measures. The committee also reports regularly to the Board of Directors. All E.SUN directors and executive managers have signed the statement of ethical corporate management to declare that they uphold the principles of ethical corporate management while conducting business activities and will actively assist the Board of Directors in fulfilling its commitment to ethical corporate management and overseeing ethical corporate management compliance in internal management practices and other business activities. All E.SUN employees have signed the "E.SUN Employee Service Code of Conduct and Behavior Standards" to practice ethical management with high standards and to realize ethical business operation.

E.SUN also links employee performance with remuneration and includes ethical management in the performance assessment and human resource policies with a clear and effective disciplinary system in place. The sales management units conduct self-assessments and self-evaluation for compliance every six months in order to ensure effective management and implementation. In addition, legal compliance risk evaluation is performed annually. High-risk units are selected for the legal compliance test on important management issues with the aim of improving and adjusting the legal compliance mechanism. The audit unit performs independent risk-oriented audits to ensure the uninterrupted operation of the organization as a whole. All units work together to manage and prevent unethical behavior.

E.SUN Core Values

~Pure as Jade, Sturdy as Mountain.

E.SUN offer warm services with sincerity, and serve business with integrity and high quality.

E.SUN has established related regulation, includes "Ethical Corporate Management Best Practice Principles", "Ethical Procedures and Code of Conduct", "Code of Ethical Conduct of Directors", "E.SUN Employee Service Code of Conduct and Behavior Standards", "E.SUN's Commitment to Anti-corruption, Anti-bribery, and Anti-competitive Behavior", "the Fair Customer Treatment Policies and Strategies", and "the Regulations Governing the Concurrent Serving Management for Responsible Persons". Those rules and policies applies to all E.SUN employees and value chain, includes directors, managers, employees, nominees, other entities with substantive control, and suppliers.

E.SUN emphasizes code of conduct and ethics, which cover the following aspects, includes "Anti-corruption and anti-bribery", "Security and confidentiality of information", "Prevent conflicts of interest and insider trading", "Antitrust/anti-competitive practices", and "Anti-

Money laundering/countering the financing of terrorism”.

People is the key of code of conduct

E.SUN values human rights, discrimination, and we emphasize safety and healthy working environment.

E.SUN believe people is the key of code of conduct. We keep our workplaces as a safe and healthy work environment for its employees, including necessary health and first-aid facilities and endeavor to curb dangers to employees' safety and health so as to prevent occupational accidents. E.SUN also organize training on safety and health for its employees on a regular basis.

In terms of employment opportunities and treatment, E.SUN assure that the fairness of management systems, including payroll and promotion opportunities, is safeguarded. In addition, employees are fully protected against any discrimination, harassment or unfair treatment for reasons of race, gender, religion, age, or political inclination.

We also expect our suppliers to respect Labor Rights. It has been ensured that all dismissals and layoffs of suppliers' employees comply with laws and regulations, and there is no illegal child labor employment, oppression of labor, or discrimination, and all inhumane treatment is prohibited. It has also been ensured that suppliers' operating activities do not pose direct or indirect danger to the safety and health of employees or others.

In order to implement our commitment to and responsibilities for human rights, E.SUN signed "E.SUN FHC Human Rights Commitment", and puts an end to any infringement on or violation of human rights ◦

Implementation of Code of Conduct

✓Anti-corruption and anti-bribery

E.SUN attaches great importance to integrity and anti-corruption, and prohibits bribery, bribery and various dishonest behaviors.

E.SUN request its directors, supervisors, managers, employees, mandataries, and substantial controller, when conducting business, may not directly or indirectly offer, promise to offer, request, or accept any improper benefits in whatever form to or from clients, agents, contractors, suppliers, public servants, or other stakeholders. And may not commits a breach of ethics, unlawful act, or breach of fiduciary duty for purposes of acquiring or maintaining benefits.

E.SUN takes a zero-tolerance approach to bribery and corruption and we are committed to conducting our global business activities free from any form of bribery and corruption.

✓Security and confidentiality of information

E.SUN attaches great importance to the safety and confidentiality of important information ◦

E.SUN employees shall faithfully follow the operational directions pertaining to intellectual properties as mentioned in the preceding paragraph and may not disclose to any other party any trade secrets, trademarks, patents, works, and other intellectual properties of E.SUN FHC of which they have learned, nor may they inquire about or collect any trade secrets,

trademarks, patents, and other intellectual properties of E.SUN FHC unrelated to their individual duties.

Hence, E.SUN establish operational procedures and guidelines to guide directors, managers, employees, and substantial controllers on how to conduct business, keeping confidential trade secrets and sensitive business information obtained in the ordinary course of business. For example, the Company's business conditions, business plans, business policies, product R&D plans, policy plans, financial information, clientele, and other relevant know-how. They may not publicly disclose or publish such information without permission or use such information to gain improper benefits. They are also prohibited from inquiring about or gathering business secrets of the Company which are unrelated to our job duties. The same shall apply in the event that they have left the Company. E.SUN also set up a special unit charged with formulating and implementing procedures for managing and maintaining the confidentiality of E.SUN's trade secrets, trademarks, patents, works and other intellectual properties and it shall also conduct periodical reviews on the results of implementation to ensure the sustained effectiveness of the confidentiality procedures.

✓Prevent conflicts of interest and insider trading

E.SUN adopt policies for preventing conflicts of interest to identify, monitor, and manage risks possibly resulting from unethical conduct.

E.SUN' directors, supervisors, managers, employees, mandataries, and substantial controllers shall not take advantage of their positions or influence in the companies to obtain improper benefits including insider trading for themselves, their spouses, parents, children or any other person.

Staff of all levels of E.SUN FHC and its subsidiaries shall uphold the principle of fairness in handling stakeholder transactions to prevent the following conflicts of interest that occur when personal interest intervenes or is likely to intervene in the overall interest of the company. And in a case with which a staff member has a personal interest, the staff member shall recuse himself/herself from participating in the discussion and voting :

1. Unable to perform their duties in an objective and efficient manner.
2. When a person in such a position takes advantage of their position in the company to obtain improper benefits.
3. 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.

✓Antitrust/anti-competitive practices

E.SUN prohibit all acts of unfair competition.

E.SUN follow the Fair Trade Act and applicable competition laws and regulations when engaging in business activities, and may not fix prices, make rigged bids, establish output restrictions or quotas, or share or divide markets by allocating customers, suppliers, territories, or lines of commerce.

✓Anti-Money laundering/countering the financing of terrorism

AML/CFT is a shared direction and goal internationally.

To strengthen the anti-money laundering (“AML”) and counter terrorism financing (“CFT”) mechanisms , Improve the internal control and audit framework of AML and CFT, and to mitigate the risk of the E.SUN, its subsidiaries and their employees, products or services being used by customers for money laundering and terrorist financing, E.SUN formulate the “Anti-Money Laundering and Countering Terrorism Financing Policy of E.SUN Financial Holding”. The objective of the Policy is to establish consistent standards of internal control and code of conduct for the Company and its subsidiaries.

In order to improve the possibility of prosecution of money laundering, to establish transparent cash flow traces, to enhance relevant systems and to strengthen international collaboration, E.SUN continually implements the AML/CFT mechanisms, including the amendments to domestic and overseas AML/CFT policies and procedures, refining customer due diligence (CDD) and control measures, optimizing AML monitoring and watch-list filtering systems, and providing comprehensive training to strengthen the quality of domestic and overseas AML personnel.

Whistle-blowing system and whistle-blower protection

Enhance E.SUN's corporate culture of integrity, transparency and sound management, E.SUN FHC, E.SUN Bank and E.SUN Securities has established " Whistleblowing Channels and Procedures ". The procedure establishes the dedicated handling unit and independent investigation units. Whistleblowing hotlines, email addresses, and mailboxes are set up. These channels are available to any employee or outsider wishing to blow a whistle to any employees or suppliers who commits a crime, corrupt, violates laws, include corporate law, security transaction law, or any financial and economic related regulations. It is also prohibited to impose unfavorable human resource measures on employees who report cases. Anonymous reporting is also enabled to actively prevent unethical, corrupt or illegal conduct.