

Nan Shan Life Insurance Co., Ltd.

Regulations on Handling of Whistleblowing Case

Established by the Board of Directors on September 20, 2018

Amended by the Board of Directors on November 10, 2020

Amended by the Board of Directors on December 14, 2021

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Article 1. Basis and Purpose

To foster a corporate culture of integrity and transparency and to promote sound corporate operations, these Regulations on Whistleblowing Cases are established in accordance with Article 32-2 of the “*Regulations Governing Implementation of Internal Control and Auditing Systems of Insurance Enterprises*,” Article 28-1 of the “*Corporate Governance Best Practice Principles for Insurance Enterprises*,” and Article 23 of the “*Ethical Corporate Management Best Practice Principles for TWSE/TPEx Listed Companies*,” in order to provide standards for the appropriate handling of whistleblowing cases.

Article 2. Scope of Whistleblowing Matters

Any individual who becomes aware of potential criminal conduct, corruption, or violations of laws or regulations committed by the Company’s internal employees, managers, or directors in the course of performing their duties may report such matters in accordance with the procedures stipulated in these Regulations. However, matters involving violations of the “Labor Standards Act”, “Occupational Safety and Health Act”, “Employees’ Welfare Fund Act”, “Labor Insurance Act”, “Labor Inspection Act”, “Employment Service Act”, “Sexual Harassment Prevention Act”, “Gender Equality in Employment Act”, or the “Amendments to the Regulations for Establishing Measures on Prevention of Sexual Harassment in the Workplace” shall be handled in accordance with the Company’s internal guidelines, including the “Guidelines for Handling Employee Grievances,” “Sexual Harassment Prevention and Complaint Handling Guidelines,” and “Workplace Sexual Harassment Prevention, Complaint, and Disciplinary Guidelines.” Matters involving financial consumer disputes shall be handled in accordance with the

Company's "Dispute Resolution Mechanism for Financial Consumers" and do not fall under the scope of these Regulations.

The aforementioned criminal conduct, fraud, or violations of laws or regulations refer to, but are not limited to, the following behaviors:

- (1). Offering or accepting bribes.
- (2). Illegal political donations.
- (3). Improper charitable donations or sponsorships.
- (4). Offering or accepting inappropriate unreasonable presents or hospitality, or other improper benefits.
- (5). Misappropriation of trade secrets and infringement of trademark rights, patent rights, copyrights, and other intellectual property rights.
- (6). Engaging in unfair competitive practices.
- (7). Damage directly or indirectly caused to the rights or interests, health, or safety of consumers or other stakeholders in the course of research and development, procurement, manufacture, provision, or sale of products and services.
- (8). Violating the Insurance Act, Company Act, Securities and Exchange Act, Business Entity Accounting Act, Criminal Code of the Republic of China, or other acts involving criminal offenses.

For matters not covered under the two preceding paragraphs, the unit receiving the report shall assess whether other appropriate handling procedures should be adopted and refer the case to the responsible unit for further processing.

Article 3. Accepting Unit and Channels

The designated unit responsible for handling whistleblowing cases is the Compliance Department.

Other units within the Company are not authorized to process whistleblowing cases. Any reports submitted through channels not publicly announced in accordance with Paragraph 3 below shall be immediately forwarded to the designated unit for handling in accordance with these Regulations.

The Company has established and publicly announced internal and external independent whistleblower mailboxes and hotlines on its official website and

internal portal. These channels are available to both internal and external parties for reporting purposes.

Article 4. Requirements for Accepting Reports

Reports must be submitted with the reporter's real name; otherwise, the responsible unit shall not accept the case. However, if the whistleblowing matter is specific and clearly stated, and supported by substantial evidence, the case may be accepted as an exception even if submitted anonymously. Whistleblowers must provide at least the following information:

- (1). Whistleblower's name or national identification number, and contact information such as address, telephone number, or email address. (This requirement does not apply to anonymous reports.)
- (2). The name of the reported person or other information sufficient to identify the individual.
- (3). Specific factual evidence available for investigation.

The report shall not be accepted under any of the following circumstances:

- (1). The content of the report clearly falls outside the scope defined in Article 2 of these Regulations.
- (2). The report is vague or abstract and fails to present any concrete and specific issues.
- (3). The same matter has already been investigated, concluded, and is being resubmitted.
- (4). The matter has been conclusively determined by a court ruling, administrative decision, or completion of other statutory procedures.
- (5). Any other circumstances that do not comply with these Regulations.

If the whistleblowing case does not fall under any of the above situations for non-acceptance, the designated accepting unit shall promptly escalate the case to the Investigation Team for further investigation.

Article 5. Internal Reporting Procedure

If the whistleblowing case does not meet any of the non-acceptance conditions outlined in Article 4, Paragraph 2 of these Regulations, the designated personnel in the accepting unit shall promptly notify the following officers via

email, telephone, or other appropriate means:

- (1). Chairman
- (2). President
- (3). Chief Auditor
- (4). Chief Risk Officer
- (5). Head of the Compliance Department.

If the whistleblowing case involves confidentiality or is of a special nature, the accepting unit may determine appropriate recipients for notification based on the circumstances.

If any of the above individuals have a conflict of interest with the whistleblowing case, the accepting unit may withhold notification to that person.

Article 6. Investigation Team Members and Responsibilities

The Investigation Team may comprise department heads or their designated representatives from the following units:

- (1). Internal Audit Office (serves as the team lead)
- (2). Legal Department
- (3). Compliance Department
- (4). Human Resources Department
- (5). The head of the Investigation Team may, depending on the nature of the case and with the approval of the Chief Auditor, invite the head of the reported person's department to join the Investigation Team.

The Investigation Team is responsible for verifying the facts of the whistleblowing matter and submitting an investigation report and recommendations for handling to the Disciplinary Review Committee.

Article 7. Members and Responsibilities of the Disciplinary Review Committee

The Disciplinary Review Committee shall be composed of the following members:

- (1). President (serves as Chair of the Committee).
- (2). Lead of the Investigation Team.
- (3). Chief Risk Officer.
- (4). Head of the Compliance Department.

(5). Head of the Human Resources Department.

The Committee may invite the Chief Auditor to attend meetings to provide professional advice.

The Disciplinary Review Committee is responsible for guiding and reviewing the investigation reports submitted by the Investigation Team.

A secretary shall be appointed to the Committee, to be served by a designated staff member from the accepting unit. The secretary shall assist with administrative matters and track whether relevant departments have executed the decisions approved by the Committee. The tracking results shall be submitted to the Committee for confirmation.

Article 8. Duties of the Audit Committee

If the reported individual is a director or a member of senior management at the level of Vice President or above, the investigation report and proposed handling method shall be submitted to the Audit Committee for further review.

Article 9. Investigation Principles and Conflict of Interest Avoidance

The Investigation Team, Disciplinary Review Committee, and Audit Committee shall strictly maintain the confidentiality of the whistleblower's identity and the reported content during the processes of acceptance, investigation, review, and re-review. They must uphold principles of fairness, independence, and objectivity.

Personnel from the accepting unit and members of the Investigation Team, Disciplinary Review Committee, and Audit Committee who are involved in the investigation, review, or re-review processes must sign a written confidentiality agreement regarding the whistleblower's identity and case details.

Any personnel involved in the receipt, investigation, or handling of the report—whether from the accepting unit, Investigation Team, Disciplinary Review Committee, Audit Committee, or other relevant decision-making units—must recuse themselves in the event of a conflict of interest and report the recusal to their direct superior. Circumstances requiring recusal include:

- (1). The individual or their spouse, blood relatives within the third degree of kinship, or in-laws within the second degree is the whistleblower, the reported party, or has a direct interest in the case.
- (2). Factual evidence indicates that the individual may be biased in performing

their duties.

Article 10. Obligation to Cooperate with Investigations and Confidentiality Obligations

All internal employees, managers, and directors of the Company—whether acting as whistleblowers, reported individuals, or persons requested by the Investigation Team, Disciplinary Review Committee, or Audit Committee to assist in investigations—shall be obligated to cooperate with the investigation. This includes, but is not limited to, responding to inquiries, providing information, and preserving evidence. All parties shall maintain strict confidentiality and must not disclose any information related to the whistleblowing case.

Article 11. Procedural Safeguards for Reported Individuals

In cases where the Investigation Team, Disciplinary Review Committee, or Audit Committee determine that the report is substantiated, and unless there is concern that notifying the reported individual may lead to collusion with witnesses, destruction of evidence, absconding, or concealment of assets, the reported individual shall be informed of the allegations and given the opportunity to respond before any disciplinary decisions are finalized.

Article 12. Notification to Whistleblower

The status and handling of the whistleblowing case shall be appropriately communicated to the whistleblower in writing or by other suitable means. If such notification is not feasible, this requirement may be waived.

Article 13. Reporting and Follow-up of Whistleblowing Cases

If the investigation of a whistleblowing case concludes that the matter constitutes a material contingency, the accepting unit or relevant department shall handle it in accordance with the Company’s “Regulations for Handling Material Contingencies.”

The President shall supervise the relevant departments to implement the handling methods approved by the Disciplinary Review Committee and the Audit Committee. The President shall also ensure that relevant departments develop specific corrective action plans based on deficiencies identified in the

investigation and continue tracking and reviewing the progress of such improvements.

If the relevant department is unable to carry out the approved handling method, the reasons shall be stated and submitted to the Disciplinary Review Committee for review. If the case was previously reviewed by the Audit Committee, it shall be submitted again to the Audit Committee for further review.

Once the accepting unit receives the specific improvement plan approved by the President or Chairperson, it shall, within 15 working days, report the case to the President along with the approved investigation results and handling method for case closure. For cases that have been reviewed by the Audit Committee and reported in accordance with the Material Contingency regulations, the case shall be reported to the Chairperson for closure within 15 working days.

If the investigation determines that the reported individual may be criminally liable, the accepting unit shall notify the Legal Department to assess whether to file a criminal complaint or report to the judicial authorities.

If the investigation determines that the reported individual is civilly liable to the Company for damages, the accepting unit shall notify the Legal Department to assess the filing of a civil lawsuit or other legal actions to protect the Company's interests.

If the investigation concludes that internal employees or managers violated internal Company policies, the employing unit or relevant department shall assess and, if appropriate, submit the matter to the Employee Rewards and Disciplinary Committee for handling in accordance with the Company's "Employee Rewards and Disciplinary Guidelines."

Article 14. Protection and Rewards for Whistleblowers

Employees and managers of the Company who, without improper intent, submit a report in accordance with the procedures set forth in these Regulations and provide reasonable evidence in good faith shall not be subject to dismissal, reassignment, demotion, salary reduction, disciplinary action, or any other adverse treatment, regardless of whether the case is accepted or whether the report is ultimately substantiated.

No internal employee or manager of the Company shall retaliate against or

obstruct the discovery of the truth by subjecting the whistleblower or any person assisting in the investigation to any adverse work arrangements, physical or psychological harm, threats, or harassment.

If an internal employee or manager of the Company submits a report under this Policy and is also involved in the same violation, the Company may, based on the materiality of the case and the importance of the information or evidence provided, reduce or exempt the individual from disciplinary action.

If an internal employee or manager of the Company, not involved in the wrongdoing, submits a report that is verified as true and that contributes to damage mitigation or other benefits for the Company, the employing unit or relevant department may propose an appropriate reward through the Employee Rewards and Disciplinary Committee in accordance with the Company's "Employee Rewards and Disciplinary Guidelines."

If an internal employee or manager knowingly and deliberately submits a false report or provides false information during the investigation process, the employing unit or relevant department shall evaluate and, if appropriate, submit the matter to the Employee Rewards and Disciplinary Committee for disciplinary action in accordance with the Company's "Employee Rewards and Disciplinary Guidelines," considering the seriousness of the case and the impact of the false information.

Article 15. Retention of Records

Upon the closure of a whistleblowing case, the unit responsible for handling reports shall classify all audio recordings, electronic records, and written documents related to the receipt and investigation of the case as confidential, and retain them for a minimum of five years.

Article 16. Education and Training

The Company shall conduct annual awareness campaigns and training sessions on the whistleblowing system.

Article 17. Supplementary Provisions

These Regulations shall take effect upon approval by the Board of Directors. The same shall apply to any subsequent amendments hereto.