



員工行為準則

Code of Conduct

繁體中文版

English Version

版權聲明 Copyright

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V 7.0

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本準則內規階層及核決權限

- 一、 本準則屬第一階文件。
- 二、 本準則經董事長核准後生效及實施，修訂時亦同。

文件制/修訂履歷

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前言

本準則所稱「公司」或「中國信託」係指中國信託金融控股股份有限公司與其轄下各子公司或分支機構。本準則所稱「同仁」、「員工」或「成員」係指所有因僱傭、委任、承攬或其他契約關係，而於「中國信託」工作之個人，包括但不限於經理人、一般正式及臨時人員。

本準則適用於每一位在中國信託工作的成員，任何人一旦同意擔任中國信託的職務，自到職日起即有責任遵守相關法律、本「行為準則」以及各自業務單位的政策及內規。雖然本準則已盡可能涵蓋相關從業規範，但仍無法預期所有可能發生的問題。若您有任何有關道德行為的問題，應先尋求同事或主管的指導以了解更多資訊。

歡迎加入中國信託！

中國信託自成立以來，以「萌芽美麗之島，金融服務全球」的企業使命，持續推動公司治理，落實企業社會責任，為客戶、員工、股東與社會創造最大利益，打造「臺灣第一、亞洲領先」的領導品牌，期許成為最值得信賴的金融服務機構。

「謙沖致和、開誠立信」、「We are family 大家庭精神」是中國信託的企業精神，「理想、積極、奮鬥、奉獻」是中信人具體實踐的行為規範。我們勇於追求理想，懷有 Dream Big 的決心；主動進取、全力以赴；以勇於接受挑戰、不畏艱難的奮戰信念，使命必達；我們攜手團隊合作，重視培育與傳承，致力卓越永續發展。

《中國信託員工行為準則》乃規範員工行為的基本標準，簡略地說明同仁在工作上應遵守之法律規範和應履行之員工義務；並做為所有同仁從事業務相關活動時所應遵守的基本標準和全體人員共同信守的承諾。

項目	內容	意涵
企業精神	謙沖致和、開誠立信	謙讓虛心 和睦團結 誠實正派 樹立信用
	We are family 大家庭精神	待人如親 愛心感動
行為規範	理想	追求卓越 推動創新
	積極	盡職盡責 迅速確實 主動進取 全力以赴
	奮鬥	接受挑戰 不怕失敗 永不放棄 使命必達
	奉獻	團隊合作 培育傳承

1. 我們的經營方式

1-1. 從業倫理與法律規範

身為中國信託一員，應忠實執行業務及盡善良管理人之注意義務，並以高度自律及審慎之態度行使職權，且應遵循公司治理、誠信經營及公平對待股東原則。對於公司及其客戶相關資訊均應保守秘密，不得有損害公司營業利益、營業秘密、以及股東權益之競業關係或不當行為。

1. 同仁應忠勤服務工作並接受任務指派。
2. 同仁有責任與義務保護公司有形與無形資產，不得挪用、偷竊或故意耗損公司所有或持有物品設備，或洩漏公司營業上之秘密、破壞公司聲譽，致使公司蒙受損害。
3. 關於公司一切有形資源(包括但不限於辦公場所、設施、車輛、電腦軟硬體設備、物品、器具等)及無形資源(包括但不限於公司品牌、形象聲譽、人力資源、休息時間以外之正常出勤時間、網路資源、預算、經費等)，只能運用於公司或經核准之公務用途，不可挪為私用或有不當圖利他人之情形，公私必須分明。
4. 同仁須了解、熟悉並確實遵守與業務有關的法律、法規或條例以維持公司良好聲譽。如果在工作時遇到不清楚的法律問題，應向有經驗的主管、同仁請教，或向人力資源或法務/法遵人員諮詢，不可自作主張。
5. 中國信託全體同仁應遵守本行為準則之規範。本準則如有新增、刪除或修正條文，將以發文通知全體同仁，俾利同仁遵循。
6. 除本準則外，同仁亦需遵守業務單位的各項作業規範與工作手則。另外，公司董事、獨立董事、監察人及經理人另需遵循《道德行為準則》之規定。

1-2.誠信經營原則

身為中國信託一員，應遵守《誠信經營守則》與《誠信經營作業程序及行為指南》規定。

同仁於從事商業行為之過程中，應秉持公平、誠實、守信、透明原則行事，不得直接或間接提供、承諾、要求或收受任何不正當利益，或做出其他違反誠信、不法或違背義務等不誠信行為，以求獲得或維持利益。

前項行為之對象，包括公職人員、參政候選人、政黨或黨職人員，以及任何公、民營企業或機構及其董事（理事）、監察人（監事）、經理人、受僱人、受任人、實質控制者或其他利害關係人。

2. 舉報責任與申訴權利

2-1. 受理檢舉管道

1. 公司對於建立誠信、透明的企業文化及促進健全經營等議題非常重視，同仁若發現公司人員於執行公務時有涉及犯罪、舞弊、違反法令之虞、違反誠信經營守則及道德行為準則時，均有責任及義務向管理階層舉報或透過以下檢舉管道與我們聯繫：
 - (1) 中信金控
 - 電話：+886-2-5573-2220
 - 電子信箱：
中信金控檢舉信箱：
whistleblowing.fh@ctbcholding.com
中信金控董事長信箱：
ctbcfhcchairman@ctbcholding.com
 - 郵寄地址：
11568臺北市南港區經貿二路168號26樓「中國信託金融控股股份有限公司法令遵循部檢舉信箱」收
 - (2) 如涉及集團內其他公司人員之案件，請透過被檢舉人所屬公司之檢舉管道進行舉報。如其所屬公司未設置專屬檢舉管道者，可利用其直屬母公司之檢舉管道進行舉報。
2. 為加速案件之受理及調查，檢舉人提出檢舉時應提供可供調查之具體事證供公司查證。如檢舉人未檢附可供調查之具體事證，或檢舉內容屬惡意攻訐、虛偽不實或顯無理由，或業經審議調查之案件，公司得不予受理。
3. 公司受理、調查及參與檢舉案件處理的人員，對於檢舉人的身分及檢舉案件的內容，均負有保密義務。違反者，公司得終止其參與並視情節懲處及追究責任。
4. 公司不因所屬人員提出檢舉或協助他人檢舉而為不利處分。

但因應業務、經營需求之組織改組、整併、裁撤或人力調動等非針對檢舉人個人所為之處置，或檢舉人有違法或不當之行為，經公司查證屬實而依相關規定懲處者，不在此限。

5. 如檢舉人有遭受他人威脅、恐嚇或其他不利行為者，可尋求公司協助報請警察機關處理。
6. 其他相關規定悉依公司之《檢舉案件處理辦法》所訂為準。

2-2.員工申訴管道

1. 員工如發生以下情事，得提出申訴：
 - (1) 員工個人或單位權益受損或有遭遇不公平之對待。
 - (2) 因公司其他員工違法、濫權、有損公司商譽、違反內稽內控、或影響公司經營管理之行為致侵犯權益。
 - (3) 其他與公務有關，有提申訴之必要且能證明者。
2. 申訴形式應以書面為原則並載明下列事項：申訴及被申訴人之姓名、單位及職稱、事實發生之日期及內容，如以電話申訴者，應後補書面說明。
3. 申訴管道：
 - (1) 中信金控
 - 電話：+886-2-3327-8804
 - 電子信箱：0885@ctbholding.com
 - 書面投遞：
郵寄或傳送至「申訴中心」收
 - (2) 其他公司同仁請透過所屬公司之員工申訴管道提出申訴。如所屬公司未設置專屬申訴管道者，可利用母公司之申訴管道。
4. 申訴案件調查過程採不公開方式處理，處理申訴案件之調查人員應嚴守保密原則，不得洩漏申訴人之姓名及其他足資識別身分之相關資料及案件內容。如有違反者，應提請懲處。

3. 我們的公司

3-1. 員工關係之維護

□ 員工隱私權

1. 中國信託得基於管理和業務之需要，蒐集、處理、保存、傳送及利用有關同仁之個人資料。
2. 為維護業務機密，中國信託在必要範圍內得監看或記錄同仁於執行職務場所所收發之電子郵件、通訊或其他相關活動。
3. 於公司登記項目或章程所訂業務之需要等特定目的範圍內，中國信託得於財團法人金融聯合徵信中心及金管會指定機構蒐集或處理同仁之個人資料。
4. 同仁薪資獎金應絕對保密，不得公開討論或洩漏薪資獎金等資料。

□ 健全的工作環境

中國信託承諾為全體員工提供安全與健康的工作環境，而同仁也需對工作場所之健康與安全共盡責任。

1. 不可在工作時濫用受管制藥物，或出售、製造、分發、擁有、使用任何非法藥物。
2. 不得涉入婚外不正常關係、性騷擾、任何型態的歧視（不論是種族、性別、身心障礙、宗教等歧視行為）或恐嚇行為。
3. 不得出入特種風化場所，例如卡拉 OK 酒店、酒家、舞場、特種咖啡廳/茶室、色情 KTV、色情賓館/按摩等。如因業務需要無法避免者，務須於事前或翌日報告主管。

4. 不得故意製造事端或其他行為致使公司聲譽蒙受損害，亦不得對其他主管同仁施暴、脅迫或有重大侮辱之行為。

□ 免於歧視或騷擾的環境

中國信託重視職場多元化，尊重個體差異，致力於提供一個專業化、有尊嚴的工作場所。

1. 公平對待客戶

我們強調「親切服務」的經營理念，不能因客戶的膚色、種族、性別、年齡、宗教或其他因素，而有所歧視或不平等的對待；亦不得因客戶交易金額的大小，而心生怠慢。

2. 平等就業環境

(1) 我們承諾建立一個多樣化、免於歧視與騷擾的工作環境，讓員工之間互相信任、尊重，每個人皆為公司的績效表現與信譽負責。

(2) 我們以員工從事工作的能力與資格，作為招募、選拔和聘用員工的標準；我們會與同仁共同努力提昇工作技能與知識。

3. 我們為防治工作場所之性騷擾事件、促進兩性平等之工作環境，規範同仁不得有以下行為：

(1) 因性別差異所產生之侮辱、蔑視、或歧視之態度與行為。

(2) 與性有關之不適當、令人不悅、冒犯性質的語言、身體碰觸或性要求。

(3) 以性行為或與性有關之行為為交換報償之要約。

(4) 以威脅或懲罰之手段要求性行為或與性有關行為。

(5) 強暴或性攻擊。

(6) 展示具性意涵或性誘惑之圖片或文字。

4. 另外我們也嚴格禁止任何針對主管、部屬、同仁或客戶的種族、性別認同或表達、膚色、信仰、宗教、國籍、年齡、身心障礙、婚姻狀況、性取向、家世、兵役狀況、社會經濟狀況等之騷擾、歧視或恐嚇行為。
5. 同仁亦不得使用公司電子郵件或其他傳播形式，傳送有性意味或種族侮辱、毀謗、謾罵，或其他任何具騷擾性、污辱性、猥褻性的影像文字或非法出版品。
6. 同仁如遇上述情事時，可透過人力資源單位所設之員工申訴管道（見 2-2.員工申訴管道）提出申訴。

3-2. 兼職之禁止及利益衝突之迴避

身為中國信託的一員，同仁應對任何可能影響工作的兼職或可能發生利益衝突的狀況保持警覺，並避免可能與其公司職責有衝突的個人行為或金錢利益，絕不可濫用職權使自己或他人獲取私利。

1. 員工應專心於公司的工作，除經事前以書面形式報請核可外，不得有兼職或兼差行為。
2. 員工兼職或兼差不得違反下列原則：
 - (1) 不得違反法令規定（如兼職禁止、競業禁止...等）、公司員工行為準則、工作規則或其他管理規章等相關規定，致影響公司或客戶利益或使其遭受重大損失。
 - (2) 不得與公司利益產生利害衝突。
 - (3) 不得與原有職務產生利害衝突及影響業務執行。
3. 不可為了規避本準則或相關作業規範、法規，而透過第三人（含親屬、合作夥伴或朋友等）從事與公司利益衝突之活動。
4. 於公司任職期間，不得以自己或他人名義經營、從事或投資與公司業務相同或類似之事業，亦不得擔任與公司業務相同或類似公司之受僱人、受任人、顧問或其他職務。
5. 不得為圖利自己而利用職務之便推介、銷售或轉介任何非屬公司所提供之商品或服務。如有引進家庭成員提供服務、產品之必要時，必須主動告知單位主管及相關單位進行說明並取得許可。
6. 不得將自己帳戶做為客戶私人交易之使用；亦不可於公司電腦作業系統上，親自承作本人、配偶與三親等以內之血親與二親等以內之姻親的帳戶交易。
7. 同仁不宜作為直系親屬、配偶及兄弟姐妹以外之個人或企業機構之借貸行為之保證人；若員工與客戶有親屬關係，批准貸款或其他交易時亦應予以迴避。
8. 同仁進行與公司業務有關之個人交易行為應限於長期投資行為

而不得為短期投機行為。同仁從事個人交易行為時，應注意避免與公司發生利益衝突的可能，尤應特別避免從事買賣與特定交易或謠言有關有價證券之投機行為。

3-3. 餽贈、招待與贊助之規範

□ 不提供或不接受不合理禮物、款待或其他不正當利益

主管、同仁不得直接或間接提供或接受任何不合理禮物、款待或其他不正當利益，藉以建立商業關係或影響商業交易行為。然若客戶、主管、同仁間因表達感謝或為業務交誼之需要而有餽贈或招待之情事，則需遵守以下規範：

1. 不得以任何名目向「客戶」或「業務相關之任何第三人」要求或收受公司規範許可以外之費用、餽贈、報酬或利益，亦不得與彼等有私人借貸或金錢往來關係，或向客戶要求分享其投資收益。
2. 不可利用職務機會要求向當前、潛在客戶或其他與公司業務相關的人士，收受餽贈（包括現金、禮品或其他變相財貨（如禮券、股票、支票等）、給予回扣、挪借款項、參與客戶投資或索取其他不正當利益，亦應避免表現出任何易使對方誤解的言行。
3. 藉由第三人名義接受饋贈或其他上述第 2 點所列行為，如由直系血親、配偶或親屬等接受餽贈再轉達者，亦屬禁止範圍。
4. 客戶、主管、同仁間若接受屬公務禮儀之性質或符合社會禮儀習俗之餽贈，應以非主動求取且係偶發之情形為限。其市價不得超過新台幣 3,000 元，或同一年度自同一贈與人處取得之餽贈，合計不得超過新台幣 5,000 元。
5. 如為維持正當的業務關係而需贈送禮品予業務相關人士，應盡量採用印有公司標誌之禮品；安排任何禮品、款待，亦應符合一般商業禮節之常規，不得過度奢華或頻繁，造成大量或不必要之支出。

□ 不做不正當的慈善捐贈或贊助

對慈善捐贈或贊助，應符合相關法令及《捐贈暨贊助管理政策》規範，不得為變相行賄。

3-4. 資訊完整性之維護

同仁執行職務需確保所擁有、收集、使用及管理的紀錄和資訊必須正確完整。

1. 如實向主管反應業務情況是公司保持誠信的重要前提，同仁於彙報工作時不得故意隱瞞工作中的失誤；若知曉客戶出現特別情況，且可能對公司產生不利影響時，應即時報告。
2. 在編寫可能為第三者留存或引用的紀錄或文件時，對於內容與措辭應小心謹慎，避免造成解讀失當而有重大誤導之可能，並需依相關政策留存或備份紀錄。
3. 不得有業務故意或過失行為，致使公司信譽或財務蒙受損害，例如對保不實。
4. 不得對客戶辦理各項業務相關事項做不實之陳述或誤導客戶，或做逾越職務權限之說明或承諾，亦不得對客戶出具任何不當或不實之承諾，因而影響公司或客戶之權利義務。
5. 不得建議客戶填寫不實之資料；不得引導客戶做不實之陳述或教唆客戶偽造、變造各項資料。當發現客戶或同事涉及前述行為或有合理懷疑時，必須立即呈報權責主管。
6. 不得在未與客戶進行投資風險屬性分析與風險揭露之前，即向客戶建議各項具風險性之投資產品。
7. 所有帳簿表冊或紀錄應能完整、允當、正確地及時反應所有交易與資產處份的內容。
8. 財務報表及相關揭露訊息不得有任何重要錯誤，不得故意直接或間接以強迫、操縱、誤導或詐騙的方式影響稽核人員，或對會計師、律師就有關查核，或對任何政府機關申報或申請事項，做重大誤導、不完整、不實的陳述。

3-5. 智慧財產權之保護

身為中國信託的一員，應重視公司與他人智慧財產之保護，確保對智慧財產權之使用符合《智慧財產管理計畫》之規範。

□ 營業機密之保護

所有同仁皆應確保公司財產可以充分、合法並有效的利用。若非因公司業務而需動用公司的服務、設備、設施、物品或其他資源，必須事先取得授權。

1. 於任職期間內，因使用公司之設備、資源或因職務關係，而直接或間接收受、接觸、知悉、構思、創作、或開發具有實際或潛在財產利益或經濟價值的機密資訊及資料，皆負有保密義務。
2. 營業秘密係指非一般涉及該類資訊之人所知者、因其秘密性而具有實際或潛在之經濟價值者、無法以公開方式申請保護之研究報告或技術資料、公司已採取適當之保密措施者等資訊，與其他依約或依法負有保密義務而涵蓋之機密資訊。
3. 於任職期間所獲知或獲取之營業秘密，係公司賴以經營企業之重要資產，應採取所有合理有效的措施維護該營業秘密，不得以任何方式洩漏或交付該營業秘密予任何第三人或為自己或第三人所使用；因過失洩漏或知悉他人洩漏時，應即告知公司，且此保密及告知義務不因員工與公司間之契約關係終止而失效。
4. 離職、調職（任）、退休前應繳還持有之公司資料、文件等營業秘密予原任職單位並妥為交接。
5. 不得藉由操縱、隱瞞、濫用機密資訊或誤導重大事實以謀取不正當利益，亦不得散播、轉述與公司業務相關而未經證實之訊息。
6. 答覆外界問題時，應對諮詢者和諮詢內容負責，告知對方的資料不能超出公司允許的範圍。

7. 中國信託係上市公司，設有專責對外發言及訊息揭露制度，同仁承諾嚴格遵守該發言及訊息揭露制度。

□ 商標、著作權、專利

1. 於受僱或受聘期間，所完成職務上或與職務有關之發明、創作、設計等，其專利權、商標權、著作權等智慧財產權均屬中國信託，並以中國信託為發明人、創作人、設計人及著作人。非經公司事前書面同意，不得洩漏、交付、移轉、公開發表、出售、出租或為其他妨害公司權益之行為。於聘僱關係結束後，所有員工因工作關係所創作或取得之財產或資訊之權利將成為中國信託之專有財產。
2. 於完成與職務相關之專利、商標、著作而於國內外有登記或著述必要時，願無條件主動、協助登記或註冊為中國信託或其指定人名義，並有遭核駁時協助答辯等相關程序之義務。
3. 中國信託之商標應使用於與公司業務有關之商品、文書、廣告、網站上，以維持公司之商標專用權。
4. 未獲權責主管書面授權同意，不可任意於各種傳播媒體、廣告海報或網際網路上，使用中國信託之商標。
5. 不得在未經權責主管或單位之核准下，擅自以公司或私人名義發出任何證明或文件予客戶、擅自對外發表與職務相關之文章或演講，亦不得以未經公司認可之名片或任何形式之廣告文宣製作物為產品之推廣促銷。

□ 其他智慧財產權項目

1. 為避免侵犯他人智慧財產權及保護公司電腦作業環境，不得複製無版權軟體或使用非法著作權之軟體。
2. 引進技術時應以不侵害他人之智慧財產為首要之務，應於契約中約定技術提供方所提供之技術不得有侵害他人權益情事，如有違反致公司遭受損害，技術提供方應負賠償責任。

3-6. 資訊安全規範

身為中國信託的一員，應重視公司各類資訊資產之保護，並於使用公司所提供之資訊設備時遵守資訊安全相關規範，以保障公司資訊資產及環境安全。

1. 僅能使用經授權使用的資訊資產，包含但不限於電腦設備、辦公室自動化設備、應用軟體、電子檔案或紙本文件。
2. 不得試圖獲取或猜測非經授權之資訊系統帳號及密碼。
3. 嚴禁員工利用個人外部信箱收送及處理機密公務資料，以降低資料外洩風險。
4. 不得允許或協助未經授權之人員使用公司之資訊設備或連接至公司內部網路。
5. 未經核准不得連接私人設備至公司內部網路。
6. 未經核准不得破壞公司資訊資產之完整性，包含但不限於私自拆卸、更換或加裝任何具備網路連線功能或儲存功能之元件於資訊設備，且不得擅自更改、移除、停止資訊設備上已裝載之資訊安全管控軟體。
7. 應做出合理的努力保護所持有的資訊系統帳號及密碼，並保護公司資訊資產不受未經授權的使用或存取。
8. 公司提供之資訊設備應僅限於公務使用，不得用於私人用途，例如使用公司帳號申辦業務無關服務、以公司設備進行私人交易等。
9. 不得使用公司所提供之資訊資產進行任何不法行為，包含但不限於盜版軟體之安裝使用及製造或散播電腦病毒或惡意程式。

3-7. 終止僱用關係之情事

如有下列情形之一者，中國信託得不經預告終止僱用關係，並得請求相關法律責任：

1. 於訂立勞動契約時虛偽意思表示，使雇主（以下指中國信託）誤信而受損害之虞者。
2. 對於雇主、雇主家屬、雇主代理人或其他共同工作之勞工，實施暴行或有重大侮辱之行為者。
3. 受有期徒刑以上刑之宣告確定，而未諭知緩刑或未准易科罰金者。
4. 違反勞動契約或工作規則，情節重大者。
5. 故意損耗機器、工具、原料、產品，或其他雇主所有之物品，或故意洩漏雇主技術上、營業上之秘密，致雇主受有損害者。
6. 無正當理由繼續曠工三日，或一個月內曠工達六日者。

雇主依前項第一款、第二款、第四款至第六款規定終止契約者，應自知悉其情形之日起，三十日內為之。

4. 我們的行業

4-1. 公平交易之原則

我們相信透過激烈與公平的競爭，可促進整體產業的發展。同仁從事各項經營行為與交易活動，應秉持資訊透明、公平、無誤導性的原則，避免構成足以影響交易秩序之顯失公平行為。

1. 與同業對手競爭服務客戶時，不應違背客戶自願的原則。
2. 不得在客戶面前故意貶低競爭對手。
3. 不得進行或隨意承諾客戶或往來廠商未經金融監管單位許可之業務，或隨意修改匯率以招攬客戶，亦不得以不當行銷方式促銷業務。
4. 不得以配合客戶要求為由，規避公司規定或作業慣例而執行業務，如偽造或變造不實資料以申辦業務，或替客戶於業務之申請單上填寫不實資料。
5. 不得為提高某特定人之業績，而以任何非經權責主管單位允許之推廣通路或行銷管道執行業務，如與未簽約之代辦公司合作進件；亦不得有擅改客戶認養同仁代號、侵占其他同僚業績或同僚間互相合併、交換、轉讓業績等行為。

4-2.防範內線交易之行為

1. 員工於中國信託工作期間實際知悉公司或其他上市、上櫃及興櫃公司未公開之重大消息，包含：

- (1) 「重大影響公司或其他上市、上櫃及興櫃公司股票價格之消息」，係指涉及公司之財務、業務或該證券市場供求、公開收購，其具體內容對其股票價格有重大影響，或對正當投資人之投資決定有重要影響之消息，包含公司財務報告或相關業績內容；及
- (2) 「有重大影響公司或其他上市、上櫃及興櫃公司支付本息能力之消息」，係指有喪失債信情事、發生重大虧損，致有財務困難、暫停營業或停業之虞...等消息。

其詳細規定請參酌「證券交易法第 157 條之 1 第五項及第六項重大消息範圍及其公開方式管理辦法」第 2 至 4 條之規定。

2. 公司禁止同仁：

- (1) 於獲悉重大影響公司或其他上市、上櫃及興櫃公司股票價格之消息時，在該消息明確後，未公開前或公開後 18 小時內，自行或以他人名義買入或賣出該公司股票或其他具有股權性質之有價證券；
- (2) 於獲悉有重大影響公司或其他上市、上櫃及興櫃公司支付本息能力之消息時，在該消息明確後，未公開前或公開後 18 小時內，不得自行或以他人名義賣出該公司之上市或在證券商營業處所買賣之非股權性質之公司債。

3. 同仁亦不得直接或間接的洩漏前述未公開之重大消息予他人。

4. 其他相關規定悉依公司之《防範內線交易管理政策》所訂為準。

4-3.防制洗錢、打擊資恐及反制詐騙

1. 同仁與公司有共同協助打擊犯罪的義務，同仁應遵守各地有關防制洗錢、打擊資恐及反制詐騙之相關法令，並充分認知所執掌業務之風險點及作業規範，不得建議、隱匿或協助他人將非法所得轉換為看似合法的資金；面對洗錢、資恐或詐騙手法推陳出新，同仁應留意新型態之犯罪態樣，於日常執行業務時提高警覺，並落實客戶盡職審查，如有發現客戶或交易可能涉不法，須依規定婉拒、回報主管或通報相關單位。
2. 主管應注意部屬是否有奢侈之生活方式與其薪資所得顯不相當之情況，並了解部屬之相關背景；如有異常，應對其經辦事務予以抽查，必要時可洽請稽核單位協助。

4-4. 賄賂之禁止與政治獻金規範

身為中國信託一員，不得意圖行賄或從事不法情事，換取業務之方便。

1. 執行業務時，不得直接或間接向客戶、代理商、承包商、供應商、公職人員或其他利害關係人提供、承諾、要求或收受任何形式之不正當利益。
2. 對政黨或參與政治活動之組織或個人直接或間接提供捐獻，應符合政治獻金法及《捐贈暨贊助管理政策》規範，不得藉以謀取商業利益。

5. 我們的社會

5-1. 客戶隱私之保護

身為中國信託的一員，除非應法律要求或客戶書面授權，同仁不可以任何方法洩漏相關往來客戶或經辦之業務秘密。

1. 為保護公司與公司客戶權益，除因法令要求或業務所需，不得向任何與業務不相關之第三者洩漏中國信託金融控股(股)公司及各子公司客戶資料與往來狀況。嚴禁將客戶名單或相關資料攜出，如因業務需要必須將上列資料暫時攜出，必須經過權責主管同意。
2. 收受客戶相關證明文件應妥善保管，不得挪作他用，且不可擅自偽造、變造、塗改、修正客戶之申請文件或客戶各項交易所提供之資料，如取款條、申請書、約定書等。
3. 不論是否經過當事人同意，不得模仿客戶、同事、主管之簽字於各項業務相關文件上，亦不得取用彼等之印鑑蓋於各項業務相關文件上。
4. 不可為客戶代墊或代為保管任何款項、有價證券、印鑑、存摺或金融卡等私人資料，不得將非屬客戶之款項或帳戶，存入或提出相關款項。
5. 除現行銷售作業相關規定許可之情況下，不可私下留存載有客戶印鑑或簽字之業務相關文件、取款條、支票、定存單、與轉帳收據。在任何情況之下，不得保管客戶之各項業務相關密碼。
6. 談論客戶情況要注意場合，無關人員不應在場。除非因工作需要，同仁不得洩漏公司、相關往來客戶或同仁經辦之業務秘密。如因電腦資訊設備或其他設備而知悉或持有之秘密亦不得洩漏。

5-2. 支持人權

中國信託恪守全球營運據點所在地法規，並支持全球的人權保護與基本原則，如《世界人權宣言》(The Universal Declaration of Human Rights)、《國際勞工組織工作基本原則與權利宣言》(International Labor Organization: Declaration of Fundamental Principles and Rights at Work)與《聯合國工商企業與人權指導原則》(The UN Guiding Principles on Business and Human Rights)等國際公認之相關規範，身為中國信託的一員應認真地體現尊重人權的責任。

中國信託的人權執行方針：

1. 提供安全與健康的工作環境
2. 杜絕不法歧視以確保工作機會均等，並遵從《性別平等工作法》及《性騷擾防治法》，防治工作場所性騷擾之發生
3. 禁止強迫勞動、雇用童工、人口販運
4. 協助員工維持身心健康及工作生活平衡
5. 持續與員工維持暢通的溝通管道，推動勞資關係和諧。
6. 定期檢視及評估相關制度及作為

員工行為承諾聲明書

當您到職成為我們的員工時，即應仔細閱讀、了解並遵守本《員工行為準則》，若有疑義應立即尋求說明。違反本準則規定，公司將視情節輕重採取各項適當處分。若因本準則所約定事項發生任何民事爭議，經友好協商仍未能獲得解決，則其所涉訟事件，同仁同意以臺灣臺北地方法院為第一審管轄法院。

除本準則外，同仁在實際工作中亦應遵守相關公司人事與業務作業規章制度與金融業相關的法令條文。若本準則有違反法律強制規定而經法院宣告無效者，違反之部分即時作廢；其餘未經法院宣告無效之條款仍繼續有效。本準則若因業務性質、經濟環境或政策法規等需要而有修改，則應以人力資源單位公告者為準。

本人（正楷）_____已閱讀並同意《員工行為準則》全部內容，願遵守其一切規定、履行義務，克盡身為中國信託一員的責任，特此承諾。

員工簽名_____

身分證字號_____

簽署日期_____



Code of Conduct

English Version

V 7.0

Copyright

This document is the property of CTBC Financial Holding Co., Ltd. It is strictly confidential under the Copyright Act of the ROC. In no circumstances shall it be disclosed, amended or duplicated in any form unless permission is granted.

The Level and the Approval Authority of The Rule

1. This rule is a first-level document.
2. This rule and any amendments hereto shall be effective upon the approval by the Chairman .

Version Chronology

Version	Updated By	Revision Rationale	Effective Date	Announcement Memorandum Ref No.
6.0	General Administration Department	Revise chapter 2-1 、 3-2 、 3-5	2021.08.05	Ref.NO.:1103238200049
7.0	Human Resources Management Department	Revise chapter Welcome to CTBC 、 2-1 、 3-5 、 3-6 、 4-2 、 4-3 、 5-2	2024.06.03	Ref.NO.:1133263720023

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Preface

The terms “the Company” and “CTBC” mentioned in this Code refer to CTBC Financial Holding Co., Ltd, and its subsidiaries and/or their branches. The term “Employee” in this Code refers to all individuals who work at "CTBC" under any form of employment, appointment, contract or other contractual relationship, including but not limited to managerial officer, general full-time and temporary personnel.

The Code of Conduct is applied to everyone who works at the Company. Each employee becomes accountable for compliance with this Code, and official laws and policies, once he/she joins the Company. Although this Code endeavors to address a wide range of business practices and procedures, no written policy can anticipate every ethical dilemma or troublesome issue one may face in work. When confronted with such a situation, employees shall seek additional information from experienced colleagues or supervisors before taking any response or action.

Welcome to CTBC

Since CTBC was established, we have striven to realize our "Born in Taiwan, serving the globe" mission. We have done this by fostering corporate governance and pursuing corporate social responsibility in order to create the greatest benefits for our customers, employees, shareholders, and society, in turn cementing our status as "Taiwan Champion, Asia Leader" and becoming the most trusted financial institution.

Our corporate spirit is embodied by "Humility builds harmony, honesty inspires trust" and "We are family," and the guiding principles of CTBC employees are "Ambition, Proactivity, Resilience, and Devotion." We are courageous in pursuing our ideals and are determined to dream big. We take the initiative and strive wholeheartedly. We face challenges fearlessly until we succeed. And we work as a team and nurture talent in order to reach new heights of excellence for sustainable development.

Inspired by CTBC's corporate spirit and guiding principles, the Code of Conduct sets forth the basic standards for employee behavior. The Code briefly explains the legal requirements and other obligations that are expected of employees. It serves both as the basic standards that all employees must abide by in business-related activities and as a commitment that all employees must collectively uphold.

Item	Content	Meaning
Corporate spirit	Humility builds harmony, honesty inspires trust.	Do business with integrity to earn customers' trust
	Spirit of We are family	Treat everyone like family.
Guiding principles	Ambition	Pursue excellence and promote innovation.
	Proactivity	Fulfill our responsibilities and take initiative.
	Resilience	Always persevere and never be afraid to fail.
	Devotion	Embrace teamwork and nurture each other.

1. How We Do Business

1-1. Business Ethics and Legal Compliance

As a member of the Company, employees shall faithfully execute business and fulfill the duty of care as a bona fide manager, and exercise the function and power with high self-discipline and prudent attitude, and shall comply with the principles of corporate governance, integrity management and fair treatment of shareholders; Shall keep information related to the customers of the Company and each subsidiary confidential, and shall not engage in any competition relations or improper acts damaging the operating income, business secret, as well as shareholders' equity of the Company and each subsidiary.

1. Employees shall be loyal to the Company and willingly accept job assignments.
2. Employee shall undertake the responsibility to safeguard any tangible and intangible assets of the Company. He or she must understand that any misuse of assets will put the Company at risk and may damage its reputation or financial situation.
3. All tangible resources (Include but not limited to office space, facilities, vehicles, computer hardware and software equipment, articles and devices) and intangible resources (Include but not limited to company brand, image, human resources, working hours, network resources, budget and funding) of the Company shall only be used for the Company purpose or approved business affairs, and cannot be used in private or used to benefit others. There shall be a clear separation between business and private affairs.
4. Employees must fully understand and be familiar with all business-related and applicable laws, orders and regulations. Should there be any question, employees should consult with experienced colleagues, HR, or the Legal/Compliance Department as soon as possible.
5. Any amendment, deletion, or revision of this Code will be announced directly after approval, and all employees agree to comply with the latest announced version.
6. In addition to this Code, employees should firmly comply with all operational procedures or internal rules. Furthermore, all directors, independent director, supervisors and managerial officers shall adhere to the "Code of Ethical Conduct".

1-2. Ethical Corporate Management Principles

As members of CTBC, employees shall abide by the provisions prescribed in the “Ethical Corporate Management Best Practice Principles” and the “Procedures for Ethical Management and Guidelines for Conduct”.

When engaging in business activities, CTBC employees shall follow the principles of fairness, honesty, faithfulness, and transparency; and shall not provide, accept, promise, or request, either directly or indirectly, any improper benefit (improper advantage) or commit any unethical conduct against ethics, the law, or their duty to obtain or maintain benefits.

Parties referred to in the preceding paragraph include public officials, political candidates, political parties or their staffs, and government-owned or private-owned businesses or institutions and their directors, supervisors, managerial officers, employees, persons having substantial control, or other interested parties.

2. Obligation to Report and Rights for Grievance

2-1. Report Channel and Procedure

1. CTBC attaches great importance to fostering an honest, transparent corporate culture and promoting sound business operations. Anyone who discovers any instance of crime, fraud, violation of a law or regulation, or violation of the Ethical Corporate Management Best Practice Principles or Code of Ethical Conduct by any member of the Company has the responsibility to report it to a supervisor or through the reporting channels below.

(1) CTBC Holding

- Tel: +886-2-55732220
- Email:

CTBC Holding Whistleblowing Mailbox :

whistleblowing.fh@ctbcholding.com

CTBC Holding Chairman Mailbox :

ctbcfhcchairman@ctbcholding.com

- Mail Address: 26F, No.168, Jingmao 2nd Rd., Nangang Dist., Taipei City 11568, Taiwan; Attention: Petitions Reporting Mail Box, Compliance Department, CTBC Financial Holding Co., Ltd.

- (2) Employees of other subsidiaries shall use their own channels to report. If no channels are available, they may use the ones of CTBC Holding.

2. To facilitate a speedy investigation, the informant who reports a complaint shall provide concrete evidence. The Company may not accept the complaint if no concrete substance or evidence is provided; the complaint is found to be a malicious attack, fraudulent or without merit; or the complaint has already been investigated or considered.
3. Person who accept, investigate or otherwise engage in the handling of the complaint shall keep confidential the informant's identity and the content of the complaint; In case of any violation, the Company may terminate their engagement in the investigation and impose punishment to such persons and look into relevant liabilities thereof depending on the seriousness of the case.

4. The Company shall not adversely treat any employee who reports a complaint under the Rules or assists others with a complaint. Notwithstanding the foregoing, the Company may give the informant any treatment that is non-vindictive due to reorganization, consolidation or closure in response to business or operational needs, and may meter out punishment pursuant to relevant regulations to the informant if it verifies and proves any illegality or impropriety of the informant.
5. If the informant is threatened, intimidated, or experiences any adverse actions due to their whistleblowing, they may seek the Company's assistance to report the matter to police.
6. Other relevant rules are subject to the provisions of the "Procedures for Handling Whistleblowing Cases".

2-2. Grievance Channel and Procedure

1. Employees may file a grievance if the following occurs:
 - (1) The Employee's or the Company's rights are breached or unfairly treated.
 - (2) Inappropriate employee behaviors, including and not limited to violations of laws, abuse of powers, violation of internal policy, or damage to the Company's reputation and operation, which cause infringement of someone or the Company's rights.
 - (3) Evidence of the business affairs that compel actions of reporting.
2. Employees are required to provide a precise description of the suspected violations, including the informant's and accused person's name, department and title, violation date and event. Employees shall supplement the violation case with printed description, if the case is reported first by phone.
3. Reporting Channel:
 - (1) CTBC Holding
 - Tel: +886-2-33278804
 - Email: 0885@ctbcholding.com
 - Mail: Employee Communication Center
 - (2) Employees of other subsidiaries shall use their own channels to file a grievance. If no grievance channel built yet, they may use the ones of CTBC Holding.
4. The process of investigation for grievance shall be confidential at all time. The investigator handling the grievance shall not disclose the name or other relevant information of the informant and the content. In case of any violation, the Company shall impose punishment.

Our Company

3-1. Maintenance of Employee Relations

Employee Privacy

1. To the extent permitted by law, employees agree the Company can collect, use, maintain and transfer employee profile information for business-related or management purposes.
2. To ensure business secrecy, employees agree to authorize the Company to implement its management right to monitor employees' email, messages, or other related communication records on its premises.
3. To the extent practicable and permitted by law, employees agree that the Company can collect or use employees' personal data for the purpose of legal compliance or business necessity from the Joint Credit Information Center or institutions assigned by the Financial Supervisory Commission.
4. Discussion of anyone's (including the employee's own) compensation package with others is prohibited; every employee's compensation package shall be kept highly confidential.

Safe and Healthy Work Environment

The Company commits to provide and maintain a safe and healthy work environment, while employees are required to support this commitment to help create an equal opportunity workplace.

1. Involvement in any drug abuse, including use, sale, manufacture, distribution or possession of illicit drugs, is prohibited.
2. Involvement in any extramarital affairs, sexual harassment or any kind of discriminative, harassing, intimidating or offensive behavior is prohibited.
3. Entry into disreputable places, such as red-light districts, is prohibited. If the entry is for business necessity and unavoidable, employees shall report to their direct supervisor before or within one day after accessing such prohibited places.

4. Deliberately causing trouble and damage to the Company's possessions and reputation is prohibited. Violence, threats, and humiliation are also prohibited at the workplace.

□ **Non-discriminative Environment**

The Company values employees' differences and devotes itself to creating a diverse work environment that is free from intimidation and harassment.

1. Fair treatment for customers

To keep our promise of "integrity and warm service", any unfair practice, such as harassment, intimidation or discrimination, against customers based on their economic status, race, gender, age, religion or other reasons is prohibited.

2. Fair employment environment

(1) The Company commits to create a diverse workplace that is free from harassment and discrimination, under which employees trust, respect and work with each other for organization performance and reputation.

(2) The Company commits to utilize fair employment practices, such that employees are recruited, selected and hired based on their knowledge, skills and abilities. The Company also commits to work together with employees to advance their job-related capabilities.

3. To ensure a workplace free from sexual harassment and to improve gender equality, the following actions are prohibited:

(1) Making a sexual request in the course of executing employment duties

(2) Using verbal or physical conduct of a sexual nature or with gender discrimination to intimidate or infringe upon another employee

(3) Offending, interfering with, or affecting another employee's personal dignity, physical liberty, or performance

- (4) Explicitly or implicitly making a sexual request in exchange for the establishment, continuance, modification or assignment of a labor contract or as a condition of another employee's designation, remuneration, personal evaluation, promotion, demotion, reward or punishment
4. Any harassing, discriminative, and threatening behavior toward supervisors, subordinates, colleagues or customers based on their age, race, marital status, disability, sexual-orientation, gender, military service or economic status is prohibited.
5. Use of the Company's communication systems, such as email or internal mail delivery, to transmit images or text of sexual nature or containing ethnic slurs, racial epithets or any other harassing, offensive or lewd material is prohibited.
6. Employees shall file to HR through the official employee communication channel to report any suspicious or factual violation of the non-discriminative policy.

3-2. Avoidance of Outside Employment and Conflicts of Interest

Employees must be alert to any outside employment that might affect performance at the Company, and avoid any kind of conflict between personal interests and those of the Company. Employees shall never take advantage of their position at the Company to create improper interests.

1. Employees shall prioritize their work for the Company and shall not have any outside employment or part-time work except with prior approval.
2. Employees shall not violate the following principles for approved outside employment or part-time work:
 - (1) Do not violate laws or regulations, the Company's Code of Conduct, work rules, or other internal management regulations that may affect the interests of the Company or its customers or cause them a significant loss.
 - (2) Avoid conflicts of interest with the interests of the Company.
 - (3) Avoid conflicts of interest with the employee's duties for the Company and the execution of those duties.
3. Operating any business or activity through a third party, including family members, partners or friends, to evade this Code, official regulations and principles is prohibited.
4. Owning, managing or investing in any business similar to or the same as the Company either under employees' names or on behalf of others is prohibited. Employees should not take any position, such as employee, appointee, consultant or others, at any company whose business is similar to or the same as the Company.
5. Promoting, selling or passing on any non-Company product or service by using the position at the Company or information learned during employment is prohibited. If there is any need to introduce a family member to the Company to provide services or products, the employee shall report to the concerned parties and get prior approvals.
6. Use of employees' own accounts to execute a customer's private transactions is prohibited. In addition, personally executing transactions for accounts of

employees, their spouses and relatives on the Company computer system is prohibited.

7. It is not appropriate for an employee to be the guarantor for a personal or corporate loan application other than the said application is applied by the employee's direct relatives or siblings. Employees shall also avoid approving loans or executing other transactions when the customer is their relative.
8. Personal transactions related to Company business should be restricted to long-term investments. When performing personal transactions, employees shall avoid the possibility of conflicts of interests with the Company, especially avoiding speculation in securities.

3-3. Provisions Governing Endowments, Hospitality, and Sponsorship

- No offering or acceptance of unreasonable presents or hospitality, or other improper benefits.

Neither officers nor employees of CTBC shall offer or accept, either directly or indirectly, unreasonable presents or hospitality, or other improper benefits of any kinds for establishing business relationships or influencing business transactions. However, gift receiving or giving will be allowed under the circumstance of expressing appreciation or for the purpose of maintaining a good business relationship. All these activities shall comply with the rules listed below:

1. Soliciting or asking for any monetary or non-monetary gifts, rewards, or interests, other than as permitted by company regulations, for any reasons, from customers or other third parties, is prohibited. Employees should not have any personal loan or monetary relationship with those parties and shall not ask for bonus sharing.
2. Accepting gifts or the conveyance of anything with value, such as cash, commissions or other monetary equivalents, including gift coupons or stocks, investing in a customer's or supplier's business, and taking unfair advantage of current or prospective customers, suppliers, or business-related individuals or enterprises, are prohibited.
3. Employees are prohibited from having a family member, such as a spouse, parent, child, cousin, in-law, or other relative, accept gifts, monetary equivalents or other preferential treatment, or perform any prohibited behaviors listed in the above item, and then transfer such treatment to the employee in order to evade this Code or relevant business operation regulations.
4. Gifts may be accepted when permitted under applicable rules if 1) they are occasionally given for the purpose of business etiquette or social custom with the value of or under USD 100; or 2) the value of the gifts is under USD 160 cumulatively from the same grantor per year.
5. If the gift is to be given to maintain a normal business relationship, employees should use a company-approved and logo-printed gift. Arrangements of gifts or entertainment shall not be excessively luxurious or too often result in

unnecessary expenses.

- No improper charitable donations or sponsorship.

When making or offering donations and sponsorship, CTBC officers and employees shall abide by relevant laws and the “Donations and Sponsorships Management Policy”, and shall not surreptitiously engage in bribery.

3-4. Maintenance of Information Completeness and Accuracy

The records, data, and information owned, collected, used and managed by the Company must be accurate and complete.

1. Employees should not conceal any mistake made on the job and shall report to the concerned parties about customer risky situations to avoid any possible disadvantage the Company may suffer.
2. Employees shall be cautious as to the content and wording of documents, which may be cited or kept by others, and avoid any possibility of misleading. Employees are also required to keep copies or records of documents according to relevant policies.
3. Employees should not deliberately make mistakes resulting in reputation damage or financial loss to the Company.
4. Making unauthentic statements or misleading customers when processing business-related transactions is prohibited. Also, employees are prohibited from providing explanations or promises that are beyond their authority to customers. In addition, employees are prohibited from making any inappropriate promise to affect a customer's or the Company's liability.
5. Attempting to lead a customer to make unauthentic statements, provide fabricated information or forge documents is prohibited. If such actions from a customer or colleague are discovered or rationally suspected, an immediate report to a supervisor is required.
6. Suggesting any investment product to a customer prior to risk disclosure and investment analysis is prohibited.
7. Employees shall strictly adhere to the rules and controls of the Company in maintaining information. All records shall accurately reflect the underlying transactions in a timely manner and shall be immediately corrected in the event an incorrect or misleading entry is detected.
8. Financial statements and related disclosure information must always be prepared in accordance with generally accepted accounting principles and fairly present, in all material respects, the financial position of the Company. Employees are

prohibited from improperly influencing any internal independent auditor, legal counsel, security personnel, or other properly authorized person during the review of any financial statement of the Company.

3-5. Intellectual Property

CTBC employees shall respect the intellectual property (IP) of the Company and others and shall ensure that their use of IP adheres to CTBC's Intellectual Property Management Plan.

□ Business Secrets

All employees shall safeguard Company assets and make sure assets are properly and legally used. Prior approval is required if there is a need to use Company resources, services, facilities or other properties for non-business purposes.

1. Any information or material, which has actual or potential economic value, directly or indirectly acquired during employment, is strictly confidential and should be kept secret.
2. The following items are considered confidential information or business secrets: information not known to persons generally familiar with information of this type; information with economic value, actual or potential, due to its secretive nature; research reports and technical data for which public protection cannot be applied; and information, the secrecy of which the Company has taken reasonable measures to maintain, or which is required to be kept secret due to legal compliance.
3. Business secrets acquired during employment are important assets of the Company and should be kept with efficient protection. Use, release, or passing on of any business secret to any third party is prohibited. Employees shall advise the Company immediately upon disclosure of the same resulting from their negligence or if they become aware of another party's disclosure of the same. These obligations to keep trade secrets confidential and advise of their disclosure shall survive termination of the contractual relationship between employees and the Company.
4. Employees shall return trade secrets, including Company data and documents in their possession, to the units in which they hold office, and strictly complete all handover requirements, if any, prior to their resignation, transfer, or retirement.

5. Control, concealment, misuse or misleading use of confidential information in order to seek improper interests is prohibited. Also, employees are prohibited from spreading unapproved or unconfirmed business related information.
6. When answering inquiries from outsider, employees shall take full responsibility about the content provided, and the information provided should not exceed authorization set by the Company.
7. CTBC has policies for public announcement and information disclosure, with which all employees shall firmly comply. Also, employees are prohibited from spreading unapproved or unconfirmed business related information.

□ **Trademark, Copyright, Patent**

1. Employees can create, invent, or design when performing duties or utilizing information or resources available during employment. Publications, documentation, training materials, computer code, and other works of authorship employees develop for the Company are protected by copyrights. To the extent permitted by law, employees agree that all works of authorship, inventions, improvements, derivatives, designs, technologies, written materials, programs or any other work, whether patentable or protectable by copyright, business secret or trademark, are the Company's assets.
2. Employees are required to assign the entire right, title, and interest to the Company or its assigned parties without any condition when they complete any patent, trademark, or copyright related to their job worldwide. Employees are also obligated to assist in completing the application for any invention, design, or creation and in providing defense in legal proceedings if the application is rejected.
3. The registered CTBC trademarks shall be used on commodities, instruments, advertisements, and websites related to the Company's business.
4. Employees are prohibited from using Company logos on media,

advertisements, promotions or websites without prior written permission from a supervisor.

5. Issuing any certificate or document to customers using the name of the Company, or publishing or giving any document or speech related to the job is prohibited. Also, employees are prohibited from promotion through the use of unapproved business cards or any type of advertisement.

□ Other Intellectual Property Rights

1. To prevent the Company from infringing the intellectual property rights of others, employees are prohibited from using pirated software or other illegal computer products.
2. When introducing any new technology, the non-infringement of the technology upon any other party's IP shall be the top priority. The contract the technology's supplier shall stipulate that the technology be free from any infringement upon another party's rights and interests, and that the provider shall be liable for any damage caused by a violation of said requirements, if any, to the Company.

3-6. Information Security Protection Requirement

As a member of CTBC, employees shall diligently protect the Company's various information assets and comply with information security-related regulations when using information equipment provided by the Company to protect the safety of our information assets and environment.

1. Only use information assets authorized by the Company, including but not limited to computer equipment, office automation equipment, application software, electronic files, and paper documents.
2. Do not attempt to obtain or guess unauthorized information system accounts or passwords.
3. In order to reduce the risk of data leaks, employees are prohibited from using their private external mailboxes to send, receive, or handle confidential official information.
4. Do not permit or assist unauthorized personnel to use the Company's information equipment or connect to the Company's internal network.
5. Do not connect private devices to the Company's internal network without prior approval.
6. The integrity of the Company's information assets shall be maintained; prior approval shall be obtained before any changes, including but not limited to disassembling, replacing, or adding any components with network connection or storage function to the information equipment; and information security control software installed on the information equipment shall not be changed, removed, or stopped without authorization.
7. Employees shall protect information system accounts and passwords held by them and protect the Company's information assets from unauthorized use or access.
8. Information equipment provided by the Company shall be used for business only and shall not be used for private purposes, such as using the Company's email account to apply for non-business related services or using the Company's equipment for private transactions.
9. Do not use information assets provided by the Company for illegal activities,

including but not limited to the installation and use of pirated software and the creation or distribution of computer viruses or malicious programs.

3-7. Termination of Employment Relationship

CTBC may dismiss an employee without advance notice if one of following conditions exists:

1. Where material misrepresentation by the employee at the time of hiring and cause the employer to sustain damage therefrom.
2. Where violence or gross insults by the employee against the employer, his or her family members, agents, or colleagues.
3. Where the employee has been imprisoned.
4. Where the employee has committed a gross breach of the labor contract or work rules.
5. Where the employee has deliberately ruined property of the employer or deliberately disclosed technological or confidential business information of the employer, with damage resulting.
6. Where the employee is absent without cause for three days in a row or six days in a month.

For categories 1,2,4,5, and 6, the employer must terminate the employee within 30 days after the employer becomes aware that such circumstances exist.

4. Our Industry

4-1. Principles of Fair Competition

The Company believes that vigorous and fair competition will make the whole industry more prosperous. Information provided should be kept in a transparent, fair and accurate manner to avoid any behavior or activity that may damage the fairness of transactions.

1. Infringing a customer's will or interests when competing with other competitors is prohibited.
2. Demeaning other competitors when serving customers is prohibited.
3. Promising customers or vendors a business transaction, which is not permitted by government financial supervisory commission or bureaus, is prohibited. Also, promising or executing unauthorized transactions, altering exchange rates at employees' own will to attract customers, or promoting business with inappropriate methods is prohibited.
4. Evading Company regulations or operating procedures to execute transactions, for example, forging information on application forms for the customer, with the excuse of catering to the customer, is prohibited.
5. Cooperating with unapproved agents to increase a certain employee's performance or seize, exchange, transfer or merge with other employees' performance achievement is prohibited.

4-2. Insider Trading Regulations

1. In the course of working at CTBC, employees may learn or have access to material non-public information regarding the Company or companies listed on the Taiwan Stock Exchange, Taipei Exchange (“TPEX”), or TPEX Emerging Stock Market, including:

- (1) “Non-public information that may have a material impact on the stock price of the Company or a listed company”: shall include financial, business, or market supply and demand information; public acquisitions; or any other information that may materially affect the stock price or a reasonably prudent investor’s investment decisions, including company financial reports or information regarding operating performance.
- (2) “Non-public information that may have a material impact on the ability of the Company or a listed company to pay principal and interest”: shall include the information relating to the loss of good credit standing, a material loss likely to result in financial difficulty, or the suspension or termination of business, etc.

Please refer to Articles 2 to 4 of the” Regulations Governing the Scope of Material Information and the Means of its Public Disclosure Under Article 157-1, Paragraphs 5 and 6 of the Securities and Exchange Act” for detailed regulation.

2. The following actions are prohibited :

- (1) Upon learning of any non-public information that may have a material impact on the stock price of the Company or a listed company, employees may not buy or sell the company's stock or other equity securities either personally or on behalf of others within 18 hours before or after the information becomes public.
- (2) Upon learning of any non-public information that may have a material impact on the ability of the Company or a listed company to pay principal or interest, employees may not sell the listed or OTC non-equity corporate bonds either personally or on behalf of others within 18 hours before or after the information becomes public.

3. Directly or indirectly disclosing aforementioned material non-public

information to any third party is prohibited as well.

4. Other relevant rules are subject to the provisions of the “Management Policy for Preventing Insider Trading”.

4-3. Anti-Money Laundering, Countering the Financing of Terrorism, and Fraud Prevention

1. Employees have a shared responsibility with the Company to help combat crime. Employees shall comply with relevant laws and regulations related to anti-money laundering, countering the financing of terrorism (AML/CFT), and fraud prevention in various jurisdictions. They shall also fully understand the risk points and operational norms of their business responsibilities and must not advise, conceal, or assist others in converting illegal gains into seemingly legitimate funds. Facing the ever-evolving techniques of money laundering, terrorism financing, and fraud, employees shall be vigilant in identifying new types of criminal patterns and exercise due diligence in daily business operations. If you suspect that a customer or a transaction may be involved in illegal activities, you shall not complete the transaction and shall report the incident to your supervisor or the relevant authorities in accordance with relevant regulations.
2. Officers shall notice if employees maintain a standard of living above that which is commensurate with their present or past official emoluments and understand their relevant backgrounds. Should anomalies be observed, officers shall selectively check the transactions they have engaged and may see assistance from the audit unit where necessary.

4-4. Bribery Prohibition and Restrictions on Political Donations

CTBC employees shall not offer bribes or commit crimes for the convenience of business transactions.

1. When conducting business, CTBC employees shall 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.
2. When directly or indirectly offering a donation to political parties or organizations or individuals participating in political activities, CTBC employees shall comply with the Political Donations Act and the “Donations and Sponsorships Management Policy”, and shall not make such donations in exchange for commercial gains or business advantages.

5. Our Community

5-1. Protection of Customer Privacy

Unless authorized by customers or by applicable law or legal regulations, employees are responsible for protecting customer privacy, confidentiality and security entrusted to the Company.

1. To protect the Company and its customers, employees are prohibited from disclosing customer information, including trading records, to any unrelated third party, except under legal requisitions. If it is necessary to bring this confidential information outside the Company, a supervisor's approval is required.
2. Employees shall carefully store each customer's documents or trading records. Employees are prohibited from misusing, changing or revising a customer's documents or information without the customer's written approval.
3. Whether approval is obtained or not, imitating the seals or signatures of any customer, colleague, or supervisor, or further stamping or signing on any documents is prohibited.
4. Putting a customer's payment under an employee's custody, paying for a customer, depositing or withdrawing unclassified money to or from a customer's account is prohibited.
5. Privately keeping any documents with a customer's signature or seal on it, or keeping a customer's password, except as permitted by current regulations, is prohibited.
6. Employees are prohibited from disclosing confidential information or business secrets of customers, colleagues or the Company, except for business requirements. In addition, disclosing the confidential information acquired by computer system or other telecommunication facilities is prohibited.

5-2. Support for Human Rights

CTBC abides by the laws and regulations in the worldwide locations where it operates and supports global human rights protection and basic principles with regard to internationally recognized principles, such as the UN Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights. Hence, it is essential for CTBC employees to practice respect for human rights.

CTBC human rights implementation policy:

1. Provide a safe and healthy work environment.
2. Eliminate discrimination to ensure equality in opportunity for work and abide by the “ Gender Equality in Employment Act ” and “ Sexual Harassment Prevention Act ” to prevent workplace sexual harassment.
3. Prohibit forced or compulsory labor, hiring child labor, trafficking human.
4. Help employees maintain physical and mental health and balance work and life.
5. Maintain unimpeded communication with employees and promote labor-management harmony.
6. Regularly review and access relevant systems and actions.

Declaration of Commitment to Code of Conduct

As an employee, you shall read, understand and comply with the Code of Conduct. You shall consult HR or the Legal Department whenever you have a question about this Code. If you fail to comply with the Code, you will be subject to disciplinary action, which will depend on the circumstances of the violation. In the event that any dispute cannot be amicably resolved by both Parties, both Parties agree that the Taipei District Court shall have exclusive jurisdiction for the first instance.

In addition to the guidelines included in this Code, you shall comply with personnel regulations, business operating procedures, and any applicable laws or regulations. If any provision of this Code of Conduct is determined by a court of competent jurisdiction to be invalid or unenforceable under any applicable law, such provision will be deemed severed. However, the remainder of this Code will still be in full force and effect. HR shall announce changes to this Code, including but not limited to business requirements, the evolution of the economic environment, laws and policies. Such announcement shall supersede any prior written or oral announcement, which has been published by any other department.

I, _____, hereby acknowledge and commit to the Company that I have read the Code of Conduct and understood my obligations as an employee to follow the principles, policies and laws outlined in the Code.

Signature : _____

Personal ID : _____

Date : _____
