

Notice

The English version is for reference only. The Chinese version shall prevail.

The Shanghai Commercial & Savings Bank Regulations for Handling Whistleblowing

Board of Directors approved
Secretarial office of Board of Directors 11.14, 2020 prepared
03.23,2023 revised
11.10,2023 revised
11.15,2024 revised
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08.28,2026 revised

- Article 1 This Procedure is hereby promulgated in order to promote sound operations of the Bank, strengthen corporate governance, and ensure the sustainable development of the Bank, it is based on the "Implementation Rules of Internal Audit and Internal Control System of Financial Holding Companies and Banking Industries", "The Corporate Governance Best Practice Principles of Banking", and the Bank's "Ethical Corporate Management Best Practice Principles", "Procedures for Ethical Management and Guidelines for Conduct ", etc.
- Article 2 Anyone who discovers any suspected of committing crimes, fraud, or violating laws may file a report in accordance with the provisions of Articles 5 and 6 of these Measures.
- Article 3 The Compliance Department is designated as the dedicated unit to accept the whistleblowing case.
In order to facilitate the investigation of the reported case, the Compliance Department may contact the relevant unit or contact the chief auditor to designate an auditor to conduct the investigation, and each unit/person shall cooperate.
The Bank shall set up a "Reported Case Review Committee" (hereinafter referred to as the Review Committee) under the management department to be responsible for the review of

reported cases. The membership and duties of the committee shall be handled in accordance with the Bank's "Procedures for the Establishment of the Whistleblowing Case Review Committee".

Article 4 The types of reporting cases accepted by the Bank are as follows:

1. The person being reported is accused of committing acts in person or instigating others to commit crimes or fraud.
2. The person being reported is accused of committing any other violations of laws.

Article 5 Reported cases should be submitted through the publicly announced reporting channels. Whistleblowers should fill in the attached " Whistleblowing Case Form " to submit reports by email or written letter. The Bank shall also set up a hotline for whistleblowing. If a whistleblower makes a whistleblower through the aforementioned hotline, the whistleblower shall fill in the attached "Whistleblowing Case Form" and submit it to the Legal Compliance Department within seven business days from the date of filing the whistleblowing case.

The bank also establishes and announces the reporting channels on the company's website and internal website for the whistleblower' s reference.

Article 6 Reported cases can be reported anonymously, but the true name, ID number, and address, telephone, and e-mail address of the whistleblower should be obtained as much as possible.

And the whistleblower should provide at least the following information:

1. The name of the person being reported and other information sufficient to identify the identity of the person being reported.
2. Specific evidence available for investigation, and sufficient information must be provided to facilitate

verification (including but not limited to the name, unit, job title, date of the incident and description of the content of the relevant personnel).

Article 7 Reported cases with one of the following conditions will not be accepted, the case should be closed according to the prescribed approval procedures, but relevant information should still be kept for verification:

1. The case will be closed after verification by the responsible unit:

Its content shall only contain opinions or suggestions on the bank's financial products, services or the service attitude of its personnel, and other matters that are clearly not among the types of cases to be accepted as stipulated in Article 4 of these Measures.

2. After being approved by the president by the dedicated unit, the case will be closed:

(1) The information specified in Article 6 is not provided completely, and the correction is not made within seven business days after the notification or the notification cannot be made.

(2) The reported case is known to have been under investigation or trial by the judiciary, or decision not to prosecute, or decision to defer the prosecution, or confirmed by judgment.

(3) Those cases that do not fall under the preceding paragraph and are not among the types of cases accepted by the Bank as stipulated in Article 4 of these Regulations.

3. After being approved by the Review committee by the dedicated unit, the case will be closed:

(1) Those which have been reported repeatedly after handling and responding to the cause of the report, but those which have new facts or evidence of new incidents are not subject to the limits.

(2) The reported case is obviously inconsistent with the facts or there are false criticisms.

After a reported case is closed in accordance with the aforementioned provisions, unless there are circumstances where notification cannot be made, the responsible unit shall notify the informant within seven business days in writing or by other means.

Article 8 The dedicated unit shall handle the report case in accordance with the following procedures:

1. Start the investigation:

- (1) Except for cases closed in accordance with the provisions of Article 7, Paragraph 1, the dedicated unit shall handle the investigation on its own or in consultation with other units or personnel.
- (2) For general employees, the head of department shall be notified to verify the relevant facts, and the results shall be reported back to the dedicated unit.
- (3) The investigating unit/personnel may notify the person being reported or relevant personnel to state their opinions by phone or in writing. Investigators should uphold the spirit of independence and a fair, impartial, honest, and objective attitude, and handle relevant investigations in a non-public manner, and the person under investigation shall have the duty of confidentiality regarding the contents of the investigation and reporting case.

2. Deliberation and review of investigation reports:

- (1) The investigation report shall be sent to the Review meeting for deliberation. Reporting cases involving directors or managers above the executive vice president level, shall be reported to independent directors and reported to the Audit and Sustainable Committee for review. After the investigation report has been reviewed by the Review committee, if there is a case involving the applicable objects of the Bank's "Responsibility Map System Guidelines for Senior Management Personnel" and meeting the major breach standards stipulated in the above-mentioned standards, or cases involving the Bank's

"Accountability System for Handling High-Asset Customer Business" and of serious nature, in addition to being handled in accordance with the provisions of these Measures, the Human Resources Department will also open the case in accordance with the above-mentioned standards. Handled according to the regulations.

- (2) After the reported case is verified, the dedicated unit in charge determines that it is true, the dedicated unit in charge shall report to the president and request the person being reported to stop the relevant behavior before the Review committee meeting has considered it.
- (3) After the investigation report has been reviewed by the Review committee, the Review committee shall deal with it appropriately, including but not limited to instructing the responsible units to review the relevant internal control system and operating procedures and propose improvement measures. Cases involving personnel rewards and punishments, except for those cases in item (1) that should be held accountable according to relevant standards, transfer to the Personnel Review Committee for processing and request damages through legal procedures when necessary. If any illegal case is involved, an assessment should be made as to whether to report it to the competent authority or transfer it to the judicial authority for investigation and the report should be submitted to the president for approval.
- (4) After investigating the reported case, it is found to be a major accidental event or an operational risk event as defined in the Bank's "Operational Risk Event Reporting and Handling Guidelines", the dedicated unit shall notify the dedicated unit of the bank's "Major Accidental Even Reporting and Handling Guidelines". Or the "Operational Risk Event Reporting and Handling Guidelines" of the incident

notification unit, each of which shall handle follow-up matters in accordance with relevant regulations.

(5) If a major violation of laws and ordinances or the bank is likely to suffer major damage after investigation, the dedicated unit shall immediately prepare a report and notify the independent directors in writing.

3. Report to the board of directors: The dedicated unit shall report its handling methods and follow up review and improvement measures to the board of directors.

4. Notify the whistleblower: Except for circumstances where notification cannot be made, after the investigation report of the whistleblowing case is reported to the board of directors, the dedicated unit shall notify the whistleblower in writing or in other ways within seven business days after it is submitted to the board of directors.

The responsible unit shall complete the investigation within three months from the day after the whistleblowing case is received and transferred. If an extension is necessary, it may extend it with reason, but only once, and the extension period shall not exceed three months.

Article 9 The acceptance, investigation and management of reported cases shall comply with the following principles:

1. Persons who accept, investigate or review reported cases, such as those who have kinship with whistleblower or the person being reported within spouses, second-degree relatives, first-degree relatives in-laws, or conflicts of interest, or factors that may affect the fair and impartial handling of the case, should be avoided.

2. Before making a decision on the reported case, the person being reported shall be provided with an opportunity to state his opinions.

3. Each responsible unit and dedicated unit shall retain written documents regarding the acceptance of reports, investigation process and investigation results, and shall be kept for at least five years, and shall be kept electronically. However, when a lawsuit related to the

reported content occurs, the relevant information shall be kept until the end of the lawsuit.

Article 10 The Bank shall take the following protective measures for the whistleblower:

1. The identity information of the whistleblower shall be kept confidential, and no information sufficient to identify his/or her identity shall be disclosed unless required by law or required by litigation.
2. The relevant personnel handling the reported case (ie, the accepting, investigating and reviewing personnel) shall declare in writing that the identity of the whistleblower and the content of the report shall be kept confidential. The Bank undertakes to protect the whistleblower from being improperly handled due to the report, except for the case which the report is found to be untrue or involves malicious attacks on the Bank or its personnel.
3. The Bank shall not sack, dismiss, demote, transfer, take a pay cut, damage the rights and interests under the law, contract or custom, or impose other unfavorable sanctions on the whistleblower because of the report of the case.
4. Subject to the whistleblower protection provisions set forth in the preceding paragraph, and based on internal control principles and risk assessments, the Human Resources Department may adjust the whistleblower's work content, transfer positions or units based on business needs, manpower allocation, professional capabilities, and equity principles. Relevant operations shall be handled in accordance with the Bank's "Employee Transfer Regulations."

Article 11 When a reported case is proven to be true, according to the severity and the specific situation of circumstances concerned, and the report bonus or other appropriate rewards may be issued upon the approval of the Review committee; if the whistleblower makes a false report or

malicious accusation, or internal personnel deliberately leaked personal information about the reported case, the internal employees will be handled in accordance with the company's punishment regulations; if criminal responsibility is involved, it will be handled in accordance with the law.

Article 12 The dedicated unit shall regularly promote and train on the whistleblowing system for employees of the bank.

Article 13 If there are any issues that are not covered by the Regulations, they will be handled in accordance with relevant laws and regulations or the regulations of the Bank.

Article 14 The Regulations shall be implemented after approval by the Board of Directors, and the same shall be applied when revised.

Whistleblowing Case Form

DATE :			
Name of accused person and other information sufficient to identify the identity of the accused		Affiliated unit	
Report Content	Please provide specific factual evidence for investigation, and provide sufficient information to facilitate verification (including but not limited to the name, unit, title, date of occurrence of the incident and description of the content of the relevant personnel)		
Whistleblower name		Contact number	
		Address/e-mail	