

KGI LIFE INSURANCE CO., LTD.

Regulations Governing Whistleblowing of Illegal,
Immoral, or Unethical Conducts

Regulation No.: Compliance - 014
Compiling Department: Compliance Department
Version: Version 12
Amendment Date: May 28th, 2025

Article 1 Basis

KGI Life Insurance Co., Ltd. (hereinafter referred to as "the Company"), for the purpose of protecting the legitimate rights and interests of whistleblowers and respondent, has established the "Regulations Governing Whistleblowing of Illegal, Immoral, or Unethical Conducts" (hereinafter referred to as "the Regulations") in accordance with Article 32-2 of the "Regulations Governing Implementation of Internal Control and Auditing System of Insurance Enterprises", Article 28-1 of the "Corporate Governance Best Practice Principles for the Insurance Enterprises", Article 2, Paragraph 7 of the Company's "Code of Ethics", Article 20 of the "Integrity and Ethics Management Best Practice Principles", and Article 13 of the "Procedures for Integrity and Ethics Management and Guidelines for Conduct".

Article 2 Scope of Application

Any person discovering any of the Company's employee to be in violation of the Code of Ethics, Integrity and Ethics Management Best Practice Principles, Procedures for Integrity and Ethics Management and Guidelines for Conduct may file a report in accordance with the Regulations.

The reported cases accepted by the Company include but are not limited to the following matters:

- a. The violation of insurance related regulations.
- b. Offering and acceptance of bribes.
- c. Improper charitable donations or sponsorship.
- d. Infringement of intellectual property rights.
- e. Engagement of unfair trading taking unfair gains.
- f. Engagement of insider trading taking advantage of or divulging undisclosed information.
- g. Damage caused to the rights and interests of stakeholders or other behaviors that seriously harm the benefit of the public.

The Company has established dedicated units to handle cases regarding customer complaints, business solicitation/insurance claim disputes, the management of agents, occupational safety and health, and sexual harassments. Cases that belong to the aforementioned scope shall apply its dedicated rules or regulations and are not within the scope of application of the Regulation.

Article 3 Receiving, Acceptance and Investigation Unit

The Company's Compliance Department is the receiving unit for any illegal, immoral, or unethical misconduct.

After the reported case is received, the receiving unit shall decide whether to accept the case or not in accordance with Article 5 of the Regulations.

Accepted case shall be reported in accordance with the following rules, and the person who receives the report shall be the convener, who shall organize and command the investigation team to investigate the case in accordance with Article 7 of the Regulations:

- a. Respondents who are employees below the level of Senior Assistant Vice President shall be reported to the President.
- b. Respondents who are director or a management level with responsibilities equivalent to Senior Vice President or above, shall be reported to the convener of the audit committee.
- c. Respondents who are independent directors, shall be reported to the Chief Compliance Officer and the Chief Auditor.

Article 4 Report Venues

The whistleblower may report to the receiving unit via four different venues: In-person, via written form, e-mail (whistleblower.KGIL@kgi.com), or telephone. Said venues shall be publicly disclosed on the Company's website.

Article 4-1 Cases Requested by the Competent Authority for Investigation

For reported cases referred to the Company by the Financial Supervisory Commission or its affiliated agencies, the Company shall handle them in accordance with their instructions and the relevant provisions of the Regulations. If a specific investigation unit is designated, that unit shall take charge of coordinating the investigation matters, and the provisions of the Regulations shall not apply. However, if the accused is a director or holds a managerial position equivalent to or above that of a Senior Vice President, the investigation report shall be directly submitted to the most recent Audit Committee for review.

Article 5 Processing Procedures for Reported Cases

The whistleblower shall provide the following details and information.

- a. Whistleblower's real name and contact information. For anonymous whistleblowers, effective contact information shall at least be provided.
- b. Whistleblower shall state the facts and provide relevant evidence.

Should any of the following occur, the receiving unit may make a decision of "Case not entertained":

- a. The whistleblower fails to state the facts and provide relevant evidence requested

in aforementioned paragraphs.

- b. Information provided by the whistleblower includes malicious intent, false accusations, lacks of specificities, or is not in violation of laws and regulations.
- c. The statement does not in the applicable scope stipulated in the “the Ethical Corporate Management Best Practice Principles”, “Ethical Corporate Management Procedures and Guidelines” and “the Code of Ethical Conduct”. .
- d. The same reported situation of the same respondent has been verified by the company, the Financial Supervision Commission, the Financial Ombudsman Institution, the court, or other government agencies, or the case has been closed.

If there are other applicable procedural norms in the reported case or the reported case is under the authority of other department, the investigation team may make a decision of transferring it to the responsible unit and submit relevant information, and the transferred unit shall continue to deal with it in accordance with its norms.

After receiving the reported case, the receiving unit shall record it in the registration form (Appendix 1) and make a written record form (Appendix 2) and case acceptance form (Appendix 3); The receiving unit shall also prepare a receipt for acceptance (Appendix 4) and deliver it to the whistleblower by letter, email or other means, but if the whistleblower fails to provide a valid contact information, the restriction foresaid shall not apply.

The receiving unit shall report cases that are not entertained or are transferred to other responsible unit to the President and notify the whistleblower. But the restriction foresaid shall not apply if the whistleblower fails to provide a valid contact information.

Unless otherwise provided by the law, if the same reported case of the same respondent has been accepted by the Financial Supervisory Commission, the Financial Ombudsman Institution, the court, or other government agency but has not yet been resolved, the investigation team of the company may suspend the procedures of deciding to accept the case or investigation, and take action after the completion of the aforementioned procedures.

Article 6 Protection of the Whistleblower

The Company shall keep the identity of the whistleblower confidential, and the relevant information shall be carefully stored, encrypted and protected, and access rights shall be restricted. Information that is sufficient to identify the whistleblower shall not be disclosed.

If the whistleblower is an employee of the Company, the Company shall provide appropriate protective measures and ensure that the employee will not be dismissed,

demoted, reduced in salary, or subject to any other adverse punishment due to the whistleblower's rights and interests in accordance with laws, regulations, contracts, or customs. Provided that the whistleblower falls under the second paragraph of Article 11, this restriction shall not apply.

Article 7 Investigation and Submission Procedures for Reported Cases

With the exception of when “Case not Entertained” and transfer conditions stated in Article 5 are met, the investigation procedure of the received case should be completed within two months, and may be extended if necessary.

If verification is required in the course of the investigation, the investigation unit may request relevant information or data from relevant units or the whistleblower. The investigation unit may also question the whistleblower or the respondent, and make records of such question.

Investigation report (Appendix 5) shall be compiled after conclusion of the investigation, and distributed to relevant units after approved by the convener of the investigation unit. If the respondent is a Director or a manager in a position equivalent to that of a Senior Vice President or above, the investigation report should be submitted to the Company’s Audit Committee for review.

Article 8 Follow-up Processing Procedures for Reported Cases.

If the respondent is deemed to have engaged in illegal, immoral, or unethical misconduct after thorough investigation, the Company shall immediately request the respondent to cease all relevant misconduct, and take appropriate measures in light of the violation. Prior to implementing final disciplinary actions, the Company shall provide the respondent an opportunity to state their opinions.

If the reported case is deemed to be a material contingency or violation of the law after thorough investigation, relevant authorities should be reported or informed.

If the reported case has been verified to be true, the Company shall request relevant departments to conduct revisions of internal control and operating procedures, and submit compiled information to the Company’s Sustainability and Ethical Management Committee.

Regarding the processing of an accepted case, the receiving unit of the Company shall notify the whistleblower on the progress of the case via written or other forms of communication, but this restriction shall not apply if the whistleblower fails to provide a valid contact information.

Regarding the case that is transferred to the responsible unit to deal with in accordance with Paragraph 3, Article 5 of the Regulations, the transferred unit shall notify the whistleblower and the Compliance Department on the progress of the case

via written or other forms of communication. If the whistleblower fails to provide a valid contact information, then the notification will be sent to the Compliance Department.

Unless otherwise specified, the level of approval of the preceding investigation report shall be approved by the supervisor of the transferred unit. However, for the departments directly under the chairman or the president, the investigation report shall be approved by the highest supervisor of the departments directly under the chairman or the president.

Article 9 Avoidance

For parties who have family relationships or potential conflicts of interest regarding the reported case, avoidance should be exercised during receiving, acceptance, investigation, review, and other relevant procedures of the reported case.

Article 10 File Maintenance and Archiving

All information regarding the reported case, including the receiving, acceptance, investigation process, investigation result, and other relevant information, should be retained for a minimum of five years. If litigation concerning the reported case occurs prior to the expiry of the retention period, the retention period of all relevant information shall be extended till the conclusion of the litigation.

Article 11 Rewards and Punishments

If the reported case is verified to be true and with grave circumstances, the Company should process the case in accordance with relevant laws or the Company's relevant regulations, and provide the whistleblower with appropriate rewards.

If the whistleblower is an employee of the Company and is in the full knowledge that the reported activity is false, or if the whistleblower provides false evidence, the Company shall impose appropriate punishments.

Article 12 Education Training

The Company shall promote the whistleblowing system, and hold education training for its personnel at least once a year.

Article 13 Amendment and Implementation

The regulations shall come into effect after being approved by the board of directors, and the same shall apply when revised.

The addition, modification, or deletion of the appendix to the regulations shall be approved by the President of the Company.

Appendix 1: Registration Form for reporting Illegal, Immoral, or Unethical Conducts

Registration Form for reporting Illegal, Immoral, or Unethical Conducts

Case No.	Received On	Whistleblower	Venues	Reasons for reporting cases	Undertaker	Result

Appendix 2: Record Form for reporting Illegal, Immoral, or Unethical Conducts

Record Form for reporting Illegal, Immoral, or Unethical Conducts

Whistleblower	Name	
	Contact Address	
	Phone Number	
	Email Address	
Respondent	Name	
	Department	
	Position Title	
	Main Duty	
	Other Info.	
Venues	<input type="checkbox"/> In-Person <input type="checkbox"/> Written Form <input type="checkbox"/> Email <input type="checkbox"/> Telephone	
Reporting matters	<ul style="list-style-type: none"> ● Time of occurrence : ● Location of occurrence : ● Reporting matters : ● Other relevant facts/information : 	
Ever reported to the Company	<input type="checkbox"/> Has not reported/appealed to the Company. <input type="checkbox"/> Previously reported/appealed to the Company.	
Evidence		

Review Supervisor	Undertaker
(MM) (DD) (YYYY)	(MM) (DD) (YYYY)

Appendix 3: Case Acceptance Form

Case Acceptance Form

Case No.	
Received On	
Whistleblower	
Respondent	
Reasons for Reporting case	
Overview of Reporting Contents	
Case Decision	<p><input type="checkbox"/> Case accepted.</p> <p>“Case not Entertained”, due to:</p> <p><input type="checkbox"/> The Whistleblower failed to provide description of the fact and info. in accordance with Article 5, Paragraph 1 of the Regulations.</p> <p><input type="checkbox"/> Information provided by the whistleblower includes malicious intent, false accusations, lacks of specificities, or the case is not in violation of laws and regulations.</p> <p><input type="checkbox"/> The statement provided by the whistleblower does not fall under the category of whistleblowing cases of illegal, immoral, or unethical conducts.</p> <p><input type="checkbox"/> The same reported situation of the same respondent has been verified by the company, or the case has been closed.</p> <p style="padding-left: 40px;"><input type="checkbox"/> Previously reported/appealed to the Company.</p> <p style="padding-left: 40px;"><input type="checkbox"/> Previously reported/appealed to other institution, _____ °</p> <p><input type="checkbox"/> Other applicable procedural norms in the reported case , will transfer to _____ °</p>

Convener of the investigation team	The investigation team
(MM) (DD) (YYYY)	(MM) (DD) (YYYY)

Appendix 4: Receipt of reporting Illegal, Immoral, or Unethical Conducts

Receipt of reporting Illegal, Immoral, or Unethical Conducts

Case No.	
Whistleblower	
Venues	
Received On	(MM) (DD) (YYYY)

Appendix 5 Investigation report on cases of reporting Illegal, Immoral, or Unethical Conducts

Investigation report on cases of reporting Illegal, Immoral, or Unethical Conducts

Case No.	
Received on	
Venues	
Whistleblower	
Respondent	
Fact of the Case	
Result of Investigation	<p>The Case <input type="checkbox"/> verified to be true <input type="checkbox"/> verified not to be true</p> <p>Explanation:</p>
Subsequent processing	
Evidence	