

King's Town Bank Co., Ltd.
Ethical Corporate Management, Anti-Corruption,
and Anti-Bribery Policy and Commitment

King's Town Bank adopts a zero-tolerance policy toward corruption and bribery. We promise no corruption or bribery in any form when conducting business activities. The promise is applicable for all subsidiaries (and sub-subsidiaries) of King's Town Bank.

The Bank's anti-corruption and anti-bribery policy (including the code of conduct and other related policies of the Company) is clearly specified in the Company's "Code of Ethical Corporate Management" (hereinafter, "the Code"). The Code has been disclosed on the Company's internal website and has been clearly conveyed to all employees.

The Bank lays great emphasis on ethical conduct and anti-corruption. Before involving in business dealings with subsidiaries or others, the Bank evaluates the legality of the counterparties, fully understands their status of ethical management and compliance with corporate social responsibility, clearly refuses direct or indirect provide, promise, request, or accept improper benefits in any form or name, and stipulates in the contracts that ethical management and corporate social responsibility shall be complied.

King's Town Bank agrees to and abides by the "Company Act," "Securities and Exchange Act," "Business Entity Accounting Act," "Political Donations Act," "Anti-Corruption Act," "Government Procurement Act," "Enforcement Rules of the Act on Recusal of Public Servants Due to Conflicts of Interest," laws and regulations regarding public companies or other business activities, as a foundation for ethical corporate management. The Bank clearly and thoroughly prescribes the specific ethical management practices and the programs to forestall unethical conduct (hereinafter referred to as "prevention programs"), including operational procedures, guidelines, and training, and lays emphasis on the internal advocacy and promotion of the following matters:

- **Prohibition of offering and acceptance of bribes:** When conducting business, the Company and its directors, managers, employees, and agents may not directly or indirectly offer, promise to offer, request, or accept any improper benefits in any form to or from clients, agents, contractors, suppliers, public

servants, or other stakeholders during business activities.

- **Prohibition of offering illegal political donations:** When directly or indirectly offering a donation to political parties or organizations or individuals participating in political activities, the Company and its directors, managers, employees, and agents shall comply with the Political Donations Act and the Company's relevant internal operational procedures, and shall not make such donations in exchange for commercial gains or business advantages.
- **Prohibition of offering improper charitable donations or sponsorship:** When making or offering charitable donations or sponsorship, the Company and its directors, managers, employees, and agents shall comply with relevant laws and regulations and internal operational procedures, and shall not surreptitiously engage in bribery.
- **Prohibition of accepting unreasonable gifts, entertainment, or other improper benefits:** The Company and its directors, managers, employees, and agents shall not directly or indirectly offer or accept any unreasonable presents, hospitality, or other improper benefits with the aim to establish business relationships or influence business transactions.
- **Prohibition of misappropriation of trade secrets and infringement of trademark rights, patent rights, copyrights, and other intellectual property rights:** All personnel of the Company shall faithfully follow the operational directions pertaining to intellectual properties and the Company's internal operating procedures and may not disclose to any other parties any trade secrets, trademarks, patents, works, and other intellectual properties of the Company of which they have learned, nor may they inquire about or collect any trade secrets, trademarks, patents, and other intellectual properties of the Company.
- **Prohibition of engaging in unfair competitive practices:** The Company shall engage in business activities in accordance with the Fair Trade Act and applicable competition laws and regulations, and shall not fix prices, make rigged bids, establish output restrictions or quotas, or share or divide markets by allocating customers, suppliers, territories, or lines of business.
- **Prevention of damage caused by products and services to stakeholders:** In the course of development, procurement, provision, or sale of products and services, the Company and its directors, managers, employees, and agents shall observe applicable laws and regulations, and ensure the transparency of

information about, and safety of, its products and services. The Company shall also carry out the policy in the operations, with a view to preventing its products and services from directly or indirectly damaging the rights or interests, health, or safety of consumers or other stakeholders. Where there are sufficient facts to determine that the products or services are likely to pose any hazard to the safety and health of consumers or other stakeholders, the Company shall, in principle, suspend the services immediately.

All directors, agents, contractors, suppliers, and related persons shall comply with all policies, laws, regulations, rules, and procedures regarding anti-bribery and anti-corruption when representing the Bank or providing services for the Bank. King's Town Bank reserves its right to terminate any business relationship under circumstances of violation of the Bank's zero-tolerance policy regarding anti-bribery and anti-corruption.

King's Town Bank continues to control and prevent all bribery, corruption, and competition occurring from its business activities with all cooperation partners to mitigate potential risks and impacts for ensuring the implementation of its ethical management policy.