

Bank SinoPac

Ethical Corporate Management Assessment Form

Form Filled- out by	Name & Signature	Branch/ Unit	
Assessment Date		Compliance Officer	(Signature)

I. Basic information of counterparty

Type of Counterparty : <input type="checkbox"/> Proprietorship/Partnership <input type="checkbox"/> Corporation <input type="checkbox"/> Organization <input type="checkbox"/> Foreign Government Agency <input type="checkbox"/> Natural person <input type="checkbox"/> Others:		
Name :		
Legal representative : (Nil for nature person)		
Place of incorporation / Nationality for natural person	Business operating location / Place of residence for natural person <input type="checkbox"/> Same as the place of incorporation / nationality <input type="checkbox"/> Others: _____	Location of payee's bank account opened at <input type="checkbox"/> Same as the place of incorporation/ nationality <input type="checkbox"/> Others: _____

II. Assessment Items

Sr. No.	Items	Results	Descriptions
1	None of the places of incorporation (or nationality), business operation location, or the location of payee's bank account is a high-risk corruption country.	<input type="checkbox"/> Yes <input type="checkbox"/> No	(Please fill in the search result)
2	The counterparty has a corporate ethical management policy in place. (NA for natural person).	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	(Please provide a brief description of the execution status)
3	The business scope of counterparty is not involved with high-risk corruption industries.	<input type="checkbox"/> Yes <input type="checkbox"/> No	(Please provide a brief description of the business activities.)
4	The counterparty and its legal representative have no negative news associated with bribery or illegal	<input type="checkbox"/> Yes <input type="checkbox"/> No	(Please fill in the search result)

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	political donations during the past year.		
5	The counterparty has not been involved in any penalty, discipline action, incidents or negative news related to forced labor, child labor, human trafficking, or other actions that violate human rights during the past year.	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Note: Please refer to **Descriptions of the Assessment Procedures** on the next page for details. Please be advised that Branch/Unit may briefly explain the checking results and provide supporting documents in the “Descriptions” column under item II. **The relationship with the counterparty may still be established irrespective of the checking result showing “NO”. However, it is required to be cautious of risks associated with transactions.**

III. Assessment Result

In light of the assessment result, the unethical corporate management risk of the counterparty is ☐ lower ☐ higher **(Please tick)** and we would therefore recommend proceeding on the following grounds: (Please provide a brief description of the long-term business status and goodwill of the counterparty, as well as the reasons for establishing the relationship)

Descriptions of the Assessment Procedures:

This ethical corporate management assessment is set out in accordance with article 16 of “SinoPac Holdings Procedures for Ethical Management and Guideline for Conduct.”

- 1、Before establishing a business relationship with counterparty by submitting an internal proposal either via the system or by paper circulation, the undertaking Branch / Unit is required to affix this Ethical Corporate Management Assessment Form and address reasons. It is required to retain supporting documents for audit trail purpose. The in-scope internal proposal applies to transactions where Bank SinoPac is bound to monetary obligation. Q&A brochure is available in SinoCloud.
- 2、This table does not apply to: (1) contracts with a total amount less than NT\$500,000 or their equivalent in foreign currency; (2) SinoPac Holdings and its affiliates; or (3) counterparties that are central or local government agencies, administrative legal entities, or public schools in the country where the branch is located.
- 3、Recommended approaches in executing check items:

(1) Item 1: High corruption risk country lookup

- (a) Please refer to CPI Index for the newest status. It is deemed as a high-risk corruption country if it is ranked 136th or beyond.
- (b) You may input the country name on the CPI Index lookup page (<https://www.transparency.org/en/cpi>) and the result will be shown in the red box as below.



(2) Item 2: The counterparty has a corporate ethical management policy in place.

Please provide the brief of checking process, and if applicable, affix supporting documents, i.e., ethical corporate management policy or relevant statement disclosed on the official webpage, with the assessment form.

(3) Item 3: High-risk corruption industries

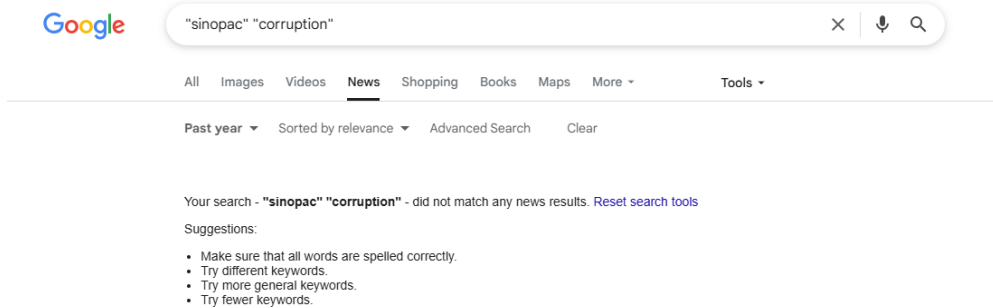
The following industries are generally exposed to higher corruption risk with reference to page 25-27 under “Very high threat: Corruption and Bribery” in the 2024 National Money Laundering, Terrorist Financing and Proliferation Financing Risk Assessment Report. These industries include Foreign Government (Except Taiwan) agencies, Legislative bodies, Construction industry, Water industry and environmental protection industry.

(4) Item 4: Checking the counterparty and its legal representative with negative news associated with bribery or illegal political donations during the past year.

Please affix enquiry results after filtering news with respect to bribery or illegal political donations during the past year. You may

- (a) Google News: It is advised to enter the search of counterparty and its legal representative on Google News and click “Past year” on the toolbar to find out the specific dates those topics have hit the news in the past year. Using quotation marks around your keywords and putting spaces between keywords for multiple keywords in a search can make the search results more precise and efficient.

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- (b) Given AML name screening system may generate irrelevant results, users are advised to follow internal procedures when operating AML name screening system and carefully review results to ensure accuracy.

(5) Item 5: Inquiries into penalty incidents or negative news about any form of forced labor, employment of child labor, human trafficking and other actions which violate human rights during the past year.

- (a) Searching method (taking the counterparty's locations in the R.O.C. as an example): It is advised to query in the "Ministry of Labor Inquiry System for Public Institutions (Employers) Violating Labor Laws" system(<https://announcement.mol.gov.tw/>), enter the "name of the institution" and "date of penalty" to select a period from the query date to the past year, then the results of the penalties by searching keywords in the past year will appear. If there are many cases, you can check whether there are words such as "employment of child labor", "human trafficking" and "forced labor" in the content which violates laws and regulations.
- (b) If the local Authority do not publicly disclose penalty incident, please affix enquiry results after filtering news with respect to "employment of child labor", "human trafficking" and "forced labor" during the past year.

Google News: Please refer to Item 4.

Overseas branches can check the website of the local labor authority or Google website if you have dealings with local counter-party .