

The Procedures of whistleblowing cases for Yang Ming Group Members

October 27,2022

- Article 1 The Procedures of Whistleblowing Cases for Yang Ming Group Members (these “Procedures”) have been formulated to establish channels for internal and external whistleblowers and procedure system, to effectively implement relevant legislation, Yang Ming’s regulations, “Codes of Ethical Conduct of Yang Ming Group,” “Ethical Corporate Management Best Practice Principles of Yang Ming Marine Transport Corporation,” “Procedures for Ethical Management and Guidelines for Conduct of Yang Ming Marine Transport Corporation,” as well as ensure the legitimate rights of whistleblowers and related parties.
- Article 2 These Procedures are applicable to a whistleblowing case about the directors, managers, employees, assignees as well as personnel with actual controlling power (collectively “Personnel”) of this Company, its subsidiaries, any foundation to which this Company's direct or indirect contribution of funds exceeds 50% of the total funds received, and other institutions or juridical persons which are substantially controlled by this Company (collectively “the Group”).
These Procedures shall not apply to cases and instances covered by the Group’s existing procedures for handling whistling and compliant:
- 1.Handling a stakeholder’s suggestion or complaint by the Audit Committee.
 - 2.Prevention and complaint regarding sexual harassment.
 - 3.Matters pertaining to occupational security and sanitation.
- Article 3 Submission of a whistleblowing case:
- 1.Electronic submission:email to a dedicated email address (conduct@yangming.com).
 2. Mail submission: send to Yang Ming Marine Transport Corporation No.271,Ming De 1st Road, Cidu District Keelung 20646 Taiwan,R.O.C. and indicate that the mail should be handled solely by the Chief Audit Executive.
- Article 4 The whistleblower may submit the whistleblowing information via the aforesaid channels, and shall at least include the following:
- 1.Whistleblower’s name (or anonymously) and available contact information, including but not limited to address, contact number, email, etc.
 2. Name or other information sufficient to identify the respondent.
 3. Concrete evidence for investigation or reasonable doubt such as time, location, or

people involved.

Article 5 This Company accepts whistleblowing case about the Group's Personnel's illegal acts, violation of work-related rules or other Unethical Conduct, including but not limited to the following:

1. Acts violating Codes of Ethical Conduct of Yang Ming Group, Ethical Corporate Management Best Practice Principles of Yang Ming Marine Transport Corporation, business integrity guidelines/policies.
2. Misappropriation or embezzlement.
3. Leaking trade secrets or information concerning employees or customers.
4. Acts violating government laws, company regulations, or work-related rules.
5. Using company facilities, resources, by taking advantages of his/her official position, for personal gains or benefiting specific people, which is prejudicing or likely to prejudice the company's reputation or interests.
6. Anti-fair competition practices.
7. Other acts that may prejudice or likely to prejudice the company's reputation or interests.

Article 6 Only the Chief Audit Executive or his/her assigned person has the authority to read whistleblowing e-mails sent to the dedicated account (conduct@yangming.com). All whistleblowing cases, including those submitted as per Article 3, submitted via other channels and forwarded to the Chief Audit Executive under the direction of a department head, are handled solely by the Chief Audit Executive, who then assigns a suitable auditor to handle the case. If necessary, the Chief Audit Executive may report such cases to Board of Directors/ Chairman for a decision on the methods of investigation and dedicated personnel (assistance from the Legal Compliance Office (HLCO), Legal Affairs Office (HLAO), Human Resources Department (AHDP) or other departments may be required). Should there be insufficiency in the evidence listed in Article 3, the case-handling office may notify the whistleblower to provide further evidence within five (5) working days from the date of notification.

Article 7 Where there is one of the following circumstances in a whistleblowing case, it may not be accepted, the Chief Audit Executive shall report it to the Chairman for approval:

1. The description does not meet the requirements in Article 4, or the evidence is insufficient that effective investigation is not possible.
2. Where supplementary evidence is required as per Article 6 Paragraph 2, the whistleblower cannot be reached or fails to do so within a specified time after being notified of such requirement.
3. The case is found to be malicious attack, fabrication, not related to the Group, intended for personal attack, running counter to facts, the rules of experience and

logic.

4.The case is knowingly being investigated, adjudicated by a judicial authority, or subject to non-prosecution, deferred prosecution, or a decision thereof has been rendered.

5.The case is being submitted once again after it was rejected by the case-handling office or closed. However, re-submission may be allowed if the whistleblower can provide new evidence warranting a re-investigation.

Article 8 The case-handling office shall according to Paragraph 2 and Paragraph 3 determine whether to process or forward the case to suitable offices within ten (10) working days from the receipt of the whistleblowing case. If there is pending supplementary evidence, the time shall begin on the following day after the submission is completed; if not completed, the time shall begin on the day following the cut-off day for submission of supplementary evidence.

Where the whistleblowing case is rejected on grounds stipulated in the Article 7, the Chief Audit Executive shall report it to the Chairman for approval. The case-handling office shall within five (5) working days following said approval notify the whistleblower in writing or in other methods. However, the above shall not apply if the whistleblower cannot be reached.

If a whistleblowing case is about the Personnel of this Company's subsidiaries, any foundation to which this Company's direct or indirect contribution of funds exceeds 50% of the total funds received, and other institutions or juridical persons which are substantially controlled by this Company, the Company's case-handling office may seek the approval of the Chairman/ the President for referral of handling by an affiliated company or organization, or investigation by relevant personal thereof. The result shall be reported back to the Company's case-handling office or the Chief Audit Executive.

The abovementioned referral shall be made known to the whistleblower by the Company's case-handling office. However, this shall not apply if the whistleblower cannot be reached.

Article 9 During the investigation, all the relevant offices and persons shall cooperate with the investigation office and provide relevant information. Falsehood, fabrication, interference, or stonewalling in any form or method is prohibited.

The whistleblowing case accepted by the case-handling office shall be investigated by the investigation office in accordance with the following principles. The investigation shall be executed in confidential unless otherwise provided by law.

1.The investigation shall be conducted on the basis of fairness, just, and following the rules of law. Pay attention to favorable and unfavorable circumstances concerning the respondent. Offer the respondent an opportunity to express opinions or defend the allegation.

2. Interviews of relevant parties or witnesses shall be conducted individually and documented in writing. The content shall be confirmed and signed by interviewees. Prior consent shall be obtained and noted in the written document if the interview requires sound or image recording.

3. The identities of relevant parties and witnesses shall be kept secret. The case-handling office shall produce a separate whistleblowing summary and use codes for the whistleblower and other identifiable features or information and provide these documents to the investigation office.

4. All the persons involved in the acceptance, handling, investigation, review, and decision rendering in respect of a whistleblowing case shall keep confidential regarding the above, as well as other documents such as whistleblowing letters and the investigation report.

The investigation office shall proceed to register the case after acceptance of whistleblowing by the case-handling office. The investigation office shall file a report after the investigation is completed. The report should include grounds for whistleblowing, investigation process, suggestions for handling, reviews and internal audit by responsible offices. Following approvals from the Chief Audit Executive, the report shall be treated as confidential document and used according to the procedures of the following:

1. The report shall be submitted to the Board of Directors for review and approval where the respondent is the current or the then director, manager or of equivalent or higher positions serving prior to whistleblowing, or where the severity of the case could seriously harm the Group.

2. Where the respondent or the whistleblowing case does not entail scenarios described in Paragraph 3 subparagraph 1, the report shall be submitted to the Chairman for review and approval.

Article 10 A written request for disqualification shall be submitted to the Chief Audit Executive by the persons in case-handling office, investigation office, or tasked with reviewing and approving the investigation should they find themselves under any one of the following circumstances:

1. Where the person or their spouse, third-degree kinship by blood, second-degree kinship by marriage, family members living together, or those having had the abovementioned relationships that are parties of the whistleblowing case.

2. Where the direct supervisor or subordinate of the whistleblowing parties.

3. Where other facts that sufficiently attest to a conflict of interest in the process of case acceptance, handling, investigation, review, and approval.

A written request for disqualification shall be submitted to the Chief Audit Executive by the whistleblowing parties should they find the persons in case-handling office, investigation office, or tasked with reviewing and approving the investigation under any one of the following circumstances:

1. There's no voluntary disqualification being requested under circumstances stipulated in Paragraph 1.

2. There are facts that sufficiently attest to a possible bias in the process of case acceptance, handling, investigation, review, and approval.

Where there's no voluntary disqualification being requested under circumstances stipulated in Paragraph 1 and no such request being made by the whistleblowing parties, the Chief Audit Executive shall ask said persons to disqualify themselves. The persons requesting or being requested to disqualify themselves shall stop participating in the relevant procedures before a decision on such request is rendered by the Chief Audit Executive. However, a necessary action shall be taken in cases of urgency.

Where the Company's Chairman, directors (including independent directors), or the President cannot carry out their duties prescribed in these Procedures due to the disqualification provisions in Paragraph 1 through Paragraph 3, a supervisor of higher level or a person assigned by the Board of Directors shall take charge. Where the Chief Audit Executive falls into any of the abovementioned circumstances, the Chairman shall assign other special personnel to take charge.

The persons involved or have knowledge about the whistleblowing case, including but not limited to those in the case-handling office, investigation office, investigation review office, as well as those in charge of approval shall, from the time the case is being reported to the Company, keep confidential regarding case details and the identities of the whistleblower and the respondent. Unless otherwise provided by law or where confidentiality is no longer necessary, leaking information that may sufficiently identify the whistleblower is strictly forbidden. Those who violate the above shall stop participating in the case and be subject to punishment according to relevant regulations.

Article 11 If the whistleblower and other participants in the investigation who are also the Group's Personnel, they shall be protected against disparate treatment, including but not limited to dismissal, demotion, salary cut, or compromised rights and interests protected by the relevant laws and employment contract. However, acts intended for libel, false accusation, or malicious framing shall not be protected.

If the whistleblower or the Group's Personnel may violate the Group's relevant regulations because of providing evidence/information or cooperate in investigations, or if they are themselves offenders in the whistleblowing case, the Corporate Governance and Integrity Division shall review the seriousness of said case and the importance of the evidence/information provided and deliberate on the reduction of or exemption from punishment by having the whistleblowing parties undergo the following procedures:

1. For the whistleblowers or Personnel are the Company's directors and managerial officers or of equivalent or higher positions: Reporting to the Board of Directors for

a determination.

2. For the whistleblowers or Personnel are other than those stipulated in the preceding subparagraph: On-shore Employees shall be subject to the determination by the Human Resources Committee; seafarers shall be subject to the determination by the Seafaring Human Resources Committee.

3. For the whistleblowers or Personnel are persons from the Group's other businesses or organizations: The determination shall be made by respective businesses or organizations and the result should be submitted to the Corporate Governance and Integrity Division.

Article 12 The investigation office shall conclude the whistleblowing case within three (3) months following the date of the receipt of such case and, if necessary, shall report to the Board of Directors or the Chairman for approval of an extension. The whistleblowing parties shall be notified of the extension. Following the case's conclusion, the Chief Audit Executive shall mail the written result (in the form of a classified file) to the whistleblowing parties or notify them via the dedicated email (conduct@yangming.com) detailing the result, handling, and time period and method for filing an appeal.

The whistleblowing parties that disagree with the result may file an appeal to the Chief Audit Executive within ten (10) working days following the day of the receipt of the result. If the whistleblowing parties do not provide accurate address in their whistleblowing via the dedicated email (conduct@yangming.com), a result shall be sent to the whistleblowing parties using the same email. The day the result is sent shall be deemed as the day of receipt by the whistleblowing parties.

Upon receiving the appeal, the investigation office shall then re-assess the investigation report according to the provision in Article 9 Paragraph 3 and notify the whistleblowing parties of the re-assessment result in writing (in the form of a classified file) or via the dedicated email (conduct@yangming.com).

The case shall be deemed concluded if the whistleblowing parties do not file an appeal according to Paragraph 2. As such, the whistleblowing parties must not submit another whistleblowing case on the basis of the same fact.

The whistleblowing parties can only file their appeal once; they cannot appeal to the result of re-assessment.

Article 13 If the whistleblowing facts are found to be true and their uncovering leads to the betterment of the Company's internal control system, or if it effectively protects the Company against further damage or compromised image, the Human Resources Committee or the Seafaring Human Resources Committee shall be responsible to make a determination on the basis of the case's significance so as to warrant the awarding of commendation or a merit to the whistleblower. However, the identity of the whistleblower shall be respected and, if requested, kept confidential. If the

whistleblower is an employee of the Group, a recommendation for awarding commendation or a merit shall be made to the relevant offices at their affiliated business or organization.

Where the conditions in Paragraph 1 are met, the Company shall issue monetary award or other rewards on the basis of the case's significance. The standard for issuing monetary award, qualifications, and the principles for the whistleblower's receipt of monetary award are stipulated in the Company's "Guidelines for Auditing Committee Handling Whistleblowing Cases." A determination shall be rendered by the Corporate Governance and Integrity Division and submitted to the Board of Directors for review and approval.

Where the conditions in this Article are met, the monetary award shall be issued by the Group's parent company and to the whistleblower, regardless of their being the employee of the Group's parent company or other businesses or organizations.

Any employees of the Group found involved in falsehood, malicious accusation, or leaking the whistleblower's information and case details shall be subject to subsequent handling according to the Company's relevant regulations.

Article 14 The handling, evidence, investigation process, and investigation report shall be kept for five (5) years by the Chief Audit Executive and may be kept in electronic form. In the event of a relevant lawsuit taking place before the expiry date, the documents shall continue to be kept till the lawsuit's conclusion.