

Whistleblowing Policy

1. Objective

To uphold and protect the reputation and assets of China Steel Corporation (CSC, hereinafter referred to as "the Company") and to prevent corruption, bribery, fraud, theft, misappropriation, or other unethical and dishonest conduct that may harm the interests of shareholders, employees, and business partners, the Company has established dedicated whistleblowing channels and procedures. These mechanisms are designed to enhance corporate governance and safeguard the legal rights of whistleblowers and relevant personnel.

This framework is established in accordance with the following internal codes and policies:

- Code of Ethical Conduct for First Echelon Supervisors and Executives
- The Ordinance for Avoiding Conflict of Interests
- Employee Work Regulations
- Ethical Code of Conduct for CSC Group Personnel
- Ethical Corporate Management Best Practice Principles for CSC
- Procedures for Integrity Management and Guidelines for Conduct
- Anti-Corruption and Anti-Bribery Policy

2. Applicable Scope and Subjects

Anyone may lodge a whistleblowing report if they discover that any of the Company's directors, managers, employees, or mandataries have violated the Company's regulations listed in Article 1 or any anti-bribery laws.

3. Principles of Acceptance

- (1) Whistleblowers should report illegal activities through proper channels. Whistleblowers may choose to report either under the whistleblower's real name or anonymously. However, those who choose to report anonymously must provide a clear description of the matter, attach specific supporting evidence, and include valid contact information. Whistleblowing must not be intentionally fabricated for the purpose of defaming, framing, or intentionally causing others to be subject to disciplinary action.
- (2) Whistleblowing made under impersonation or those lacking a clear description and specific supporting evidence may not be accepted. After the identity of the individual making the false report is confirmed, the individual will be held civilly or criminally liable depending on the specific circumstances. If the individual is an employee of the Company, disciplinary action shall also be taken in accordance with the Company's personnel regulations.

4. Authority and Responsibilities

(1) The Policy is formulated by the Audit Office, reviewed by the Chief Auditor, and approved by the Chairman.

(2) Independent directors

Oversee and review the operation of the whistleblowing policy.

(3) Chairman

(a) Allocate sufficient and appropriate resources to ensure the effective operation of the whistleblowing policy.

(b) Ensure that no personnel will be subject to retaliation, discrimination, or punishment for whistleblowing out of good faith on violations or suspected violations of regulations, or for refusing to engage in or accept corruptive practices, or for actions that may impact the Company's business as a result.

(c) Review investigation results of whistleblowing cases.

(4) Audit office

In charge of handling the investigation of cases that fall within the scope defined in Article 2 and the cases that should be handled according to the Company's "Internal Control System Manual"; cases outside the scope of the Audit Office will be referred to the appropriate responsible units within the Company for further handling.

(5) Supervisors of the Reported Individuals' department and division

(a) Cooperate and supervise personnel of the department to assist or cooperate with the investigating unit in the investigation.

(b) Upon completion of the investigation of whistleblowing cases, cooperate in implementing necessary management or corrective procedures.

5. Whistleblowing channels

(1) Hotline: +886-7-8021111#2191; +886-7-3371111#22191 or +886-7-3371296.

(2) Mailbox: P.O.BOX 47-13 Kaohsiung, Taiwan.

(3) Web: [The Whistleblowing System](#) °

6. Principles for handling whistleblowing cases

(1) Upon receiving a whistleblowing case, the Audit Office shall have the Chief Auditor assign a designated individual or form an investigation team to conduct the investigation. If necessary, relevant units may be requested to assist in gathering supporting evidence.

- (2) A direct or collateral blood relative, a third degree relative by marriage with the whistleblower or the reported person, or who has a conflict of interest in the subject matter of the reported person, or any other relationships that might affect the handling of the case, may not serve as a member of the investigation team.
- (3) Investigation shall be fair and objective; the opportunity for the person accused or the related parties to present their views shall be provided.
- (4) After careful verification by the Audit Office, investigators shall record the whistleblowing case, including records from case acceptance, the investigation process, and outcome reports, along with original whistleblower materials, written documents, audio recordings, and other relevant forms of evidence. All information shall be treated as confidential and properly archived for future reference.
- (5) If a whistleblowing case is found to be substantiated after investigation, the matter may be referred to the relevant responsible unit to request the reported person to cease the relevant misconduct. Disciplinary action or corrective measures shall be taken in accordance with company regulations to prevent recurrence of the same behavior.
- (6) The Audit Office shall notify the whistleblower of the investigation results in an appropriate manner with the contact information provided; however, this does not apply to anonymous or impersonated whistleblower.
- (7) When handling whistleblowing cases, the identities of whistleblowers and other interested parties shall be protected, and their rights and interests shall not be harmed as a result of whistleblowing activities.
- (8) The detailed procedures for investigating and handling relevant whistleblowing cases shall be conducted in accordance with the Company's "Procedures for Investigating and Handling Whistleblowing Cases."

7. Confidentiality and rewards and punishments in Whistleblowing

- (1) When handling whistleblowing cases, the Company will take appropriate measures to protect the personal data and privacy of whistleblowers and interested parties in accordance with the law, unless otherwise required by law, in order to prevent any harm to their rights and interests resulting from the act of whistleblowing.
- (2) The parties involved in the case, the whistleblower, and the relevant personnel responsible for handling the case shall not disclose any related information externally and are obligated to maintain confidentiality, in order to prevent the whistleblower from being treated unfairly, retaliated against, or threatened. Violations shall be subject to punishment measures in accordance with the Company reward and disciplinary regulations.

- (3) The whistleblower and related personnel shall have the obligation to accept inquiries, respond to inquiries truthfully and provide relevant information.
- (4) Relevant personnel of the Company shall not retaliate, discriminate, or punish the whistleblower in any form. Any violations shall be dealt with in accordance with the Company reward and disciplinary regulations.
- (5) Written or electronic records related to the acceptance, investigation process, and investigation results of whistleblowing cases shall be retained for five years, with proper responsibility exercised to ensure secure storage and confidentiality. If litigation related to the whistleblowing arises before the end of the retention period, such records shall be further preserved until the conclusion of the legal proceedings.
- (6) Any individual who engages in impersonation, false accusations, deception, defamation, or intentional disruption shall be subject to disciplinary action by the Company in accordance with relevant regulations.
- (7) If a whistleblowing case is verified and found to have made a significant contribution or resulted in considerable economic benefits, the whistleblower shall be appropriately rewarded in accordance with the Company's personnel reward and disciplinary regulations.

8. Training and Awareness

The Company shall regularly propagate its whistleblowing channels to employees and relevant stakeholders, and shall publish the whistleblowing policy on the Company's official website to ensure full awareness of the relevant procedures and the consequences of violations.

9. Prevention and improvement

If a whistleblowing case after investigation is confirmed that there is a violation of laws or Company regulations, and such violation indicates systematic deficiencies or has a significant impact on the Company, the Audit Office may coordinate with relevant units to review internal regulations or operational procedures.

If the whistleblowing case violates anti-bribery policies, the responsible unit shall submit the review results along with preventive and corrective measures to the executive secretary of the anti-bribery management system for consolidation and reporting to the Management Review Meeting.

10. Implement

This Whistleblowing Policy shall take effect upon approval by the Chairman and shall be submitted to the latest anti-bribery Management Review Meeting to review and file for reference. The same procedure shall apply to any subsequent amendments. The "Procedures for Investigating and Handling Whistleblowing Cases" under this Policy is authorized to be drafted and amended by the Audit Office.