

Taiwan Cooperative Financial Holding Co., Ltd. Related Party Transaction Transfer and Pricing Policy

Approved by the 25th Meeting of the 4th Board of Directors on July 25, 2022

Chapter 1. General Provisions

Article 1 The Related Party Transaction Transfer and Pricing Policy (hereinafter referred to as the Policy) is established in response to the global anti-tax avoidance trend and the Base Erosion and Profit Shifting (BEPS) Action Plan promulgated by the Organisation for Economic Co-operation and Development (OECD), and to institutionalize the inter-group transactions of the Company and strengthen Group tax governance.

Article 2 Under the spirit of stable operation, the main purpose of transactions between the Group's related parties should not be tax avoidance, and should also consider commercial substance, corporate social responsibility, risk control and sustainable development, and fulfill the obligations of global corporate citizenship.

Article 3 All domestic and foreign subsidiaries included in the Company's consolidated financial statements should follow this policy.

Chapter 2. Related Party Transaction Transfer and Pricing Principles

Article 4 Principles of commercial substance: Transactions with related parties must meet reasonable commercial purposes and bear the risks derived from related party transactions and receive corresponding remuneration, while the pricing should reflect the economic substance.

Article 5 Conventional transaction principles: Related party transactions should be evaluated individually, and the most appropriate conventional transaction methods should be adopted according to the transfer pricing regulations of various countries to ensure that their transaction conditions are similar to those of similar non-related party transaction conditions and results.

Article 6 Tax compliance principles: Domestic and foreign subsidiaries within the Group should prepare or declare related party transaction content, transfer and pricing documents, etc. in accordance with the tax laws and regulations of the country where they are located.

Chapter 3. Management Organization

Article 7 The relevant management organizations and responsibilities of related party transfer and pricing are as follows:

I. Board of Directors

(I) The Board of Directors is the highest supervisory unit for establishing the Company's effective related party transfer and

pricing management mechanism.

(II)Based on the overall operating strategy and operating environment, the Board of Directors approves the overall related party transfer and pricing policy to ensure the effective operation of the transfer and pricing management mechanism.

(III)The executive unit is the Accounting Office, which regularly reports to the Board of Directors on the related party transfer and pricing management.

Chapter 4. Supplementary Provisions

Article 8 In response to changes in international and government laws, the Policy should be reviewed and revised in a timely manner.

Article 9 The Policy and any amendments thereto shall be implemented upon approval by the Board of Directors.