

O-Bank Co., Ltd.

Directives for Prevention, Complaint, and Punishment of Sexual Harassment

Implementation upon approval by the President on September 29, 2021

Article 1

O-Bank Co., Ltd. (hereinafter “the Bank”) has established these Directives in accordance with the *Sexual Harassment Prevention Act*, *Regulations of Sexual Harassment Prevention, Enforcement Rules of the Sexual Harassment Prevention Act*, and *Act of Gender Equality in Employment*, as well as the *Regulations for Establishing Measures of Prevention, Correction, Complaint, and Punishment of Sexual Harassment at Workplace* promulgated by the Ministry of Labor to provide its personnel (including employees, contracted labor, applicants, technical students, and interns) with a work and service environment free of sexual harassment and to undertake proper preventive, corrective, punitive, and handling measures, thereby protecting the interests and privacy of the parties involved.

Article 2

Sexual harassment referred to in these Directives includes:

1. Sexual harassment referred to in the *Act of Gender Equality in Employment* shall mean any of the following circumstances:
 - 1) In the course of an employee executing his/her duties, any one makes a sexual request, uses verbal or physical conduct of a sexual nature or with an intent of gender discrimination, causes him or her a hostile, intimidating, and offensive working environment that infringes on or interferes with his/her personal dignity and physical liberty or affects his/her job performance.
 - 2) An employer explicitly or implicitly makes a sexual request toward an employee or an applicant, uses verbal or physical conduct of a sexual nature or with an intent of gender discrimination as an exchange for the establishment, continuance, or modification of a labor contract or as a condition to his/her placement, assignment, compensation, evaluation, promotion, demotion, or award and discipline.
2. Excluding sexual assault crimes, sexual harassment referred to in the *Sexual Harassment Prevention Act* means the sexual or gender-related behavior violating another person's wishes and any of the following circumstances:
 - 1) A person's obedience to or rejection of another's sexual advances becomes a condition of obtaining, losing, or reducing his/her rights and interests in work, education, training, services, plans, or activities.
 - 2) Texts, pictures, voices, images, or other objects are used to inundate or intimidate, or discriminatory and/or insulting languages and behaviors or other means are adopted so as to impair another person's dignity of character, make another person feel scared, disliked with hostility, or offended, or adversely affect another person's work, education, training, services, plans, activities, or other normal habits.

Article 3

The Bank shall prevent the occurrence of sexual harassment in the workplace, protect its personnel from the threats of sexual harassment, establish a friendly work environment, and enhance the awareness of executives and employees about gender equality. Upon occurrence or suspected occurrence of any sexual harassment case, relevant preventive measures shall be reviewed and improved immediately.

Article 4

The Bank shall conduct educational training on the prevention of sexual harassment in the workplace and properly organize courses on gender equality and sexual harassment prevention; employees have the obligation to undergo such training.

Article 5

The Bank has established the following channels for filing complaints of sexual harassment:

Telephone hotline: (02) 8752-7166

Telefax hotline: (02) 2798-6755

Email: hrappel@o-bank.com

Article 6

When the Bank learns of any sexual assault or sexual harassment cases, it shall undertake immediate and effective corrective and remedial measures. Due care shall also be exercised about the following:

1. Protection of the victim's interests and privacy.
2. Maintenance or improvement of the security of the relevant location or space.
3. Punishment for the perpetrator.
4. Other preventive and corrective measures.

Article 7

While handling complaints of sexual harassment in accordance with Article 6, the Bank shall keep it confidential and may establish a Committee for Handling Sexual Harassment Complaints (hereinafter "the Committee").

The Committee shall comprise 5 to 7 members; these shall be appointed or selected out of in-service employees by the President as warranted by the case at point and more than half of them shall be female.

One member shall be designated by the President as chairperson of the Committee to preside over its meetings. If the chairperson is unable to preside for any reason, he/she may appoint another member to do so on his/her behalf. The Committee may convene only with more than half of its members in attendance, and a resolution may be made only with more than half of the attending members in concurrence. The chairperson shall enter the vote in the event of a tie.

If a dispatched worker is sexually harassed by employees of the Bank when performing his/her duties, the Bank shall handle his/her complaint and conduct an investigation together with the dispatching entity. The results of the investigation shall be provided to the dispatching entity and the worker in question.

Article 8

A complaint of sexual harassment may be raised verbally or in writing. If a complaint is filed verbally, the handling department shall designate a representative to make a record and read it aloud to the complainant or make available its contents for review by the latter. Upon confirmation of the aforesaid record, the complainant shall affix a signature or seal thereon.

Such a complaint shall be affixed with the complainant's signature or seal and shall specify the following:

1. The complainant's name, department and title, home address, and telephone number, as well as the place and date of the alleged offense.
2. If there is a designated representative, a power of attorney shall be provided, specifying the representative's name, home address, and telephone number.
3. The date of complaint, alleged occurrences, and relevant evidence.

If a complaint or the record of a verbal complaint is inconsistent with the requirements listed in the preceding paragraph and if such inconsistency can be corrected, the complainant shall be given notice to correct it within 14 days. If correction fails to be made within the aforesaid period, the

complaint will not be accepted for handling.

Article 9

Before the Committee reaches a resolution, the complainant or his/her authorized representative may withdraw the complaint in writing. Once withdrawn, no complaint may be filed again for the same matter.

Article 10

Persons who are the parties involved or their spouses, former spouses, relatives by blood within the fourth degree of relations, relatives by marriage within the third degree of relations, parents, or family members shall recuse themselves from the handling, investigation, and resolution of sexual harassment complaints.

Where persons fail to recuse themselves notwithstanding the fact that they are obligated to do so, or there is concern that such persons may not perform their duties impartially on the basis of sufficient factual evidence notwithstanding the absence of the aforesaid relations, the parties involved may present to the Committee relevant reasons and facts in writing and request their recusal.

Based on the results of its meetings, the Committee shall reach a resolution with reasons attached and may provide recommendations on punitive or other measures; such a resolution shall be delivered to the complainant, the counterparty, and other related entities.

Article 11

Upon receipt of a sexual harassment complaint, the processing window shall determine if it is to be accepted within seven working days; the complainant shall be notified of a rejected complaint with the reasons attached. The complainant who refuses to abide by the rejection may appeal in accordance with provisions prescribed in Paragraph 3 of this Article.

If a complaint is accepted, the Bank may establish an ad hoc team to conduct investigation; a report of investigation results shall be compiled in writing and presented to the Committee.

The Committee shall close the case within 2 months from the filing of the complaint. If warranted, the period may be extended for one month and the parties involved shall be notified. Any objection to the resolution of a complaint by the complainant and counterparty may be filed with the Committee within 20 days from the following day after a written notice is served on the parties involved; otherwise, this period shall start from a later time of occurrence or knowledge of the reason for objection.

Any objection shall be accompanied by written reasons and handled by the Committee that shall convene further for a resolution. After the case is closed, no complaint may be filed again for the same matter.

Article 12

The Committee may not accept a sexual harassment complaint if any of the following circumstances applies:

1. The complaint fails to be filed in accordance with the procedures prescribed in Article 8.
2. The Committee has previously made a resolution on the complaint or the complaint is being filed again after its withdrawal earlier.
3. A complaint is being filed outside the domain of sexual harassment.
4. The complainant is not a party involved in a given sexual harassment case or a legal representative or agent thereof.

Article 13

Persons participating in the handling, investigation, and resolution of sexual harassment complaints shall keep confidential the contents of the complaint in their knowledge. In case of any

breach, the chairperson of the Committee shall terminate the participation of such persons. The Bank may also, depending on the gravity of the matter, impose penalties and hold them legally responsible in accordance with applicable regulations, as well as relieve them of duties conferred by the Committee.

Article 14

The Bank shall conduct investigation of sexual harassment cases based on the following principles:

1. Sexual harassment cases shall be investigated in a nonpublic manner and the privacy and personality rights of the parties involved shall be protected.
2. Sexual harassment cases shall be investigated in an objective, impartial, and professional manner, with the parties involved given an opportunity to present their opinions and defense in full.
3. If the victim's statement is clear and there is no need to make inquiries, duplicate inquiries shall be avoided.
4. When a sexual harassment case is under investigation, the parties involved and other related persons may be told to be present and make statements. Other persons with related expertise and experience may also be invited to provide assistance.
5. If there is power imbalance between the parties involved or witnesses in a sexual harassment case, face-to-face confrontation(s) shall be avoided.
6. If warranted, an investigator may prepare written documents and provide them to the parties involved for their review or advise them with the key contents thereof, within the extent of confidentiality.
7. All persons handling a sexual harassment case shall keep confidential the names and other identifiable personal information of the parties involved, except warranted by the ongoing investigation or out of consideration for public security.
8. During an investigation of sexual harassment allegations, the parties involved—depending on their physical and mental status—may be referred to specialized counseling or medical institutions or provided with psychological assistance and legal aid.
9. In the course of handling, investigating, or reviewing a sexual harassment complaint, no differential treatment shall be applied to any person who files a complaint, report, claim, or lawsuit, gives testimony, offers assistance, or participates otherwise.

Article 15

With consent of the complainant, the Committee may resolve to suspend investigation of and seek a resolution on a complaint of sexual harassment already undergoing judicial proceedings. This recourse shall be free of the time restraints prescribed in Article 11, Paragraph 3.

Article 16

If any conduct of sexual harassment is confirmed by investigation, the Bank may, depending on the gravity of the matter, take punitive or other measures against the counterparty of the complainant in accordance with the Bank's employment rules and other applicable regulations. If criminal liability is involved, the Bank shall also assist the complainant in filing a complaint. If any allegation of sexual harassment is proven false, the Bank may, depending on the gravity of the matter, take punitive or other measures against the complainant in accordance with the Bank's employment rules and other applicable regulations.

Article 17

The Bank shall follow up on and monitor any conduct of sexual harassment to ensure effective implementation of punitive or other measures and to avoid a repeat of like incidents or any reprisal.

Article 18

The Bank will not dismiss, relocate, or take any other unfavorable action on any employee for filing a complaint or assisting any other person in doing so.

Article 19

If the person engaging in sexual harassment is not an employee of the Bank, the Bank shall provide necessary protection in accordance with these Directives.

Article 20

Matters not addressed herein shall be handled in accordance with the *Act of Gender Equality in Employment* and other applicable laws and decrees as well as the Bank's other regulations.

Article 21

These Directives shall be implemented upon approval by the President; the same shall apply to any amendments thereto.

Amendment History:

Implementation upon approval by the President on December 15, 2014

Implementation upon approval by the President on June 15, 2015

Title change upon approval by the President on December 14, 2016; taking effect on January 1, 2017

Implementation upon approval by the President on September 29, 2021