



**第一商業銀行**  
**First Commercial Bank**

**布里斯本分行**  
**Brisbane Branch**  
Incorporated in Taiwan

## **Modern Slavery and Human Trafficking Statement 2023**

This statement is made pursuant to the Modern Slavery Act 2018 for the financial year ending 31 December 2023.

### **Reporting Entity**

First Commercial Bank Ltd. ARBN 126 292 608 ("Branch") is the Australian Branch of First Commercial Bank ("Bank") a wholly owned subsidiary of First Financial Holding Co., Ltd. (TWSE: 2892) ("First Financial").

The Branch operates from premises located on the M Floor of 199 George Street, Brisbane, QLD 4000.

This statement sets out the steps that the Branch, Bank and First Financial take to identify and mitigate the risks of modern slavery in their business dealings and supply chains.

### **Structure, Operations and Supply Chains**

The Bank was originally established in 1899 as Savings Bank of Taiwan. The Bank was converted from a government entity into a private bank in 1998 and became a wholly-owned subsidiary of First Financial in January 2003.

The Bank has its headquarters in Taipei, Taiwan and provides financial services through 187 domestic branches, one offshore banking branch and 34 overseas branches/sub-branches/representative offices (including the Branch) and one subsidiary bank and seven branches in the U.S.

The Branch was established in 2009 as a foreign ADI regulated by APRA, licensed to deal in financial products and registered as a Foreign Company (Overseas) with ASIC. The Branch's primary businesses are deposit taking and commercial lending on a syndicated and bilateral basis.

The Branch's supply chains comprise suppliers from the following sectors:

- Information, Communication and Technology;
- Legal and Consulting Services (including Taxation and Audit);
- Property Services (including Facilities Management, Utilities, Cleaning, Waste Management and Security); and
- Office Consumables and Supplies.

These suppliers are all located in Australia.

Suppliers of Information, Communication and Technology, and Legal and Consulting Services are suppliers of specialist skilled services and are medium to large firms.

Property Services suppliers provide both services and products which are all generic in nature and comprise a combination of large and small firms.

Office Consumables and Supplies comprise generic office products, which are generally purchased on an as-needs basis from third party suppliers. Again, these suppliers comprise a combination of large and small firms.

## **Commitment**

First Financial upholds the principles of corporate social responsibility and is committed to the elimination of modern slavery and human trafficking throughout the First Financial Group, and maintains effective policies and procedures to mitigate the risks to which it is exposed in this respect.

## **Risks of modern slavery practices in operations and supply chains**

During the reporting period, the risk of modern slavery within the operations and supply chains of the Bank is considered to be low, on the basis of the nature of the business, together with the values of the Group.

The Bank acknowledges the potential for modern slavery to occur in its operations and supply chains. A number of outsourced services that may carry relatively higher risk are identified as a result of their labour-intensive nature, such as cleaning, property security services and hospitality services. However, the majority of procurement is in relation to professional services from businesses with low risk of modern slavery, and which are provided by reputable suppliers.

Suppliers are expected to manage their businesses in an ethical manner respecting human rights. Suppliers are expected to ensure that all employees and contractors are legally entitled to work and no bonded, forced or involuntary labour, child labour, human trafficking or other forms of slavery are employed in the delivery of their products and services to the Bank.

There is very low modern slavery risk in the Bank's operations in Australia, as the Branch assesses and reviews the risks of its local suppliers on an annual basis, to limit the opportunity for modern slavery to occur.

The Bank undertakes due diligence measures on supply chains in all parts of its business to identify risks of modern slavery.

## **Policies and Due Diligence Processes**

### **Suppliers**

First Financial is committed to abiding by the International Bill of Human Rights and other conventions including the "Modern Slavery Act", and has included them in the Human Rights Policy of the Group.

The Bank operates a zero tolerance policy to modern slavery and human trafficking in accordance with all local and international laws. It will not knowingly enter into a new, or maintain an existing, business relationship that will cause contravention of this policy. All new suppliers to the Branch are formally assessed against environmental, labour-related, human rights and public welfare regulations and legislation.

Supplier management guidelines and Environmental, Social and Governance (ESG) product review mechanisms are used to qualify vendors conforming to the Bank's spirit of corporate sustainable development as long-term partners. The Bank will not deal with suppliers involved in environmental pollution, violation of labour laws and regulations, or presenting threats to public interests.

### **Employees**

The Bank ensures that its employees enjoy internationally accepted labour rights. The Bank supports an equal opportunity workplace, and will not accept discrimination on the basis of

race, gender or any other circumstance. All Directors, Supervisors and employees of the Bank must comply with the Bank's Code of Conduct which prohibits any action that violates human rights such as dignity and personal freedom.

### **Customers**

The Bank executes rigorous customer due diligence (CDD) and know your customer (KYC) procedures, including threats to public interests, infringement of human rights, and ESG issues as factors in customer risk evaluations. With regard to equity investment of the Bank's funds or assets under management in listed companies, we review whether the investee violates requirements in screening criteria such as product sustainability, human rights, environmental protection, and controversial social issues. Investments shall not proceed if any violation is found.

### **Assessing Effectiveness**

The Bank has developed a comprehensive Human Rights Risk Assessment and Management process to assess and monitor risk factors on a regular basis, in order to minimise potential risks.

First Financial's Corporate Sustainable Development committee reviews relevant human rights issues each quarter and uses the results of investigations, data monitoring, and questionnaire surveys to identify, evaluate and address potential human rights risks and issues.

### **Consultation**

The Branch consults with its Head Office and with branches of the Bank in other jurisdictions on a regular basis to ensure that, subject to local laws and regulations, policies and procedures are in line with best practice and consistent across the Bank.

### **Training and Whistleblowing**

The Branch provides training to all employees regarding the risks of modern slavery and human trafficking to ensure they are aware of Bank policies in relation to the identification of modern slavery risks and practices.

The Bank has formal Whistleblowing arrangements in place to provide staff members and other interested parties with channels to report suspected wrongdoings and have them properly investigated.

### **Further Information**

First Financial's ESG Report, is available at the following urls:

[https://csr.firstholding.com.tw/en/csr\\_report.html](https://csr.firstholding.com.tw/en/csr_report.html) (English)

[https://csr.firstholding.com.tw/tc/csr\\_report.html](https://csr.firstholding.com.tw/tc/csr_report.html) (Chinese)

## Approval

This statement was approved by the Bank's Board of Directors on 9/5/2024 and will be reviewed and updated annually.

Signed by

A handwritten signature in blue ink, appearing to be 'YH', is written over a horizontal line.

Yong-Yi Hu  
Senior Officer Outside of Australia  
First Commercial Bank, Ltd.  
20/5/2024