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# KB Financial Group Whistleblower Protection Policy

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July 15, 2022

※ This Policy was developed based on the contents of the Operational Guidelines on KB Financial Group Upright Whistleblowing Program and shall have effect as the KBFG Whistleblower Protection Policy.

## 1. Objective

The purpose of this Policy is to prevent violation of internal control standards of the KB Financial Group (KBFG) and keep incidents from expanding, by stipulating how the reporting channel for the whistleblower is operated, the contents of the report is investigated and how the whistleblower is protected.

## 2. Definition of Terms

Whistleblower refers to all executives and employees of KBFG including contract workers and outsourced workers.

## 3. Scope

Matters that could be reported according to the on KBFG Upright Whistleblowing Program are as follows.

1. Material violation of the internal control standards of the Group
2. An act of accounting that breaches the internal accounting management policy as per Article 28 of Act on External Audit of Stock Companies
3. An act that is suspicious of violating the Act on Real Name Transactions and Confidentiality or the Act on Reporting and Using Specified Financial Transaction Information
4. An alleged criminal act such as embezzlement, negligence, theft, intimidation, bribery, arrangement of personal lending, illegal act pertaining to savings and flight of domestic property
5. Wrongful or illegal work related instruction by a superior
6. Verbal or physical sexual harassment
7. An act that could cause public criticism and seriously damage KBFG's reputation
8. Illegal or wrongful inspection by the audit department of KBFG or an affiliate or a reasonable filing of dissent regarding an inspection

9. Alleged illegal solicitation or graft in breach of the Act on Improper Solicitation and Graft
10. When there is acknowledgement of unlawful solicitation for employment or reasonable doubt of a wrongful act such as solicitation (including intervention or causing influence in the hiring process through a third party)
11. Any other acts that are deemed to be illegal or an improper operation or a symptom of an accident.

#### **4. Duties**

- ① In the event a whistleblower acknowledges an act subject to reporting (including when he/she was forced or suggested to engage in an act that is subject to reporting from a staff or someone other than a staff), such should be reported without delay following the Reporting Method or through the subsidiaries' whistleblowing program.
- ② A person who knowingly did not report an act or interrupted the reporting of such act may be subject to a sanction that is similar to the sanction imposed on the actor as per the relevant internal policy of KBFG.
- ③ In the event a person filed the report even if he/she knew or could have known that the content of the report is not true in order to slander or defame another staff, the head of the responsible department may regard the whistleblower as a violator of internal control standards and take due action.

#### **5. Reporting Methods**

- ① The whistleblower shall state the contents of the report in detail following the 5W1H principle including the subject of the report and relevant proofs. In the event of the following, a separate template shall be used for the reporting
  1. To report on a material violation of the internal control standards of the Group, the alleged wrongdoing shall be stated a separate template in detail and submitted with relevant evidences. In case of exceptional circumstances where

the report template cannot be submitted, the whistleblower may file a report or notice on the violation verbally, in which case the evidence must be submitted. And the person who received the verbal report or notice shall write down what the whistleblower had said, show or read it to the whistleblower, and then ensure that the whistleblower signs or seals the report.

② The whistleblower may file the report using the method of his/her convenience out of the following options

1. Send a registered mail to the head of the responsible department (statement of the relevant facts without restriction of the format)
2. Make the report via the responsible department's telephone, intranet or internet channel
3. Use the reporting channel operated by an external institution that is responsible for receiving such reports

③ Reports received through the reporting channel operated by external institutions responsible for receiving such reports shall be informed to the Chief Compliance Officer or the executive responsible for audits according to the category of the report.

④ If there is request from the whistleblower or if it is clear that the report has been made groundlessly only to slander or defame other employees, the responsible department may delete or close the case, in which case the content of the report and the reason for deletion or closure must be separately recorded and stored.

## **6. Designation of Dedicated Personnel**

The head of the responsible department shall designate a person within the department to be in charge of the KBFG Upright Whistleblowing Program.

## **7. Investigation**

Upon receipt of a report through the KBFG Upright Whistleblowing Program, the head of the responsible department shall report to the Chief Compliance Officer or the executive in charge of audit without delay and proceed as the following.

1. The head of the responsible department shall conduct the investigation in person or may request the investigation department or the relevant department of the subsidiary to investigate on the case to confirm the facts of the contents of the report that had been received. The investigation department shall complete the investigation as promptly as possible.
2. The head of the investigation department may request the submission of information and statement from, and the presence of the subject person or department or subsidiary of the investigation, if deemed necessary to proceed with the procedure.
3. If a department other than the responsible department received the report as prescribed in Article 3.1, it shall notify the responsible department of such report and discuss the handling of the report if necessary.

## **8. Investigation Follow-ups**

① Once the investigation is complete, the head of the investigation department shall report without delay on the outcome (including the actions taken against the actor or the relevant person(s), if any) to the head of the responsible department, which will then report to the Chief Compliance Officer or the executive responsible for audit without delay.

② According to the outcome of the investigation, if necessary, the head of the responsible department may request the HR department of the Group to impose a disciplinary action against the actor and the relevant person(s) as per the relevant regulation.

③ The head of the responsible department may request the relevant head of department or branch to rectify or improve the unreasonable operational procedure with regard to the contents of the report. In this case, the head of department or branch shall accede to such request unless there is an exceptional circumstance.

④ When a disciplinary action is required, the level of disciplinary action may be requested to be eased if the actor or the relevant person(s) filed the report voluntarily.

## **9. Notice to the Whistleblower**

If there is request from the whistleblower, the head of the responsible department must inform the whistleblower of the consequence of the reporting. Such is not the case if the report was made anonymously.

## **10. Report to Audit Committee**

The Chief Compliance Officer or the executive in charge of audit must report to the Audit Committee of the outcome of handling the report made through the KBFG Upright Whistleblowing Program.

## **11. Confidentiality**

① Persons obligated to maintain confidentiality shall not provide or leak (including any action of implication) to another person any information on the report or the identity of the whistleblower he/she directly or indirectly found out pertaining to the report.

② The head of the responsible department shall collect a signed pledge of confidentiality template from the dedicated staff and the investigating personnel when investigating a reported case (if the responsible department is not the investigation department, the head of investigation department shall collect such from the investigating personnel), and the dedicated staff and the investigating

personnel shall handle the operation in a fair and independent manner as per the pledge.

## **12. Protection of the Whistleblower**

- ① The Group of Companies shall not allow the whistleblower to undergo any unfair treatment including disadvantage in status or discrimination in working conditions for his/her reporting through the KBFG Upright Whistleblowing Program.
- ② If it is deemed that the whistleblower suffered from disadvantage because of the whistleblowing, the Chief Compliance Officer or the executive in charge of audit may request the head of relevant department or subsidiary to rectify such mistreatment.
- ③ If the whistleblower requests, for example, to be relocated for concerns of mistreatment due to whistleblowing, the Chief Compliance Officer or the executive in charge of audit must request the head of relevant department or subsidiary to take necessary action.
- ④ The head of relevant department or subsidiary that was requested to take action shall accede to the request unless there is an exceptional circumstance.
- ⑤ If there is concern that the employee who cooperated with the investigation by such means as providing a statement experienced or could experience disadvantage in terms of personnel management, the employee shall be provided with the same level of protection of the whistleblower.

## **13. Exception**

For such cases that involve the CEO, Chief Compliance Officer, executive in charge of audit or the head of responsible department, the reporting on the receipt of whistleblowing, investigation and the reporting on the outcome of the investigation shall be orchestrated by another person who can execute and supervise the process.

#### **14. Training**

The head of responsible department shall conduct regular whistleblower training on the KBFG Upright Whistleblowing Program.

#### **15. Record Management**

The head of responsible department shall maintain and manage the record pertaining to the KBFG Upright Whistleblowing Program for five years.