

Our Policy on Whistle-Blowing and Prohibition of Retaliation

Based on its corporate philosophy, SNBL develops a whistle-blowing mechanism for the prevention, early detection and correction of any wrongdoing with the aim of enhancing the reliability of its compliance management. Helplines are in place both internally and externally to receive reports of problems by telephone, email, letter, interview and other means. We make the helplines extensively known to our officers and employees. The officer in charge of our whistle-blowing system assumes responsibility for operating the helplines.

- 1. Our officers and employees will not turn a blind eye to wrongdoing or violation of law in the workplace or in the course of business.
- 2. Our officers and employees may report to their supervisor or the specified point of contact for whistleblowing a fact that is problematic or possibly problematic in light of laws and the SNBL Compliance Guidelines for Action.
- 3. Our officers and employees may not abuse the whistle-blowing system in an attempt to harm others' rightful interests.
- 4. SNBL strictly maintains confidentiality of personal information of an individual who blew a whistle or consulted with the company on a coworker's problematic behavior (hereinafter "whistle-blower") and the secrets about whistle-blowing including information that may cause a whistle-blower to be identified. The company strictly protects the privacy of whistle-blowers and makes utmost efforts to prevent whistle-blowers suffering from retaliation or other disadvantages.
- 5. SNBL maintains the credibility, honor and privacy of whistle-blowers and individuals who cooperated in an investigation (hereinafter "investigation cooperators"); strictly protects secrets about whistle-blowing including the fact of a specific individual's cooperating in an investigation; and makes utmost efforts to prevent investigation cooperators suffering from retaliation or other disadvantages.
- 6. Retaliation against a whistle-blower or an investigation cooperator is prohibited. A retaliator will be subject to appropriate and rigorous action irrespective of his/her position in the company.
- 7. Upon receiving a report, SNBL promptly and properly conducts a fair investigation into the reported case. If a wrongful act has come to light as a result of an investigation, action to correct the problem and prevent its recurrence will be swiftly taken. Any issue that may significantly affect our business management will be reported to the Board of Directors and, if necessary, to relevant government agencies as well. Also, the company will seek to ensure that the results of the investigation and corrective action are reported to the whistle-blower.
- 8. Any action SNBL has taken to correct a problem and prevent its recurrence will be communicated throughout the company.