

Ethics and Business Conduct Policy

I. Purpose

This policy is established based on the principle of integrity in conducting business activities. To implement the Company's integrity management policy and proactively prevent dishonest conduct, it is formulated in accordance with the "Ethical Corporate Management Best Practice Principles for TWSE/GTSM Listed Companies" published by the Taiwan Stock Exchange. This policy sets forth specific guidelines that personnel of the Company shall observe when performing their duties.

II. Philosophy

To foster a corporate culture of integrity and enhance the ethical standards, professional conduct, and competencies of all employees, thereby laying a solid foundation for the Company's sustainable development.

III. Provisions

Article 1: Scope of Application

This Policy shall apply to the overall operational activities of the Company.

Article 2: Applicable Personnel

The term "Company personnel" as used in this policy refers to the Company's managers and employees. Any benefits provided, promised, requested, or received by Company personnel through third parties, in any form or under any name, shall be presumed to have been conducted by the Company personnel themselves.

Article 3: Types of Benefits

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The term "benefits" in this policy refers to any form or under any name of money, gifts, presents, commissions, positions, services, privileges, rebates, facilitation fees, hospitality, entertainment, investment shares, and other valuable items.

Article 4: Ethics and Business Conduct

Company personnel are strictly prohibited from engaging in any form of bribery, corruption, extortion, embezzlement, or similar misconduct during the performance of their duties. They shall neither directly nor indirectly offer, accept, promise, or request any improper benefits, nor engage in any other acts that violate principles of integrity, laws, or fiduciary obligations. Any such conduct by Company personnel in the course of executing their duties shall be deemed as "dishonest behavior."

Article 5: Designated Responsible Unit

The Company hereby designates the "Sustainable Development Committee" (hereinafter referred to as the Responsible Unit) to oversee the amendment, implementation, interpretation, provision of consultation services, reporting, documentation, and supervision of this Policy. The Responsible Unit shall be primarily responsible for the following duties and shall report regularly to the Board of Directors:

1. Assist in integrating integrity and ethical values into the Company's business strategies, and formulate anti-fraud measures in compliance with relevant laws and regulations to ensure integrity in business conduct.
2. Establish programs to prevent dishonest behavior, including developing related standard operating procedures and codes of conduct within each program.
3. Plan internal organization, staffing, and responsibilities, and implement mutual supervision and checks-and-balances mechanisms for business activities with higher risks of dishonest conduct within the scope of operations.
4. Promote and coordinate training and awareness programs on integrity policies.

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5. Develop a whistleblowing system to ensure effective implementation.
6. Assist the Board of Directors and management in auditing and evaluating the effectiveness of the established preventive measures for integrity management, and regularly assess compliance with relevant business processes and prepare reports accordingly.

Article 6: Prohibition on Offering or Accepting Improper Benefits

Company personnel shall adhere to the principle of not accepting gifts. However, considering customary business etiquette, when offering, accepting, promising, or requesting money, gifts, services, privileges, hospitality, entertainment, investment shares, or other benefits, whether directly or indirectly, such actions must comply with the provisions of this Policy and follow the relevant procedures, except under the following circumstances:

1. Compliant with the laws and regulations of the place of operation.
2. Based on business needs, during domestic or overseas visits, reception of guests, business promotion, or communication and coordination, in accordance with local etiquette, customs, or practices.
3. Participation in or invitation to normal social events for customary social courtesy, business purposes, or relationship building. For travel-related activities, prior approval from the center head is required to determine participation and participants.
4. Invitation of clients or acceptance of invitations to specific business activities, factory visits, etc., where the costs, number of participants, accommodation standards, and duration are clearly specified. Such activities shall not involve visits to entertainment venues, gambling establishments, or other activities violating public morals or laws.
5. Participation in publicly held folk festivals or events open to the general public.
6. Rewards, assistance, condolences, or appreciation provided by supervisors.

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7. Offering or accepting money, property, or other benefits (including those mentioned in items 1 to 6 above) from persons other than relatives or frequent acquaintances, with a market value not exceeding NT\$2,000, and excluding securities. For participation in vendor-organized events with raffles, prizes won shall comply with these regulations. The number of times gifts may be offered or accepted shall not exceed five occasions each. The total market value of gifts offered to or received from the same party or source in the same year shall not exceed NT\$5,000.
8. Gifts received due to engagements, weddings, childbirth, housewarming, employment, promotion, retirement, resignation, departure, or for injury, illness, or death of the individual, spouse, or immediate family members, with a market value not exceeding NT\$5,000 and excluding securities. The number of times gifts may be offered or accepted shall not exceed five occasions each. The total market value of gifts offered to or received from the same party or source in the same year shall not exceed NT\$5,000.
9. Other cases that comply with company regulations or are specially approved by the General Manager.

Article 7: Procedures for Handling the Acceptance of Improper Benefits

When Company personnel are directly or indirectly offered or promised money, gifts, services, privileges, hospitality, entertainment, investment shares, or other benefits by others, except under the circumstances specified in the preceding Article, the following procedures shall be followed:

1. If the provider or promisor has no official interest or conflict of interest with the recipient, the recipient shall report to their immediate supervisor within three days of receiving the benefit, and notify the Company's Responsible Unit when necessary.
2. If the provider or promisor has an official interest or conflict of interest with the recipient, the benefit shall be returned or refused, and the recipient shall report to their immediate supervisor and notify the Company's Responsible

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Unit. If returning the benefit is not possible, the recipient shall complete the "Improper Benefit Handling Form" and submit it to the Company's Responsible Unit within three days of receipt.

3. The term "official interest or conflict of interest" as referred to in the preceding paragraph means any of the following situations:

- (1) Having business dealings, supervisory or command relationships, or relationships involving expense subsidies (awards).
- (2) Seeking, conducting, or having established contracts for subcontracting, purchase, sale, or other agreements.
- (3) Being otherwise affected favorably or unfavorably by decisions, executions, or omissions of Company business.

The Company's Responsible Unit shall, based on the nature and value of the property mentioned in Paragraph 1, propose appropriate actions such as returning the item, accepting it with payment, surrendering it to the Company, donating it to a charitable organization, or other suitable measures. Such proposals shall be submitted to the Chairperson of the Responsible Unit for approval before implementation.

Article 8: Prohibition of Facilitation Payments and Handling Procedures

The Company shall not offer or promise any facilitation payments.

If any Company personnel provide or promise facilitation payments due to threats or coercion, they shall document the process, report to their immediate supervisor, and notify the Company's Responsible Unit.

Upon receiving such notification, the Responsible Unit shall take immediate action and review the circumstances to mitigate the risk of recurrence. If any illegal activities are identified, the Responsible Unit shall promptly report to the judicial authorities.

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The Company shall make political contributions in accordance with relevant laws and regulations as well as the Company's Donation Procedures.

2. Procedures for Charitable Donations or Sponsorships

The Company shall provide charitable donations or sponsorships in compliance with applicable laws and the Company's Donation Procedures.

3. Conflict of Interest and Recusal

Directors, managers, and other interested parties attending or present at Board meetings who have a conflict of interest with respect to any agenda item, either personally or on behalf of an entity they represent, shall disclose the material details of such conflict during the meeting. If the conflict poses a potential detriment to the Company's interests, they shall refrain from participating in discussion and voting on the matter. Such individuals must also recuse themselves during discussion and voting and are prohibited from voting by proxy for other directors. Directors are expected to exercise self-discipline and must not improperly support one another.

When Company personnel, in the course of performing their duties, identify a conflict of interest between the Company and themselves or the entity they represent, or a situation that may result in improper benefits to themselves, their spouse, parents, children, or other interested parties, they shall report the matter to both their immediate supervisor and the Company's Responsible Unit. The immediate supervisor shall provide appropriate guidance.

Company personnel shall not use Company resources for any external business activities, nor shall their participation in such activities adversely affect their job performance.

4. Organization and Responsibilities for Confidentiality Mechanisms

The Company has designated a dedicated unit responsible for the handling of trade secrets. This unit is tasked with establishing and implementing procedures for the management, preservation, and confidentiality of intellectual property, including trade secrets, trademarks, patents, and

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copyrights. The effectiveness of these procedures shall be reviewed periodically to ensure their continued adequacy and efficiency.

All Company personnel shall strictly adhere to the aforementioned procedures related to intellectual property and shall not disclose any trade secrets, trademarks, patents, copyrights, or other intellectual property of which they become aware. Furthermore, personnel shall not seek or collect Company trade secrets, trademarks, patents, copyrights, or other intellectual property that is not relevant to the performance of their duties.

5. Prohibition of Trade Secret Disclosure

The Company, in the conduct of its business activities, shall comply with the Fair-Trade Act and relevant competition laws. It shall not engage in price fixing, bid rigging, production or quota restrictions, or market sharing or allocation based on customers, suppliers, business regions, or types of business.

All Company personnel shall strictly comply with internal procedures related to the handling of trade secrets. They shall not disclose any trade secrets of the Company to others, nor shall they seek or collect trade secrets that are not relevant to the performance of their duties.

6. Prohibition of Insider Trading

The Company shall collect and understand the relevant laws, regulations, and international standards applicable to its products and services. Key compliance considerations shall be compiled and communicated internally to ensure that personnel adhere to applicable requirements during the research and development, procurement, manufacturing, provision, or sale of products and services, thereby ensuring the transparency and safety of product and service information.

7. Confidentiality Agreement

Company personnel shall comply with the provisions of the Securities and Exchange Act and shall not engage in insider trading using any material non-

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public information they become aware of, nor disclose such information to others, in order to prevent its misuse for insider trading.

Personnel involved in the Company's mergers and acquisitions, significant memoranda, strategic alliances, other business cooperation projects, or the execution of important contracts shall enter into a confidentiality agreement with the Company. They shall undertake not to disclose the Company's trade secrets or other material information to any third party, and such information shall not be used without the Company's prior consent.

The handling and disclosure of such information shall be conducted in accordance with the Company's "Procedures for Handling Material Internal Information."

8. Public Disclosure of Ethical Business Conduct Policy

The Company shall disclose its ethical business conduct policy through internal regulations and on its official website. The Company shall also make appropriate declarations of this policy during external events such as product launches, investor conferences, or other public engagements, so that suppliers, customers, and other business partners and stakeholders clearly understand the Company's commitment to integrity and its related standards of conduct.

9. Integrity Due Diligence Prior to Establishing Business Relationships

Prior to establishing any business relationship, the Company shall assess the legality and ethical conduct of prospective agents, suppliers, customers, or other business partners, including a review of their integrity policies and any history of unethical conduct. This is to ensure that their business practices are fair and transparent, and that they do not demand, offer, or accept bribes.

In conducting such assessments, the Company may implement appropriate due diligence procedures and consider the following factors to evaluate the counterparty's commitment to ethical business conduct:

- (1) The country of registration, place of operation, organizational structure, business policies, and payment location of the enterprise.

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- (2) Whether the enterprise has established an integrity management policy and the effectiveness of its implementation.
- (3) Whether the enterprise operates in a country identified as having a high risk of corruption.
- (4) Whether the enterprise is engaged in an industry with a high risk of bribery.
- (5) The enterprise's long-term business performance and reputation.
- (6) Opinions from the enterprise's business partners.
- (7) Whether the enterprise has any record of unethical conduct, such as bribery or illegal political donations.

10. Communicating the Integrity Management Policy to Business Partners

During the course of business activities, Company personnel shall clearly communicate the Company's integrity management policy and relevant regulations to its business partners. They shall explicitly reject any direct or indirect offer, promise, request, or acceptance of improper benefits in any form or under any name, including but not limited to rebates, commissions, facilitation payments, or other means of providing or receiving improper benefits.

11. Avoiding Transactions with Unethical Business Partners

Company personnel shall avoid engaging in business transactions with agents, suppliers, customers, or other business partners that are found to engage in unethical or dishonest conduct. If any such unethical behavior is identified, the Company may suspend business dealings with the relevant party and list them as a prohibited counterparty, in order to uphold the Company's commitment to integrity in business operations.

12. Incorporation of Integrity in Contracts

When entering into contracts with other parties, the Company shall thoroughly understand the counterparties' commitment to integrity in business conduct

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and include compliance with integrity principles as contractual terms. At a minimum, the contract shall explicitly specify the following provisions:

- (1) If either party becomes aware of any personnel violating the contractual provisions prohibiting commissions, kickbacks, or other improper benefits, it shall promptly inform the other party of the identities of such personnel, the manner, amount, or other details of the provision, promise, request, or receipt of such benefits, provide relevant evidence, and cooperate with the other party's investigation.
- (2) If either party is involved in any dishonest conduct during commercial activities, the other party may unconditionally terminate or rescind the contract at any time.
- (3) Clear and reasonable payment terms shall be established, including payment location, methods, and compliance with applicable tax laws and regulations.

13. Handling of Company Personnel Involved in Dishonest Conduct

When the Company discovers or receives a report alleging that any personnel are involved in dishonest conduct, it shall promptly investigate the relevant facts. If the violation of applicable laws, regulations, or the Company's policies and rules on integrity is confirmed, the Company shall immediately require the responsible individual to cease the conduct and take appropriate disciplinary actions. When necessary, the Company may seek damages through legal proceedings to protect its reputation and rights. The Company has established and publicly announced an independent internal reporting mailbox on both its corporate website and intranet for use by internal and external parties.

For confirmed cases of dishonest conduct, the Company shall instruct relevant departments to review internal control systems and operating procedures, and to propose corrective measures to prevent recurrence. The Company's dedicated unit shall report the incidents, handling outcomes, and subsequent improvement measures to the responsible authorities, and handle cases in

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accordance with the Company's "Regulations for Reporting Violations of Ethical Business Conduct" and "Complaint Policy and Procedures".

14. Handling of Dishonest Acts Committed by Third Parties Against the Company

If any Company personnel encounter dishonest acts committed by third parties against the Company, and such acts involve illegal activities, the Company shall report the relevant facts to judicial and prosecutorial authorities. If the acts involve government agencies or public officials, the Company shall also notify the government anti-corruption agencies.

15. Establishment of Reward and Punishment, Complaint System, and Disciplinary Actions

The Company's dedicated unit shall conduct an internal awareness campaign at least once a year to emphasize the importance of integrity. Integrity management shall be incorporated into employee performance evaluations and human resource policies. The Company shall establish clear and effective systems for rewards, punishments, and complaints. For Company personnel who commit serious violations of integrity, dismissal or termination shall be carried out in accordance with relevant laws or the Company's personnel regulations. Information regarding personnel who violate integrity, including their job titles, names, dates of violations, details of violations, and handling results, shall be disclosed on the Company's internal website.

IV. Effectiveness and Revision

This policy shall be implemented upon approval by the Chairperson of the Sustainability Development Committee following the consent of the Committee meeting. The same procedure shall apply to any amendments.

V. Reference Documents

Ethical Corporate Management Best Practice Principles for TWSE/TPEX Listed Companies