

Code of Conduct

1. Conduct towards Shareholders

The Company recognizes shareholders as business owners, and as such, focuses on ethical business operations, respect for rights of shareholders, and responsibility to shareholders, in accordance with the following practices:

- (1) To operate businesses honestly, in good faith and fairly to all shareholders in the best interests of shareholders as a whole, with social responsibility in respect of laws and ethics, and be committed to contributions to persons, communities, society and the environment.
- (2) To operate businesses through standard operational and control systems and utilize knowledge and competencies to the fullest with due care, sufficient information and evidence for reference, and compliance with laws, the Company's articles of association, policies, resolutions of the Board and shareholders, and relevant requirements as well as strict compliance with good corporate governance.
- (3) To regularly, equally and fully disclose information, operating results and financial positions of the Company and its subsidiaries to shareholders.
- (4) To oversee directors, executives and staff of the Company and its subsidiaries to refrain from seeking personal gain and gain of others by using any non-public information of the Company and its subsidiaries, or from taking any actions which may give rise to conflicts of interest with the Company and its subsidiaries.
- (5) To refrain from taking any actions which may give rise to conflicts of interest with the Company and its subsidiaries.

2. Conduct towards Staff

The Company always regards all staff as the most valuable resources of the Company and its subsidiaries, and they serve as contributing factors behind successful achievement of the Company's goals. The Company thus focuses on development and promotion of organizational cultures as well as good work environment, in accordance with the following practices:

- (1) To manage human resources to be aligned with strategies and goals of the Company and its subsidiaries, adhere to and promote morality and ethics at every level of the Company and its subsidiaries, and monitor and resolve any potential conflicts of interest in the Company and its subsidiaries.
- (2) To closely oversee staff on the basis of justice without prejudice.
- (3) To politely treat staff with honor, regard and respect for their pride, dignity, individualism and human rights.
- (4) To appoint and rotate staff, including their rewards and punishment, in good faith based on their knowledge, competencies and qualifications.
- (5) To provide staff with fair remuneration given market circumstances, business competition, job description, performance, knowledge and competencies of individual staff, as well as the Company's ability to pay such remuneration.
- (6) To regularly focus on staff knowledge and competency development, e.g., seminars, training, and widespread opportunities for other skill development for all staff.
- (7) To always maintain the occupational safety, health and work environment for the safety of life and property of staff, and provide welfare at the minimum legal requirements or more as appropriate.
- (8) To encourage staff to provide suggestions or submit complaints concerning work performance, and related solutions for the benefit of all parties, and foster good relationships for collaboration.

3. Conduct towards Clients

The Company is committed to ensuring client satisfaction and confidence by creating, offering and managing products and services of the Company and its subsidiaries that meet standards and ethical requirements, under the following principles:

- (1) To deal with clients with sincerity, keep promises made with them, provide quality services in response to clients' needs, and treat them fairly in the provision of services without discrimination, and be available to provide suggestions and assistance to clients with courtesy and polite interaction.
- (2) To develop services in terms of diversity, quality and standard in response to clients' needs.
- (3) To disseminate news, information, advertisements and public relations, and promote sales and services duly, fairly, sufficiently and timely for clients, to ensure that clients have sufficient information for their decision-making, without any exaggeration in any advertisements or communications through other channels with clients which may mislead clients about quality or conditions of the services, and without taking advantage of clients' misunderstanding.
- (4) To comply with terms and conditions fairly made with clients, failing which, give prompt notice to clients to jointly find solutions.

- (5) To respond clients' needs rapidly and arrange for a client relations system for complaints regarding quality of services, and a mechanism to regularly oversee, monitor and evaluate services to clients.
- (6) To refrain from disclosing clients' information known in the course of business operations that should have been reserved, unless required by law to be disclosed.

4. Conduct towards Trading Partners

The Company takes into account equality and integrity in its business operations and protection of mutual benefits with trading partners by complying with rules of practice as mutually agreed upon, laws, regulations, requirements and customary practices, and thus sets out the following practices:

- (1) To treat trading partners equally and fairly on the basis of mutual benefits in fairness to both sides, whereby the Company and its subsidiaries strictly comply with contracts or conditions mutually agreed upon, failing which, give prompt notice to trading partners to jointly find solutions.
- (2) In the course of business negotiation, to refrain from demanding, accepting or paying any benefits in bad faith in dealing with trading partners, both directly and indirectly, and if there is any occurrence of demand, acceptance or payment of any benefits in bad faith, disclose details thereof to trading partners and jointly find solutions on the basis of justice and rapidity.
- (3) To provide accurate, clear, complete and unbiased information ensure fair, transparent and auditable competition.
- (4) To keep information provided by clients confidential.
- (5) To refrain from disclosing confidential information or documents of the Company and its subsidiaries to other unauthorized persons.
- (6) To develop and maintain sustainable relationships with trading partners, promote the building of service quality, image and reliability in collaboration with the Company and its subsidiaries.
- (7) To ensure that the procurement process and the conditions of contracts or agreements are fair toward fair competition.
- (8) To provide training partners with knowledge, develop their potential and upgrade their service capacity to meet standards.
- (9) To communicate and encourage trading partners to respect human rights, treat their labor fairly, and be socially and environmentally responsible, as well as monitor and evaluate trading partners for the purpose of mutual and sustainable business development.

5. Conduct towards Creditors

The Company adheres to the practices for fair treatment and responsibility to creditors, taking into account the mutual best interests, as follows:

- (1) To strictly observe and comply with the conditions with creditors of the Company and its subsidiaries, in respect of repayments, care of collateral, and other conditions, failing which, give prompt notice to creditors to jointly find solutions.
- (2) Should there be any events which may materially affect the financial position and debts to be repaid, the Company and its subsidiaries shall give prompt notice thereof to creditors to jointly find ways to prevent or resolve such events to avoid damage.
- (3) To regularly provide accurate and complete financial reports to creditors in a timely manner.

6. Conduct towards Competitors

The Company fairly treats competitors of the Company and its subsidiaries within the legal framework for competition under the following practices:

- (1) To act within the legal framework regarding fair, transparent and equal competition.
- (2) To refrain from seeking competitors' confidential information by any means in bad faith or inappropriate, e.g., bribery of competitors' staff, etc.
- (3) To refrain from discrediting competitors' reputation by way of malicious accusations, fake news or attacks to competitors.
- (4) To refrain from agreeing with competitors or any persons to reduce or restrict competition, and from entering into any commercial terms or taking any actions which may implicitly cause unfair competition or monopoly.
- (5) To refrain from disclosing or providing confidential information of the Company or its subsidiaries to competitors while dealing with them.

7. Conduct towards Communities, Society and the Environment

The Company gives priority to communities, society and the environment, and is well aware that the Company and its subsidiaries are members of society and must be responsible for social contribution and support to community activities and environmental protection, under the following practices:

- (1) To manage and oversee the Company and its subsidiaries to be responsible for and observe customary practices and traditions of communities and society, including environmental protection.
- (2) To prevent, reduce, manage and seek to ensure that the Company and its subsidiaries shall not create or cause any negative impact on the environment, which extends to the use of raw materials, energy, water, revolving resources, discharge and management of waste from business operations, greenhouse gas emission, etc.
- (3) To regularly organize activities for contribution to society, communities and the environment to improve the quality of life in communities and society, both on its own accord and in collaboration with public sector and communities.
- (4) To respond rapidly and effectively to events giving rise to impact on the environment and communities from the operations of the Company and its subsidiaries, and provide full cooperation with state officials and relevant authorities.
- (5) To regularly build and raise awareness, and communicate and provide staff in every level with knowledge about community, social and environmental responsibility.
- (6) To apply business knowledge and experience of the Company and its subsidiaries for development of projects clearly beneficial to communities, and monitor and evaluate development thereof and long-term achievements.

8. Conduct towards Public Sector/Regulatory Agencies

The Company stresses the importance of compliance with laws, regulations, requirements and rules applicable to the business operations of the Company and its subsidiaries, including collaboration with public sector/regulatory agencies, whereby the Company sets out the following guidelines for conduct towards public sector/regulatory agencies to avoid any activities which may lead to misconduct:

- (1) To fully and strictly comply with the laws, regulations, requirements, criteria, measures and policies set out by public sector/regulatory agencies.
- (2) To provide cooperation in activities hosted by public sector/regulatory agencies as part of strengthening the economic growth and prosperity.
- (3) To act duly and straightforwardly when contacting and dealing with public sector/regulatory agencies.
- (4) To familiarize or build good relationships with public sector/regulatory agencies as appropriate and practicable, e.g., public discussions, congratulations on special occasions or courtesy interactions.

9. Conduct towards Anti-Corruption

- (1) The Company focuses on and is committed to anti-corruption, and as such, has established an anti-corruption policy as guidelines for the Company and its subsidiaries in compliance with the applicable laws, rules and regulations.
- (2) Corruption refers to an abuse of power or property available for the benefit of one's own company or related persons, or giving rise to damage to others' benefits, which may be in the form of, for example, bribery by way of persuasion, offering, granting or accepting bribes, such as, items of value, money or any other benefits, conflicts of interest, fraud, money laundering, embezzlement, concealment of facts or obstruction of justice, influence peddling. Corruption not only applies to any relationship between private and public sectors, but also extends to transactions between private individuals or business entities.

Director, Executive and Staff Conduct

In compliance with the Code of Conduct, the Company has adopted the code of conduct for directors, executives and staff of the Company and its subsidiaries in the course of their work performance on the basis of ethics, integrity and good faith, as follows:

1. Director and Executive Conduct

All directors and executive staff must comply with regulations, requirements, announcements and orders of the Company and of their higher supervisors, as follows:

- (1) To support policies and strict compliance with regulations, requirements, orders, agreements, announcements or circular letters of the Company and its subsidiaries, which have been announced to everyone.
- (2) To perform duties honestly, in good faith and equally, and promptly report any events which may cause damage to reputation and property of the Company and its subsidiaries.
- (3) To act politely, with honor and respect to colleagues.
- (4) To perform duties attentively and diligently, maintain order and corporate governance of the Company and its subsidiaries as a role model to general staff to ensure prosperity of the Company and its subsidiaries and compliance with the standard of ethics.
- (5) To strictly protect benefits and secrets of the Company, its subsidiaries and clients or in connection with any businesses that should not have been disclosed by the Company and its subsidiaries, whereby news and information regarding businesses, finance and individuals of the Company and its subsidiaries must be duly and carefully disseminated only to the extent legally permitted and compliant. Therefore, throughout and after their status as staff of the Company and its subsidiaries (as the case maybe), all staff agrees to keep the above secrets confidential. Should there be any disclosure or transmission to others or use of such information for any other purposes than their performance of duties to the Company or its subsidiaries, staff agrees to be held responsible and compensate for any damage actually caused to the Company or its subsidiaries in all respects.
- (6) To assist or try to safeguard and protect property of the Company and its subsidiaries from damage or loss, whether due to persons or any public disaster to the fullest extent possible, and refrain from using any items, whether equipment or property, of the Company or its subsidiaries for person use or for others irrelevant to business operations of the Company and its subsidiaries.
- (7) To administer work by adhering to and promoting morality and ethics at every level of the Company and its subsidiaries, and monitor and resolve any potential conflicts of interest in the Company and its subsidiaries.
- (8) To closely supervise their subordinates in the line of command on the basis of justice without prejudice.
- (9) To work as a team and open to opinions of others.
- (10) To strictly comply with, and support and supervise staff under the line of command to strictly comply with, regulations, discipline, policies and requirements of the Company and its subsidiaries in the use of information technology systems, computer systems, computer data, computer traffic data of the Company and its subsidiaries, to ensure that the use of information technology and computer systems of the Company and its subsidiaries comply with the computer, copyright, personal data protection laws or other applicable laws, and prevent any damage to reputation and image of the Company and its subsidiaries.

2. Undesirable Conduct for Directors and Executives

All directors and executive staff must refrain from acting or behaving themselves in the following manners detrimental to the Company and its subsidiaries and their own, namely:

- (1) To use their working hours at the Company or its subsidiaries for other business than for the benefits of the Company or its subsidiaries or for person affairs.
- (2) To engage in any business of the same nature as or in competition with the Company or its subsidiaries, whether for personal gain or gain of others, or become a shareholder with managerial powers which may cause damage to the Company or its subsidiaries, whether directly or indirectly.
- (3) To behave themselves in any manner detrimental to their positions, duties and credentials of the Company or its subsidiaries.
- (4) To provide or use false information or conceal any truth that should have been provided to the Company or its subsidiaries, or distort any truth to acquire personal gain or gain of others which may cause damage to the Company or its subsidiaries, whether directly or indirectly.
- (5) To perform work negligently, or take any action inappropriate for their performance of duties as good directors and executives to duly accomplish work in good faith.
- (6) To obstruct or take any action that obstructs due performance of any authorized persons in the Company or its subsidiaries, or issue any orders for staff to misbehave or act unethically.
- (7) To breach civil and criminal laws which cause serious damage to themselves or others, whether intentionally or otherwise.

- (8) To disclose wages or salaries, or salary increase of themselves or others, whether intentionally or otherwise.
- (9) To demand or accept gifts, whether in the form of money, property or any other benefits, from clients, trading partners, competitors or any other persons in business dealing with the Company and its subsidiaries, or any entertainment proven to be unreasonably beyond appropriate courtesy in the ordinary course, or any activities which may affect performance and business decisions, including image of the Company and its subsidiaries, should also comply with such practices set forth in the Anti-Corruption Policy of the Company and its subsidiaries.
- (10) To bribe, whether directly or through third parties, and/or abuse their influence on state officials, clients or trading partners, which constitution violation of the Anti-Corruption Policy of the Company and its subsidiaries.
- (11) To add, delete or revise by any means any records or information to intentionally change or distort operating results and accounting records to be contrary to the truth for any purpose whatsoever.
- (12) To make payments or business arrangements intended or understood as part of such payments or business arrangements for other purposes than the objectives specified in the relevant documents for payments or business arrangements.
- (13) To become insolvent or have any particular reason presumed by law to be insolvent.
- (14) To fail to protect information on intellectual property of the Company and its subsidiaries or obtained by the Company and its subsidiaries in the course of performance of duties by staff.
- (15) To imitate products and infringe intellectual property of others.
- (16) To take any action to unduly seek personal gain or gain of others.
- (17) To have any unit other than the Purchasing Department request support from counterparties or trading partners (if such support is necessarily required for the benefit of the Company or its subsidiaries, such units shall discuss with the Purchasing Department to be in charge of such request, except for marketing activities, the marketing unit of Strategic Planning Department shall be in charge.
- (18) To take any action to overlook or facilitate any persons to unduly benefit from or access or interfere with the information technology systems, computer systems, computer data, computer traffic data of the Company and its subsidiaries or without permission from the Company or its subsidiaries, or intentionally support or allow to happen or exist any misconduct of service providers under the computer, copyright, personal data protection laws or other applicable laws.

3. Staff Conduct

In order to promote efficient and effective work performance, staff of the Company and its subsidiaries should comply with the following practices:

- (1) To perform work honestly, in good faith, transparently, diligently and actively, and improve their performance efficiency for themselves, the Company and its subsidiaries.
- (2) To have discipline and behave in strict compliance with work rules and regulations of the Company and its subsidiaries, and customary practices, whether in writing or otherwise.
- (3) To respect and obey their supervisors' orders in accordance with policies and regulations of the Company and its subsidiaries.
- (4) To act in harmony among colleagues in the Company and its subsidiaries, assist one another, and prevent any conflicts which may be harmful to others in the Company and its subsidiaries, as well as promote and maintain the sense of unity and synergy among staff.
- (5) To respect rights of other staff, including the management team, and give honor to one another, avoid disclosing or criticizing any information or issues of others, both performance and personal affairs, which may cause damage to staff, the Company and its subsidiaries.
- (6) To refrain from offering gifts to supervisors, and avoid accepting any gifts that may make them feel awkward to perform duties in the future, and if that is inevitable, give prompt notice to their supervisors.
- (7) To refrain from abusing their positions, duties or benefits from work for personal gain or gain of their associates, or from engaging in any business in competition with the Company and its subsidiaries.
- (8) To treat clients and trading partners honestly, in good faith and equally.
- (9) To strictly keep confidential information of clients, trading partners, the Company and its subsidiaries confidential.
- (10) To avoid any actions which may jeopardize reputation and image of the Company and its subsidiaries, or which may become subsequently problematic to the Company or its subsidiaries.
- (11) To report any matters known to them to their supervisors without delay when such matters may affect the operations or reputation of the Company or its subsidiaries.
- (12) To maintain rights, benefits and property of the Company and its subsidiaries in good condition for optimum and safe utilization, without wasting, loss, damage or deterioration before reasonable time.

Complaints and Whistleblowing

The Company and its subsidiaries implement the Whistleblowing Policy as a means for all directors, executives and staff of the Company and its subsidiaries, including stakeholders, to submit complaints or report any finding of misconduct or violation of the Code of Conduct.

Monitoring of Compliance with the Code of Conduct

This Code of Conduct compiles best practices in various areas and provides the scope of standard practices subject to the ethical and moral frameworks as duties and responsibilities of all directors, executives and staff to be aware of and familiarize themselves with, and strictly comply with the Code of Conduct, which is compulsory and may not be excused by claiming that they are not aware of this Code of Conduct.

It is the duties of the Board of Directors and executives to oversee and provide advice to their subordinates to be aware of, understand and strictly comply with this Code of Conduct.

Punishment

The Company and its subsidiaries regard this Code of Conduct is a form of discipline with which all directors, executives and staff must strictly comply. Should there be any information or evidence to reasonably believe that an alleged person has breached the Code of Conduct of the Company or its subsidiaries, the Company and its subsidiaries shall give the alleged person the right to acknowledge the allegation and prove himself/herself by producing additional information or evidence to demonstrate that he/she was not involved in the alleged misconduct.

Should the alleged person be found to have breached the Code of Conduct of the Company or its subsidiaries, such person, whether he/she be a director, executive or staff of the Company or its subsidiaries, shall be subject to disciplinary review under the regulations set forth by the Company and its subsidiaries, and if such action is illegal, he/she shall be subject to both legal penalty and disciplinary actions under the regulations of the Company and its subsidiaries, including the following punishment:

1. Punishment for Executive Staff

- 1.1 Non-serious violation: Such executive will be given written warning describing such violation, including basis on which such violation is considered. Such executive will also be given an opportunity to answer such allegation to his/her supervisor. If such issue cannot be resolved, the issue will be forwarded to the Board for consideration, and the Board's decision is deemed final. Any repeated violation or failure by such executive to remedy his/her first violation per the written warning shall be subject to disciplinary actions, which may result in termination of employment.
- 1.2 Serious violation includes the following actions, e.g., offering or acceptance of bribery, fraud, disclosure of confidential information or intellectual property of the Company or its subsidiaries to third parties, and any actions detrimental to credentials of the Company or its subsidiaries, or conceal or fail to report any material information or documents to supervisors, in which case, the Company or its subsidiaries may consider terminating employment without severance pay and without first issuing any written warning.

2. Punishment for Staff

Should any staff act in any manner giving rise to conflicts of interest with the Company or its subsidiaries, such issue shall be considered in accordance with the management structure of the Company or its subsidiaries, and work rules and regulations. Each unit will initially consider and conclude the issue for submission to higher supervisors and in the upper line of command in order to decide on such misconduct and impose punishment as appropriate. Should such conflicts of interest be serious and cause adverse damage, which may not be within the authority of the unit in charge, such issue may be further submitted to the Executive Committee of the Company for consideration, conclusion and punishment as follows:

- (1) Verbal warning;
- (2) Written warning;
- (3) Work suspension;
- (4) Termination.

Disclosure and Review of the Code of Conduct

The Company discloses the Code of Conduct in the annual registration statement/annual report (Form 56-1 One Report) and on its website, and reviews the Code of Conduct annually.