## Fulfillment of Ethical Corporate Management and Deviations from the "Ethical Corporate Management Best Practice Principles for TWSE/GTSM Listed Companies"

	Implementation Status				
					from the
					"Ethical
					Corporate
	Evolution Itom				Management
	Evaluation Item	Yes	No	Abstract Illustration	Best Practice
					Principles for
					TWSE/GTSM
					Listed
					Companies"
					and Reasons
1.	Establishment of ethical corporate				(1) ~(3)
	management policies and programs				No significant
(1)	Does the company have a Board-approved	V		(1) The company with three major management faith	variances
	ethical corporate management policy and			of "active and proactive", "Integrity and	
	stated in its regulations and external			Down-to-Earth" and "sharing excellence". Based	
	correspondence the ethical corporate			on the management concept of integrity,	
	management policy and practices, as well as			transparent and responsibility, the company	
	the active commitment of the Board of			enacted the related policies based on integrity,	
	Directors and management towards			and establishing the corporate culture of the	
	enforcement of such policy?			company. The company enacted the "Ethical	
	emoleciment of such policy.			Corporate Management Best Practice Principles",	
				"Codes of Ethical Conducts", "Management	
				Operation of Preventing Insider Trading" and	
				other basic regulations, as well as employees code	
				of conduct, guidelines for rewards and	
				punishments for our personnel to follow.	
				The company's "Ethical Corporate Management	
				Best Practice Principles" has been approved and	
				enacted by the board of directors, and published	
				on the company's website. The Ethical Corporate	
				Management Best Practice Principles stated that	
				the members of the board of directors and	
				managerial personnel shall perform the duties of	
				care when executing business, shall perform the	
				duties with care in order to perform the	
				commitment of ethical management policy. Inside	
				the Ethical Corporate Management Best Practice	
				Principal also enacted the matters that the	
				company's personnel shall pay attention to	
				following the ethical management policies when	
				executing business.	
(2)	Does the company have mechanisms in place	V		(2) and (3)	
'	to assess the risk of unethical conduct, and			The company has established the effective internal	
	perform regular analysis and assessment of			control system, all units implementing annual	
	business activities with higher risk of			"Internal Control Self-Evaluation" operation. The	
	unethical conduct within the scope of			assessment of the effectiveness of the internal	
	business? Does the company implement			control system has been approved by the audit	
	programs to prevent unethical conduct based			committee. Through the internal audit process and	
	on the above and ensure the programs cover			enhance on the various anti-corruption measures	
	. –			and disseminating, effectively preventing any	
	at least the matters described in Paragraph 2,				
	Article 7 of the Ethical Corporate			incidents of unethical occurred.	
	Management Best Practice Principles for		l	Under the "Guidelines for Board of Directors'	

	Implementation Status Dev			
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<ul> <li>TWSE/TPEx Listed Companies?</li> <li>(3) Does the company provide clearly the operating procedures, code of conduct, disciplinary actions, and appeal procedures in the programs against unethical conduct? Does the company enforce the programs above effectively and perform regular reviews and amendments?</li> </ul>	V		meeting" and the "Remuneration Committee Charter" enacted the avoidance in directors' interest and implementing them accordingly. For more information please refer to Implementation of directors' avoidance of motions in conflict of interest under III. Corporate Governance. (Page 24) In addition, in the "Code of Ethical Conduct, "Work Rules" and the "Affidavit Letter of no improper gift or commission payment signed by the suppliers " prohibited the personnel performing business gain their personal interests through the convenience of their duties. Internally, when an employee conducts unethical behaviours, the company will be punished depends on the severity of the condition in accordance of "Guideline of Reward and Punishment". Except terminating his or hers purchase contract, disqualifying the supplier and request the responsibility of compensating the loss of the company.	
<ol> <li>Fulfill operations integrity policy</li> <li>(1) Does the company evaluate business partners' ethical records and include ethics-related clauses in business contracts?</li> </ol>	V		(1) The company request the suppliers to sign an affidavit letter, and no behaviours of improper gifts or commissions payment. By the affidavit letter to ensure the fair and transparent commercial activities between the two parties. In addition, the company's correspondent financial institutions were legally registered and well-known commercial bank or securities company, rights and obligations of both parties and the conditions of transactions were stated clearly inside the Credit Agreement.	No significant variances
(2) Does the company have a unit responsible for ethical corporate management on a full-time basis under the Board of Directors which reports the ethical corporate management policy and programs against unethical conduct regularly (at least once a year) to the Board of Directors while overseeing such operations	V		(2) The company established Audit Committee under board of directors to monitoring the effective measures, compliance of laws, regulations and rules of the company's internal control, as well as the control of existing or potential risk of the company. The internal audit unit also implementing the audit operation in accordance of the annual audit plan, and reported to the board of directors about the implementation regularly.	
(3) Does the company establish policies to prevent	V		(3) The company enacted the "Ethical Corporate	

	Implementation Status De			
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conflicts of interest and provide appropriate communication channels, and implement it?			Management Best Practice Principle" and "Codes of Ethical Conduct" to prevent from interest conflicts and provide the channel for making proper statement.	
(4) Does the company have effective accounting and internal control systems in place to implement ethical corporate management? Does the internal audit unit follow the results of unethical conduct risk assessments and devise audit plans to audit the systems accordingly to prevent unethical conduct, or hire outside accountants to perform the audits?	V		(4) The company's account and internal control system were approved by the audit committee and the board of directors. Regular and Irregular review on the implementation of the system to effectively anti-corruption and to benefitting the company operation.	
(5) Does the company regularly hold internal and external educational trainings on operational integrity?	V		<ul> <li>(5) Actual Practice of Implementing Ethical Corporate Management</li> <li>A. Hosting internal and external educational training on ethical corporate management</li> <li>The company hosting internal and external educational training on ethical corporate management every year. The company disseminating internal educational training on ethical corporate management (including corporate culture; work rules and internal regulation; occupational safety and health; Ethical Corporate Management; Law Compliance and other issues) in pre-job training for new employees.</li> <li>The accumulated training employees were 398 attendees with 608 hours of training duration in 2020.</li> <li>The accumulated training employees were 549 attendees with 1,145.5 hours of training duration in 2021.</li> <li>B. Conditions on education and disseminate of preventing insider trading The accumulated training</li> </ul>	
			The company provides education and disseminate document to current directors and managers. For example, by providing Q&A Disseminate Handbook of insider trading for TWSE Listed Company. This allows the insider of the company understand the rules and comply to it. In addition, internal regulations and procedures were made public on the company's external website for directors, managers and employees as reference.	

			Implementation Status	Deviations
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<ol> <li>Operation of the integrity channel</li> <li>Does the company establish both a reward/punishment system and an integrity hotline? Can the accused be reached by an appropriate person for follow-up?</li> </ol>	V		(1) The company enacted the "Ethical Corporate Management Best Practice Principle" and "Codes of Ethical Conduct" to encourage the whistle-blower to reported to the independent director, manager, internal audit manager with behaviours against the law or violates the "Codes of Ethical Conduct". In addition, there is a General Manager's Mailbox for a convenient whistle blowing channel and dedicated the appropriate responsible personnel.	variances
(2) Does the company have in place standard operating procedures for investigating accusation cases, as well as follow-up actions and relevant post-investigation confidentiality measures?	V		(2) The company dedicated the responsible unit in according to the matters of reported and monitored by the audit personnel to ensure the relevant content is confidential.	variances
(3) Does the company provide proper whistleblower protection?	v		(3) According to the company's "Ethical Corporate Management Best Practice Principle" and "Codes of Ethical Conduct", the company shall keep confidential to the whistle-blower and the content of reported cases and ensure the measure for protecting whistle-blowers from inappropriate disciplinary action.	variances
<ol> <li>Strengthening information disclosure Does the company disclose its ethical corporate management policies and the results of its implementation on the company's website and MOPS?</li> </ol>	V		The company disclose our "Ethical Corporate Management Best Practice Principle" and "Codes of Ethical Conduct" on the company's website.	-
	•		hanagement policies based on the Ethical Corporate please describe any discrepancy between the poli	•

- 1. Other important information to facilitate a better understanding of the company's ethical corporate management policies (e.g., review and amend its policies).
- (a) The company complies to the Company Act, Securities and Exchange Act, Business Entity Accounting Act, Political Donation Act, Anti-Corruption Act, Government Procurement Act, Act on Recusal of Public Servants Due to Conflicts of Interest, and related laws and regulations of listed company and other business behaviors. The company takes these laws and regulations as the basis of implementing ethical corporate management.
- (b) The Company's Rules of Procedure for Board Directors and Audit Committee Charter stated the Avoidance of Conflicts of

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				"Ethical		
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Evaluation Item				Management		
				Best Practice		
	Yes			Principles for		
				TWSE/GTSM		
				Listed		
				Companies"		
				and Reasons		
Interest to the directors. Within the meeting items if consists of the conflict of interest related to his or her own or the legal						
person and with the concern of affe	ecting the co	mpan	y's benefits, the director may make the state	ement and answerin		

person and with the concern of affecting the company's benefits, the director may make the statement and answering questions. However, the director may not join the discussion and voting, he or she shall avoid himself or herself, and may not act as a proxy as other directors to vote.