

◎Implementation of Corporate Conduct and Ethics

Evaluation Item	Implementation Status			The difference from Corporate Conduct and Ethics Best Practice Principles for TWSE/TPEX Listed Companies and reason
	Yes	No	Explanation	
1.Establishment of Corporate Conduct and Ethics Policy and Implementation Measures				
(1)Does the company have a clear ethical corporate management policy approved by its Board of Directors, and bylaws and publicly available documents addressing its corporate conduct and ethics policy and measures, and commitment regarding implementation of such policy from the Board of Directors and the top management team?	V		(1)The company's "Code of Integrity Management" was revised and approved in the Board Meeting on March 24, 2021. The company engages in commercial activities following the principles of fairness, honesty, faithfulness, and transparency. In order to fully implement a policy of ethical management and actively prevent unethical conduct, irregularly promote to the company staff understand the regulations, prevent unethical behavior during the business implementation, and transmit the importance of ethical policy implementation to create a business environment of sustainable development, the related regulations were reported on MOPS and published on the company website.	None
(2)Whether the company has established an assessment mechanism for the risk of unethical conduct; regularly analyzes and evaluates within a business context, the business activities with a higher risk of unethical conduct; has formulated a program to prevent unethical conduct with a scope no less than the activities prescribed in Article 7 Paragraph 2 of the Ethical Corporate Management Best Practice Principles for TWSE/TPEX Listed Companies?	V		(2)The "Code of Integrity Management" ruled to prohibit unethical behavior included to provide or receive improper benefits, providing and promise the facilitating payment, providing an illegal political contribution, improper charitable donations or sponsorships, damage the stakeholders' rights and interests, disclosure of confidential information, unfair competitive behaviors, and insider trading, and promote the relative staffs to follow and implement the ethical policy.	None
(3)Whether the company has established relevant policies that are duly enforced to prevent unethical conduct, provided implementation procedures, guidelines, consequences of violation and complaint procedures, and periodically reviews and revises	V		(3)The "Code of Integrity Management" regulated the matters that need to be noticed, processing procedure, report system, reward and punishment, grievance system, and disciplinary measure for the company employees during the business implementation, and published on the company website and	None

such policies?			integrated the concept into the daily operation. Pay attention to the updated regulations and Acts anytime to review and adjust them to implement. The company directors and managers should take ethical management as the priority principle and should recuse themselves from the trading or decision involved self-benefit.	
2.Ethic Management Implementation				
(1)Whether the company has assessed the ethics records of whom it has a business relationship with and include business conduct and ethics-related clauses in the business contracts?	V		(1)The Company engages in commercial activities following the principles of fairness, honesty, faithfulness, transparency, and regulated the employees should avoid developing the commercial business with the agent, supplier, customer, or other counterparties in commercial dealings involved in unethical conduct. Suppose another counterparty in a business relationship or commercial dealings were found unethical conduct. In that case, the commercial relationship should be terminated and listed as the severed communication to implement the company ethical management policy.	None
(2)Whether the company has set up a unit which is dedicated to promoting the company's ethical standards and regularly (at least once a year) reports directly to the Board of Directors on its ethical corporate management policy and relevant matters, and program to prevent unethical conduct and monitor its implementation?		V	(2)The Company has not set up a unit that is dedicated to promoting the company's ethical standards. The "Code of Integrity Management" dedicated the auditor to be as the unit, which is affiliated with the Board of Directors, to transact the related operations, like the revision, implementation, explanation, counseling service, and recording and filing the report content and monitor to implement it; the 2022 implementation status was reported to the Board of Directors on December 29, 2022.	Depends on the actual requirement
(3)Whether the company has established policies to prevent conflict of interests, provide appropriate communication and complaint channels and implement such policies properly?	V		(3)The Company established the related clauses of preventing the conflict of interest in the "Code of Integrity Management" and "employment contract" to provide the introduction of the whole regulations for employees; set up the accusation email address: suggestion@mail.cwt.com.tw to provide the unimpeded reporting and declaration channel.	None
(4)To implement relevant policies on ethical conduct, has the company established effective accounting and internal control systems, audit	V		(4)The Company established the accounting system and internal control system to ensure the effectiveness of the financial report process and	None

<p>plans based on the assessment of unethical conduct, and have its ethical conduct program audited by internal auditors or CPA periodically?</p> <p>(5) Does the company provide internal and external ethical conduct training programs on a regular basis?</p>	V		<p>internal control. According to the risk assessment results, the auditor drafted the audit plan, would implement the auditor regularly, and report the auditor results to the Audit Committee and Board of Directors. Through the self-evaluation of the annual internal control, all departments should self-review the internal control system and ensure system design and implementation effectiveness.</p> <p>(5) Through the new employee orientation to illustrate the related regulations of the company internal website and sign the employment contract. Announce the concept of ethical management irregularly and integrate it into the daily operation to clearly understand the ethical management ideas, regulations, and importance for employees.</p> <p>Education and training courses related to ethical management issues (including courses on ethical management policies, prevention of insider trading and compliance with laws and regulations) totaled 291 participants and 179.5 hours in 2022.</p>	None
<p>3. Complaint Procedures Implementation</p> <p>(1) Does the company establish specific complaint and reward procedures, set up conveniently accessible complaint channels, and designate responsible individuals to handle the complaint received?</p> <p>(2) Whether the company has established standard operating procedures for investigating the complaints received, follow-up measures after investigation are completed, and ensuring such complaints are handled in a confidential manner?</p> <p>(3) Does the company adopt proper measures to prevent a complainant from retaliation for his/her filing a complaint?</p>	V	V	<p>(1) The “Code of Integrity Management” designated the auditor to be a dedicated unit and established the accusation email address: suggestion@mail.cwt.com.tw to provide the unimpeded reporting and declaration channel.</p> <p>(2) Article 21 of the “Code of Integrity Management” established the accusation processing procedure and should reserve the documentation of case acceptance, investigation processes, and investigation results, which would be transacted by the dedicated unit and reported to the Board of Directors, and keep confidential on the reporter and the content.</p> <p>(3) Article 21 of the “Code of Integrity Management” established the related person dealing with the accusation matters should be confidential of the identity of whistle-blowers and the content of reported cases as the written declaration. The Company also should promise to measure for protecting</p>	<p>None</p> <p>None</p> <p>None</p>

			whistle-blowers from inappropriate disciplinary actions due to their whistle-blowing.	
4.Information Disclosure (1)Does the company disclose its guidelines on business ethics as well as information about the implementation of such guidelines on its website and Market Observation Post System?	V		The Company disclosed the “Code of Integrity Management” on the website and the MOPS and disclosed the implementation status in the Annual Report.	None
5.If the company has established corporate governance policies based on Ethical Corporate Management Best Practice Principles for TWSE/TPEX Listed Companies, please describe any discrepancy between the policies and their implementation: No material difference.				
6. Other material information that contributed to understanding the implementation status of ethical management: Please refer to MOPS or the company website to inquiry the related information of the company’s “Code of Integrity Management”				