

Code of Business Conduct and Ethics

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I. General Principles

A. Purpose

In order to foster ethical business environment, to implement business integrity policy, to engage in commercial activities following the principles of fairness, honesty, faithfulness and transparency, and to actively prevent unethical conduct, Powertech Technology Inc. (the “Company”) hereby promulgate this “Code of Business Conduct and Ethics”(the "Guidelines") pursuant to the provisions of the “Ethical Corporate Management Best Practice Principles for TWSE/GTSM-Listed Companies” and related enforcement rules for the purposes to providing all personnel of the Company with clear directions for the performance of their duties.

B. Scope

1. Applicability

- 1.1 The scope of application of the Guidelines includes the subsidiaries of the Company, any incorporated foundation in which the Company's accumulated contributions, direct or indirect, exceed 50 percent of the total funds of the foundation, and other group enterprises and organizations, such as institutions or legal entities, substantially controlled by the Company.
- 1.2 For the purposes of the Guidelines, the term "personnel of the Company" refers to any director, committee member, managerial officer, employee, appointee or person having substantial control, of the Company or its group enterprises and organizations.

2. Definitions

- 2.1 Unethical conduct: The term "unethical conduct" referred in the Guidelines means the activity that any personnel of the Company, in the course of their duties, directly or indirectly provides, promises, requests, or accepts improper benefits or commits a breach of ethics, unlawful act, or breach of fiduciary duty for purposes of acquiring or maintaining benefits. The counterparties of the unethical conduct under the preceding paragraph include public officials, political candidates, political parties or their staffs, and government-owned or private-owned enterprises or institutions and their directors, supervisors, managerial officers, employees, appointees and persons having substantial control, or other interested parties.
- 2.2 Types of benefits: The term “benefits” referred in the Guidelines means any money, gratuity, gift, commission, position, service, preferential treatment, rebate, facilitating payment, entertainment, dining, or any other item of value in whatever form or name.

C. Responsible Unit

1. For the purpose of managing ethical business conduct, the Company will establish and dedicate the “Sustainability Management Office” as the responsible unit (the "responsible unit") directly under the Board of Directors, in charge of the amendment, implementation and supervision of the ethical business policy and prevention of unethical business conduct, and should be responsible for the following matter, and shall report to the Board of Directors on a regular basis.
 - 1.1 Assist to incorporate the business integrity and ethics into the business strategy of the Company, and to establish the preventive measures in accordance with the laws and regulations to ensure the business integrity.

- 1.2 Regularly analyze and evaluate the risk of dishonesty in the business scope, and according the plans to prevent unethical business conduct, and to set forth the related work scope, standard procedures and guidelines for each plan.
- 1.3 Propose internal organizations and job functions, and cross-checking monitoring systems for those business activities within operation scope that may involve high unethical business conduct.
- 1.4 Hold the business ethics education training courses to let the employees understand the determination, policy and preventive action of the business ethics and the consequences of involving unethical conduct.
- 1.5 Set up the channels to report unethical conducts, and the categories and investigation procedures for each type of unethical conducts, and ensure the effective implementation.
- 1.6 Assist the Board of Directors and the managerial personnel to examine and evaluate the effectiveness of the preventive action for unethical conducts, and evaluate and report the relevant compliance procedures on a regular basis.
- 1.7 Establish the data related to the implementation of business integrity, and analyze and evaluate the effectiveness of such ethics implementation, and disclose such ethics policy, implementation status and evaluation result in the website and annual report of the Company, and disclose the Guidelines in the Market Observation Post System.
2. The Audit Office should conduct regular audits of the business activities, based on the assessment results of the risk of dishonest behavior, formulate relevant audit plans, including the object, scope, project, frequency, etc. This audit may be conducted by the CPA, and if necessary, can be conducted with the assistance of professionals. The results of the audit shall be reported to the top managers and Sustainability Management Office, and should report the result to the Board of Directors.

II. Contents

A. Prohibition against Providing or Accepting Improper Benefits

1. During the course of business dealing, the personnel of the Company should not provide, accept, promise or request, directly or indirectly, any money, gratuity, service, preferential treatment, entertainment, dining or other inappropriate benefits to establish business relationship or influence commercial transactions except under one of the following circumstances, provided however that the conduct of the given personnel of the Company shall comply with the relevant provisions of the Ethical Corporate Management Best Practice Principles for TWSE/GTSM-Listed Companies, the Guidelines and the relevant laws and regulations:
 - 1.1 The conduct is in compliance with the laws and regulations of the place where the Company is conducting business operations.
 - 1.2 The conduct is undertaken to meet business needs and is in accordance with local courtesy, convention or custom during domestic (or foreign) visits, reception of guests and promotion of business.
 - 1.3 The conduct has its basis in ordinary social activities that are attended or others are invited to hold in line with accepted social custom, commercial purposes, or developing relationships.
 - 1.4 Invitations to guests or attendance at commercial activities or factory visits in relation to

business needs, when the method of fee payment, number of participants, class of accommodations, and the time period for the event or visit have been specified in advance.

- 1.5 Attendance at folk festivals that are open to and invite the attendance of the general public.
- 1.6 Rewards, emergency assistance, condolence payments, or honorariums from the management.
- 1.7 Money or other benefits provided to or received from relatives or friends due to engagement, marriage, maternity, relocation, assumption of a position, promotion or transfer, retirement, resignation, or severance, or the injury, illness, or death of the recipient or the recipient's spouse or lineal relative.
- 1.8 Other conduct that complies with the rules of the Company.
2. Except under any of the circumstances set forth in the preceding article, when any personnel of the Company are provided with or are promised, either directly or indirectly, any money, gratuity, service, preferential treatment, entertainment, dining, or other benefits by a third party, the matter shall be handled in accordance with the following procedures:
 - 2.1 If there is no relationship of interest between the party providing or offering the benefit and the official duties of the Company's personnel, the personnel shall report to their immediate supervisor within 3 days from the acceptance of the benefit, and the responsible unit shall be notified if necessary.
 - 2.2 If a relationship of interest does exist between the party providing or offering the benefit and the official duties of the Company's personnel, the personnel shall return or refuse the benefit, and shall report to his or her immediate supervisor and notify the responsible unit. When the benefit cannot be returned, then within 3 days from the acceptance of the benefit, the personnel shall refer the matter to the responsible unit for handling.
3. "A relationship of interest between the party providing or offering the benefit and the official duties of the Company's personnel," as referred to in the preceding paragraph, refers to one of the following circumstances:
 - 3.1 When the two parties have commercial dealings, a relationship of direction and supervision, or subsidies (or rewards) for expenses °
 - 3.2 When a contracting, trading, or other contractual relationship is being sought, is in progress, or has been established.
 - 3.3 Other circumstances in which a decision regarding the Company's business, or the execution or non-execution of business, will result in a beneficial or adverse impact.
4. The responsible unit of the Company shall make a proposal, based on the nature and value of the benefit under paragraph 1, that it be returned, accepted on payment, given to the public, donated to charity, or handled in another appropriate manner. The proposal shall be implemented after being reported and approved.

B. Prohibition against and Handling Procedure for Facilitating Payments

1. The Company shall neither provide nor promise any facilitating payment. If any personnel of the Company provides or promises a facilitating payment under threat or intimidation, they shall submit a report to their immediate supervisor stating the facts and shall notify the responsible unit.

2. Upon receipt of the report under the preceding paragraph, the responsible unit shall take immediate action and undertake a review of relevant matters in order to minimize the risk of recurrence. In a case involving alleged illegality, the responsible unit shall also immediately report to the relevant judicial agency.

C. Avoidance of Conflict of Interest

1. The board directors, committee members, managerial personnel, and any stakeholders who attend the board meeting shall maintain a high degree of self-discipline; when a proposal at a board of directors meeting concerns a director's personal interest or the interest of the legal entity represented by the director, and such a relationship is likely to prejudice the interest of this Company, that director shall not participate in the discussion nor vote on that proposal. In addition, that director shall recuse himself or herself when the discussion and voting is in progress, and may not exercise voting rights as proxy on behalf of another director. The directors shall exercise discipline among themselves, and may not support each other in an inappropriate manner. The spouse or any relative by blood within the second degree of kinship of a director, or any company has controlling or subordinate relation with a director, has a personal interest in the matter under discussion at a board meeting, which shall be deemed as the said director having such personal interest.
2. If in the course of conducting company business, any personnel of this Company discovers that a potential conflict of interest exists involving themselves or the legal entity that they represent, or that they or their spouse, parents, children, or a person with whom they have a relationship of interest is likely to obtain improper benefits, the personnel shall report the relevant matters to both his or her immediate supervisor and the responsible unit.
3. No personnel of this Company may use company resources on commercial activities other than those of this Company, nor may any personnel's job performance be affected by his or her involvement in the commercial activities other than those of this Company.
4. Due diligence
To establish a corporate culture of integrity management and implement conflicts of interest avoidance, all employees of the Company should report truthfully according to the following instructions:

4.1 Reporting Objects

- 4.1.1 Relatives with three degrees of kinship working in PTI.
- 4.1.2 Relatives within third degree of kinship working for suppliers who having business dealings with PTI, and the relatives serve as “sales staff, supervisor”, “managerial officer, manager”, “director, supervisor”, or “operating owner”, employee should report it truthfully.
- 4.1.3 Relatives within third degree of kinship who serves as important, critical or sensitive positions in PTI's competitors (assembly and testing industry), for example, “RD staff, supervisor”, “managerial officer, managers”, or “directors, supervisors”, employee should report it truthfully.

- 4.2 Reporting time: during new staff onboarding, annual ethics training and when there's any job change.

- 4.3 Any conflict of interest will be handled according to relevant internal policies.

D. Procedures for Making Political Contributions, Donations or Sponsorships

1. Political contributions: The Company shall comply with the Political Donations Act and the internal Delegation of Authority and related operational procedures to make a political contribution and such political contributions shall not be made in exchange for commercial gains or business advantages. Further, the political contributions shall be made in accordance with the following:
 - 1.1 It shall be ascertained that the political contribution is in compliance with the laws and regulations governing political contributions in the country in which the recipient is located, including the maximum amount and the form in which a contribution may be made.
 - 1.2 A written record of the decision-making process shall be kept.
 - 1.3 Account entries shall be made for all political contributions in accordance with applicable laws and regulations and relevant procedures for accounting treatment.
 - 1.4 In making political contributions, commercial dealings, applications for permits, or carrying out other matters involving the interests of this Company with the related government agencies shall be avoided.
2. Donations or sponsorships: For the purpose of education, culture, public welfare or charity, the company authorizes the Chairman to make the donations to non-profit organizations with an accumulated amount of less than NT\$5 million (inclusive) within one calendar year. The Company shall comply with relevant laws and regulations, and internal Delegation of Authority, Donation Management Procedure and related operational procedures to make a donations or sponsorships, and such donations or sponsorships shall not surreptitiously engage in bribery. Further, the donations or sponsorships shall be made in accordance with the following:
 - 2.1 It shall be ascertained that the donation or sponsorship is in compliance with the laws and regulations of the country where this Company is doing business.
 - 2.2 A written record of the decision making process shall be kept.
 - 2.3 After a donation or sponsorship has been given, it shall be ascertained that the destination to which the money flows is consistent with the purpose of the contribution.

E. Procedures for Developing & Establishing Business Relationship

1. Evaluation of legality and ethical management policy prior to development of commercial relationships with a third party :

Before developing a commercial relationship with another party, such as an agent, supplier, customer, or other counterparty in commercial dealings, this Company shall evaluate the legality and ethical management policy of the party and ascertain whether the party has a record of unethical conduct, in order to ensure that the party conducts business in a fair and transparent manner and will not request, offer, or take bribes. When this Company carries out the evaluation under the preceding paragraph, it may adopt appropriate audit procedures for a review of the counterparty with which it will have commercial dealings with respect to the following matters, in order to gain a comprehensive knowledge of its ethical management:

 - 1.1 The enterprise's nationality, location of business operations, organizational structure, and management policy, and place where it will make payment.
 - 1.2 Whether the enterprise has adopted an ethical management policy, and the status of its implementation.

- 1.3 Whether enterprise's business operations are located in a country with a high risk of corruption.
- 1.4 Whether the business operated by the enterprise is in an industry with a high risk of bribery.
- 1.5 The long-term business condition and degree of goodwill of the enterprise.
- 1.6 Consultation with the enterprise's business partners on their opinion of the enterprise.
- 1.7 Whether the enterprise has a record of unethical conduct such as bribery or illegal political contributions.
2. Statement of ethical management policy to counterparties in commercial dealings :

Any personnel of this Company, when engaging in commercial activities, shall make a statement to the trading counterparty about this Company's ethical management policy and related rules, and shall clearly refuse to provide, promise, request, or accept, directly or indirectly, any improper benefit in whatever form or name, including rebates, commissions, facilitating payments, or other improper benefits provided or accepted through other channels.
3. Avoidance of Commercial Dealings with Unethical Parties:

All personnel of this Company shall avoid business transactions with an unethical agent, supplier, customer, or other counterparty in commercial interactions. When the counterparty or partner is found to have engaged in unethical conduct, the personnel shall immediately cease dealing with the counterparty and blacklist it for any further business interaction in order to effectively implement this Company's ethical management policy.
4. Stipulation of Terms of Ethical Management in Contracts :

Before entering into a contract with another party, the Company shall gain a thorough knowledge of the status of the other party's ethical management, and may make the observance of ethical management as a part of the terms and conditions of the contract, stipulating at the least the following matters:

 - 4.1 When a party to the contract becomes aware that any personnel has violated the terms and conditions pertaining to prohibition of commissions, rebates, or other benefits, the party shall immediately notify the other party of the violator's identity, the manner in which the provision, promise, request, or acceptance was made, and the monetary amount or other benefit that was provided, promised, requested, or accepted. The party shall also provide the other party with pertinent evidence and cooperate fully with the investigation. If there has been resultant damage to either party, the party may claim damage from the breaching party.
 - 4.2 Where a party is discovered to be engaged in unethical conduct in its commercial activities, the other party may terminate or rescind the contract unconditionally at any time.
 - 4.3 Specific and reasonable payment terms, including the place and method of payment and the requirement for compliance with related tax laws and regulations.

F. Other Ethical Business Conduct Policy

1. Disclosure of Ethical Management Policy to the Public

The Company shall disclose its ethical management policy in its internal rules, annual reports, on the company's websites, and in other promotional materials, and may make timely

announcements of the policy in events held for outside parties such as product launches and investor press conferences, in order to make its suppliers, customers, and other business-related institutions and personnel fully aware of its principles and rules with respect to ethical management.

2. Prohibition against Insider Trading

The Company's personnel shall adhere to the provisions of the Securities and Exchange Act, and may not take advantage of undisclosed information of which they have learned to engage in insider trading. Personnel are also prohibited from divulging the undisclosed information to any other party in order to prevent another party from using such information to engage in insider trading.

3. Prohibition against Disclosure of Confidential Information

3.1 All personnel of the Company shall faithfully follow the operational directions pertaining to the trade secrets owned and possessed by the Company, and may not disclose to any other party such trade secrets of which they have learned, nor may they inquire about or collect any trade secrets of the Company unrelated to their individual duties.

3.2 Any organization or person outside of the Company that is involved in any merger, demerger, acquisition and share transfer, major memorandum of understanding, strategic alliance, other business partnership plan, or the signing of a major contract by the Company shall be required to sign a non-disclosure agreement in which they undertake not to disclose to any other party any trade secret or other material information of the Company acquired as a result, and that they may not use such information without the prior consent of the Company.

4. Prohibition against Infringement of Intellectual Property Rights

The personnel of the Company shall comply with relevant laws and regulation, internal operating procedures and contracts relating to intellectual property rights, and shall not use, disclose, dispose, destroy, or involve in any act infringing intellectual property right unless a consent is given by the intellectual property owner.

5. Prohibition against Acts of Unfair Competition

The Company shall conduct business activities in accordance with relevant laws and regulations governing fair business competition, and shall not fix price, manipulate the bidding, limit production and quota, or allocate and divide market by means of allocating customers, suppliers, operating regions, business activities, etc.

6. Preventing Products or Services from Damaging the Stakeholders

6.1 The personnel of the Company shall comply with relevant laws, regulations and international guidelines in each process of research & development, procurement, manufacturing, supply and sales, shall ensure the information transparency and safety of the products and services provided, shall establish and disclose the policy relating to the protection of rights of customers and stakeholders, and shall implement such in operating activities to prevent the products and services provided from damaging, directly or indirectly, the right, health and safety of customers and other stakeholders.

6.2 The Company shall immediately recall the products or stop the services if there is sufficient fact to evidence the products or services that will pose a risk to the safety and health of consumers and other stakeholders.

G. Offence-Reporting System, Disposition of Unethical Conducts, and Reward, Punishment and Appeal System

1. Offence-Reporting System and Procedure

1.1 The Company sets up and announces the offence-reporting emails (csr@pti.com.tw) and hotline (03-5980300 Ext. 338926) for internal and external personnel to report offence. The personnel who involves in false misstatement or malicious accusation shall be disciplined or even dismissed. The real-name reporting is the principle, anonymous reporting is an exception ;

1.1.1 The real name offence report will not be accepted when it comes to the lack of any one of the following information.

1.1.1.1 The name and the correct contact information of the offence reporter.

1.1.1.2 The name of the violator or any feature or characteristic that is sufficient to identify the violator.

1.1.1.3 The evidence that is concrete and sufficient to conduct investigation towards the violation.

1.1.2 Anonymous Reports If the documentary evidence or physical evidence has been attached, and the circumstances, the name of the party, the time, the place, and the person concerned are clearly stated, the responsible personnel must also conduct an internal preliminary investigation. However, due to the interruption of the evidence chain or the lack of legal elements, anonymous reporters are required to provide supplementary explanations or provide information. If there is no or no response, the responsible personnel can complete the case.

1.2 If the offence report involves ordinary employee, this should be submitted to the department supervisor. If the offence report involves a board director or senior management, this should be submitted to the independent board directors or the Audit Committee. After the investigation process and if this offence involves a material violation of laws or internal rules or may cause a significant loss to the Company, a report should be prepared immediately and shall give the independent board directors or the Audit Committee a written notice.

1.3 After the responsible unit receives an offence report, it shall jointly investigate such offence with the supervisor or the unit receiving the offense report under the assistance from the audit office and related departments if necessary, shall proceed in accordance with relevant internal rules, and shall keep the records of such acceptance of offence report, investigation process, result and relevant documentation in the form of paper or electronic files. The term of keeping the aforesaid records is five (5) years from the date of acceptance of offence report. However, if any litigation relating to the said offence report arises before the expiration of the term of keeping records, the said records shall be kept till the date such litigation concludes.

1.4 The Company shall keep the identity of offence reporter and its report content in confidence, and shall protect such reporter from being subject to inappropriate disposition due to his/her offence report.

2. Handling of unethical conduct by personnel of the Company

2.1 If it is verified that the violator indeed violates applicable laws and regulations or the Company's policy and procedures of ethical management, the Company shall

immediately require the violator to cease the conduct and shall make an appropriate disposition. When necessary, the Company will institute legal proceedings and seek damages to safeguard its reputation and its rights and interests.

- 2.2 With respect to the verified offence report, the Company shall charge relevant units with the task of reviewing the internal control system and relevant procedures and proposing corrective measures to prevent a recurrence of the same unethical conduct. The responsible unit of the Company shall submit to the board of directors a report on the unethical conduct, actions taken, and subsequent reviews and corrective measures.
3. **Actions upon Event of Unethical Conduct by Others towards the Company**

If any personnel of the Company discovers that another party has engaged in unethical conduct towards the Company, and such unethical conduct involves alleged illegality, the Company shall report the relevant facts to the judicial and prosecutorial authorities; where a public service agency or public official is involved, the Company shall additionally notify the governmental anti-corruption agency.
4. **Rewards and Penalties; the Appeal Procedures for Disciplinary Measures**
 - 4.1 The Company shall announce the rewards and penalties, and the appeal procedures for disciplinary measures for violation of ethical conduct, and shall link ethical management to employee performance evaluations and human resources policy, and establish clear and effective systems for rewards, penalties, and complaints.
 - 4.2 If any personnel of the Company seriously violates ethical conduct, the Company shall dismiss the personnel from his/her position or terminate his/her employment in accordance with applicable laws and regulations or the internal policy and procedures of the Company.
 - 4.3 The Company shall disclose on its intranet information the matters related to ethical conduct violation, its investigation result and the disciplinary measures.
5. **Award Measure for the Offence Reporter**
 - 5.1 If the alleged offence is verified that there is indeed a violation of applicable laws and regulations or the Company's policy and procedures of ethical management, the Company may award the amount indemnified by the violator to the offence reporter based on the following percentage:
 - 5.1.1 0.5 percent, if the evidence provided by the offence reporter is helpful for the Company, judicial and relative competent authorities to start investigation. However, the amount shall not exceed NT\$ 500,000.
 - 5.1.2 1.0 percent, if the evidence provided by the offence reporter is so concrete and clear to prove unethical conduct had been done without any further investigation by the Company, judicial and relative competent authorities. However, the amount shall not exceed NT\$ 1,000,000.
 - 5.2 The offence reporter shall be awarded only one time for one case.
 - 5.3 The award shall be split evenly among offence reporters, if the evidence under paragraph 1 is provided under following circumstances:
 - 5.3.1 Such evidence is provided by plural offence reporters in the same time.
 - 5.3.2 Such evidences are provided by plural offence reporters respectively, however,

the content of them is same.

5.4 The award shall not be granted to the offence reporter, or shall be returned if it was granted to the offence reporter already, provided that the offence reporter engages in one of the following conducts:

5.4.1 To directly or indirectly disclose the offense report before the Company or judicial authority disclose it

5.4.2 To engage in or coerce others to engage in unethical conduct

5.4.3 To provide evidence that is forged or altered

III. Reference Documents

A. Sources of Relevant Laws & Regulations

1. Ethical Corporate Management Best Practice Principles for TWSE/GTSM-Listed Companies

B. Relevant Internal Rules of the Company

1. Delegation Of Authority

2. Donation Management Procedure

IV. Enforcement

A. The Guidelines and any amendments hereto shall be implemented after adoption by resolution of the board of directors. The matters not specified in the Guidelines shall follow the relevant laws and regulations.

B. These Procedures and Guidelines are promulgated on April 30, 2013.

The first amendment to the Guideline is implemented after the Board of Directors passed the resolution on February 9, 2015.

C. The second amendment to the Guideline is implemented after the Board of Directors passed the resolution on November 2, 2018.

D. The third amendment to the Guideline is implemented after the Board of Directors passed the resolution on March 10, 2020.

E. The fourth amendment to the Guideline is implemented after the Board of Directors passed the resolution on March 10, 2022.

F. The fifth amendment to the Guideline is implemented after the Board of Directors passed the resolution on November 4, 2022.