

Wistron Corporation

Code of Conduct

Wistron Corporation (hereinafter referred to as "Wistron", "We" or "the Company") is committed to the sustainable development of enterprises. We know that in the pursuit of the company's sustainable growth, the business strategy must take into account the impact and impact on society and the environment, so we continue to strive forward with the vision of "Sustainability through Innovation". In order to establish the consistent values and culture of all Wistron personnel and to be guided in conducting business activities, this Code of Conduct (hereinafter referred to as this Code) is formulated. This Code applies to all persons of the Company, its subsidiaries and joint ventures in which the Company has significant influence, including directors, supervisors, managers and employees.

Chapter I Business Ethics and Operations

Integrity is the core value of Wistron and the foundation of business operations. We commit to implementing the company's core values, adhere to a high standard of professional ethics, require all personnel to engage in daily work and business, and abide by ethical standards of conduct in order to maintain the company's reputation.

Article 1 Corruption and Bribery

Integrity is the core value of Wistron and the foundation of business operations. We resolutely prohibit any corruption, bribery or any improper benefits. All business functions are subject to the same requirements, and We never condone any acceptance or giving of gifts, offering or hospitality that may be considered bribes.

1. While engaging in commercial conduct, you shall not directly or indirectly offer, promise, demand, or engage in other acts that violate integrity, illegality, or breach of fiduciary duties.
2. When accepting gifts or hospitality arising from the position, you shall be premised on not affecting the execution of business and conflicts of interest, and shall conform to the principles of normal social etiquette and convention.

Article 2 Conflict of interest

All personnel of Wistron shall recuse themselves from any situation that may cause a conflict of personal interests with the interests of the Company in the course of engaging in business conduct. When aware/faced with (but not limited to) the following circumstances, you should proactively and fully report to your immediate supervisor and the top executive of the human resources unit (for relevant persons other than directors) or the board of directors (for directors) any conflict between personal interests and the interests of the company:

1. The functions held and the business performed may cause undue benefits to themselves, spouses, and relatives within third-degree relative (including but not limited to any form or name of money, gifts, commissions, positions, services,

privileges, kickbacks, etc.), or may affect the handling and judgment of official duties.

2. Activities outside the Company that cause direct competition with the Company's business, or any work and responsibilities that may interfere with the one's own duties.
3. Without the permission of the Company, use the Company's resources (such as: information, goods, property, etc.) to engage in activities other than the Company's business.
4. There are relatives within third-degree relative who serve in Wistron.

Article 3 Fair trade

Wistron prohibits engaging in unfair competition and all personnel shall follow the following principles when engaging in business activities:

1. Business activities shall be carried out in accordance with relevant competition laws and regulations, and shall not fix prices, manipulate bids, limit production and quotas, or share or divide the market by means of allocating customers, suppliers, operating areas or types of business.
2. If there are relevant doubts in the execution of business, the supervisor or legal unit should be consulted immediately. Any matter that may involve or violate the relevant regulations is found, it should be immediately reported to the top supervisor of the unit.

Article 4 Insider trading

We shall comply with the relevant laws and regulations on insider trading in order to safeguard the rights and interests of the investment public, enable buyers and sellers to obtain equal information, and promote the fairness of securities market transactions, and no one shall engage in the following acts:

1. Upon actually knowing of any information that will have a material impact on the price of the securities of the Company, after the information is precise, and prior to the public disclosure of such information or within 18 hours after its public disclosure, purchase or sell, in the person's own name or in the name of another, shares of the Company that are listed on an exchange or an over-the-counter market, or any other equity-type security of the Company.
2. Upon actually knowing of any information that will have a material impact on the ability of the Company to pay principal or interest, after the information is precise, and prior to the public disclosure of such information or within 18 hours after its public disclosure, sell, in the person's own name or in the name of another, the non-equity-type corporate bonds of such company that are listed on an exchange or an over-the-counter market.

Article 5 Political contributions

Wistron personnel who contribute directly or indirectly to political parties or organizations or individuals involved in political activities shall follow the following principles:

1. When Wistron engages in political donations, it shall comply with the relevant laws and regulations and shall not seek commercial benefits or transaction advantages. Any legitimate political contribution in the name of Wistron, regardless of the amount, shall be approved by the Chairman of the Board of Directors before it can be made.
2. Wistron personnel shall not provide political contributions directly or indirectly on behalf of the Company.
3. You may not use any of Wistron's property, facilities, or engage in any political activity during business hours.

Article 6 Charitable contributions and social engagement

To implement Wistron's "altruistic" business philosophy, we invest resources in fulfilling our corporate citizenship responsibilities through charitable donations and social engagement. Relevant legal charitable donations or sponsorships made by Wistron shall be handled in accordance with the Administrative Measures for Charitable Donations and Sponsorships, and shall not be disguised as bribes and profits. Charitable donations or sponsorships should be made in accordance with the following principles:

1. Comply with the provisions of the laws and regulations of the place of operation.
2. The rewards received as a result of sponsorship shall be clear and reasonable and shall not be the object of commercial dealings or persons with an interest in Wistron.
3. After a charitable donation or sponsorship, it shall be confirmed that the purpose of the money flow is consistent with the purpose of the donation.

Article 7 Information security

1. In order to protect the company's assets and the rights and interests of stakeholders, Wistron has established an "information security policy", continuously strengthens information security governance, and establishes a sound information security system and mechanism to ensure the confidentiality, integrity and availability of information assets.
2. All Wistron personnel must comply with the following behaviors:
 - (1) Confidential information shall not be disclosed.
 - (2) Unauthorized access to other people's information is not allowed.
 - (3) Downloading, installing and distributing unauthorized software or data is prohibited.
 - (4) Do not illegally intercept network packets and invade other people's computer systems.

- (5) Do not set up or distribute programs or devices that interfere with other people's systems.
- (6) Shall not use the company's network resources to carry out non-company business-related work.
- (7) Keep your personal computer secure, such as installing anti-virus software, setting strong passwords, installing patches, etc.
- (8) Carrying storage media such as laptops and disk pieces into and out of the company shall comply with the relevant control measures of each district.
- (9) (9) In the case of violation, in addition to submitting the relevant records to the supervisor for supervision and improvement, if the circumstances are serious, the deliberation and legal liability shall be handled in accordance with the relevant reward and punishment measures of the company.

Chapter II Protection of Human Rights

Article 8 Human rights

1. Human rights assessment

We conduct regular human rights risk assessments/due diligence and take appropriate improvement actions to mitigate negative impacts on human rights protections.

2. Anti-discrimination

There is no discrimination in any of geography, race, ethnicity or background of upbringings, social class, ancestry, religion, physical disability, sex, sexual orientation, pregnancy, marital status, union membership, political stance, appearance, age or union affiliation. Besides, we also encourage the employment of persons with disabilities.

3. Humane treatment and anti-forced labor

Inhumane treatment of employees, including any form of violence, harassment, infringement, corporal punishment, mental or physical oppression, bullying, public humiliation, or verbal abuse, is prohibited, nor is there any threat of doing so. Forced labor, bonded labor, imprisonment, or threats of violence to compel the labors to provide the service is strictly prohibited.

Article 9 Privacy Policy

1. Wistron will be committed to protecting the personal data of employees, customers, suppliers and any user (including but not limited to visitors of Wistron websites, users of our products or services, employees of corporate customers and contractors', job applicants, visitors to Wistron, etc.). In order to implement the protection and management of personal data and reduce the impact of personal data incidents, the "Privacy Policy" and "Personal Data Protection And Management Policy" are formulated as the highest guiding principles for privacy protection.

2. Wistron's actions for privacy protection are as follows:
 - (1) The provision, collection, use and retention of personal data shall be based on the principle of not overstepping specific scope of purposes and in accordance with privacy protection and relevant laws and under the premise of legitimate business activities
 - (2) Adopt a strict security control mechanism for the protection of personal data to prevent from illegal intrusion and illegal access of data.

Article 10 Occupational safety and health

1. It is Wistron's responsibility and obligation to provide a healthy and safe working environment for all employees. We established an occupational safety and health management system to conduct risk assessments and procedures improvements which to reduce health and safety hazards. We formulated Occupational Safety and Health Policy, committed to:
 - (1) Improving the operation and performance of occupational safety and health management system.
 - (2) Enhancing employees for consultation, participation, and awareness.
 - (3) Preventing injury and unhealthiness.
2. In the factory management, we take the following measures to protect all employees:
 - (1) To control and reduce hazards through management, prevention and early warning system, such as engineering control and protective protection.
 - (2) Implementing measures related to maternity protection to protect pregnant or nursing mothers.
 - (3) Establishing emergency preparedness and planning to conduct regular drills which respond to various emergencies.
 - (4) Establishing management procedures to prevent injuries and occupational diseases, further to assist employees to return for work.
 - (5) Maintaining and overhauling machinery and equipment regularly to prevent injury.
 - (6) Providing a healthy, safe, and hygienic diet and dormitories.
 - (7) (7) Providing relevant training and posting announcements to improve safety awareness.

Chapter III Environmental Protection

To reduce a negative impact of our operations to the environment, Wistron, while continuing to develop high-quality green products and services, is also committed to environmental friendliness, and formulating an Environmental Policy and Nature and Biodiversity & No Deforestation Policy for energy saving and carbon reduction, and we are committed to:

1. Striving to save energy and increase the ratio of renewable energy to mitigate climate change.
2. Supporting efficient energy equipment and program improvement, and adopting environmentally friendly technologies to reduce pollutant emissions.
3. Implementing the recycling of water and the reduction of waste.
4. Providing green products and services, and implementing the concepts of energy conservation and carbon reduction, material saving, prohibition of harmful substances and resource recovery.
5. Maintaining, enhancing, and conserving biodiversity, and preventing any deforestation activities that may lead to the depletion of natural resources.

Article 11 We implement climate-related financial disclosures (TCFDs), which includes proportion of renewable energy sources, finally to reduce the impact on climate change.

Article 12 We will implement water resources management and daily water conservation to improve the efficiency of water resources utilization. We will treat wastewater properly before discharge, and continuously conduct monitoring activities to ensure the compliance with laws and regulations.

We will actively promote waste reduction and recycling without using restricted substances and raw materials. Wistron will conduct technological improvements and find environmentally friendly materials. We will assess or inventory the flow of waste and hazardous substances to minimize waste output. We will reduce pollutants through environmentally friendly technologies.

Article 13 We are committed to research and development of products, design, manufacturing and services, with life cycle thinking. Wistron will integrate the concept of circular economy, product sustainable design and development. We will keep resources being used continuously forming a green cycle of sustainable business models.

Article 14 The Company avoids operating in locations adjacent to important biodiversity areas. With regards to our operating sites, product design and development, and raw material procurement, the Company conducts risk assessments for biodiversity and deforestation, and takes measures to avoid, minimize, restore, and offset the impacts on biodiversity.

Chapter IV Management Mechanisms

Article 15 Authority and responsibility unit
Sustainability Office has the primary authority and responsibility to implement this Code and to establish the necessary procedures to ensure the implementation of this Code.

Article 16 Abidance
All Wistron personnel shall abide all requirements of this Code, whose actual implementation will be incorporated into the performance evaluation, and the results

of which may affect their bonuses and promotions.

Article 17 Training

We will regularly train all personnel with this Code of Conduct and evaluate the effectiveness of the training.

Article 18 Penalties for violations

We have a zero-tolerance policy for any violation of this Code and we will thoroughly investigate reported violations and deal with them in real time. In the event of a violation of this Code, Wistron may punish and withhold performance bonuses/annual bonuses, etc., depending on the seriousness of the circumstances, and if the violation of this Code is serious, it may terminate the employment contract in accordance with the relevant laws and regulations of each place and the provisions of the employment contract, and the violator will also be sent and claimed in accordance with the applicable laws and regulations.

Article 19 Enquiries channel

Any enquiries regarding this Code may be raised through Sustainability Office. The subsidiaries and joint ventures with significant influence of the Company may set up their own enquires channels.

Article 20 Mechanism for whistleblowing

Wistron Global Human Resources & Administration is the main accepting unit for whistleblowing cases and is available to raise via Ethic@wistron.com. After the acceptance, it will be determined by the specific personnel/unit according to the properties and content of the case to conduct the processing or investigation. If the whistleblowing involves an ordinary employee, it shall be reported to the head of the department or the top supervisor of Global Human Resources & Administration, and if the whistleblowing involves a Director of the Board or Executive, it shall be reported to the highest supervisor of the audit unit or independent directors. The audit unit shall be responsible for supervising the investigation and handling of the whistleblowing. Wistron is committed to maintaining the confidentiality of the identity and content of the whistleblower and accepting anonymous reporting to protect the whistleblower from being mishandled since the whistleblowing.

Article 21 Implementation and revision

This Code will be implemented after its adoption by the Board of Directors and as amended.

This Code was established on December 23, 2021.

The 1st amendment was made on March 16, 2022.

The 2nd amendment was made on May 11, 2023.

The 3rd amendment was made on August 12, 2024.