

Wistron Corporation
Codes of Ethical Conduct

Article 1 Purpose

The Codes of Ethical Conduct was established to enforce the Wistron Corporation (hereinafter as the Company)'s core values, and maintain its high level of business ethics, as well as for Relevant Personnel to strictly abide by the Company's standard code of ethical conduct to uphold the company's reputation, and to gain the respect and trust of customers, suppliers and professionals of all fields. The Codes of Ethical Conduct was thereby established and shall be duly followed.

Article 2 Applicable Range and Definition

The Codes of Ethical Conduct shall apply to the Directors of the Board (including the independent Directors, and hereinafter referred the same), managerial officers and employees employed or delegated by the Company or persons having substantial control over the Company (hereinafter as Relevant Personnel).

Article 3 Important Codes of Ethical Conduct

1. Integrity is Wistron's core value, and is also the root for operating an enterprise. To operate an enterprise based on Integrity is to provide a job environment and atmosphere that will allow Relevant Personnel to execute their job duties in accordance to the ethical standard. The Company requires that all Relevant Personnel to fully understand and abide by the Codes of Ethical Conduct and self Integrity. The following is the relevant and important codes of ethical conduct:

- (1) One must strictly keep confidential the information related to the Company or clients whom the Company purchases goods from or whom the Company sells products to. Unless being authorized or prescribed under law to disclose the above information, one has the obligation to keep confidentiality. The confidential information that must not be disclosed includes all information that could be possibly used by competitors or cause damages to the Company or the Company's clients after disclosure.
- (2) When one uses information related to the Company or clients whom the Company purchases goods from or whom the Company sells products to, one must not contravene the acts and laws, or the Company's Policies and Procedures on the Protection of Confidential Information.
- (3) One must treat clients whom the Company purchases goods from or whom the Company sells the products to, the competing companies and employees on a fair and equal basis, and must not use the information obtained through job convenience to manipulate, conceal, or misuse such information to make false statement on important matters, or use such information to obtain unjust benefits through other unjust transactions.
- (4) One must be loyal to his or her job, and the execution of duties, including disposition of money, purchase, safekeeping assets, evaluation of performances and making and ratification of reports, shall be accomplished with Integrity, diligence and dedication.
- (5) One has the duty to protect the Company's assets and resources, and ensure that such assets and resources can be legally and effectively used in business operation. It is strictly prohibited to use the Company's assets or resources to gain personal

interest. One should also recuse from negatively affecting the Company's interest through personal or department's interest or through stealing, neglecting, and wasting the Company's assets and resources.

- (6) One must recuse from any conflict that will result in the conflict of personal and the Company's interest.
 - (7) One must not participate or instigate others to proceed in activities or relationships that might cause harm to job loyalty or professional judgment.
 - (8) One must not request, accept, or give any gifts, donations, political donations or treats (bribery) that might cause harm to job loyalty or professional judgment.
 - (9) One must not commit any acts that will damage the reputation of the Company.
 - (10) One must abide by the national acts, rules and regulations. One must not be involved in any illegal or inappropriate activities under any circumstances.
2. The Codes of Ethical Conduct will not be limited to acts, rules and regulations. The spirit in the execution of this is in the high level of self restrain, and that one will abide by the Codes without violating general conventions.

When Relevant Personnel cannot determine whether an action or a circumstance fits with the Company's Codes of Ethical Conduct, one should check its adequacy based on the following principles:

- (1) Whether the disclosure of such relationship or action will cause negative effects to the Company's reputation.
- (2) Whether the process of such relationship or action will be generally interpreted as having effects on the just execution of job duties or professional judgment.

Article 4 Recusal Policy on the Conflict of Interest

1. The Relevant Personnel should recuse from any conflict that will cause conflict between the personal and Company's interest. For this, the Relevant Personnel shall automatically and fully report to the direct supervisor and the management personnel of the highest level in Human Resource department (suitable for Relevant Personnel who are not Directors of the Board), or the Board of Directors (suitable for Directors of the Board) upon knowing or facing (not limited to) the following circumstances and explain how the personal interest can be conflicting with the Company's interest:
 - (1) When the positions held by the Relevant Personnel might let them, their spouse, or third-degree relatives gain unjust benefits, or obstruct their objective and effective handling of business operations.
 - (2) When the activities participated by the Relevant Personnel outside the Company cause direct competition against the Company's business operation, or obstruct with the Relevant Personnel's positions held and duties in the Company.
 - (3) Using the Company's resources (such as information, objects or property) to participate in activities outside the Company without the Company's permission.
 - (4) Has third-degree relatives working in the Company.
2. When the Company receives reports from the Relevant Personnel on how their actions do not fit the Recusal Policy on the Conflict of Interest, the Chairman (suitable for Directors of the Board) or the management personnel of the highest level in Human Resource department (suitable for Relevant Personnel who are not Directors of the Board), together with the involved Relevant Personnel's supervisor of the highest level

from their affiliating organization shall discuss handling principles and procedures, and pass the case to the general manager (suitable for Relevant Personnel who are not Directors of the Board) for authorization, or pass the case to the Board of Directors (suitable for Directors of the Board) to handle.

Article 5 Giving Presents and Treats as Part of Business Routine

1. To maintain the highest standard for ethical conduct, one must not accept or give any presents, cash gifts, treats from suppliers, contractors, clients, and other relevant parties and groups (including governmental agencies) involved in the Company's business operation, for such action will affect the normal operation of business and judgment. Any form of bribery is strictly prohibited.
2. When it is necessary to accept presents or any types of gifts, one shall proceed in accordance to the following in addition to abiding by Paragraph 1 of Article 5:
 - (1) One must not accept cash, check, or any valuable papers (such as gift coupons or stocks).
 - (2) When one has to accept as a courtesy the presents or treats, the value of such must not exceed or can only be equivalent of NTD1,000 as the maximum limit. If the presents from the company include its trademark souvenirs, then the value of such must not exceed and can only be equivalent of NTD\$6,000 as the maximum limit.
 - (3) If one must accept a present in the fear that refusal might be inappropriate, and such present temporarily accepted has exceeded the value stated in Paragraph 2.b. in Article 5, such present shall be handed to the Executive Secretary of the Employees' Welfare Committee within seven days of acceptance for disposition.
 - (4) One must not subscribe any shares of stock or any other similar preferential packages from any units or companies that are involved with the Company's business operation outside the open transaction market.
3. To maintain and promote the normal business relationship and operation of the Company, one may be permitted to give presents to relevant individuals involved in the Company's business operation. However, such acts must be done in accordance to the aforementioned Paragraph 1 under Article 5, and abide by the following rules:
 - (1) Write down what the presents were for and the presents shall contain the name of the Company.
 - (2) One should select the most appropriate presents for subjects from the presents provided by the Company.
4. When one accepts or arranges any treats related to business operation, they shall be done in accordance to the rules of general business courtesy and cannot be too frequent, and must not let customers or companies think that such presents or treats are part of the conditions to maintain business relationship with the Company.
5. The relationship and interaction between superiors and employees shall also be processed pursuant to the spirits and principles of this Codes of Ethical Conduct.

- Article 6 The Procedure for Handling the Provision of Legal Political Donations
- When Relevant Personnel makes direct or indirect donations to a political party, or an organization or individual participating in political activities, they should abide by the following basic principles:
1. It should be done pursuant to the Political Donations Act and relevant acts, and shall not use it to seek commercial benefits or transaction advantages.
 2. Relevant Personnel shall not directly or indirectly provide political donations in the name of the Company.
 3. One must not use any of the Company's property, facility or to participate in political activities during working hours.
 4. When making political donations in the Company's name, it must be done only after the approval of the Chairman notwithstanding the amount of such donation.
- Article 7 The Procedure and Amount Standards for Handling the Provision of Just Charitable Donations or Sponsorship
- When Relevant Personnel make charitable donations or sponsorship, they shall abide by the following basic principles:
1. It should be done pursuant to relevant acts and internal operation procedures, and must not turn into an act of bribery through other manners.
 2. If one makes a legal charitable donation or sponsorship in the Company's name, it must be done in accordance with "Procedures for Handling Charitable Donations or Sponsorships"
- Article 8 The Execution for Codes of Ethical Conduct
1. To achieve sound ethical corporate management, Global Human Resources & Administration unit is delegated to take charge of establishing and supervising the implementation of the ethical corporate management policies and related measures, and it shall report to the Board of Directors on a regular basis; and relevant units shall hold training courses and publicize the Codes of Ethical Conduct to ensure that all Relevant Personnel understand, accept and will strictly abide by and enforce the Codes.
 2. Relevant Personnel shall continue to raise awareness and publicize the Company's Codes of Ethical Conduct to business related units or other companies that are involved in the business relations with the Company to ensure that they understand and support the determination and polices of the ethical corporate management of the Company.
- Article 9 Disciplinary measures on the Relevant Personnel involved in violation of the Codes
1. The Company encourages the insiders and outsiders to report any activities which violate the Codes, and the anonymous reporting shall be accepted. However, insiders shall not make false report or malicious accusation, people who conduct the

aforementioned behaviors shall be subject to disciplinary action, and removed from office if the circumstance concerned is material.

2. A whistleblower shall at least furnish the following information:
 - (1) The whistleblower's name and I.D. number, and the communication channels to reach him/her. (Except for anonymous whistleblowing.)
 - (2) The informed party's name or other information sufficient to distinguish its identifying features.
 - (3) Specific facts and evidences available for investigation.
3. Company personnel handling reported matters shall represent in writing that they will keep the whistleblowers' identity and contents of information confidential. This Corporation also undertakes to protect the whistleblowers from improper treatment due to their report. The responsible unit of this Corporation shall observe the following procedure:
 - (1) Tip involving a general employee shall be reported to the department head or the highest manager of Global Human Resources & Administration unit; tip involving a director or senior manager shall be reported to the highest manager of Auditing office or the independent directors.
 - (2) The responsible unit of the Company and the department head or personnel being reported to in the preceding subparagraph shall immediately verify the facts, and be provided with the assistance of the legal compliance or other related department if necessary.
 - (3) If a person being informed of is confirmed to have indeed violated the Codes of Ethical Conduct, 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.
 - (4) The business transaction counterparties involved in violating the Codes of Ethical Conduct will be strictly treated by the Company by decreasing or canceling the cooperation with the Company according to the extent of violation, or reported to the corresponding judicial authorities.
 - (5) Documentation of case acceptance, investigation processes and investigation results shall be retained for five years and may be retained electronically. In the event of a suit in respect of the reported case before the retention period expires, the relevant information shall continue to be retained until the conclusion of the litigation.

- (6) With respect to a confirmed reported case, the Company shall charge relevant units with the task of reviewing the internal control system and relevant procedures and proposing corrective measures to prevent recurrence.
- (7) The responsible unit of the Company shall submit to the board of directors a report on the reported case, actions taken, and subsequent reviews and corrective measures.

Article 10 Enforcement and Amendment

The Principles will be implemented after adoption by resolution of the Board of Directors, same as amendment, and will be delivered to the shareholders meeting for report.

The Codes are enacted on March 25, 2014.

The 1st amendment was made on November 11, 2016.

The 2nd amendment was made on November 9, 2018.

The 3rd amendment was made on March 14, 2023.