

**WT Microelectronics Co., Ltd.**  
**Implementation of Ethical Corporate Management In 2023**

Evaluation Item	Implementation status
<p>I. Establishment of ethical corporate management policy and approaches</p> <p>(I) Did the company establish an ethical corporate management policy that was approved by the Board of Directors, and declare its ethical corporate management policy and methods in its regulations and external documents, as well as the commitment of its Board and management to implementing the management policies?</p> <p>(II) Does the company establish mechanisms for assessing the risk of unethical conduct, periodically analyze and assess operating activities within the scope of business with relatively high risk of unethical conduct, and formulate an unethical conduct prevention plan on this basis, which at least includes preventive measures for conduct specified in Article 7, Paragraph 2 of the Ethical Corporate Management Best-Practice Principles</p>	<p>(I) The Company’s Board of Directors passed the resolution to formulate the “Ethical Corporate Management Best Practice Principles” and “Procedures for Ethical Management and Guidelines for Conduct”, and formulated “United Nations Anti-Corruption Policy”, “Social Policy And Code Of Conduct” and “Anti-corruption, Anti-bribery &amp; Anti-money laundering Policy”, which were signed by the Chairman. They were disclosed on the Company website. In addition, the Company issued the 2022 Sustainability Report on June 30, 2023 to make stakeholders aware of the Company’s promotion performance and results of sustainable development. The Group’s senior management and members of the Board of Directors are committed to upholding their responsibility of supervision based on honesty and trustworthiness when performing their duties, in order to create a sustainable business environment.</p> <p>(II) The Company explicitly prohibits unethical conduct such as offering and receiving bribery, providing or accepting improper interests, providing or promising facilitation payment, providing illegal political contributions, engaging in unfair competition, providing improper charitable donations or sponsorships, disclosing trade secrets and damages to the interests of stakeholders, etc., in the “Ethical Corporate Management Best Practice Principles” and “Procedures for Ethical Management and Guidelines for Conduct”. The Company has taken preventive measures and conducted educational advocacies and periodically analyze and assess operating activities within the scope of business with relatively high risk of unethical conduct, establish comprehensive and effective control mechanisms in accounting and internal control systems to prevent potential business activities and operational procedures that may involve higher levels of dishonest behavior. The internal audit team also prioritizes high-risk operations for annual audit plans based on risk assessments to strengthen</p>

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<p>for TWSE/TPEX Listed Companies?</p> <p>(III) Did the company specify operating procedures, guidelines for conduct, punishments for violation, rules of appeal in the unethical conduct prevention plan, and does it implement and periodically review and revise the plan?</p>	<p>preventive measures, and reports on the actual implementation of audit plans to regular board meetings to implement the ethical management policy.</p> <p>(III) The Company engages in commercial activities based on the principles of fairness, honesty, trustworthiness and transparency, the Board of Directors passed the resolution to formulate the “Procedures for Ethical Management and Guidelines for Conduct”. Specifying the matters the Company’s personnel shall be minded of when performing business. It includes clear operating procedures and guidelines for each program, disciplinary action for violations and grievance systems. It is applicable to all of the Group’s companies and organizations such as the Company and its subsidiaries, foundations with the Company directly or indirectly contributing more than 50% of the funds, and other institutions or legal persons which the Company has substantial control. In addition to disseminate to new employees and in the Company's internal website, the “Procedures for Ethical Management and Guidelines for Conduct” are actually implemented in operations, and ethical management is included in employee performance appraisal and human resource policies. For those who violate the ethical management severely, they should be dismissed or fired in accordance with relevant laws and regulations or with the Company's human resource regulations; the Company also regularly reviews and makes amendments according to the implementation.</p>
<p>II. Implementation of ethical corporate management</p> <p>(I) Does the company evaluate the ethical records of parties it does business with and stipulate ethical conduct clauses in business contracts?</p>	<p>(I) After the evaluation, the Company shall sign contracts that contain an ethics clause with transaction counterparties if necessary. The ethics clause includes not accepting or requesting improper benefits, such as bribery, gift money, gift cards, etc., and conducting all business activities based on the principles of fairness, justice, openness and honesty. When assessing customers, suppliers, and financial institutions, the Company would first understand their past ethical situations. The financial institutions for deposits and transactions are banks and securities brokers under the Banking Act or Securities and Exchange Act. The rights and obligations of both parties and the transaction conditions are clearly stipulated in the account opening credit or underwriting agreement.</p>

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<p>(II) Does the company have a unit that supports ethical management practices on a full-time basis under the board of directors, and reports the ethical management policy and programs against unethical conduct regularly (at least once a year) to the board of directors and oversees the operations?</p>	<p>(II) In order to improve the ethical corporate management, the HR, Legal and Audit Office jointly form an Ethical Management Promotion Task Group under the Board of Director and the Chief Human Resources Officer serve as the leader of the team, decentralizing the formulation and supervision of ethical corporate management policies and preventive measures based on the work responsibility and scope of each unit, to ensure the implementation of the Ethical Corporate Management Best Practice Principles.</p> <p>In addition, the Ethical Management Promotion Task Group reports the implementation of ethical corporate management in the previous year to the Board of Directors every year, to assist the Board of Directors in assessing whether the ethical corporate management measures established by the Company are operating effectively. On January 31, 2024, the implementation of ethical management reported to the Board of Directors. Progress in 2023:</p> <ol style="list-style-type: none"> <li>1. Education and training In addition to promoting ethics and integrity as the core values of the Company to all employees, the task group also provides education and training to new employees to advocate the matters which require attention when conducting business.</li> <li>2. Communication channels Employees can also respond to and communicate with management and the HR unit through multiple channels (including the Company’s website, internal email system, etc).</li> <li>3. Reporting procedures and whistleblower protection There is a whistleblowing platform for any violation of the code of conduct on the Company’s official website, providing a channel for whistleblowers to report illegal activities of the Company’s personnel. The Ethical Management Promotion Task Group is responsible for accepting the reported cases, forwarding these cases to the highest supervisors of the relevant units for investigation, and tracking the final result of each cases. The identity of the whistleblower and the contents of the report shall be kept confidential, and a complete record of the acceptance, investigation process and results of the case shall be retained. The Company received 1 reported cases, after investigation and confirmation, 0 valid case and 0 major cases in 2023.</li> <li>4. Prevention of insider trading The Company regulate stock trading control measures in the “Corporate Governance Best</li> </ol>

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<p>(III) Does the company establish policies to prevent conflict of interests provide appropriate channels for filing related complaints and implement the policies accordingly?</p> <p>(IV) Does the company have effective accounting system and internal control systems set up to facilitate ethical corporate management, does the internal auditing unit formulate audit plans based on unethical conduct risk assessment results, and does it audit compliance with the unethical conduct prevention plan or commission a CPA to perform the audit?</p> <p>(V) Does the company regularly hold internal and external educational trainings on ethical corporate</p>	<p>Practice Principles” that from the date that Directors become aware of the contents of the Company's financial reports. Measures include those prohibiting a director from trading his or her shares during the closed period of 30 days prior to the publication of the annual financial reports and 15 days prior to the publication of the quarterly financial reports. In addition, the Company's stock affairs department also notifies Directors to comply with this regulation before the aforementioned close period.</p> <p>(III) The Company’s “ Ethical Corporate Management Best Practice Principles “, “Procedures for Ethical Management and Guidelines for Conduct” and “Codes of Ethical Conduct” have clearly specified policies for preventing conflicts of interest and requires all units to implement them. Open channels are provided internally and on the Company’s website for employees to present their opinions. In addition, the Company’s Directors recused themselves for those proposals that they have a conflict of interest in accordance with Article 15 of the Company’s “Rules of Procedure for Board of Directors’ Meetings” on directors’ recusal due to conflict of interest.</p> <p>(IV) The Group has established a complete and effective control mechanism in the accounting system and internal control system for business activities and operating procedures that have potentially high levels of unethical conduct. Internal auditors shall include high-risk operations as the primary audit items in the annual audit plan based on risk assessments to strengthen preventive measures, and report the actual implementation of the audit plan during regular Board meetings. In addition, through the Company’s annual self-assessment of internal controls, all departments and subsidiaries of the Company are required to self-examine the internal control system, in order to ensure the effectiveness of the system’s design and implementation.</p> <p>(V) 1. The “Ethical Corporate Management Best Practice Principles”, the “Procedures for Ethical Management and Guidelines for Conduct” and the “Codes of Ethical Conduct” established by the Company are disclosed in the “Corporate Governance” section of the official website and</p>

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management?	<p>on the Company’s internal website, as well as provided regularly re-training for current employee of whole group every year as well as training for new employees when they take office. The training aims for each employee to understand and abide by the Best Practice Principles. The information on "Ethical Corporate Management Best Practice Principles" and "Advocacy for prevention of Insider transaction" is disclosed on the Company's internal website for all employees to refer to, so as to convey the Company's philosophy of ethical management. In addition, relevant personnel are also appointed to participate in seminars and symposiums organized by public associations or professional organizations to strengthen the Group’s ethical corporate management policy.</p> <ol style="list-style-type: none"> <li>2. Two directors of the Company participated in the "Advocacy meeting for Insider equity transaction compliance in 2023" organized by the Securities and Futures Institute (SFI) in June 2023 and October 2023, and obtained 3 hours of training to strengthen the understanding and insights of the laws and practices of insider trading.</li> <li>3. From June 8, 2023 to June 23, 2023, the Group carried out the "Code of Conduct" training for all employees. A total of 2,566 employees completed the course and passed the test (100% pass rate).The course and test cover self-ethics control, intellectual property rights, data protection, accurate statement, import and export control, corruption and other improper exchanges of interest, competition and antitrust, conflicts of interest, insider trading, reporting, protection of whistleblowers from retaliation and punishment ...And so on.</li> <li>4. In addition, the new employee training arranged course dissemination about the important management regulations, such as “Corporate Governance Best Practice Principles”, “Sustainable Development Best Practice Principles”, "Ethical Corporate Management Best Practice Principles", “Codes of Ethical Conduct”, "Procedures for Ethical Management and Guidelines for Conduct" and “Supplier Code of Conduct”; in addition, they must complete the online education and training of " Code of Conduct " and pass the test within 7 days of on-board.</li> </ol> <p>In 2023, the total number of training hours for integrity management education and training was 1,486.5 hours, and there were 2,790 trainees.</p>

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<p>III. Operation of whistleblowing system</p> <p>(I) Does the company establish concrete whistleblowing and reward system and have a convenient reporting channel in place, and assign an appropriate person to communicate with the accused?</p> <p>(II) Does the company establish standard operating procedures for investigating reported cases, and does it take subsequent measures and implement a confidentiality mechanism after completing investigation?</p> <p>(III) Does the company provide proper whistleblower protection?</p>	<p>(I) In accordance with Article 23 of the Company’s “Ethical Corporate Management Best Practice Principles” and Article 21 of the “Procedures for Ethical Management and Guidelines for Conduct” on the whistle-blowing system, if members of the Group suspect or discover any violations, they shall report it to independent directors, executive officers, the chief internal auditor or other suitable personnel. In addition, there is a professional ethics violation reporting channel on the Company’s website for relevant personnel to report wrongdoings. The Ethical Management Promotion Task Group will accept reported cases and is responsible for forwarding reported cases to the top supervisor of the Group for investigation.</p> <p>(II) In accordance with Article 23 of the Company’s “Ethical Corporate Management Best Practice Principles” and Article 21 of the “Procedures for Ethical Management and Guidelines for Conduct”, records of the whistleblower report acceptance and investigation process and results shall be kept and retained, and the whistleblower’s identity and contents of the report shall be kept confidential. When any material misconduct or likelihood of material impairment to the Company comes to their awareness upon investigation, the dedicated personnel or unit handling the whistle-blowing system shall prepare a report and notify the independent directors in writing or via e-mail.</p> <p>(III) In accordance with Article 23 of the Company’s “Ethical Corporate Management Best Practice Principles” and Article 21 of the “Procedures for Ethical Management and Guidelines for Conduct”, the whistleblowers identity and contents of the report shall be kept confidential, and whistleblowers shall not be subject to improper treatment due to whistleblowing.</p>
<p>IV. Enhancing information disclosure</p> <p>Does the company disclose information regarding the company’s ethical corporate management principles and implementation status on its website and</p>	<p>The Company has disclosed these Best-Practice Principles on the Company’s website and Market Observation Post System, and its implementation in annual reports, sustainability reports and prospectus in accordance with Article 25 of the “Ethical Corporate Management Best Practice Principles”. Integrity is the Company’s most important core value and business philosophy. Employees must abide by clear ethical and character standards. The Company keeps its commitment</p>

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the Market Observation Post System?	to shareholders/banks, customers, employees, vendors and suppliers, and also does its utmost to ensure the interests and rights of all stakeholders.
<p>V. If the company has established Ethical Corporate Management Principles in accordance with “Ethical Corporate Management Best Practice Principles for TWSE/GTSM Listed Companies”, describe difference with the principles and implementation status: The Company established the “Ethical Corporate Management Best Practice Principles” to establish a corporate culture of ethical management and to achieve sound development. There is no deviation between actual operations and the Company’s Best Practice Principles.</p>	
<p>VI. Other important information to facilitate a better understanding of the company’s implementation of ethical corporate management: (e.g., review and amendment of the Ethical Corporate Management Best Practice Principles) The Company’s “Procedures for Ethical Management and Guidelines for Conduct” was amended in response to the regulations and the Company’s operation, and passed by the Board of Directors on August 2, 2023. Furthermore, the Company shall pay attention to the development of relevant domestic and international ethical management regulations, and encourage directors, executive officers and employees to attend training and propose improvements and suggestions to enhance the promotion performance of the Company ethical corporate management.</p>	