

Sinyi Group Code of Business Integrity

In order to strengthen the awareness of ethics in procurement matters and to standardize daily procurement management, the Group adheres to the principles of openness, fairness, impartiality, integrity, and objectivity and a business philosophy of legal, clean, honest, and trustworthy operation. We hope to find business partners through various channels that share these principles.

We also require Sinyi Group staff to resolutely uphold the Company's principles, conducting business in good conscience and honesty with a focus on the company's reputation and in line with the governing rules of Sinyi Group and other relevant laws and regulations. Staff shall not conduct or accept entreating or lobbying, nor shall they seek to obtain improper personal benefit. Any activity in breach of this or of the Group's operating philosophy will damage the credibility of both parties, and thus the following Code of Conduct has been established:

1) Staff of Sinyi Group shall not:

1. Use their work relationships to demand, agree to accept from, or accept from vendors bribes, rebates, gifts (of items or of money), cards, negotiable securities, valuables, refurbished products, or any other form of preferential transaction or improper benefit.
2. Demand, hint at, or accept meals, accommodation, transportation, entertainment, travel, dirty entertainment, or any other similar situations with free charge or preferential treatment from vendors connected with their formal duties.
3. Conduct procurement in a manner not in compliance with Company regulations or in a non-impartial manner, obstruct procurement efficiency, or leak confidential procurement information.
4. Use the premises of the Company or public property for personal business or activities, using their formal duties to raise funds or engage in commercial activities, or use confidential information obtained in the course of their duties for improper personal benefit.
5. Engage in other improper behaviors which may impact normal business operations.

2) The signatory party may not:

1. Overtly or covertly bribe staff of Sinyi Group, nor reimburse staff for expenses that should be paid by the individual;
2. Offer gifts (of items or of money), or any form of negotiable securities or other payment vouchers to Sinyi Group staff;
3. Provide any form of consumer entertainment to Sinyi Group staff;
4. Facilitate the shareholding, equity participation, part-time employment, or other personal profits of Sinyi Group staff with the signatory party. Make use of relationships with the signatory party through formal duties to borrow from said party, or to invest with said party, not through open transaction;
5. Use formal relationships with staff of Sinyi Group to introduce said staff's relatives

or friends to work for the signatory party;

6. Or engage in other improper behaviors which may impact normal business operations.

Should any concerns about possible violations of the above in the course of interaction between the two parties arise, we request that the other party be informed in order to protect both parties' rights and interests, build a good cooperative relationship, and maintain order in business. Should staff of the signatory party be found to have violated this Code of Conduct, the Group reserves the right to suspend or revoke cooperation or contracts, with the signatory party taking responsibility for any losses incurred.

Contact Hotline: 02-2755-7666 ext. 8180; Contact Email: EnterpriseEthics@sinyi.com.tw

Notifier : Sinyi Group

The signatory company acknowledges:

This Company has read your Company's Code of Business Integrity and hereby agrees to adhere to it strictly.

Signatory Company Name:

Signature or Seal of Authorized Representative:

Date (MM/DD/YYYY): ___/___/_____