

Wistron Corporation Code of Conduct

Wistron Corporation (hereinafter referred to as "Wistron" or the "Company") is committed to corporate sustainability, and we understand that in the pursuit of sustainable growth of the Company, our business strategy must consider the impact and impact on society and the environment, so we continue to strive forward with the vision of "Sustainability through Innovation". This Code of Conduct (hereinafter referred to as the "Code") is hereby established to establish a consistent value and culture among all Wistron employees and to conduct business activities in accordance with the principles. This Code applies to all personnel, including directors, supervisors, managers and employees of the Company, its subsidiaries and its influential joint ventures.

Chapter 1 Business ethics and operations

Integrity is the core value of Wistron and the foundation of our business. We are committed to implementing the Company's core values, adhering to a high level of professional ethics, and requiring all personnel to abide by ethical standards of conduct in their daily work and business to safeguard the Company's reputation.

Article 1 Corruption and bribery

Integrity is Wistron's core value and the foundation of its business operations. We firmly prohibit any corruption, bribery, and any improper benefits. This applies equally to all business operations and we will never condone the acceptance or giving of any presents, gifts, or entertainment that could be considered a bribe.

1. In the process of engaging in commercial activities, it is not allowed to directly or indirectly provide, promise, request, or engage in other acts that violate good faith, illegality or breach of fiduciary duty.
2. When accepting gifts or entertainment arising from the performance of duties, it should be based on the premise that it does not affect the execution of business or conflicts of interest and is in accordance with the principle of normal social etiquette and norms.

Article 2 Conflict of interest

1. All employees of Wistron shall refrain from any situation that may cause a conflict of personal interests with the interests of the Company in the course of engaging in business activities. When aware/confronted with (without limitation) the following circumstances, the Company shall proactively and adequately report to the immediate supervisor and the top executive of the human resources unit (for relevant people other than the Directors) or the Board of Directors (for the Directors) any situation in which personal interests may conflict with the interests of the Company:
 - (1) The position held or the business performed may cause improper benefits (including but not limited to money, gifts, commissions, positions, services, preferential treatment, kickbacks, etc.) to themselves, their spouses, or relatives within the third degree of kinship, or affect the handling and judgment of official duties.
 - (2) Activities outside the Company may directly compete with the Company's business, or any circumstances that may hinder the performance of one's duties and responsibilities.

- (3) Using the Company's resources (such as information, items, property, etc.) to engage in activities other than the Company's business without the Company's permission.
2. At the time of the appointment process, the spouse or third-degree relative of the proposed person is already in the same department, the application shall be approved by the CEO.

Article 3

Fair trading

Wistron prohibits unfair competition and shall comply with the following principles when engaging in commercial activities:

1. Business activities shall be carried out in accordance with relevant competition laws and regulations, and shall not fix prices, conduct bid rigging, limit production and quotas, or share or divide markets by allocating customers, suppliers, operating areas or types of business.
2. If there are any relevant doubts in the execution of business, the head of the unit or the Legal department should be consulted immediately; Any situation that may involve or violate the relevant regulations should be reported to the top supervisor of the unit immediately.

Article 4

Insider trading

Regulations regarding insider trading must be observed to safeguard the interests of the investing public, ensure that buyers and sellers receive equal information, and promote fairness in securities market transactions. The following conduct is prohibited:

1. Upon knowledge of material news affecting the Company's stock price, after such news becomes clear but before it is made public, or within 18 hours after it is made public, buying or selling, either personally or under the name of another person, the Company's listed or over-the-counter securities (or other equity securities).
2. Upon knowledge of material news affecting the Company's ability to pay principal and interest, after such news becomes clear but before it is made public, or within 18 hours after it is made public, selling, either personally or under the name of another person, the Company's listed or over-the-counter non-equity corporate bonds.

Article 5

Money laundering

The Company abides by the relevant laws and regulations on anti-money laundering, prohibits and combats money laundering, tax evasion, sanctions violations and other criminal activities, adopts zero tolerance policy for money laundering crimes, is committed to strengthening various anti-money laundering mechanisms, cooperates with the requirements of financial institutions, provides relevant documents required for identity confirmation, and enhances the awareness and vigilance of employees to prevent money laundering and fraud.

Article 6

Political contributions

Wistron employees who make direct or indirect contributions to political parties or organizations or individuals involved in political activities shall follow the following principles:

1. When Wistron engages in political contributions, it shall comply with relevant laws and regulations and shall not seek commercial benefits or trading advantages. Any legal political contribution made in the name of

Wistron, regardless of the amount, must be approved by the Chairman of the Board of Directors.

2. Wistron personnel shall not make political contributions directly or indirectly on behalf of the Company without approval.
3. Do not engage in any political activity on any of the Company's property, facilities or during working hours.

Article 7

Charitable contributions & social engagement

In line with Wistron's altruistic philosophy, we invest resources in fulfilling our corporate citizenship responsibilities through charitable contributions and social engagement. The legal charitable contributions or sponsorships made by Wistron shall be handled in accordance with the "Regulations for the Administration of Charitable Contributions and Sponsorships" and shall not be disguised as bribery or profiteering. Charitable contributions or sponsorships should be made in accordance with the following principles:

1. Comply with the laws and regulations of the place of operation.
2. The feedback received because of the sponsorship shall be clear and reasonable and shall not be the object of business dealings or people with whom Wistron has an interest.
3. After a charitable contribution or sponsorship, it should be confirmed that the purpose of the money flow is consistent with the purpose of the contribution.

Article 8

Information security

1. To protect the rights and interests of the Company's assets and stakeholders, Wistron has formulated an "Information Security Policy" to continuously strengthen information security governance and establish a sound information security system and mechanism to ensure confidentiality, integrity and availability of information assets.
2. All Wistron personnel must comply with the following behaviors:
 - (1) Confidential information must not be disclosed.
 - (2) Unauthorized access to other people's information is not permitted.
 - (3) Downloading, installing, and distributing unauthorized software or data is prohibited.
 - (4) Do not illegally intercept network packets and hack into other people's computer systems.
 - (5) Do not set up or distribute programs or devices that intrude into the systems of others.
 - (6) Do not use the Company's network resources to carry out work not related to the Company's business.
 - (7) Do a good job of maintaining the security of personal computer use, such as installing anti-virus software, setting strong passwords, installing patches, etc.
 - (8) Bringing storage media such as laptops and diskettes into and out of the Company must comply with the relevant control measures of each district.
 - (9) If there is a violation, in addition to reporting the relevant records to the supervisor for supervision and improvement, if the circumstances are serious, the disciplinary action and legal responsibility will be dealt with in accordance with the relevant rewards and disciplines of the Company.

Chapter 2 Protection of human rights

Article 9 Human rights

1. Human rights assessment

We regularly conduct human rights risk assessments/due diligence and take appropriate improvement actions to mitigate the negative impact of human rights protections.

2. Anti-discrimination

There is no discrimination based on geography, race, ethnicity or upbringing, social class, ancestry, religion, physical disability, gender, sexual orientation, pregnancy, marital status, trade union membership, political affiliation, appearance, age or union affiliation. We also encourage the employment of people with disabilities.

3. Humane treatment and anti-forced labor

prohibit inhumane treatment of employees, including any form of violence, harassment, assault, corporal punishment, mental or physical oppression, bullying, public humiliation, or verbal abuse; Nor shall any such act be threatened. It is strictly forbidden to force laborers to provide labor services by means of forced labor, bonded labor, imprisonment or threats of violence.

Article 10 Privacy protection

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

2. Wistron's actions regarding privacy protection are as follows:

(1) In accordance with the relevant laws and regulations on privacy protection and legitimate business activities, the provision, collection, use and retention of personal information shall not exceed the specific purpose and object.

(2) For the protection of personal information, a strict security control mechanism is adopted to prevent illegal intrusion and illegal access to data.

Article 11 Occupational safety and health

1. It is Wistron's responsibility and obligation to provide a healthy and safe working environment for all workers. We have established an occupational safety and health management system, conducted risk assessment and process improvement to reduce health and safety hazards, formulated an "Occupational Safety and Health Policy", and committed to:

(1) Continuously improve the operation and performance of the occupational safety and health management system.

(2) Enhance worker consultation, participation and awareness.

(3) Prevent injuries and ill-health of personnel.

2. In the management of the sites, we take the following measures to protect all workers:

(1) Control and reduce hazards through management, prevention and

early warning mechanisms, such as engineering controls and protective protection.

- (2) Implement measures for the protection of motherhood and protect pregnant and lactating women.
- (3) Establish emergency response plans and procedures and conduct regular drills to respond to various emergencies.
- (4) Establish procedures to prevent and manage work-related injuries and diseases and assist employees in returning to work.
- (5) For related machinery and equipment, regular maintenance and overhaul to prevent injuries.
- (6) Provide healthy, safe and hygienic meals and dormitories.
- (7) Provide relevant education and training and post announcements to improve safety awareness.

Chapter 3 Environmental protection

To reduce the negative impact of operations on the environment, Wistron is committed to environmental friendliness while continuing to develop high-quality green products and services. We have formulated an "Environmental Policy" and a "Nature and Biodiversity and Non-Deforestation Policy" to reduce pollution emissions and conserve energy and reduce carbon emissions:

1. We are committed to reducing energy use and increasing the proportion of renewable energy to mitigate climate change.
2. Support the procurement and improvement of energy-efficient equipment and adopt environmentally friendly technologies to reduce pollutant emissions.
3. Implement water recycling, waste reduction and recycling.
4. Provide green products and services, implement the concepts of energy conservation and carbon reduction, material saving, prohibition of harmful substances and resource recycling.
5. Maintain, enhance and protect biodiversity and prevent any deforestation to reduce the consumption of natural resources.

Article 12 Reduce greenhouse gas emissions and reduce the impact on climate change through the implementation of climate-related financial disclosures (TCFD), greenhouse gas reduction, improved energy efficiency and increased the proportion of renewable energy.

Article 13 Implement water resource management and daily water conservation and improve the efficiency of water resource utilization; Effluent is properly treated before discharge and continuously monitored to ensure compliance with regulatory standards.

Do not use prohibited substances and raw materials and actively promote waste reduction and recycling; making technical improvements and finding environmentally friendly materials; Assess/inventory the generation and flow of waste and toxic substances, minimize waste output, and recycle and reuse; Reduce pollutants by treating emissions with environmentally friendly technologies.

Article 14 We are committed to product R&D, design, manufacturing and service, integrating the concept of circular economy with life cycle thinking, carrying out sustainable product design and development, and making sustainable use of resources to form a green and circular sustainable business model.

Article 15 Avoid operating activities near important biodiversity; Conduct risk

assessments of biodiversity and deforestation at business sites, product design and development, and raw material procurement, and mitigate the impact on biodiversity by avoiding, minimizing, restoring, and offsetting.

Chapter 4 Management mechanisms

Article 16 Authorities and responsible units

Wistron Global Human Resources & Administration has the primary authority and responsibility for the implementation of this Code and has established the necessary procedures to ensure the implementation of this Code.

Article 17 Compliance

All Wistron personnel are expected to comply with all the norms of this Code, and their actual implementation has been included in the performance evaluation, and the results of the evaluation may affect their bonuses and promotions.

Article 18 Training

Conduct annual training on this Code and the whistleblowing mechanism for all personnel and evaluate the effectiveness of the training.

Article 19 Penalties for violations

We have a zero-tolerance policy for any violations of this Code, and we will thoroughly investigate reported violations and deal with them in a timely manner. In case of violation of this Code, Wistron may impose penalties and withhold partial performance bonuses/bonuses depending on the severity of the circumstances; If the violation of this Code is serious, the employment contract may be terminated in accordance with the relevant laws and regulations of each location and the provisions of the employment contract, and the case will also be submitted and compensation will be sought in accordance with applicable laws and regulations.

Article 20 Consultation channels

Any questions regarding this Code may be raised through Wistron's Global Human Resources and Administration department. Subsidiaries and joint ventures over which the Company has significant influence may each establish consultation channels.

Article 21 Report acceptance mechanism

Wistron's Global Human Resources and Administration department is the main unit responsible for reporting cases. Anyone can report through the email address (Ethic@wistron.com) or platform set up on the official website. After acceptance, the case will be handled or investigated by a dedicated person/unit depending on the nature and content of the case. If the report involves a general employee, it should be reported to the department head or the chief executive of the Global Human Resources and Administration department; if the report involves a director or senior executive, it should be reported to the chief executive of the Audit department or an independent director. The Audit department shall be responsible for supervising the investigation and handling procedures for reports.

For the reported cases accepted, the investigation activities shall be carried out in accordance with the following procedures:

1. According to the nature of the case, an independent department/person will be assigned to be responsible for the execution of the investigation activities, and the relevant confidentiality principles shall be observed.

2. Collect the background of the case and relevant secondary information.
3. Interview the informant, the person being reported, and other people related to the case, and further collect relevant primary information.
4. Analyze and evaluate all case documents to confirm whether there are any violations of this Policy, internal regulations, or related laws.
5. Submit a case investigation report and recommend appropriate measures.

Wistron is committed to maintaining the confidentiality of the identity of the whistleblower and the content of the report and accepts anonymous reports. Wistron has adopted a zero-tolerance policy for retaliation for whistleblowing actions, and has taken the following disciplinary measures to protect whistleblowers from mistreatment for reporting incidents, depending on the severity of the retaliation and the extent of the violation of this Policy

1. Implement disciplinary action, including verbal or written warnings, temporary suspension, and termination of employment.
2. Assist whistleblowers in pursuing their legal rights, depending on the circumstances of the individual case, if there is suspicion of illegal activity.
3. Through educational training and promotion of the Code of Conduct, emphasize the importance of protecting whistleblowers and educate employees on the definition and consequences of retaliation to prevent similar incidents from recurring.

Article 22 Implementation and revision

This policy shall be implemented upon approval by the Board of Directors, and the same shall apply to any amendments.

This Policy was formulated on December 23rd, 2021.

The first revision was made on March 16th, 2022.

The second revision was made on May 11th, 2023.

The third revision was made on August 12th, 2024.

The fourth revision was made on August 12th, 2025.