

# WT Microelectronics Co., Ltd.

## Codes of Ethical Conduct

### **Article 1 Purpose of and basis for adoption**

It is advisable that the Company shall establish the codes of ethical conduct for the directors, managerial officers and employees of the Company to comply with ethical standards, and for the interested parties to better understand the ethical standards of the Company.

### **Article 2 Applicable subjects**

The codes are applicable to the directors, managerial officers and employees of the Company. The applicable subjects are hereinafter referred to as the "personnel of the Company".

### **Article 3 Principles of integrity and faithfulness**

The Company and its personnel shall comply with the regulations of relevant laws and the codes when they conduct business operation and their tasks. They shall act in accordance with the principles of integrity and faithfulness and the following codes to reach high ethical standards.

### **Article 4 Prevention of conflicts of interest**

The personnel of the Company shall perform their duties in an objective and efficient manner and shall not take advantage of their position in the Company to obtain improper benefits for either themselves or their spouse, parents, children, or relatives within the second degree of kinship.

The Company shall pay special attention to loans of funds, provisions of guarantees, and material asset transactions or the purchase (or sale) of goods involving the affiliated enterprise at which the personnel of the Company work. The Company shall establish a policy aimed at preventing conflicts of interest, and shall offer appropriate means for personnel to voluntarily explain whether there is any potential conflict between them and the Company.

### **Article 5 Minimizing incentives to pursue personal gain**

When the Company has an opportunity to gain a profit, the personnel of the Company are responsible for increasing the legitimate and legal interests that the Company can obtain.

They shall not engage in any of the following activities:

- (1) Seeking an opportunity to pursue personal gain or obtaining personal gain by using company assets or information, or taking advantage of their positions.
- (2) Competing with the Company.

### **Article 6 Confidentiality**

The personnel of the Company shall be bound by the obligation to maintain the confidentiality of any information regarding the Company itself or its suppliers and customers, except when authorized or required by law to disclose such information. Confidential information includes any undisclosed information that, if exploited by a competitor or disclosed, could result in damage to the Company or the suppliers and customers.

### **Article 7 Fair trade**

The personnel of the Company shall treat all suppliers and customers, competitors, and employees fairly, and may not obtain improper benefits through manipulation, nondisclosure, or misuse of the information learned by virtue of their positions, or through misrepresentation of

important matters, or through other unfair trading practices.

#### **Article 8 Safeguarding and proper use of company assets**

The personnel of the Company have the responsibility to safeguard company assets and to ensure that they can be effectively and lawfully used for official business purposes in order to prevent any theft, negligence in care, or waste.

#### **Article 9 Legal compliance**

The personnel of the Company shall comply with all the laws and regulations on the activities and the policies of the Company, and they shall also comply with the regulations about insider trading in the Securities and Exchange Act. They shall not engage in the trading of related securities while holding material information of the Company which is not yet disclosed.

#### **Article 10 Encouraging reporting on illegal or unethical activities:**

The personnel of the Company shall report to an independent director, managerial officer, chief internal auditor, or other appropriate individual upon suspicion or discovery of any activity in violation of a law or regulation or the codes of ethical conduct, and they shall also provide enough information for the Company to handle the following affairs.

The Company will handle the reported case in a confidential manner and will be verified by an independent channel and protect the informer.

#### **Article 11 Disciplinary measures and remedies**

When any personnel of the Company violates the codes of ethical conduct, the Company shall handle the matter in accordance with related regulations.

The Company established a relevant complaint system to provide the violators with remedies. They may apply for remedies in accordance with related regulations.

#### **Article 12 Procedures for exemption**

The codes of ethical conduct adopted by the Company must require that any exemption for the applicable subjects from compliance with the codes be adopted by a resolution of the board of directors, and that information on the date on which the board of directors adopted the resolution for exemption, objections or reservations of independent directors, and the period of, reasons for, and principles behind the application of the exemption be disclosed without delay on the MOPS.

#### **Article 13 Method of disclosure**

The Company shall disclose the codes of ethical conduct it has adopted and any amendments to them on its company website, in its annual reports and prospectuses and on the MOPS.

#### **Article 14 Enforcement**

The codes of ethical conduct and any amendments to them shall enter into force after adoption by the board of directors.

The codes of ethical conduct were established on December 1, 2014.

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

The 2ed amendment was made on August 8, 2019.