

# Eris Technology Corporation

The specific practices and implementation status of the company's integrity management policy

## **Policies and Regulations**

"Integrity" is one of Eris Technology Corporation's core values. To foster an honest and accountable corporate culture and actively prevent unethical conduct, the company has established the "Eris Technology Corporation Procedures for Ethical Management" and "Code of Conduct" and "Guidelines for Ethical Business Practices" in accordance with the "Eris Technology Corporation Principles of Ethical Management" and relevant local laws and regulations. These policies were approved by the Board of Directors and subsequently implemented.

In line with the "Principles of Ethical Management," the company has established a mechanism for assessing risks associated with unethical conduct. This includes regularly analyzing and evaluating business activities within its operational scope that pose higher risks of unethical behavior. Furthermore, the company has implemented preventive measures covering all types of conduct stipulated in Article 7, Paragraph 2 of the "Ethical Corporate Management Best Practice Principles for TWSE/TPEx Listed Companies."

## **Implementing "Ethics"**

- ✓ In May 2024, the company established the "Risk Control and Management Center," with the Chairperson serving as its highest authority. The center leads dedicated personnel in implementing operational risk control to align with the company's business ethical policy. The Director of the Management Center is responsible for planning and overseeing educational training related to promoting the company's ethical policies.
- ✓ In October 2024, the company provided a 3-hour educational awareness program to all 11 directors and managers. The content covered "Prevention of Insider Trading," "Employee Code of Conduct," and the "Principles of Ethical Management."
- ✓ During 2024, the company also conducted 6-hour educational awareness programs for 120 employees, as needed or deemed necessary.
- ✓ The "Prevention of Insider Trading" course content included the elements constituting insider trading, methods and timing of material information disclosure, penalties, judicial precedents, and regulations concerning insider stock ownership changes.
- ✓ The "Employee Code of Conduct" and "Ethical Business Practices" course content included protection of trade secrets, fair competition, anti-bribery and anti-corruption, prevention of conflicts of interest, and adherence to relevant laws and regulations.
- ✓ To reinforce employees' commitment to ethics, we also conducted ethics policy awareness sessions during employee town-hall meeting. This ensures employees clearly understand the company's ethics philosophy and guidelines and apply them concretely in their daily work,

thereby enhancing the overall conduct and professional ethics of our personnel. In 2024, a total of 200 participants received 300 hours of internal and external training related to ethical management (including courses on legal compliance, corporate social responsibility, accounting systems, and internal controls).

### **Anti-Competitive Practices**

- ✓ The company has established a Code of Ethical Management that mandates conducting business activities in accordance with relevant competition laws. This prohibits price fixing, voting manipulation, output and quota restrictions, or market sharing/division through allocation of customers, suppliers' operating territories, or types of business. Operationally, the company fully understands that compliance with fair competition is a critical aspect of business activities.
- ✓ The company strictly adheres to all relevant laws and regulations. In 2024, the company was not subject to any penalties from regulatory authorities for violations related to anti-competitive behavior or monopolistic practices.

**2024 Company Performance on Ethical Management and Differences from TWSE/TPEX-Listed Company Ethical Management Best Practice Principles**

Evaluation Item	Implementation Status			Deviations from "the Corporate Governance Best-Practice Principles for TWSE/TPEX Listed Companies" and Reasons
	Yes	No	Executive Summary	
<p>1. Establishing Ethical Management Policies and Programs</p> <p>(1) Has the company established an ethical management policy approved by the Board of Directors, and clearly articulated its ethical management policies, practices, and the commitment of the Board and senior management to actively implement these policies in its regulations and external documents?</p> <p>(2) Has the company established a mechanism for assessing risks associated with unethical conduct, regularly analyzed and evaluated business activities within its operational scope that pose higher risks of unethical conduct, and based on this, formulated programs to prevent unethical conduct? Do these programs at least cover preventive measures for all types of conduct stipulated in Article 7, Paragraph 2 of the " Ethical Corporate Management Best Practice Principles for TWSE/TPEX Listed Companies"?</p> <p>(3) Does the company's unethical conduct prevention program clearly define operating procedures, behavioral guidelines, disciplinary actions for violations, and a complaint system? Are these effectively implemented and is the aforementioned program regularly reviewed and revised?</p>	√		<p>(1) To bolster our company's ethical business culture and foster sound development, we have established "Principles of Ethical Management," "Code of Conduct," and "Corporate Governance Best Practice Principles," all of which have been approved by the Board of Directors and are disclosed on the company's website. Integrity is our core value and the bedrock of our business operations. These principles apply to all our directors (including independent directors), managers, employees, and any parties with substantial control.</p> <p>(2) We have established a mechanism for assessing risks associated with unethical conduct based on our "Principles of Ethical Management." This involves regularly analyzing and evaluating business activities within our operational scope that pose higher risks of unethical conduct. These measures comprehensively cover the preventive actions outlined in Article 7, Paragraph 2 of the " Ethical Corporate Management Best Practice Principles for TWSE/TPEX Listed Companies."</p> <p>(3) Our "Principles of Ethical Management" define a program for preventing unethical conduct, which includes specific operating procedures and behavioral guidelines. Furthermore, our "Code of Conduct" outlines disciplinary actions for violations and establishes a complaint system. We regularly review the appropriateness and effectiveness of this prevention program. The "Code of Conduct"</p>	None

Evaluation Item	Implementation Status			Deviations from "the Corporate Governance Best-Practice Principles for TWSE/TPEx Listed Companies" and Reasons
	Yes	No	Executive Summary	
			also clearly specifies prohibited behaviors, including principles and standards for avoiding conflicts of interest, handling gifts and business entertainment, political contributions, and charitable donations, as well as criteria for assessing ethical violations. Additionally, it defines reporting channels and operational procedures. In May 2024, the company established a "Risk Control and Management Center," with the Chairperson serving as its highest authority. This center leads dedicated personnel in implementing operational risk control to ensure compliance with the company's ethical management policy. The Risk Control Center under the Chairperson's Office and the Director of the Management Center are jointly responsible for planning and formulating educational training initiatives to promote the company's ethical management policy.	
<p>2. Implementing Ethical Business Practices</p> <p>(1) Does the company evaluate the integrity records of its business partners and include clear ethical conduct clauses in contracts signed with them?</p> <p>(2) Has the company established a dedicated unit under the Board of Directors responsible for promoting corporate ethical management? Does this unit</p>	√		<p>(1) Before establishing business relationships, our company assesses the counterparty's operational legality, ethical management policies, and any history of unethical conduct. During commercial engagements, we inform the counterparty of our company's ethical management policy and relevant regulations. We explicitly refuse to directly or indirectly offer, promise, request, or accept any improper benefits, regardless of form or name. Should unethical conduct be discovered, we immediately cease business interaction and designate the party as ineligible for future engagement. Our commercial contracts prohibit business activities associated with unethical conduct risks, including clearly defined and reasonable payment terms, procedures for handling situations involving unethical behavior, and clauses addressing violations related to commissions, kickbacks, or other benefits. These provisions are continuously reviewed to ensure the ongoing effectiveness of the system.</p> <p>(2) In May 2024, the company established a "Risk Control and Management Center," with the Chairperson serving as its highest authority. The execution of its work is primarily overseen by the</p>	None

Evaluation Item	Implementation Status			Deviations from "the Corporate Governance Best-Practice Principles for TWSE/TPEx Listed Companies" and Reasons
	Yes	No	Executive Summary	
<p>regularly (at least annually) report to the Board on its ethical management policies, programs for preventing unethical conduct, and the status of their implementation and oversight?</p> <p>(3) Has the company formulated a conflict of interest prevention policy, provided appropriate channels for disclosure, and effectively implemented it?</p> <p>(4) To implement ethical business practices, has the company established effective accounting and internal control systems? Does the internal audit unit develop relevant audit plans based on the assessment results of unethical conduct risks, and then audit compliance with the unethical conduct prevention program accordingly, or engage certified public accountants to perform such audits?</p> <p>(5) Does the company regularly conduct internal and external education and training on ethical management?</p>			<p>Risk Control Center under the Chairperson's Office and the Director of the Management Center, who are responsible for planning and formulating the company's ethical management policies and related measures, as well as their supervision. The center reports its performance to the Board of Directors annually. No significant violations occurred in 2024.</p> <p>(3) Our "Principles of Ethical Management" and "Code of Conduct" clearly stipulate conflict of interest clauses and require relevant personnel to recuse themselves when such situations arise. The guidelines also mandate that employees proactively and fully report to their direct supervisor, the head of Human Resources, or the Board of Directors when they become aware of or face similar circumstances.</p> <p>(4) Based on the principles of ethical management, our company annually evaluates the effectiveness of the design and implementation of our internal control systems, including the accounting system, considering changes in the operating environment. These systems are amended as necessary and reviewed by the internal audit unit.</p> <p>(5) New employees, including newly appointed managers, receive ethics and integrity training on their first day of employment. All employees are required to regularly complete online learning courses on relevant topics. In 2024, a total of <b>200 participants</b> received <b>300 hours</b> of internal and external training related to ethical management issues (including courses on legal compliance, corporate social responsibility, accounting systems, and internal controls).</p>	

Evaluation Item	Implementation Status			Deviations from "the Corporate Governance Best-Practice Principles for TWSE/TPEx Listed Companies" and Reasons
	Yes	No	Executive Summary	
<p>3. Operation of the Company's Whistleblower System</p> <p>(1) Has the company established a concrete whistleblower and incentive system, created convenient reporting channels, and designated appropriate dedicated personnel to receive reports concerning the accused parties?</p> <p>(2) Has the company established standard operating procedures for investigating reported matters, defined subsequent actions to be taken upon completion of investigations, and implemented relevant confidentiality mechanisms?</p> <p>(3) Does the company implement measures to protect whistleblowers from improper treatment as a result of their reports?</p>	√		<p>(1) Any individual who discovers a violation of the Code of Conduct may report it directly to an Independent Director, the head of Human Resources, the head of the Audit Unit, the Chairperson, or through the employee complaint channel.</p> <ul style="list-style-type: none"> <li>➤ To prevent malicious or false accusations, whistleblowers must provide their authentic name (with ID identification), contact number (detailed contact information), and a clear description of the alleged misconduct.</li> <li>➤ Managers or employees found in violation will be disciplined according to the "Employee Reward and Punishment Procedures" based on the severity of the offense, which may include termination of employment or rescission of appointment. For business partners involved in transactions that violate principles of integrity and honesty, the company will take serious action, ranging from reducing or canceling their cooperative relationship with the company to referring the matter to the appropriate judicial authorities, depending on the severity of the circumstances.</li> </ul> <p>(2) The company has established a Complaint Procedure with clear operating processes for submitting, investigating, and resolving complaints. The company maintains full confidentiality for all personnel and information involved in the complaint or accusation throughout the entire process.</p> <p>(3) The company has established operational guidelines for its whistleblower system to ensure that all individuals involved in the investigative process, whether reporting or being reported, are protected from unfair retaliation or treatment. This adheres strictly to</p>	None

Evaluation Item	Implementation Status			Deviations from "the Corporate Governance Best-Practice Principles for TWSE/TPEx Listed Companies" and Reasons
	Yes	No	Executive Summary	
			<p>Article 22 of the company's "Principles of Ethical Management," which addresses the confidentiality of the whistleblower's identity and the reported content, as well as measures to protect whistleblowers from improper treatment due to their reports. To ensure effective implementation of ethical integrity, the company provides a dedicated complaint hotline in the stakeholder section of its official website. Additionally, an "Office of the General Manager Mailbox" is available on the company's internal network for employee reports.</p> <p>➤ If any individual is found to have violated laws or engaged in unethical behavior, internal and external parties can report such incidents through the aforementioned channels. Cases are handled with appropriate confidentiality. The company is committed to protecting whistleblowers from improper treatment due to their reports. If an investigation confirms an ethical violation, disciplinary action will be taken in accordance with relevant laws or employee disciplinary procedures.</p> <p>The company will retain all records related to such reports for a period of three years.</p> <p>In 2024, the company's Ethical Complaint Mailbox received zero complaint cases.</p>	
<p>4. Enhanced Information Disclosure</p> <p>Does the company disclose the content of its established Principles of Ethical Management and its implementation effectiveness on its website and on the Market Observation Post System?</p>	√		<p>Our company discloses its adherence to the "Principles of Ethical Management" on our official website and the Market Observation Post System. We also report on our implementation status in our Sustainability Report.</p>	None
<p>5. If the company has established its own Code of Ethical Management in accordance with the " Ethical Corporate Management Best Practice Principles for TWSE/TPEx Listed Companies" please describe any differences in its operation compared to the stipulated code.</p>				

Evaluation Item	Implementation Status			Deviations from “the Corporate Governance Best-Practice Principles for TWSE/TPEx Listed Companies” and Reasons	
	Yes	No	Executive Summary		
No deviations.					
6. Other Important Information Pertaining to the Company's Ethical Management Operations (e.g., Circumstances Surrounding the Company's Review and Revision of its Established Principles of Ethical Management) The company undertakes the following proactive measures regarding ethical management and legal compliance:  (1) Our company has established " Insider trading and management procedures for major internal information". These prohibit company insiders from trading securities based on non-public market information and serve as the foundation for our company's major internal information handling and disclosure mechanisms. (2) Insiders include our company's directors, major shareholders, managers, and natural persons designated to act on behalf of a corporate shareholder in accordance with Article 27, Paragraph 1 of the Company Act. It also includes other individuals who meet the criteria of Article 157-1, Paragraphs 1 and 2 of the Securities Exchange Act, and other persons who have learned of major internal information of our company due to their status, occupation, or controlling relationship, and who have not lost such status for six months. Our company shall ensure their compliance with the relevant provisions of these operating procedures. (3) Prior to their appointment, our company provides educational awareness training on insider trading prevention and management to newly appointed directors and managers, ensuring they understand the relevant laws and regulatory requirements.					