

# **Anti-Corruption Statement**

December 10, 2024

In response to the United Nations Convention against Corruption (UNCAC) and the anti-bribery and anti-corruption policies of various countries, we, TSRC Corporation ("**TSRC**"), hereby declare a zero-tolerance stance toward corruption. TSRC requires all directors, supervisors, managers and employees of TSRC and its subsidiaries, as well as agents, distributors, suppliers, and other persons who have business dealings with TSRC and its subsidiaries, to comply with the following anti-corruption regulations:

## 1. No Self-Serving Interest

All personnel should not use any company asset or information, or their position or power to obtain any illegitimate benefit for themselves or others. It is also prohibited to seek personal gains or compete with the company by using any company resource.

## 2. Avoidance of Conflict of Interest

TSRC's "Conflict of Interest Management Procedure" serves as guidelines for handling conflicts of interest. The relevant provisions require certain personnel to complete questionnaires disclosing their conflicts of interest annually. If any personnel find any actual or potential conflict of interest involving himself/herself, his/her spouse, or any of his/her close relatives, he or she should report such circumstance to the manager and HR Department, and avoid related participation in accordance with the applicable regulations.

## 3. No Insider Trading

TSRC's "Management Procedure for Insider Trading" requires the personnel to comply with the relevant securities and exchange laws and the company's insider trading policies. No insider trading should be made using any material information not yet in the public domain. The personnel are also prohibited from disclosing any such information to anyone or having it used by others to conduct any trade.



## 4. No Bribery

The personnel, as well as all business partners, are strictly prohibited from directly or indirectly offering, promising to offer, requesting, or accepting any form of improper benefit (including any improper money, gift, commission, position, service, privilege, rebate, and facilitation payment attributable to one's position or influence). Any business partner in violation of the foregoing will be blacklisted, and if any personnel is consequently threatened or intimidated, such personnel should immediately seek help and report this circumstance to his/her close supervisor.

## 5. No Unreasonable Gift or Hospitality

TSRC's "Gift and Entertainment Policy" establishes standards for gifts, entertainment and hospitality occurring during personnel's performance of duties at work. According to the relevant regulations, the personnel should not directly or indirectly offer or receive any unreasonable gift, entertainment, hospitality, or anything that may prejudice the company's reputation. The personnel should immediately return any gift, entertainment or hospitality which may involve any improper benefit, and if such gift, entertainment or hospitality cannot be returned or avoided, the personnel should report this circumstance to his/her close supervisor and the HR department and act in accordance with the relevant regulations.

## 6. No Political Donations or Improper Charitable Donations

We ban any political donation and bribery on the pretext of charitable donations or sponsorship. Each donation should not only comply with the local laws but also be approved by an authorized officer of the company and recorded in writing in accordance with the relevant regulations to confirm that the donation will be used for the specified purpose.

## 7. Business Partners Assessment and Management

TSRC's "Supplier Code of Conduct" states our business partners that we adhere to ethical management. Before establishing any business relationship, we will assess whether the counterparty has any misconduct record and include ethical management terms in contracts. In the event of any breach of any such term, we may at any time terminate the contract, request compensation by the terms of the



agreement, and blacklist such a counterparty from doing any business with TSRC.

## 8. Educational Training and Assessment

TSRC conducts periodic educational training and outreach activities to communicate its ethical management principles and disciplinary actions to TSRC's personnel and business partners. The execution outcome should be factored into the performance assessment.

## 9. Audit and Control

TSRC will establish effective accounting and internal control systems to ensure transparency of financial information and risk management. The relevant audit department should audit the implementation of the systems periodically and make reports to the board of directors.

## **10.** Whistleblowing Channels and Protection of Whistleblowers

TSRC's "Management Procedure for Whistleblowing" provides that anyone discovering any unlawful, immoral or unethical conduct, including any potential or actual corruption, may report it through the following channel.

The Company also undertakes to protect whistleblowers; it will not only keep the whistleblower's identity in strict confidence but also ensure that anyone against the whistleblower can make no threat or retaliation.

Mode of Whistleblowing	Reporting Channel
Online	Please go to TSRC's official webpage: https://www.tsrc.com.tw/tw/whistleblowing/
By mail	<ul> <li>Please mail to TSRC's physical mailbox:</li> <li>(1) To TSRC's director or CEO: Address: Chairperson's Office, TSRC Corporation 18F, No. 95, Sec. 2, Dunhua S. Rd., Taipei City</li> <li>(2) To TSRC's other colleagues: CEO Office, TSRC Corporation 18F, No. 95, Sec. 2, Dunhua S. Rd., Taipei City</li> </ul>

Note: This Statement is made based on TSRC's "Code of Ethics" and "Code of Business Conduct".