

ITE

Ethical Corporate Management Best Principles

Article 1 (Purpose and Scope of Application)

Based on the Company's the principles of fairness, honesty, trustworthiness and transparency in business activities, and in order to implement the ethical corporate management policy and actively prevent unethical conducts, the procedures and Code of Conduct are formulated in accordance with the " Ethical Corporate Management Best Practice Principles for TWSE/TPEX Listed Companies " to specifically regulate the company. The matters that the Company's personnel should pay attention to when conducting business.

The scope of application of the procedure and Code of Conduct applies to group enterprises and organizations, including subsidiaries of the Company, legal entities that the Company directly or indirectly contributes more than 50% of their paid-in capital, and other institutions or legal entities which the Company has substantial control over.

Article 2 (Applicable objects)

The Company's personnel referred to in this procedure and Code of Conduct refer to the directors, supervisors, managers, employees and appointees and individuals with substantial control ability of the Company and group enterprises and organizations.

Any the Company's personnel provide, promise, demand, or accept any improper benefits through a third party, then it is presumed that such deeds are done by the Company's personnel.

Article 3 (Unethical Conduct)

The term "unethical conduct" refer to in the procedure and Code of Conduct refers to the direct or indirect provision, acceptance, promise or demand of any improper benefits by the Company's personnel during the execution of business in order to obtain or maintain benefits, or engagement in other conducts that are unethical or illegal or violate fiduciary obligations.

The objects of the conduct referred to in the preceding paragraph include public officials, political candidates, political parties or members of political parties, as well as any public or private enterprise or institution and its directors, supervisors, managers, employees, individuals with substantial control ability, or other interested parties.

Article 4 (Types of Benefits)

The benefits referred to in the Procedures and Code of Conduct refer to money, giveback, gifts, commissions, positions, services, preferential treatment, rebates of any type or in any name.

Benefits received or given occasionally in accordance with accepted social customs and that do not adversely affect specific rights and obligations shall be excluded.

Article 5 (Responsible Unit)

The Company designates Human Resources Department as the dedicated unit (hereinafter referred to as the Company's dedicated unit) to handles the revision, implementation, interpretation, consulting services, and filing of notification contents related to the procedure and Code of Conduct and supervised the implementation, and report to the Board of Directors, if necessary.

Article 6 (Prohibition of Providing and Receiving Bribery)

When the Company's personnel directly or indirectly provide, receive, promise or demand the benefits specified in Article 4, except for the following conditions, it should comply with the "Ethical Corporate Management Best Practice Principles for TWSE/GTSM Listed Companies" and the provisions of the procedure and Code of Conduct, and shall proceed only after the handling of relevant procedure:

1. The conduct is undertaken to meet business needs and is in accordance with local courtesy, convention, or custom during domestic (or foreign) visit, reception of guests, promotion of business and communication and coordination.
2. The conduct has its basis in ordinary social activities that are attended or others are invited to hold in line with accepted social custom, commercial purposes, or developing relationships.
3. Invitations to guests or attendance at commercial activities or factory visits in relation to business needs, when the method of fee payment, number of participants, class of accommodations, and the time period for the event or visit have been specified in advance.
4. Participate in folk festivals held publicly and in which the general public is invited.
5. Rewards, assistance, condolences or condolences from the supervisor.
6. The property donated due to engagement, marriage, childbirth, relocation, employment, promotion, retirement, resignation, illness or death of yourself, your spouse or immediate family members should conform to the general equal relationship.
7. Others that comply with company regulations.

Article 7 (Procedure for Acceptance of Improper Benefits)

When any of the Company's personnel is directly or indirectly provided or promised to provide money, giveback, and services, preferential treatments, entertainment, socializing and other benefits, the following procedures shall be followed:

1. If the persons providing or promising the benefits have no business interest with the Company's personnel, the personnel shall report to direct supervisors. The person shall report the offer to the direct supervisor within three days from the date of acceptance and, if necessary, notify the company's dedicated unit.
2. If the persons providing or promising the benefits have business interests with the Company's personnel, the personnel shall return or refuse the benefits, and report the situation to their direct supervisors, and notify the dedicated unit of the Company; if the benefits cannot be returned, they

should be handed over to the dedicated unit of the Company for handling within three days from the date of receipt.

The term "have business interests with the Company's personnel" as mentioned in the preceding paragraph refers to any of the following:

1. Those who have relationships such as business dealings, command and supervision, or expense subsidies (awards).
2. Those who are seeking, conducting or having entered into contracts, traded with the Company, or other contractual relationships with the Company.
3. Those who may face favorable or unfavorable impacts to the Company's business decision, execution or non-execution.

The Company's dedicated unit shall, depending on the nature and value of the property mentioned in the first item, propose appropriate suggestions such as returning, paying to receive, turning over to the public, donating to charitable organizations, or other suitable recommendations, and execute them upon approval.

Article 8 (Prohibition of illegal political donations)

When directly or indirectly offering a donation to political parties or organizations or individuals participating in political activities, the Company shall comply with the Political Donations Act and its own relevant internal operational procedures.

Article 9 (Prohibition of Improper Charitable Donations or Sponsorships)

When making or offering donations and sponsorship, the Company shall comply with relevant laws and regulations and internal operational procedures, and shall not indirectly or surreptitiously engage in bribery.

Article 10 (Interest Avoidance)

Directors of the Company shall exercise a high degree of self-discipline. When a proposal at a given board of directors meeting concerns the personal interest of, or the interest of the juristic person represented by, the concerned person shall state the important aspects of the relationship of interest at the given board meeting. If the risks may be detrimental to the interest of the Company, the director shall not participate in discussion and voting of the proposal and shall voluntarily abstain from voting for himself or herself or as proxy for another director. The directors shall practice self-discipline as to their internal relationship and must not support each other in an inappropriate manner.

When the Company's personnel discover a conflict of interest with themselves or the legal person he represents during the execution of company business, or a situation that may cause them, their spouse, parents, children, or other interested parties to obtain illegitimate benefits, they shall report the relevant matter to the direct supervisor and the company's dedicated unit, and the direct

supervisor shall provide appropriate guidance.

The Company's personnel shall not use company resources for commercial activities other than their duties, and shall not affect their work performance by participating in commercial activities outside the company.

Article 11 (Organization and Responsibilities of Confidentiality Mechanism)

The Company's legal affairs and information center is the dedicated unit for handling trade secrets and is responsible for formulating and implementing operating procedures for the management, preservation and confidentiality of the Company's trade secrets.

Article 12 (Prohibition against disclosure of confidential information)

The Company shall follow the Fair Trade Act and applicable competition laws and regulations when engaging in business activities, and may not fix prices, make rigged bids, establish output restrictions or quotas, or share or divide markets by allocating customers, suppliers, territories, or lines of commerce.

Article 13 (Prohibition against insider trading)

The Company's personnel shall abide by the provisions of the Securities and Exchange Act and may not take advantage of undisclosed information of which they have learned to engage in insider trading. Personnel are also prohibited from divulging undisclosed information to any other party, in order to prevent other party from using such information to engage in insider trading.

Article 14 (Non-disclosure agreement)

Any organization or person outside of this Corporation that is involved in any merger, demerger, acquisition and share transfer, major memorandums of understanding, strategic alliance, other business partnership plan or the signing of a major contract by the Company shall be required to sign a non-disclosure agreement in which they undertake not to disclose to any other party any trade secret or other material information of the Company acquired as a result, and that they may not use such information without the prior consent of the Company

Article 15 (Announcement of policy of ethical management to outside parties)

The Company shall disclose its policy of ethical management on its website and annual report.

Article 16 (Ethical management evaluation prior to development of commercial relationships)

Before developing a commercial relationship with another party, such as an agent, supplier, customer or other business partners in commercial dealings, the Company shall evaluate the legality and ethical management policy of the party and ascertain whether the party has a record of involvement in unethical conduct, in order to ensure that the party conducts business in a fair and

transparent manner and will not request, offer, or take bribes.

When the Company carries out the evaluation under the preceding paragraph, it may adopt appropriate verification procedures for a review of the counterparty with which it will have commercial dealings with respect to the following matters, in order to gain a comprehensive knowledge of its ethical management:

1. The enterprise's nationality, location of business operation, organizational structure, management policy and place where it will make payment.
2. Whether the enterprise has formulated an ethical management policy and the status of its implementation.
3. Whether the enterprise's business operates are located in a country with a high risk of corruption.
4. Whether the business operated by the enterprise is in an industry with high risk of bribery.
5. The long-term business condition and degree of goodwill of the enterprise.
6. Consultation with the enterprise's business partners on their opinion of the enterprise.
7. Whether the enterprise has a record of involvement in unethical conduct such as bribery or illegal political contributions.

Article 17 (Statement of ethical management policy to counterparties in commercial dealings)

Any personnel of this Corporation, when engaging in commercial activities, shall make a statement to the trading counterparty about the Company's ethical management policies and related rules, and shall clearly refuse to directly or indirectly provide, request or accept any improper benefits in any form or name, including kickbacks, commissions, facilitation payments or providing or accepting improper benefits through other ways.

Article 18 (Avoidance of commercial dealings with unethical operators)

The Company's personnel shall avoid business transactions with agents, suppliers, customers or other counterparty in commercial interactions that is involved in unethical conduct. When the counterparty or partner in cooperation is found to have engaged in unethical conduct, the personnel shall reduce business interaction in order to effectively implement the Company's ethical management policy.

Article 19 (Handling of unethical conduct by personnel of the Company)

The company encourages internal and external personnel to report dishonesty or misconduct. If the reported case is found to be true, the dedicated unit should report it to the superior supervisor and give the whistleblower appropriate rewards based on his contribution to corporate governance. If the internal personnel make false reports or malicious accusations, they shall be subject to disciplinary action. IF the circumstances are serious, they shall be dismissed.

Reporting channels:

1. Address for submission: 3rd Floor, No. 13, Chuangsin 1st Road, Science Park, Hsinchu 30076,

Taiwan, R.O.C. . The report mailbox

2. Email: ethics@ite.com.tw

3. Report hotline: 03-5798658 to the Director of the Human Resources Department

The whistleblower shall provide at least the following information:

1. The whistleblower's name, ID card number, and his/her contact address, telephone number, and e-mail address.
2. The name of the accused, or other sufficient data to identify his/her identity or characteristics.
3. Specific evidence available for investigation.

The Company's personnel handling the accusation shall declare in writing that they will keep the identity of the whistleblower and the content confidential. The Company shall also promises to protect whistleblower from improper treatment due to the accusation.

The Company's dedicated unit shall handle the following procedures:

1. Any information shall be reported to the department head if involving the rank and file and to an independent director or supervisor if involving a director or a senior executive.
2. The Company's dedicated unit and the department head or personnel being reported to in the preceding subparagraph shall immediately verify the facts and, where necessary, with the assistance of the legal compliance or other related department.
3. If a person being informed of is confirmed to have indeed violated the applicable laws and regulations or the Company's policy and regulations of ethical management, the Company shall immediately require the violator to cease the conduct and shall make an appropriate disposition. When necessary, the Company will institute legal proceedings and seek damages to safeguard its reputation and its rights and interests.
4. Documentation of case acceptance, investigation processes and investigation results shall be retained for five years and may be preserved electronically. In the event of a suit in respect of the whistleblowing case before the retention period expires, the relevant information shall continue to be retained until the conclusion of the litigation.
5. With respect to a confirmed information, the Company shall charge relevant units with the task of reviewing the internal control system and relevant procedures and proposing corrective measures to prevent recurrence.
6. The Company's dedicated unit shall submit to the board of directors a report on the whistleblowing case, actions taken, and subsequent reviews and corrective measures.

Article 20 (Actions upon event of unethical conduct by others towards the Company)

If any personnel of the Corporation discovers that another party has engaged in unethical conduct towards the Company, and such unethical conduct involves alleged illegality, the Company shall report the relevant facts to the judicial and prosecutorial authorities; where a public service agency or public official is involved, this Corporation shall additionally notify the governmental anti-corruption agency.

Article 21 (Establishment of a system for rewards, penalties, and complaints, and related disciplinary measures)

The Company shall link ethical management to employee performance evaluation and human resources policy, and establish a system for complaints. If any personnel of the Company seriously violates ethical conduct, the Company shall dismiss the personnel from his or her position or terminate his or her employment in accordance with applicable laws and regulations or the personnel policy and procedures of the Company.

The Company shall disclose on its intranet information such as the title of the violator, the date, and the actions taken in response.

Article 22 (Enforcement)

These Procedures and Guidelines, and any amendments hereto, shall be implemented after adoption by the board of directors.

Article 23 (Supplementary Provisions)

These Procedures and Guidelines were formulated at the third meeting of the 8th board of directors on November 7, 2014.

These Procedures and Guidelines were revised at the 9th meeting of the 9th board of directors on November 7, 2018.