

SynPower Co., Ltd.  
Codes of Ethical Conduct

Approved at the Board of Directors on held on August 9, 2021

Article 1 (Purpose and Basis for Adoption)

The Codes are adopted in accordance with the "Guidelines for the Adoption of Codes of Ethical Conduct for TWSE/TPEX Listed Companies" published by the Taiwan Stock Exchange Corporation, to serve as a standard for compliance and to prevent unethical behavior or actions that may harm the interests of the Company and its shareholders.

Article 2 (Scope of Application)

The Codes apply to the Company's directors, Audit Committee members, and managerial officers, including the General Manager and individuals holding equivalent positions, Deputy General Managers and individuals holding equivalent positions, Assistant Managers and individuals holding equivalent positions, Heads of the Finance and Accounting Departments, as well as other persons with authority over company management affairs and signing rights.

Article 3 (Principle of Honesty and Integrity)

In performing their duties, the Company's directors, Audit Committee members, and managerial officers shall uphold a proactive, diligent, and responsible attitude, reject self-interest, emphasize teamwork, and strictly adhere to the principle of honesty and integrity.

Article 4 (Principle of Honesty and Integrity)

The Company's directors, Audit Committee members, and managerial officers are obligated to act in the best interests of the Company, handle public affairs in an objective and efficient manner, and must not use their positions within the Company to gain improper benefits for themselves, their spouses, or close relatives (within the second degree of kinship).

If any of the aforementioned individuals or their affiliated entities are involved in transactions such as lending funds to the Company, providing guarantees, significant asset transactions, or engaging in significant trade dealings with the Company, the relevant director, Audit Committee member, or managerial officer must proactively disclose any potential conflicts of interest with the Company.

In cases where a director, Audit Committee member, or managerial officer is involved in a potential conflict of interest, the matter shall be directly

reviewed by the Board of Directors. If the review concludes that the potential conflict will not cause harm to the Company, the relevant actions may be permitted.

Article 5 (Prohibition of Personal Gain)

The Company's directors, Audit Committee members, and managerial officers shall not seek or obtain personal gain through the use of Company assets, information, or by taking advantage of their positions. Additionally, unless permitted by the Company Act or the Company's Articles of Incorporation, they shall not engage in activities that compete with the Company.

When the Company has an opportunity for profit, the Company's directors, Audit Committee members, and managerial officers have a responsibility to protect or enhance the legitimate and lawful interests the Company can obtain.

Article 6 (Confidentiality Obligation)

The Company's directors, Audit Committee members, and managerial officers have an obligation to maintain the confidentiality of information related to the Company itself or its suppliers and customers, unless authorized or required by law to disclose it. The information that must be kept confidential includes any non-public information that, if disclosed, could be exploited by competitors or harm the Company or its customers.

Article 7 (Fair Trade)

The Company's directors, Audit Committee members, and managerial officers shall treat the Company's suppliers, customers, competitors, and employees fairly. They shall not obtain improper benefits through manipulation, concealment, abuse of information obtained due to their positions, making false statements about important matters, or other unfair business practices.

Article 8 (Proper Protection and Use of Company Assets)

The Company's directors, Audit Committee members, and managerial officers are responsible for protecting the Company's assets and ensuring that they are used effectively and legally for business purposes.

Article 9 (Compliance with Laws and Regulations)

The Company's directors, Audit Committee members, and managerial officers shall fully comply with the Company Act, Securities and Exchange Act, and all other laws, regulations, and policies that govern the Company's business activities.

Article 10 (Encouragement of Reporting Illegal or Unethical Conduct)

The Company shall strengthen the promotion of ethical values internally and encourage employees to report any suspected or discovered violations of laws, regulations, or the ethical conduct guidelines to the Audit Committee, managerial officers, internal audit supervisors, or other appropriate personnel. Employees should provide sufficient information to enable the Company to properly address and handle the matter. The Company allows anonymous reporting and will handle such cases confidentially. The Company will also ensure that employees are aware that it will make every effort to protect the safety of the whistleblower and prevent retaliation.

Article 11 (Disciplinary Actions and Remedies)

If the Company's directors, Audit Committee members, or managerial officers violate the Codes of Conduct, the Company shall handle the matter in accordance with relevant regulations. Additionally, the Company shall promptly disclose information regarding the violator, including their title, name, violation date, details of the violation, the specific code violated, and the actions taken, on the market observation post system. If any individual is disciplined for violating the provisions of the Codes, they may file an appeal in accordance with relevant regulations.

Article 12 (Exemption Procedure)

If the Company's directors, Audit Committee members, or managerial officers find it necessary to be exempted from adhering to the provisions of the Codes, such an exemption must be approved by a resolution of the Board of Directors. The Company shall promptly disclose relevant information on the market observation post system, including the title, name, exemption approval date, exemption period, reasons for the exemption, and the specific provisions of the Codes from which the exemption applies. This is to enable shareholders to assess whether the Board's decision is appropriate, to avoid arbitrary or suspicious exemptions, and to ensure that any exemptions are subject to appropriate control mechanisms to protect the Company.

Article 13 (Disclosure Method)

The Company shall disclose its established Codes of Ethical Conduct on its website, annual reports, public prospectuses, and the market observation post system. The same applies when amendments are made.

Article 14 (Implementation)

These Codes of Ethical Conduct shall be implemented after approval by the

Board of Directors and submitted to the Audit Committee and reported to the Shareholders' Meeting. The same procedure applies when amendments are made.