GlobalWafers Co., Ltd.
Status of Ethical Corporate Management Implementation (2025)

Evaluation Item	Status			Deviations from the "Ethical Corporate Management Best-Practice Principles for TWSE/TPEx Listed Companies" and reasons
	Yes	No	Abstract Illustration	
I. Establishment of ethical corporate management policies and programs (I) Does the Company have a clear ethical corporate management policy approved by its board of directors, and bylaws and publicly available documents addressing its corporate conduct and ethics policy and measures, and commitment regarding implementation of such policy from the board of directors and the top management team? (II) Whether the Company has established an assessment mechanism for the risk of unethical conduct; regularly analyzes and evaluates within a business context, the business activities with a higher risk of unethical conduct; has formulated a program to prevent unethical conduct with a scope no less than the activities prescribed in paragraph 2, Article 7 of the "Ethical Corporate Management Best Practice Principles for TWSE/GTSM Listed Companies"? (III) Whether the Company has established relevant policies that are duly enforced to prevent unethical conduct, provided implementation procedures, guidelines, consequences of violation and appealing procedures, and periodically reviews and revises such policies?	V V V		(I) The Company has the "Ethical Corporate Management Best Practice Principles" and the "Code of Ethical Conduct," specifying the tangible content of ethical management policy and are approved by the board of directors. In addition, the "Procedures for Ethical Management and Guidelines for Conduct " and the "Measures for the Report on Illegal, Immoral and Dishonest Acts", approved by the Chairperson, to implement the ethical management policy. The Company's standard contract clearly requires the counterparts of transactions to comply with the ethical management policy. The board of directors and senior management all have signed statement to actively implement the commitments in the ethical management policy. The Company also implements so in the internal management and business activities, including requiring employees to comply with the ethical management policy in the employment conditions. For relevant policies, please refer to the Company's website under "Investor > Corporate Governance > Company Policies" (https://www.sas-globalwafers.com/corporate/). (II) In the " Procedures for Ethical Management and Guidelines for Conduct ", the Company has established the risk assessment mechanism for unethical conduct listed in Article 7, Paragraph 2 of the "Ethical Corporate Management Best Practice Principles," including: data collection through the annual compliance self-assessment of departments, qualitative interview, and tracking of emails by the IT department, for regular analysis and assessment, to identify these who with higher risks, and conduct individual investigation if required, with assistance of the audits from the internal audit units. So that the preventive programs to forbid offering and accepting bribery, providing illegal political donation or improper benefits, infringement of intellectual property rights, and unfair competition may be established, to ensure the Company's operation is consistent to the Ethical Corporate Management Best Practice Principles. Within the scope of business activities, all employees are obliged to cooperate with the compliance office for the investigation related to the said unethical conducts.	No significant difference

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			(III) Pursuant to the “Ethical Corporate Management Best Practice Principles,” the Company has established the “Code of Ethical Conduct” and “ Procedures for Ethical Management and Guidelines for Conduct “ and the “Measures for the Report on Illegal, Immoral and Dishonest Acts” specifying that no improper benefit shall be accepted, nor anything unethical or illegal may be conducted. These regulations also require to promote the importance of ethical conducts to directors and employees. The said programs are regularly reviewed for its adequacy and effectiveness based on the methods determined by the assessing mechanism of unethical conduct risk, and adjusted or amended when needed. In 2025, based on recommendations from external experts, the "Procedures for Handling Reports of Unlawful and Dishonest Conduct" underwent its fifth revision. The enhancements include: (1) the consolidation of a single independent and trusted reporting coordination unit (the Legal Department), to which all responsible units are required to report upon receipt of any whistleblowing case; (2) the addition of a "Notification to Independent Directors" procedure, enabling independent directors to be kept promptly informed of the status of reported cases and to oversee subsequent handling, thereby further strengthening the whistleblower mechanism; and (3) the addition of conflict of interest recusal principles for personnel involved in case handling.	
II. Fulfill operations integrity policy (I) Whether the Company has assessed the ethics records of whom it has business relationship with and include business conduct and ethics related clauses in the business contracts? (II) Whether the Company has set up a unit which is dedicated (or concurrent) to promoting the Company’s ethical standards and regularly (at least once a year) reports directly to the board of directors on its ethical corporate management policy and relevant matters, and program to prevent unethical conduct and monitor its implementation? (III) Does the Company establish policies to prevent conflicts of interest and provide appropriate communication	 V V V		(I) The Company's "Ethical Corporate Management Principles" explicitly stipulate that, prior to entering into any business relationship, the legality of the prospective counterparty and whether such party is involved in any dishonest conduct must be assessed, so as to avoid transacting with parties engaged in dishonest behavior. In addition, pursuant to the Company's "Ethical Corporate Management Operating Procedures and Conduct Guidelines," an ethical corporate management assessment must be conducted before establishing a business relationship with any party. Such assessments are carried out in written and quantified form by the sales and marketing unit using the "Customer / Distributor / Agent Ethical Corporate Management Assessment Form," and by the procurement unit using the "Supplier (and its Distributor / Agent) Ethical Corporate Management Assessment Form." Contracts entered into with business counterparties shall, in principle,	No significant difference

Evaluation Item	Status: Yes	Status: No	Status: Abstract Illustration	Deviations from the "Ethical Corporate Management Best-Practice Principles for TWSE/TPEx Listed Companies" and reasons
channels, and implement it? (IV) To implement relevant policies on ethical conducts, has the Company established effective accounting and internal control systems, audit plans based on the assessment of unethical conduct, and have its ethical conduct program audited by internal auditors or CPA periodically? (V) Does the Company regularly hold internal and external educational trainings on operational integrity?	 V V		expressly include ethical corporate management clauses to ensure that counterparties comply with the Company's ethical corporate management policy. (II) The Company has established a Legal Compliance Department under the Legal Affairs Office, which is responsible for coordinating the formulation and overseeing the implementation of ethical corporate management policies and dishonesty prevention programs. The Legal Compliance Officer reports to the Board of Directors on such matters once a year, with the most recent report presented to the Board on November 4, 2025. In addition, internal auditors monitor implementation in the course of routine audits, and may report any anomalies to the Board of Directors at any time. Relevant Implementation Status in 2025: (1) Formulation and Review of Ethical Corporate Management-Related Policies The Company has established the "Ethical Corporate Management Principles," "Code of Ethical Conduct," "Ethical Corporate Management Operating Procedures and Conduct Guidelines," and "Procedures for Handling Reports of Unlawful, Unethical, or Dishonest Conduct," which explicitly prohibit the acceptance of any improper benefits or the engagement in conduct that violates integrity or is otherwise unlawful. The aforementioned internal regulations are periodically reviewed and revised by the Legal Compliance Department with reference to changes in external regulations and internal monitoring and implementation outcomes. In 2025, based on recommendations from external experts, the "Procedures for Handling Reports of Unlawful and Dishonest Conduct" underwent its fifth revision. The enhancements include: (a) the consolidation of a single independent and trusted reporting coordination unit (the Legal Department), to which all responsible units are required to report upon receipt of any whistleblowing case; (b) the addition of a "Notification to Independent Directors" procedure, enabling independent directors to be kept promptly informed of the status of reported cases and to oversee subsequent handling, thereby further strengthening the whistleblower mechanism; and (c) the addition of conflict of interest recusal principles for personnel involved in case handling.	

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			(2) Internal and External Policy Communication The Company's "Ethical Corporate Management Principles," "Code of Ethical Conduct," "Ethical Corporate Management Operating Procedures and Conduct Guidelines," and "Procedures for Handling Reports of Unlawful, Unethical, or Dishonest Conduct," along with other key internal regulations, are published on both the Company's external website and internal intranet for reference by the public and Company employees at any time. In addition, the Company requires suppliers to execute a "Supplier Code of Conduct and Supplier Commitment Letter" affirming compliance with legal, ethical, environmental, and quality standards, and standard-form contracts entered into with business counterparties already incorporate relevant clauses requiring adherence to ethical corporate management conduct. (3) Reporting Channels, Handling Procedures, and Whistleblower Protection The Company has established "Procedures for Handling Reports of Unlawful, Unethical, or Dishonest Conduct," setting up a disciplinary and complaint system for violations of ethical corporate management regulations. Employee suggestion boxes, email addresses, and dedicated complaint hotlines have been established and publicized at Company facilities and on both the internal and external websites, to encourage reporting of dishonest or improper conduct by both internal and external parties. The Company permits anonymous reports, and the identity of whistleblowers and the content of reports are kept strictly confidential. The Human Resources unit is responsible for verification and handling. In cases where ethical corporate management regulations are found to have been violated, appropriate action will be taken commensurate with the severity of the circumstances, and reports to the competent authority or referrals to judicial authorities for investigation will be made where necessary. (4) Education and Training The Company regularly formulates and implements education and training programs. The training subjects and hours conducted in 2025 are as follows: 1. A one-hour "Insider Trading Prevention Education and Training" program was conducted for directors, managerial officers at department head level and above, and newly hired employees. Content included an analysis of insider trading laws and regulations (constituent elements, methods and timing of disclosure of material	

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			information, and judicial interpretations) and an analysis of laws governing changes in insider shareholdings (pre- and post-transaction reporting obligations and maintenance of minimum shareholding ratios for directors and supervisors), with a total of 213 person-times participating. 2. A two-hour "Ethical Corporate Management Education and Training" program was conducted for directors, managerial officers at department head level and above, and newly hired employees. Content included trade secret protection, competition law, anti-corruption, conflict of interest prevention, export controls, and the promotion of whistleblower reporting channels, among other major legal compliance topics closely relevant to the technology industry, with a total of 214 person-times participating. (III) The Company's "Code of Ethical Conduct" explicitly sets out a conflict of interest prevention policy requiring Company personnel to handle business affairs in an objective and efficient manner and to refrain from exploiting their positions within the Company to obtain improper benefits for themselves, others, or other enterprises. The "Ethical Corporate Management Operating Procedures and Conduct Guidelines" further provide detailed provisions on the recusal procedures to be followed by stakeholders in the event of a conflict of interest with respect to any matter on the Board of Directors' agenda. The channels for disclosing conflicts of interest vary depending on the party involved: directors and independent directors shall make disclosure to the President's Office or the Corporate Governance Officer; managerial officers shall make disclosure to the Legal Compliance unit; and all other employees shall report to their direct supervisors and the Legal Compliance unit, with appropriate guidance provided by the direct supervisor. The Company has formulated an "Employee Conflict of Interest Declaration and Confirmation Letter," which is distributed to newly hired employees for execution upon onboarding, to communicate the key principles and management measures relating to conflict of interest avoidance, confirm that employees have no conflict of interest situations, and ensure that employees clearly understand their obligation to proactively report any conflict of interest that may arise.	

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			(IV) The Company has established an accounting system and internal control system, and ensures their effective implementation. Internal auditors formulate audit plans — covering audit subjects, scope, items, and frequency — based on the results of assessments of dishonest conduct risks, and conduct audits to verify compliance with prevention programs. Audit results are reported to senior management and the dedicated ethical corporate management unit, and audit reports are submitted to the Board of Directors. In addition, to ensure the continued effectiveness of system design and implementation, the Company conducts annual reviews and revisions to establish sound corporate governance and risk management mechanisms, which serve as the basis for assessing the overall effectiveness of the internal control system and issuing the Internal Control System Statement. (V) The Company regularly formulates and implements education and training programs covering areas including corporate governance, ethical corporate management, and laws and regulations relating to business conduct. With respect to "Ethical Corporate Management" and "Insider Trading Prevention" courses, training is conducted at least once every two years for incumbent directors, managerial officers, and employees determined to require such training, within three months of appointment for newly appointed directors and managerial officers, and as part of pre-employment training conducted by the Human Resources unit for newly hired employees. Furthermore, pursuant to the Company's "Ethical Corporate Management Operating Procedures and Conduct Guidelines," the Chairperson or the Corporate Governance Officer is also arranged to communicate the importance of integrity to directors, managerial officers, and other management personnel at Board meetings and management meetings. In 2025, the Company offered "Insider Trading Prevention Education and Training" and "Ethical Corporate Management Education and Training" programs. For details on the specific course content, please refer to item (2)(4) above. The cumulative number of participants across both courses was 427 person-times.	
III. Operation of the Company's reporting system (I) Does the Company establish both a reward/punishment	V		(I) In the "Measures for the Report on Illegal, Immoral and Dishonest Acts," the	No significant difference

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system and an integrity hotline? Can the accused be reached by an appropriate person for follow-up? (II) Whether the Company has established standard operation procedures for investigating the complaints received, follow-up measures after investigation are completed, and ensuring such complaints are handled in a confidential manner? (III) Does the Company provide proper whistleblower protection?	 V V		Company specifies the system, including internal and external whistleblowing channels by establishing the suggestion box, email box, and complaint hotline, and the handling principles, to implement the ethical management policy. Whistleblowing is accepted by the spokesperson, HR officers, or legal staff. Once the case is established, the handling unit will investigate and handle pursuant to the "Measures for the Report on Illegal, Immoral and Dishonest Acts." If the allegation is verified as truth, the whistleblower may be awarded if the case is material. (II) In the "Measures for the Report on Illegal, Immoral and Dishonest Acts," the Company specifies the investigation and handling process corresponding to the alleged parties and involvement. The whistle-blowing is strictly kept confidential, and all possible efforts are made to protect the whistleblowers, while giving counterpart chance to appeal, in order to secure the legal rights of both parties. If the allegation is verified as truth, the alleged party will be required to cease the conduct immediately and proper actions will be taken. The related units will be required to review and furnish corrective measures to prevent the incident from repeating. The Legal Department will review the whistleblowing, handling and follow up, and report to the board of directors. In 2025, based on recommendations from external experts, the Company completed the fifth revision of its "Procedures for Handling Reports of Unlawful and Dishonest Conduct." The enhancements include: (1) the consolidation of a single independent and trusted reporting coordination unit (the Legal Department), to which all responsible units are required to report upon receipt of any whistleblowing case; (2) the addition of a "Notification to Independent Directors" procedure, enabling independent directors to be kept promptly informed of the status of reported cases and to oversee subsequent handling, thereby further strengthening the whistleblower mechanism; and (3) the addition of conflict of interest recusal principles for personnel involved in case handling. (III) Pursuant to the "Measures for the Report on Illegal, Immoral and Dishonest Acts," the Company handles whistle-blowing in confidential. All possible efforts are made to protect the whistleblowers, allowing anonymous whistle-blowing to keep their identities absolutely confidential, so they will not be treated improperly due to whistleblowing. Personnel handling	

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<tr><th>Yes</th><th>No</th><th>Abstract Illustration</th></tr>
<tr><td></td><td></td><td></td><td>whistleblowing cases must identify themselves to the whistleblower in writing and state that contents of the report will be kept confidential.</td><td></td></tr>
<tr><td>IV. Enhancing Information Disclosure
(I) Does the Company disclose its ethical corporate management policies and the results of its implementation on the Company’s website and MOPS?</td><td>V</td><td></td><td>(I) The Company has a website to disclose the related corporate culture, operation guidelines, “Ethical Corporate Management Best-Practice Principles”, “Code of Ethical Conduct,” “Ethical Management and Guidelines for Conduct,” and “Measures for the Report on Illegal, Immoral and Dishonest Acts” and implementation of ethical management.</td><td>No significant difference</td></tr>
<tr><td colspan="5">V. If the Company has established the ethical corporate management policies based on the “Ethical Corporate Management Best-Practice Principles for TWSE/TPEx Listed Companies”, please describe any discrepancy between the policies and their implementation:
The Company has established the “Ethical Corporate Management Best-Practice Principles” which clearly regulates the matters to be followed by the Company’s staff. Other accusation cases and penalties are also clearly set out in relevant measures. There is no significant difference between the policies and the “Ethical Corporate Management Best-Practice Principles for TWSE/TPEx Listed Companies”.</td></tr>
<tr><td colspan="5">VI. Other important information to facilitate a better understanding of the Company’s ethical corporate management policies (under situations such as review and revision of regulations):
1. The Company complies with the Company Act, the Securities and Exchange Acts, the Business Entity Accounting Act, the Political Donations Act, the Anti-Corruption Act, the Government Procurement Act, the Act on Recusal of Public Servants Due to Conflicts of Interest, and other regulations for public companies and business related laws and regulations. Such compliance is the basic precondition to implement the ethical management. The Company all makes all possible efforts to comply with the environment and quality policy with high standards.
2. The Company has set up provisions related to avoidance of directors’ conflicts of interests in the “Rules of Procedure for board of directors Meetings”. If any director or a juristic person represented by a director is an interested party with respect to any agenda item, when the relationship is likely to prejudice the interests of the Company, the director may express their opinion and answer queries, but may not participate in discussion or voting on that agenda item, and further, shall enter recusal during discussion and voting on that item and may not act as another director’s proxy to exercise voting rights on that matter.
3. The Company has established the “Management Procedure to Prevent Insider Trading,” specifying that insiders, quasi-insiders, information receivers, upon actually knowing of any information that will have a material impact on the price of the securities of the issuing company, after the information is precise, and prior to the public disclosure of such information or within 18 hours after its public disclosure, shall not purchase or sell, in the person’s own name or in the name of another, shares of the Company that are listed on an exchange or an over-the-counter market, or any other equity-type security of the Company, or the non-equity-type corporate bonds of such company that are listed on an exchange or an over-the-counter market, so that anyone knowing material information will not violate the regulations of insider trading due no ignorance to laws. In addition, the “Management Procedures to Prevent Insider Trading” stipulates that directors, managers, and the natural persons appointed as a proxy to exercise duties specified in Article 27, Paragraph 1 of the Company Act, are forbidden to trade their shares during the lock-up period from 30 days prior to the announcement of annual financial statements, and 15 days prior to the announcement of quarterly financial statements. The Company requested the President Office to inform the persons subject to the provisions the lock period forbidding trading after arranging dates of board meetings; the President Office also review the compliance of the concerned persons when reporting the equity every month.</td></tr>
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<tr><td colspan="5">4. The Company has established the “Procedures for Handling Material Inside Information” to put in place a sound internal mechanism for the handling and disclosure of material inside information, so as to prevent improper information leakage and to ensure the consistency and accuracy of information released to the public. These procedures stipulate that directors, supervisors, managerial officers, and employees shall not disclose any material inside information obtained in the course of their duties to any third party. They are also prohibited from inquiring about or collecting undisclosed material inside information of the Company that is not related to their official duties from any person who has access to such information. Furthermore, any person who becomes aware of the Company’s undisclosed material inside information other than through the performance of their duties is subject to confidentiality obligations and shall not disclose such information to others.
5. Based on recommendations from external experts, the Company completed the fifth revision of its "Procedures for Handling Reports of Unlawful and Dishonest Conduct" on May 16, 2025. The enhancements include: (1) the consolidation of a single independent and trusted reporting coordination unit (the Legal Department), to which all responsible units are required to report upon receipt of any whistleblowing case; (2) the addition of a "Notification to Independent Directors" procedure, enabling independent directors to be kept promptly informed of the status of reported cases and to oversee subsequent handling, thereby further strengthening the whistleblower mechanism; and (3) the addition of conflict of interest recusal principles for personnel involved in case handling.</td></tr>
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