



Sercomm Corporation Code of Ethics for Directors and Managers

Article 1 Formulation Purpose and Basis

In order to guide the behavior of the Company's directors and managers to comply with ethical standards and to make our stakeholders more aware of the Company's ethical standards, this code is hereby formulated for compliance.

Article 2 Preventing Conflicts of Interest

A conflict of interest arises when personal interests interfere or potentially interfere with the overall interests of the Company. For instance, when a director or manager of the company is unable to handle official duties in an objective and efficient manner, or when their position within the Company results in undue benefits for themselves, their spouse, or relatives within the second degree of kinship. The Company shall pay special attention to matters related to loaning of funds or provision of guarantees, major asset transactions, and purchases (sales) with associated enterprises to which the aforementioned individuals belong. The Company shall develop policies for preventing conflicts of interest, and provide appropriate channels for directors or managers to proactively explain whether they have any potential conflicts of interest with the Company.

Article 3 Avoiding Opportunities for Personal Gain

The Company shall prevent directors or managers from engaging in the following activities: (1) Taking advantage of opportunities for personal gain through the use of Company assets, information, or their position; (2) Acquiring personal benefits through the use of Company assets, information, or their position; (3) Competing with the Company. When the Company has a opportunity to make profits, the directors or managers are responsible for increasing the legitimate and lawful profits that the Company can obtain.

Article 4 Responsibility of Confidentiality

The directors or managers of the Company shall be obliged to keep the information of the Company itself or its purchasing (selling) customers confidential, unless authorized or required by law to be disclosed. The information to be kept confidential includes all undisclosed information that may be used or leaked by competitors and which could cause harm to the Company or its customers.

Article 5 Fair Trade



Directors or managers of the Company shall treat the Company's purchasing (selling) customers, competitors, and employees fairly, and shall not obtain improper benefits through manipulation, concealment, and abuse of the information obtained taking advantage of their positions, through false statements about important matters, or other unfair trading methods.

Article 6 Protecting and Appropriately Utilizing the Company's Assets

The directors or managers of the Company are responsible for protecting the Company's assets and ensuring that the Company's assets can be effectively and legally used for official business purposes, which will directly affect the Company's profitability if stolen, neglected, or wasted.

Article 7 Compliance with Laws and Regulations

Directors or managers of the Company shall comply with the Securities and Exchange Act and other laws and regulations.

Article 8 Encouraging Reporting of Any Illegal or Unethical Behavior

The Company shall strengthen the promotion of ethical concepts internally and encourage its employees to report in accordance with internal regulations of the Company when suspecting or discovering violations of laws, regulations, or the Code of Ethics. In order to encourage employees to report illegal matters, the Company shall have a specific reporting mechanism and make the employees aware that the Company will do its best to protect the safety of whistle-blowers and prevent them from retaliation.

Article 9 Disciplinary Measures

When a director or manager of the Company violates the Code of Ethics, the Company shall take relevant disciplinary measures, and may provide remedies for those who violate the Code of Ethics in accordance with the Company's relevant appeal mechanism.

Article 10 Procedures for Exemption Application

Any exemption of the Company's directors or managers from complying with the Company's Code of Ethics must be approved by a resolution of the Board of Directors, and information such as the date of the Board of Directors' approval of the exemption, any objections or reservations of independent directors, the period of exemption application, the reasons for exemption application, and the criteria for exemption application must be immediately disclosed on Market Observation Post System (MOPS), in order to enable the shareholders to evaluate whether the resolution made by the Board of Directors is appropriate or not, so as to deter any spurious or suspicious



exemptions and ensure that any exemption from complying with the standards is subject to appropriate control mechanisms to protect the Company.

Article 11 Disclosure Method

The Company shall disclose this code on its website, MOPS, and other platforms, and the same shall apply to any amendments.

Article 12 Implementation

This code shall be implemented after being approved by the Board of Directors, and the same shall apply to any amendments.

Article 13 Revision Date

This code was formulated on May 11, 2023.