

Business Ethics Implementation

Assessment Item	Implementation Status		Non-implementation and its reason(s)
	Y	N	
<p>1. Establishment of Corporate Conduct and Ethics Policy and Implementation Measures</p> <p>(1) Does the Company have bylaws and publicly available documents addressing its corporate conduct and ethics policy and measures, and the commitment regarding implementation of such policy from the Board of Directors and the management team?</p>	✓	<p>With the goal of enhancing corporate culture and ensuring the robust development of integrity management, the Company adopted the "Ethical Corporate Management Best Practice Principles", "Code of Ethics", and "Procedures for Ethical Management and Guidelines for Conduct" on May 11, 2023. Furthermore, following recommendations from an external professional institution, the Board of Directors approved an amendment to the "Ethical Corporate Management Best Practice Principles" on July 30, 2024, incorporating a mechanism for periodic review and revision to further strengthen integrity management practices and proactively prevent unethical conduct.</p> <p>Additionally, the Company has established the "Procedures for Handling Internal Material Information" and the "Employee Code of Ethics", which provide clear guidelines and regulations for employees to follow while carrying out business activities.</p>	None
<p>(2) 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?</p>	✓	<p>Sercomm has signed the integrity clause with our employees and suppliers, and regularly analyzes and assesses business activities with higher risks of unethical conduct within our scope of business, in order to prevent unethical conduct.</p> <p>The Company regularly provides newcomer training, general education training, and management development training to promote the integrity management policy. Employees must issue a letter of undertaking to ensure their compliance with internal regulations and systems, including work rules, related operating procedures and codes of conduct, etc. The Company's operating activities and those of its subsidiaries are required to be in accordance with related laws and regulations, follow high business ethical standards, avoid any unfair competition, perform tax obligations, prevent corruption, and build adequate management systems in order to create an environment of fair competition. These regulations shall also be incorporated into the Company's internal compulsory E-Learning courses and serve as the basis for operation and conduct. All important policies relating to the operation, investment, acquisition or disposition of assets, the lending of funds, articles of guarantee or endorsement, and financing from banks are subject to the assessment of</p>	None

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			Explanation
(3) Whether the Company has established relevant policies that are duly enforced to prevent unethical conduct, provided implementation procedures, guidelines, consequences of violation and complaint procedures, and periodically reviews and revises such policies?	✓	competent departmental authorities and to Board resolution.	The Company has implemented various operating procedures, including the "Ethical Corporate Management Best Practice Principles", "Code of Ethics", "Procedures for Ethical Management and Guidelines for Conduct", and "Internal Material Information Handling Procedures", all of which are disclosed on the Company's website. New employees receive quarterly education and training, which covers the importance of the confidentiality of material information and includes explanations and examples of insider trading. Slides from the courses are also accessible on the Company's internal E-Learning system for employees who unable to participate.
2. Ethic Management Practice			To address unethical behavior, the Company established the "Regulations for the Management of the Whistle-blowing System" on July 18, 2023 and provided a reporting system. With regard to any conduct that may violate business ethics, severe disciplinary measures shall be implemented, including termination of employment or business dealings and relationships, legal actions shall be taken in due course.
(1) Whether the Company has assessed the ethics records of whom it has business relationship with and includes business conduct and ethics related clauses in the business contracts?	✓	Regarding the selection of new suppliers, in addition to the quality, cost, delivery and service covered by general evaluation, suppliers should also comply with Sercomm's specifications for green products. Along with the general procurement agreement and non-disclosure agreement, suppliers should also sign the following documents and pass the audit on green products in order to become qualified suppliers. <ul style="list-style-type: none"> • Product Quality Guarantee Agreement: Govern quality standards required of the suppliers • Letter of undertaking for corporate social responsibility: The undertaking of labor interests and rights, health and safety, environmental protection, ethics, management systems, and social impact. • Supplier's EICC letter of undertaking: Requirements for business ethics and integrity 	Under the Company's supply chain management mechanism, new suppliers are required to sign a Code of Conduct Commitment, undertaking not to engage in any form of bribery, gifts, hospitality, or other improper benefits. Suppliers also agree that, should any such conduct occur, the Company may immediately suspend or

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(2) Whether the Company has set up a unit which is dedicated 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?	✓		<p>terminate any business transactions. Only after completing the required documentation may a supplier be recognized as a qualified supplier.</p> <p>In 2024, a total of 53 new suppliers completed and signed the Code of Conduct Commitment and the Supplier Corporate Social Responsibility Code Agreement.</p>
(3) Whether the Company has established policies to prevent conflict of interests, provide appropriate communication and complaint channels and implement such policies properly?	✓		<p>To ensure the implementation of integrity management, the Company has designated personnel from the Human Resources, Risk Management, and Audit departments to oversee the development of integrity management policies and prevention plans, as well as education and promotion initiatives, complaint channels, and integrity risk assessments. Relevant documents undergo review and approval by competent decision-makers in accordance with their decision-making authority, and the execution status is regularly reported to the Board of Directors. The report for the year 2025 was submitted on February 27, 2025, including the operation status of the whistleblowing system. In 2024, the Company received one whistleblowing report and two grievance cases from Mainland China. All cases were properly handled, and corrective actions were implemented to safeguard workplace safety and employee rights. For further details regarding the cases, follow-up actions, and improvement measures, please refer to the Sustainability Report.</p>
(4) To implement relevant policies on ethical conducts, does the Company establish effective accounting and internal control systems that are audited by internal auditors or CPAs periodically?	✓		<p>Sercomm has implemented various policies to prevent conflicts of interest, including the "Ethical Corporate Management Best Practice Principles", "Code of Ethics", "Procedures for Ethical Management and Guidelines for Conduct", "Internal Material Information Handling Procedures", and "Regulations for the Management of the Whistle-blowing System", and provide reporting channels to ensure effective implementation.</p>

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(5) Does the Company provide internal and external ethical conduct training programs on a regular basis?		Committee and the Board of Directors on a quarterly basis. The Company's accounting system is established in compliance with legal requirements. Certified public accountants (CPAs) conduct quarterly audits or reviews of the consolidated financial statements, issuing reports and reporting the results to the Audit Committee each quarter. Report of the audits or review results are also presented to the Board of Directors on an annual basis.	
3. Implementation of Complaint Procedures (1) Does the Company establish specific complaint and reward procedures, set up conveniently accessible complaint channels, and designate responsible individuals to handle the complaint received?	✓	The Company provides annual E-learning training on integrity-related topics, including the Code of Ethical Conduct, to all employees and requires completion of the corresponding assessments. All newly hired employees are required to sign the Code of Ethical Conduct, and integrity-related courses are designated as mandatory training each year. In 2024, the signing rate of the Code of Ethical Conduct reached 100%. The total training hours for business ethics (including ethical and integrity management) amounted to 626.56 person-hours, with 5,671 employee participations, representing a training implementation rate of 97.66%.	None
	✓	To implement the ethical conducts and integrity management guidelines, the "Regulations for the Management of the Whistle-blowing System" were established on July 18, 2023, with an independent channel set up for the reporting of illegal activities and violations of human rights, code of conduct, or integrity management guidelines. The channel is managed by dedicated personnel and is available to employees, suppliers, customers, and other external stakeholders; the reporting process follows relevant regional procedures, and a designated email address for reporting complaints is provided, all of which is disclosed on the Company's website. In 2024, the Company received one whistleblowing report and two grievance cases from Mainland China. All cases were properly handled, and corrective actions were implemented to safeguard workplace safety and employee rights. For further details regarding the cases, follow-up actions, and improvement measures, please refer to the Sustainability Report.	None

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(2) Does the Company establish standard operation procedures for investigating the complaints received and ensuring such complaints are handled in a confidential manner?	✓		The Company has implemented the "Regulations for the Management of the Whistle-blowing System", which outline the standard operating procedures for addressing reported issues, covering various aspects, such as reporting channels, processing protocols, protection against whistle-blower probes, confidentiality, incentives, as well as promotion and training programs.
(3) Does the Company adopt proper measures to prevent a complainant from retaliation for his/her filing a complaint?	✓		In accordance with the "Regulations for the Management of the Whistle-blowing System", the Company shall take appropriate measures to protect whistleblowers.
4. Information Disclosure			
Does the Company disclose its guidelines on business ethics as well as information about implementation of such guidelines on its website and Market Observation Post System ("MOPS")?	✓		The Company has detailed its adherence to the "Ethical Corporate Management Best Practice Principles" on its website's Corporate Governance section and MOPS, and the effectiveness of these practices is also reported in its annual report.
5. If the Company has established corporate governance policies based on TWSE Corporate Conduct and Ethics Best Practice Principles, please describe any discrepancy between the policies and their implementation : On May 11, 2023, our company's board of directors resolved to establish a 'Code of Ethical Conduct,' and the actual operation is consistent with the established code.			
6. Other important information to facilitate better understanding of the Company's corporate conduct and ethics compliance practices (e.g., review the Company's corporate conduct and ethics policy): On July 30, 2024, following the recommendations of an external professional institution, the Board of Directors approved an amendment to the "Ethical Corporate Management Best Practice Principles", incorporating a mechanism for periodic review and revision to further enhance integrity management practices.			