

穩懋半導體
供應商反貪腐反賄賂政策
ANTI-CORRUPTION AND ANTI-BRIBERY POLICY
OF WIN SEMICONDUCTORS CORP.

本公司_____承諾在與穩懋半導體股份有限公司(以下簡稱穩懋公司) 所有商業合作關係中，應遵循穩懋公司最高誠信標準，禁止任何形式的賄賂、貪污、敲詐勒索、侵占、洗錢及內線交易等非法行為，並應迴避利益衝突。穩懋公司並持續強化稽核，以確保符合誠信經營的要求，並為相關利害關係人提供諮詢以協助其防止賄賂和貪腐行為。

_____ (the Company) is committed to taking the highest standards of integrity in all business interactions with WIN Semiconductors Corp. (WinSemi). The company upholds zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion, money laundry and insider trading and to avoid any conflict of interest. WinSemi continuously implement monitoring to ensure compliance with integrity requirements and provide guidance to relevant stakeholders to help them prevent bribery and corruption.

無不正當收益(No Improper Advantage)

本公司不得承諾、提供、同意、給予或收受賄賂或其他形式之不正當收益，包括不得承諾、同意、批准、給予或收受任何有價之物（無論是直接或透過第三人間接執行）、或洩漏所知悉之未公開資訊(內線交易)，以獲得或維持業務、將業務轉讓他人或獲取不正當利益。本公司採取內控、文件紀錄和訴諸法律程序，以確保符合反貪腐相關法規的要求。

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, and/or disclosure of any nonpublic information (in terms of insider trading) in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record keeping and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

迴避利益衝突(Avoid Conflict of Interest)

本公司與穩懋公司之間的商業往來，應避免所任何可能的利益衝突。可能的利益衝突情形包括（但不限於）穩懋公司內部員工或其近親（父母、子女、配偶或兄弟姐妹）在本公司任職，或對本公司有重要投資利益。本公司與穩懋公司對口人員不必要或過度頻繁的社交往來也可能構成利益衝突的疑慮或觀感。本公司與穩懋公司人員的任何接觸必須謹守一般商業往來的分際，且一旦有利益衝突的情形，應立即通知穩懋公司。本公司若有發現任何潛在的利益衝突，必須立即通報穩懋公司，並採取適當措施以防止因此所可能導致的不當行為。所謂利益衝突指個人活動或私人關係實際上或可能干擾其公正客觀履行工作職責或基於最佳利益做出業務判斷時，即存在利益衝突情形。

Any possible conflict of interest should be avoided in the business dealings between the Company and WinSemi. Possible conflicts of interest include (but are not limited to) employees of WinSemi or their close relatives (parents, children, spouses or siblings) who serve in the Company or have important investment interests in the Company. Unnecessary or excessively frequent social interactions between the Company and WinSemi's counterparts may also create suspicions or perceptions of conflict of interest. Therefore, any contact between the Company and WinSemi personnel must be within the boundaries of ordinary business dealings, and any conflict of interest must be reported to

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WinSemi immediately. If the Company discovers any potential conflict of interest, we will immediately report it to WinSemi and take appropriate measures to prevent any improper behavior that may result.

“Conflict of interest” means that conflicting interests exists when a personal activity or personal relationship actually or may interfere with the fair and objective performance of work or making of business judgments based on the best interest.

洗錢防制(Anti-Money Laundering)

本公司應採取一切合理措施防止公司被用作洗錢的手段，包括遵循會計及財務報導原則，以正確記錄所有交易，並在適當情況下可接受審查。

The Company will take all reasonable steps to prevent the Company from being employed as a vehicle of money laundering, including compliance of accounting and financial reporting principles so that all transactions are properly recorded and, where appropriate, subject to audit.

資訊公開(Disclosure of Information):

本公司所有的業務來往應透明，並正確紀錄於參與者的帳冊和商業記錄上。本公司按照適用法規和普遍的行業慣例公開有關參與勞工、健康與安全、環保活動、商業活動、組織架構、財務狀況和業績的資料，且不得偽造記錄或虛報供應鏈的狀況或慣例。

All business dealings should be transparently performed and accurately reflected on Participant's business books and records. Information regarding participant labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

智慧財產權(Intellectual Property)

本公司充分尊重知識產權；在和穩懋公司合作的技術和生產經驗的移轉中妥善保護知識財產權，並保護穩懋公司的資料。

The company fully respects intellectual property rights; In the transfer of technology and production experience in cooperation with WinSemi, who will properly protect intellectual property rights and protect WinSemi's data and information.

身份保密及防止報復(Protection of Identity and Non-retaliation):

穩懋公司承諾保護供應商和員工檢舉人並確保其身份之機密性。本公司應建立溝通管道，讓員工表達其疑慮，不需害怕遭受報復。

Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistle blowers are to be maintained. Participants should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

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違反本政策相關的反貪腐法規可能對行為人課以民事、行政或刑事責任。穩懋公司承諾，任何人善意告知有關穩懋公司及利害關係人違背本政策或相關法規，將不會遭受任何形式的報復或威脅，且對檢舉內容均將嚴守機密。

Violation of the anti-corruption laws and regulations covered by this policy may result in severe civil, administrative or criminal penalties for those responsible. We promise that anyone who informs the Company and its stakeholders in good faith that they have violated this Policy or relevant laws and regulations will not be subjected to any form of retaliation or threat, and the relevant contents of the report will remain confidential.

舉報管道 (Reporting Channels)

誠信當責是穩懋的核心價值。穩懋公司秉持誠信從事所有業務活動，絕不允許貪污及任何形式之舞弊行為。當您對於潛在或實際違反穩懋公司反貪腐規範之情事有任何問題或疑慮，請經由下列舉報管道向穩懋公司通報：

ethics@winfoundry.com

https://www.winfoundry.com/zh-TW/Other/other_investigate

Integrity and responsibility are the core values of WinSemi. WINSemi conducts all business activities with integrity and does not allow corruption and any form of fraud. If you have any questions or concerns about potential or actual violations of WinSemi's anti-corruption policy, please inform WINSemi through the following reporting channel:

ethics@winfoundry.com

https://www.winfoundry.com/zh-TW/Other/other_investigate

供應商名稱Supplier Name : _____

授權簽署人/代表姓名Name of Authorized Manager : _____

職稱Title of Authorized Manager : _____

簽名Signature : _____ (公司大小印章Seal)

簽署日期Date : _____