

¡ FIC Global, Inc.Anti-Corruption and Anti-Bribery Policy¡

No. OSD_ASA0001

Ver. 1.0.0

FIC Global Inc., and its subsidiaries (hereinafter referred to as "FIC Group") adopt a zero-tolerance principle towards corruption and bribery. All business interactions must adhere to the highest standards of integrity. This "**FIC Global, Inc. Anti-Corruption and Anti-Bribery Policy**" (hereinafter referred to as "this Policy") is established to create clear and unified standards for combating corruption and bribery.

FIC Group acknowledges and adheres to the "United Nations Convention Against Corruption", the "Act to Implement United Nations Convention Against Corruption", the ¡World Economic Forum's Partnering Against Corruption Initiative (PACI)¡, the U.S. ¡Foreign Corrupt Practices Act (FCPA)¡, the U.K. ¡Bribery Act 2010¡, and relevant antitrust laws and sunshine laws of various countries. The Group regularly implements education and training, advocacy, and audits to ensure that applicable personnel fully understand FIC Group's principles of ethical corporate management in business operations and the importance of anti-corruption policies.

I. Policy Description

- **Prohibition of bribery and accepting bribes:** Personnel of FIC Group (referring to directors, supervisors, managers, employees, appointees, and individuals with substantial control) and their related parties must not directly or indirectly provide, accept, promise, or request any form of improper benefit (including both tangible and intangible benefits) during relevant business activities (including transaction negotiations, supply, services, contracting, technical cooperation exchanges, physical goods, insurance, payments, and other contractual obligations). This prohibition includes, but is not limited to, any tangible or intangible monetary benefits, illegal gains, bribes, brokerage fees, phantom shares, improper gifts, securities, cash gifts, commissions, positions, services, privileges, kickbacks, allowances, reimbursements for costs that should be borne by oneself, property acquisitions, home renovations, dining and banquets, holiday gifts, communication tools, transportation, solutions for the admission and employment of children or relatives, or using various names to provide direct or indirect entertainment, travel, or other benefits not related to official duties, or engaging in loans, leases, investments, and any activities not directly related to official business. The low value of improper benefits does not constitute an effective defense against determining whether applicable personnel have violated this policy.
- **Prohibition of providing illegal political donations:** Employees of FIC Group shall uphold a position of political neutral stance. If employees of the Group directly or indirectly provide donations or assistance to political parties, political organizations, or individuals, such actions must comply with the relevant provisions of the Political Donations Act. Furthermore, employees of the Group are prohibited from discussing politics or engaging in political activities during work hours and within the workplace, and from posting posters, promotional materials, or speeches related to political activities.
- **Prohibition of improper charitable donations or sponsorships:** FIC Group's charitable donations or sponsorships must comply with relevant laws and be processed in accordance with the internal procedures of the Group for approval.
- **Prohibition of offering or accepting unreasonable gifts, hospitality, or other improper benefits:** Members of FIC Group shall not directly or indirectly provide or accept any unreasonable gifts, hospitality, or other improper benefits to establish business relationships or influence business transactions. If members of FIC Group receive any gifts for reasons unrelated to their own conduct, they shall immediately report to the Group and uniformly surrender the gifts for further handling by the Group. Unless there is a work-related necessity and prior approval from FIC Group, members of the Group shall not privately attend any meetings or activities organized by partners. Participation is permissible if it is within reasonable limits and not prohibited by laws or generally accepted business practices, such as attending sales activities, product launches, or professional seminars.
- **Prohibition against unfair competition:** FIC Group shall conduct its business activities in accordance with antitrust and unfair competition laws, refraining from price-fixing, bid-rigging, limiting production and quotas, or sharing or dividing the market through the allocation of customers, suppliers, operational areas, or types of business, in order to prevent the disruption of market competition and the weakening of fair competition.

II. Anti-corruption Statement

- (I) FIC Group does not engage in or accept any activities that do not comply with this policy or any anti-corruption-related laws.
- (II) The term ¡corruption¡ as stated in this policy includes the following behaviors:
 1. Bribery, facilitation payments, fraud, extortion, collusion, and money laundering.
 2. Providing or receiving gifts, loans, allowances, rewards, or other benefits as an inducement for unethical, illegal, or trust-violating behavior.

3. Corruption, influence peddling, abuse of power, illegal enrichment, concealment, and obstruction of justice.

- (III) Facilitation payments refer to small amounts paid to government officials or other third parties that do not comply with legal regulations to expedite or ensure the performance of routine governmental actions.

III. Applicable Personnel

- (I) Personnel of FIC Group: All directors, supervisors, managers, employees, appointees, and individuals with substantial control within FIC Group should be aware of and comply with the anti-corruption and anti-bribery regulations established by the Group.
- (II) Partners: To implement sustainable development and establish a clean and fair trading environment, all subsidiaries of FIC Group require suppliers and contractors (collectively referred to as partners) to sign a "Commitment to Integrity and Corporate Social Responsibility" or include anti-bribery clauses in contracts. Each subsidiary shall formulate relevant commitments based on regional policies and business needs to ensure that partners strictly adhere to this policy.
- (III) Related party: Personnel of FIC Group and any staff of partners may have close relationships with relatives and friends, including but not limited to spouses, parents, children, siblings, grandparents, great-grandparents, and other close relatives, friends, classmates, colleagues, and other affiliated personnel.

IV. Education and Training

FIC Group will timely implement relevant training on anti-corruption and anti-bribery for applicable personnel to ensure they fully understand this policy and the potential consequences and risks of any violations.

V. Audit and Supervision

The implementation of this policy by FIC Group, along with its system and control measures, will follow the relevant internal control systems. Each department will regularly conduct self-assessments and checks, further undergoing internal or external audits. The Group will also supervise the compliance of partners with this policy and implement appropriate procedures and substantive controls to ensure compliance with the Group's internal standards. Additionally, the Group will control relevant risks and promote continuous improvement.

VI. Reporting and Handling of Violations

If they become aware of any behavior or activity of the above-mentioned applicable personnel in violation of this policy or relevant laws and regulations, they shall immediately report the incident to the FIC Group through the reporting email at response@ficg.com.tw. FIC Group is committed to handling reports in a strictly confidential manner and will not retaliate against or threaten the whistleblower. However, sufficient and truthful information must be provided to facilitate subsequent investigations. If the investigation confirms the violation, FIC Group will impose sanctions in accordance with relevant regulations, including appropriate disciplinary actions, termination for severe cases, and pursuit of civil compensation or criminal prosecution.

VII. Implementation and Amendment

This policy, after being drafted by the Sustainable Development Committee and submitted to the Board of Directors for resolution, will be announced and implemented upon approval by the Board. The same procedure applies to amendments.

VIII. This policy was approved on 11/12, 2024. Each subsidiary will adjust its policy content according to the policies and relevant laws of their respective countries.