

# Innodisk Corporation

## Code of Ethical Conduct

- Article 1 (Purpose and Basis of Establishment)  
This Code is formulated to guide the behavior of the Company's personnel to conform to the ethical standards, and enable the Company's stakeholders to better understand the Company's ethical behavior standards.
- Article 2 (Definitions of Terms in this Code)  
The term "personnel of the Company" mentioned in this Code refers to directors, managers, and other employees.  
Managers mentioned in this Code include the general managers, deputy general manager levels, associate levels, and others entitled to manage the Company's affairs and sign documents.  
The term "company employees" mentioned in this Code refers to managers and other employees.
- Article 3 (Code of Ethical Conduct)  
The Company's employees must follow all applicable laws and regulations and this Code's provisions and maintain a high moral standard when executing their duties.  
The directors and managers of the Company should lead by example to promote and implement the provisions of this Code.
- Article 4 (Teamwork and Integrity Principles)  
The Company's employees shall maintain a proactive, serious, and responsible attitude in performing their duties, abandon individualism, emphasize team spirit, and adhere to the principle of honesty and integrity.
- Article 5 (Principle of Equal Appointment and Prohibition of Discrimination)  
The Company shall respect social diversity, provide its employees with equal appointment and career development opportunities, and not treat them differently or discriminate. There shall be no differential treatment or discrimination of any form due to factors such as personal gender, race, religious belief, party affiliation, gender orientation, rank, nationality, or age.
- Article 6 (Work Environment Health and Safety)  
The Company shall provide a healthy and safe working environment for its employees.  
The Company's personnel should jointly maintain a healthy and safe working environment and shall not engage in any sexual harassment or other acts of violence, threats, or intimidation.
- Article 7 (Labor Freedom)  
The Company prohibits using forced labor in any form and does not enslave or traffic labor. All labor shall be voluntary, and employees must be allowed to leave their jobs under the conditions specified by local laws and regulations. The Company forbids any behavior restricting labor freedom, such as confiscating ID cards, collecting deposits or mortgages, detaining workers' salaries, deploying surveillance or eavesdropping, demanding body searches, restricting workers' access to and from the factory, and forcing overtime.
- Article 8 (Respect for Privacy and Prohibition of Rumors)  
The Company's personnel shall respect each other's privacy and not spread rumors to attack others.
- Article 9 (Confidentiality Obligations)  
The Company's personnel shall carefully manage the matters, confidential information, or client information known to them during their duties; and shall not disclose or use them for purposes other than work unless disclosed by the Company or required by law. The same shall apply after their resignation.  
The confidential information stipulated in the preceding paragraph includes all unpublished information that competitors could use or cause damage to the Company or clients if it leaked.
- Article 10 (Obligation to Correctly Prepare and Preserve Documents and Materials)  
The Company's personnel shall ensure the correctness and completeness of all document or electromagnetic record forms under their management and must safeguard them properly. If documents or electromagnetic records are discovered to be lost, damaged, or their contents concealed or falsified, notify the unit's supervisor promptly to determine the cause.
- Article 11 (Proper Protection of Company Assets)  
The Company's personnel are responsible for safeguarding the Company's assets, ensuring they can be used effectively and legally for Company operations, and avoiding affecting the Company's ability to operate.  
When performing their duties, Company personnel must take special care not to allow data, information systems, network equipment, and other resources to be interfered with, destroyed, or invaded by any factor. The goal is to protect the confidentiality, integrity, and availability of the Company's information.

- Article 12 (Prohibition against Insider Trading)  
Any information learned by Company personnel due to their duties that may significantly affect the price of securities transactions shall be kept strictly confidential according to the provisions of the Securities and Exchange Act before it is publicly disclosed, and the information shall not be used for insider trading.
- Article 13 (Prohibition on Seeking Self-interest through Exploitation)  
The Company's employees shall not be permitted to use their positions for personal gain. The Company's personnel shall protect the legitimate rights and interests of the Company and avoid the following:
- I. Opportunities or actions to obtain personal gain through using Company assets and information or the convenience of one's position.
  - II. Compete with the Company in violation of legal procedures, or engage in business-related behaviors for oneself or others. When the Company has profit opportunities, the Company's personnel shall strive to increase the Company's legitimate legal interests.
- Article 14 (Conflicts of Interest Prohibition)  
The Company's personnel shall not engage in any fund lending, major asset transactions, guarantees, or other transactions that conflict with the interests of the Company in the name of themselves or others.
- Article 15 (Avoid Possible Conflict of Interest)  
Directors must maintain a high level of self-discipline. A participating director shall be recused if the director believes that the proposal resolved by the board of directors may cause a conflict of interest in the director or the legal person the director represents, which may harm the Company's interests.  
When a director believes he cannot handle affairs objectively or in a way that is beneficial to the Company or when a transaction or relationship may cause a conflict of interest, the director shall state the matter voluntarily and handle it legally and appropriately or be recused.  
Based on their position and authority, the Company's directors and managers shall take the initiative to declare whether they, their spouses, direct blood relatives, second-degree relatives, and the organizations for which they work are participating in the Company's business dealings; and handle it legally and appropriately or be recused.
- Article 16 (Fair Trade and Treatment)  
The Company's employees must treat the business transactions fairly and must not engage in any unfair or immoral behavior, such as:
- I. Obtaining improper benefits from each other.
  - II. Spread false rumors about clients, traders, competitors, and employees.
  - III. Deliberately misrepresent the quality or content of the Company's products or services.
  - IV. Obtaining improper benefits by manipulating, concealing, and abusing information acquired based on one's position, making false statements about important matters, or engaging in unfair transactions.
- The Company's personnel must trade with related parties or affiliated companies under the principle of fair treatment; comply with laws, regulations of competent authorities, and relevant regulations of the Company; and no special preferential treatment is permitted.
- Article 17 (Prohibition of Gifts, Bribes, or Improper Advantages)  
When performing their duties, the Company's personnel are not allowed to request, promise, deliver, or accept any form of gifts, entertainment, kickbacks, bribes, or other improper benefits to profit individuals, companies, or third parties. However, the gift or entertainment permitted by social etiquette and customs or company regulations is not restricted.
- Article 18 (Obligation to Report Transaction Authenticity)  
The Company's employees conducting transactions with others due to the performance of their duties shall, based on the principle of good faith, truthfully report the content of the transaction. They shall not conceal or make false reports that will damage the Company's rights and interests.
- Article 19 (Respect the Intellectual Property Rights of others)  
The Company's employees shall respect and legally utilize the intellectual property rights of others when performing their duties.
- Article 20 (Restrictions on Engaging in Political Party Activities)  
The Company's employees are neither permitted to engage in political activities in the workplace or during working hours nor allowed to use Company resources to do so. However, this does not apply to public relations personnel's specific public relations activities.
- Article 21 (Prohibition of Influencing the Political Party Activities of others)  
Directors and managers are not permitted to persuade employees to donate to political parties, support specific political parties or candidates, or participate in other political party activities in the workplace or during working hours.
- Article 22 (Compliance with Laws and Regulations)

- The Company's personnel shall abide by laws and regulations, such as the Securities Exchange Act, the Money Laundering Prevention Act, the Fair Trade Act, and other laws and regulations.
- Article 23 (Obligation to Report Violations)  
The directors and managers of the Company must constantly promote moral principles and urge all employees to report any violations of laws, regulations, or this Code as soon as they become aware of them or have a good faith suspicion that they have occurred. However, they must not do so in a malicious manner.  
The party accused of violation in the report shall not retaliate or make any threats against the violation reporter in the preceding paragraph. If the reporter encounters retaliation, threats, or harassment; the reporter shall immediately report to the superior supervisor, internal audit supervisor, or other appropriate personnel; and the Company shall deal with the matter immediately and appropriately.
- Article 24 (Punishment and Remedy Procedures)  
Suppose a Company's employee is involved in serious violations of relevant laws and regulations. In that case, the Company shall investigate their civil and criminal legal liabilities to protect the rights and interests of the Company and its shareholders. The Company's employees shall be subject to the personnel regulations and disciplined by the Company as necessary. The same applies to directors who failed to correct employee wrongdoing or comply with the Company's regulations.  
If a Company employee violates this Code, the responsible unit shall report it and take appropriate disciplinary action. When the Company accuses an employee of wrongdoing, the employee shall present evidence to appeal, and the Company shall take appropriate action with reference to the appeal of the accused.  
For directors and managers who violated this Code and are convicted of their crimes by the court of first instance or are determined by the Company's board of directors to violate this code and a disposition has been issued, the Company shall immediately disclose information such as the date of violation, the reason for the offense, the code violated, and the disposition on the Market Observation Post System.
- Article 25 (Procedures for Exemption)  
Suppose directors and managers must be exempted from complying with the provisions of this Code. In that case, it must be approved by a board of directors meeting with over two-thirds of the directors present and the consent of over three-quarters of the directors present.  
In the case of the preceding paragraph, the Company must immediately post information on the Market Observation Post System, including the date on which the board of directors approved the exemption, any reservations or objections from independent directors, the applicable time frame, and the criteria and justifications for the exemption.
- Article 26 (Disclosure Method)  
This Code shall be disclosed on the Company's website, annual report, prospectus, and the Market Observation Post System, and the same shall apply to its revisions.
- Article 27 (Measure Formulation and Implementation)  
The Company shall develop pertinent management rules and regulations according to the guiding principles and relevant information disclosed in this Code.
- Article 28 (Announcement and Implementation of this Code)  
This Code shall enter into force after approval by the board of directors and submitted to the shareholders' meeting. The same shall apply to its revisions.
- Article 29 (Formulation and Revisions)  
This Code of Conduct was established on 10-29-2012.  
The 1st amendment was made on 03-27-2013.  
The 2nd amendment was made on 03-18-2015  
The 3rd amendment was made on 02-23-2023.