



Anti-corruption and anti-bribery control procedures

1.0 Purpose:

In response to the societal call for anti-corruption and anti-bribery policies, and to fulfill our corporate social responsibility, this program is established to solidly advance the company's efforts in anti-corruption and anti-bribery. It aims to strengthen internal control mechanisms, promote honesty and integrity, and establish a core business philosophy centered around legality, integrity, and high-quality service. Considering the company's specific circumstances, the program focuses on reinforcing system supervision, promoting anti-corruption through established procedures, intensifying supervision and management of key areas and personnel prone to corruption, and guiding company staff and related interest groups (such as customers and suppliers) to conduct lawful and honest business, resist commercial bribery, and prevent corruption.

2.0 Scope:

2.1 This program is applicable to economic activities such as material procurement, outsourcing, facility engineering, equipment procurement and maintenance, quality supervision, as well as the management processes of personnel, finance, and assets within the company. 2.2 All customers, suppliers, service providers, and contractors engaged in business transactions with the company are also within the scope of this program.

3.0 Operating Procedures:

3.1 Implement a commitment system to prevent commercial bribery among personnel in key areas and positions.

3.2 The Human Resources Department, serving as the supervisory authority for the commitment system, has responsibilities including:

Compliance with national policies, laws, regulations, and institutional rules in combating commercial bribery.

Exercising the responsibilities of disciplinary inspection in accordance with the law.

Strengthening supervision and management of personnel in crucial positions and critical areas to ensure ethical practices.

Enforcing anti-bribery/anti-corruption commitments, preventing corruption at its source, improving institutional construction, and maintaining accurate records of the ethical conduct of personnel in critical positions and areas.

Monitoring and inspecting the implementation of this program within the company.

3.3 Commitment makers/companies must adhere to the following responsibilities:

Strictly fulfill the commitments made in the commitment letter.

Prohibit any form of commercial bribery.

Voluntarily accept the supervision of the department responsible for preventing commercial bribery.

If the commitment is violated, comply with the relevant regulations and actions determined by the supervisory department.



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3.4 During the implementation of anti-bribery measures, communication and collaboration between the company's management departments and relevant departments should be strengthened.

3.5 Carrying out Anti-Bribery/Anti-Corruption Activities:

3.5.1 Establish a leadership body for combating commercial bribery and carry out anti-bribery initiatives.

3.5.2 Set up a reporting mechanism for preventing commercial bribery and publicize the reporting hotline.

3.5.3 During the implementation of anti-bribery/anti-corruption measures, conduct thorough inspections and unannounced visits by the company's management department to other departments. Timely understanding of potential commercial bribery indicators and research on countermeasures for preventing commercial bribery.

3.5.4 Conduct investigations and research to grasp the characteristics and patterns of corrupt practices and commercial bribery. Propose specific measures in education, institutional development, and supervision to effectively prevent corruption. Promptly address emerging and potential issues.

3.6 Timely Resolution of Issues: Address problems discovered during the implementation of measures to prevent commercial bribery promptly. All departments, when identifying instances of violations or irregularities during the implementation of measures to prevent commercial bribery, should promptly intervene, handle the situation, and report it to relevant departments. Cases involving criminal suspicion should be referred to judicial authorities for processing.

3.7 Strengthen Management of Key Personnel: Each department should enhance the management of personnel in key positions. The adherence to commitment letters by these individuals should be a crucial aspect of inspections, assessments, and appointments/dismissals.

3.8 Supervision and Handling by Human Resources Department: The Human Resources Department, based on its responsibilities and authority, should conduct supervisory inspections of the implementation of this program. Actions of key personnel failing to fulfill commitment letters should be addressed, and recommendations for handling provided.

3.9 Handling Violations by Key Personnel: For key personnel within the company found to violate this program, appropriate measures should be taken based on the severity of the violation, following relevant regulations.

3.10 Handling Violations by External Entities: If individuals from companies engaged in economic activities with our company violate the "Employee Integrity and Self-discipline Commitment Letter," their supplier or service provider qualifications should be promptly revoked. Cases constituting commercial bribery crimes should be handed over to judicial authorities for criminal liability.

3.11 Department Responsible for Anti-Bribery/Anti-Corruption: Human Resources Department; Reporting hotline +36207468145 / +36207468144

3.12 Encouragement for Reporting Corruption: The company encourages employees and individuals engaged in business transactions to report instances of corruption. The entire process, including the acceptance and investigation of reports, must strictly maintain confidentiality. Disclosure of the reporter's identity, department,



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company name, and revealing report details to the accused or other departments is strictly prohibited. During the investigation, original or photocopy evidence of reports should not be presented, and the identity of the reporter should not be disclosed. Anonymous reports and accompanying materials should not undergo handwriting analysis, and the materials should not be casually loaned or disclosed to external parties.

4.0 Related Documents:

"Employee Integrity and Self-discipline Commitment Letter"