

Inventec Corporation

Anti-Corruption and Anti-Bribery Policy

Inventec Corporation (hereinafter referred to as “the Company”) is committed to a good business practice which prohibits to gain any private benefit and to give, promise, offer, or accept any improper benefits in any pattern from customers, agents, subcontractors, suppliers, public servants or any stakeholders directly or indirectly.

In order to comply with the high standard of integrity and honesty, Inventec adopts the principle of “zero-tolerance” for any forms of corruption and bribery while conducting business activities with others. To this end, Inventec formulated the “Anti-Corruption and Anti-Bribery Policy” (hereinafter referred to as “the Policy”).

Article 1 Scope of Application

The Policy applies to the Company and its directors, managers, employees, mandataries and persons having substantial control over the Company, and its subsidiaries’ directors, managers, employees, mandataries and other entities over which it has substantial control.

The board of director of the Company is responsible for ensuring that the Policy complies with the legal and ethical obligations and overseeing the compliance with the Policy by all persons to whom it applies. It is the responsibility of each level of management to ensure that all employees under their management understand the Policy.

Article 2 Definition

1. Improper Benefits

This refers to any improper payment activities in business situations for any of the purposes below, such as directly or indirectly offer or pay the government officials, individuals or entities of anything of value (including but not limited to money, presents, gifts, commissions, positions, services, favors kickbacks, facilitation payments, hospitality, mutually beneficial relationships, jobs, internships or education opportunities, advantages and other things of value, in whatever form and under whatever name):

- Affecting or preventing an act of public authority or any other act, such as entering into a contract, assessment of taxes or fines, or cancelling an existing contract or contractual obligation
- Receiving any authorizations, approvals or other permits from any government agencies or officials that the Company is otherwise unable to receive
- Obtaining business opportunities, tender products, or confidential information of competitors
- Affecting the entering or termination of any contractual relationships
- Promising to provide any other improper benefits.

2. Facilitation Payments

This refers to payments made to public officials/government officials, usually in the form of small amount of cash or small gifts, of which the sole purpose is to accelerate or ensure the implementation of routine government actions, while public officials/government officials do not have the discretion to refuse the implementation of such actions (for example, processing visas or supply electricity or water).

Article 3 Anti-Corruption Declaration

1. The Company does not engage or tolerate any activity that does not comply with the Policy or any anti-corruption laws.
2. The Company and its directors, managers, employees, mandataries and the substantial controllers shall not, directly or indirectly, provide, offer, promise, request or accept any improper benefits of any form to customers, agents, contractors, suppliers, public servants or any stakeholders including any bribes given under the pretense of direct or indirect donation or charitable donation or contribution to any political parties or any organizations or individuals involved in any political activities.
3. When direct or indirect offering contribution to political parties or organizations or individuals participating in political activities, the Company and its directors, managers, employees, mandataries and substantial controllers shall comply with the Political Donations Act and the Company's internal procedures, and shall not make such contributions in exchange for commercial gains or business advantages.
4. When making charitable contributions or sponsorships, the Company and its directors, managers, employees, mandataries, and substantial controllers shall comply with relevant laws and internal procedures, and shall not engage in bribery.
5. The Company and its directors, managers, employees, mandataries, and substantial controllers shall not directly or indirectly offer or accept unreasonable gifts, hospitality, or other improper benefits to establish business relationships or influence commercial transactions.

Article 4 Ethical Business Activities

When the company has profit opportunities, employees are liable for increasing legitimate interests and benefits of the company. Therefore, when representing the company for business purposes such as sales etc. should follow the principle of anti-corruption and anti-bribery. Integrity, honesty, commercial ethics and law should be complied with. Without the permission from the plant management center's highest director, it is prohibited to receive gifts, treats, entertainment or other rewards from the company's business associates, and people or organizations seeking to do business, especially the company's competitors. In particular, stringent standards should be strictly complied with when dealing with suppliers. Under the consent of the

plant management center's highest director, receiving gifts or hospitalities under business practices must meet the following conditions:

1. Consistent with business practices.
2. Not against the law and standards of ethical conduct.
3. Will not embarrass employees nor the company.
4. Open and transparent treatment by the company when receiving the gift.

Article 5 Compliance

The Company shall comply with the Company Act, Securities and Exchange Act, Business Entity Accounting Act, Political Donations Act, Anti-Corruption Statute, Government Procurement Act, Act on Recusal of Public Servants Due to Conflicts of Interest, TWSE/GTSM listing rules, or other laws or regulations regarding commercial activities.

Article 6 Regular Risk Assessment and Reporting Mechanism

The Company evaluates the execution and risk of current anti-corruption regulations and relevant policies. When needed, the Company will amend current policies or measures to comply with the regulation to avoid and mitigate corruption risks. The measures taken by the Company must be reasonable and appropriate which specifically address the content of the identified risks.

Article 7 Record

All financial activities including reimbursement of gifts and social expenses shall all be recorded in proper manner in books and records based on the Company's accounting system.

The Company conducts regular internal and external audits to continue monitor whether the records of various business activities is complete and accurate, in compliance with the Company's internal control system requirements regulated in this Policy.

Article 8 Training and Advocacy

The Company shall periodically organize training and awareness programs for directors, managers, employees, mandataries, and substantial controllers, and invite the Company's commercial transaction counterparties so that they fully understand the Company's resolve to implement ethical corporate management, related policies, prevention programs, and the consequences of unethical conduct.

Article 9 Report and Handling of Violations

1. If there are any violations, suspected violations or possible violations of the Policy of internal or external persons, anyone can report through the following contacts.
 - Appeal hotline: (02) 2881-0721 ext. 21999
 - Appeal email: 21999@inventec.com
2. Any Individual may file a report or complaint to the mentioned contacts; however, sufficient information should be provided for further handling of the matter.
3. The Company is committed to ensuring that any who, in good faith, reports any apparent violation of the Policy or relevant regulation of the Company or its stakeholders will not face any form of retaliation or threat. The content of such reports will be treated with strict confidentiality.
4. Individuals found to be in violation of the Policy will face severe consequences including termination of employment. In addition to internal penalties, violation of the Policy may expose responsible individuals to serious civil liabilities, administrative penalties or criminal prosecution. If a business partner is found to violate the Policy, the Company reserves the right to immediately cease all business relations and blacklist them, which reinforces the Company's commitment to this Policy.

Article 10 Implementation and revision

The Policy is implemented after being approved by the board of directors, and the same procedure applies for revision.
The Policy was formulated on November 11th, 2024.