

SHIEH YIH MACHINERY INDUSTRY CO., LTD.

Code of Ethics

1 Purpose

In order to promote the integrity of the organization and the ethical quality of the employees, and to clearly set the requirements of the relevant ethical standards that all employees should comply with and implement, and to further enhance the company's image of honesty and integrity management, the following regulations have been set forth for all employees to follow.

2 Scope

The ethical conduct of employees of the Company engaging in various duties and responsibilities of management or business activities shall comply with the implementation of these rules.

3 Rights and Responsibilities

3.1 Human Resources

- 3.1.1 Responsible for the implementation of the "Confidentiality and Intellectual Property Rights Agreement" and "Integrity Pledge" signed with all employees and the signing of relevant confidentiality or agreement documents with relevant personnel according to each project.
- 3.1.2 Promote relevant regulations and laws regarding professional confidentiality, professional integrity and ethical conduct, and assist all employees in understanding and familiarizing with all confidentiality and ethics requirements.
- 3.1.3 Receive and handle all reports and complaints of violations or relevant issues with the "Code of Ethics" within the organization, and handle and resolve issues in a timely manner.

3.2 Accounting and Finance

Responsible for establishing a sound financial system and implementing regular financial audits and disclosure of financial information.

3.3 Other Departments

The relevant units of the case should help provide information and cooperate with the investigation.

4 Standards of Ethical Conduct

4.1 Honest and Ethical Behavior

Employees shall fulfill responsibilities and duties with honesty and ethical conduct, including dealing with personal and obvious interests in the line of duty in an impartial and fair manner.

4.1.1 Employees shall follow the company's procurement process in the procurement of stationery products / raw materials / components on behalf of the company, and not to accept bribes, kickbacks or other inducements in procurement transactions.

4.1.2 Employees must not take advantage of their positions to accept benefits from relevant personnel or business units. The term "benefits" refers to money, gifts, presents, commissions, positions, services, privileges, rebates, facilitation fees, entertainment, hospitality, and other items of value, regardless of form or name. Exceptions are permitted only under the following circumstances and must be handled in accordance with relevant procedures:

4.1.2.1 Actions taken in accordance with local etiquette, customs, or traditions during domestic or international visits, hosting foreign guests, promoting business, or facilitating communication and coordination for business purposes.

4.1.2.2 Participation in or invitations to normal social events conducted for purposes of social etiquette, commercial goals, or relationship-building in line with standard social practices.

4.1.2.3 Inviting clients or accepting invitations to participate in specific business activities, factory tours, or similar events due to business needs.

4.1.2.4 Rewards, assistance, condolences, or recognition provided by supervisors.

4.1.2.5 Other actions in compliance with company policies.

4.2 Prevention of Conflict of Interest

4.2.1 Employees shall conduct duties in an objective and efficient manner and shall not use their position to receive improper benefits and gifts for themselves, spouse, parents, children, etc.

4.2.2 Employees shall not invest in entities with which the Company has business dealings or which are in competition with the Company; nor shall the employee's spouse and children engage in production and business activities within the employee's scope of responsibilities that may affect the impartial performance of their duties and infringe upon the interests of the Company.

4.2.3 Employees shall not work in any capacity for any company or entity with which the Company has a competitive relationship, conflict of interest, or potential conflict.

4.2.4 Employees shall not accept business gifts of value that may influence business decisions or impair independent judgment, nor shall the employee designate a third party to accept such gifts on his or her behalf.

4.3 Avoiding opportunities for personal gain

- 4.3.1** Employees shall not use Company property or information or use their position in a manner that provides personal benefits to oneself or others for improper gain.
- 4.3.2** Employees shall not take personal advantage of business opportunities that fall within the Company's business activities scope.
- 4.3.3** Employees shall not leverage relationships to lobby for promotions or work reassignments.
- 4.3.4** Employees shall not engage in manufacturing and business activities that are in competition with the Company.

4.4 Compliance with Trade Secret Confidentiality Requirements

- 4.4.1** Employees shall be responsible and liable for the confidentiality of non-public information, trade secrets and intellectual property rights of the Company, its suppliers or customers, unless authorized or required by law to be disclosed.
- 4.4.2** Employees shall follow confidentiality requirements and not disclose any business/commercial secrets or other personal information possessed or obtained during employment. The same applies after leaving the Company.

4.5 Fair Dealing

- 4.5.1** All employees shall uphold the Company's philosophy of integrity and shall not engage in fraud or use illegal or unethical means to obtain results or profits that would damage the Company's reputation for integrity.
- 4.5.2** Employees shall treat the Company's suppliers, customers, subordinates and associates fairly and impartially. They shall not misrepresent important matters through manipulation, concealment, or misuse of information obtained through their duties that would cause the subjects to be treated unfairly and to gain improper benefits from such treatment.

4.6 Protection and Proper Use of Company Assets

- 4.6.1** Employees shall fulfill their responsibilities and duties to properly store and maintain the company's resources, assets, and equipment to ensure effective use and operation of the Company's business and prevent theft, negligence, or waste that could damage the Company's profits and increase costs. Unit managers shall also fulfill their supervisory responsibilities.
- 4.6.2** The effective use of the Company's assets, proper preservation and maintenance, and disposal procedures must be approved and implemented in accordance with relevant regulations.
- 4.6.3** Employees shall not infringe on the intellectual property rights (e.g., patents, trademarks, copyrights, trade secrets, etc.) and other rights and interests of the Company protected by law.

4.7 Other Regulations

- 4.7.1** For confidential information that is not within the scope of an employee' s own duties, the employee shall not pry or participate in the dissemination of gossip, and should immediately report to their supervisors if they find the spread of any untrue information.
- 4.7.2** The responsible personnel should retain and store relevant documents properly and report to the supervisor immediately if they are lost or stolen.

4.8 Reporting Channels

The Company has established and announced internal independent reporting email and hotline systems, available for use by both internal and external personnel.

- 4.8.1** Email : wecare@seyi.com
- 4.8.2** Phone : 03-3525466#3260
- 4.8.3** Reports may be submitted verbally, via email, or in writing. For verbal or email submissions, the receiving personnel or department must document the report and read it aloud or present it to the informant for review to ensure its accuracy. The documentation of written, verbal, or email reports must include the following details and be signed or stamped by the informant:
 - 4.8.3.1** The informant' s name, ID number, and contact information, including address, phone number, and email address.
 - 4.8.3.2** The name of the accused or other identifiable information sufficient to determine the identity of the accused.
 - 4.8.3.3** Specific evidence or details that can facilitate the investigation.

4.9 Principle of investigation

- 4.9.1** Reports should include the name of the person being reported, unit, position, basic circumstances, the amount of money involved in the case, and other relevant information.
- 4.9.2** If an anonymous report is accompanied by solid documentary or physical evidence, and the circumstances, name of the person involved, time, place, and relationship are clearly explained, the investigative officer in charge may also initiate an internal preliminary investigation. However, if the anonymous whistleblower is required to provide additional explanation or information due to the interruption of the chain of evidence or the lack of legal constitutive elements, and if he or she is contacted but does not respond, the investigative officer in charge may close the case.

- 4.9.3** If an investigative officer in charge is a direct, collateral blood relative or relative by marriage of the whistleblower or the person being reported, or has a conflict of interest with the person being reported, or has other relationships that may affect the handling of the case, he or she shall recuse himself or herself.
- 4.9.4** The investigation shall be conducted fairly, impartially, and in accordance with the law, but the investigation shall not be open, but the conclusion of the case shall be made public.

4.10 Reporting and Handling Procedures

- 4.10.1** If the reported matter involves a general employee, it shall be submitted to the department supervisor. If it involves a senior executive, it shall be reported to the Chairman of the Board.
- 4.10.2** The Company' s designated unit and the personnel or supervisor receiving the report shall immediately investigate the relevant facts. Assistance from compliance or related departments may be sought if necessary.
- 4.10.3** If the reported individual is confirmed to have violated relevant laws, regulations, or the Company's integrity management policies and rules, the individual shall be required to cease the offending behavior immediately. Appropriate measures shall be taken, and if necessary, legal action shall be pursued to seek compensation for damages, thereby safeguarding the Company's reputation and interests.
- 4.10.4** All written records of report acceptance, investigation processes, and outcomes must be retained for five years. Records may be stored electronically. If litigation related to the report occurs before the retention period expires, relevant records must be preserved until the conclusion of the litigation.
- 4.10.5** If the reported issue is verified, the Company' s relevant units shall review the internal control systems and operating procedures to identify deficiencies and propose improvements to prevent recurrence of similar incidents.
- 4.10.6** The Company' s designated unit shall report the details of the reported matter, handling process, and subsequent improvement measures to the Chairman of the Board.

4.11 Whistleblower Protection

Personnel handling whistleblowing cases must issue a written statement to ensure the confidentiality of the whistleblower' s identity and the content of the report. The Company is committed to protecting whistleblowers from any improper treatment resulting from their report. The Company' s designated unit shall handle cases based on the following principles:

- 4.11.1** Supervisors and the Human Resources Department must strictly protect the whistleblower's identity to ensure their personal safety and prevent any threats, intimidation, or retaliation.
- 4.11.2** The whistleblower's personal information, circumstances, and report details must remain strictly confidential unless the whistleblower consents to their disclosure.
- 4.11.3** The content of the report must not be disclosed to the reported unit or individual. If disclosure is necessary for investigation, it must be approved by a supervisor of department-level or above, and an excerpt version must be prepared.
- 4.11.4** During publicity or when recognizing whistleblowers for their contributions, the whistleblower's details must not be disclosed without their consent.

4.12 Rewards and Disciplinary Measures

- 4.12.1** Internal personnel found to have made false or malicious accusations shall be subject to disciplinary action, including dismissal in severe cases.
- 4.12.2** Whistleblowers or reporters who provide substantial, significant, or exemplary information may be rewarded.
- 4.12.3** Individuals confirmed to have violated these regulations shall be disciplined based on the severity of the offense, subject to the Chairman's approval. If criminal liability is involved, the case shall be referred to judicial authorities.

5 Implementation and Amendments :

This policy shall be implemented upon approval by the Chairman of the Board. Any amendments shall follow the same procedure.

6 Attachments :

Attachment 1: Confidentiality and Intellectual Property Agreement

Attachment 2: Integrity Commitment Statement

Attachment 3: Confidentiality Agreement for Servo Press Development, Design, and Manufacturing Project