

# Code of Conduct

Wistron InfoComm (Czech), s.r.o., ID No.: 27714152, registered office at Vlastimila Pecha 1269/10, Černovice, 627 00 Brno (hereinafter referred to as "Wistron", "we" or the "Company") is committed to sustainable business development. We know that when striving for sustainable growth of a company, the business strategy must take into account the impact and impact on society and the environment, which is why we continue to strive to move forward with the vision of "Sustainability through Innovation". This Code of Conduct (the "Code") is formulated with the aim of creating consistent values and culture for all Wistron employees and guiding them in the conduct of their business activities. This Code applies to all persons within the Company, its subsidiaries and joint ventures in which the Company has significant influence, including directors, officers, managers and employees.

## **Chapter I Business Ethics and Operations**

Integrity is a core value of Wistron and the foundation of its business. We are committed to upholding the company's core values, adhering to a high standard of professional ethics, requiring all employees to engage in daily work and business, and adhering to ethical standards of conduct in order to maintain the company's reputation.

### **Article 1 Corruption and Bribery**

Integrity is a core value of Wistron and the foundation of its business. We resolutely prohibit any corruption, bribery or any improper advantage. All trading positions are subject to the same requirements and we never accept or provide gifts, offers or hospitality that may be considered bribes.

1. In business dealings, you must not directly or indirectly offer, promise, solicit or engage in any conduct that violates the integrity, legality or duty of due managerial care.
2. When accepting gifts or hospitality related to the position, it must be assumed that they must not have an impact on the performance of the job and must comply with the principles of common social etiquette and customs.

## **Article 2 Conflict of Interest**

All Wistron employees are obliged to avoid any situation in their business dealings that could cause a conflict of personal interests with those of the company. If you become aware of/are confronted with (but not limited to) the following circumstances, you should proactively and fully disclose to your immediate supervisor and the top officer of the Human Resources department (in the case of relevant persons other than directors) or the board of directors(s) any conflict of personal interest with the interests of the Company:

1. The functions and activities performed may give rise to undue advantages for yourself or your spouses and relatives up to the third degree of kinship<sup>1</sup> (including, but not limited to, any form of money, gifts, commissions, positions, services, privileges, so-called small houses, etc.) or may affect the performance of official duties and their assessment.
2. Activities outside the Company that are in direct competition with the Company's business, or any work and duties that could interfere with your job duties with the Company.
3. Using the Company's resources (such as information, goods, property, etc.) without the Company's consent for activities other than the Company's business.
4. Your relatives work at Wistron up to the third degree.

## **Article 3 Fair Trading**

Wistron prohibits participation in unfair competition and all employees must adhere to the following principles in their business activities:

1. Business activities must be conducted in accordance with applicable competition laws and regulations and must not unlawfully fix prices, manipulate offers, limit production and quotas, share or divide the market through the reallocation of customers, suppliers, operating areas or types of business.
2. In the event of reasonable doubts in the conduct of commercial activities, the superior authority or legal department should be consulted immediately. Any

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<sup>1</sup> Third-degree relatives = great-grandparents, great-grandchildren, great-uncles, great-aunts, cousins



matter that might concern or violate applicable legislation should be reported immediately to the head of the relevant department.

#### **Article 4 Insider trading**

We will comply with applicable insider trading laws and regulations to protect the rights and interests of the investing public, to allow buyers and sellers to obtain the same information, and to promote fairness of securities market transactions, and to refrain from any of the following:

1. Once it becomes aware of any information having a material effect on the price of the Company's securities, and after such information has been verified to be accurate, and before or within 18 hours after its publication, it will not buy or sell, in its own name or on behalf of another person, shares of the Company that are traded on an exchange or over-the-counter market, or any other securities of the Company's stock type.
2. Once it has become aware of any information having a material impact on the Company's ability to repay principal or interest, and after such information has been verified as accurate and before or within 18 hours after its publication, it shall not sell, in its own name or on behalf of another person, non-equity corporate bonds of such Company that are traded on an exchange or over-the-counter market.

#### **Article 5 Political contributions**

Wistron employees who directly or indirectly contribute to political parties or organizations or individuals involved in political life must adhere to the following principles:

1. If Wistron makes political contributions, it must comply with applicable laws and regulations and must not seek commercial or transactional benefits.
2. Wistron employees do not make direct or indirect political contributions on behalf of the company. Any legitimate political contribution on behalf of Wistron, regardless of its amount, must be approved by the Chairman of the Board of Directors before it is made.
3. You may not use any Wistron property, Wistron facilities, for political activities or engage in any political activities during business hours.

## **Article 6 Charitable contributions and social engagement**

To live up to Wistron's "altruistic" business philosophy, we invest resources in fulfilling our civic duties through charitable donations and social engagement. Relevant legal charitable and sponsorship donations to Wistron are handled in accordance with the Charity and Sponsorship Administration and must not be disguised as bribes or profits. Charitable and sponsorship should be provided in accordance with the following principles:

1. Comply with the provisions of applicable laws and other local legislation.
2. Rewards received as a result of sponsorship must be clear and proportionate and must not be the subject of commercial negotiations or concern persons with interests in Wistron.
3. Upon making a charitable or sponsorship donation, it will be confirmed that the purpose of the cash flow is consistent with the purpose of the donation.

## **Article 7 Information security**

1. In order to protect the Company's assets and the rights and interests of its stakeholders, Wistron has established an "Information Security Policy" while continuously strengthening information security management and establishing a robust information security system and mechanism to ensure the confidentiality, integrity and availability of information.
2. All Wistron personnel must comply with the following:
  - (1) Confidential information will not be shared with third parties.
  - (2) Unauthorized access to external information is not permitted.
  - (3) Downloading, installing and distributing unauthorized software or data is prohibited.
  - (4) It is forbidden to illegally intercept network packets and disrupt other people's computer systems.
  - (5) It is forbidden to create or distribute programs or devices that interfere with other people's systems.
  - (6) It is forbidden to use the Company's network resources to perform work unrelated to the Company's business.



- (7) Obligation to keep a personal computer safe, for example, by installing antivirus software, setting strong passwords, installing patches, etc.
- (8) Transferring storage media such as laptops and disks to and from the company must comply with the appropriate control measures of each circuit.
- (9) In the event of a violation, in addition to submitting relevant records to the supervisor for review and improvement if the circumstances of the case are serious, the hearing and legal liability will be dealt with in accordance with the Company's relevant measures regarding remuneration and penalties.

## **Chapter II: Protection of Human Rights**

### **Article 8 Human rights**

1. Human Rights Risk Assessment – we conduct regular human rights risk assessments and take appropriate improvement measures to mitigate negative impacts on the protection of human rights.
2. Non-discrimination - discrimination based on geographical location, race, ethnic origin or upbringing, social class, ancestry, religion, disability, gender, sexual orientation, pregnancy, marital status, trade union membership, political views, appearance, age or trade union affiliation is prohibited. In addition, we also support the employment of people with disabilities.
3. Humane treatment and prohibition of forced labour - inhumane treatment of employees, including any form of violence, harassment, violation of rights, corporal punishment, psychological or physical oppression, bullying, public humiliation or verbal abuse, is prohibited or threatened. Forced labour, slave labour, imprisonment or threats of violence to force workers to provide services are strictly prohibited.

### **Article 9 Privacy Policy**

1. Wistron is committed to protecting the personal data of employees, customers, suppliers and all users (including, but not limited to, visitors to Wistron's websites, users of our products or services, employees of corporate customers and suppliers, job applicants, visitors to Wistron, etc.). In order to establish the



protection and management of personal data and reduce the impact of personal data incidents, the "Privacy Policy" and the "Privacy Policy"

2. Wistron's privacy practices are as follows:
  - (1) The disclosure, collection, use and retention of personal data is based on a principle of not going beyond the specific purpose and is in accordance with privacy and applicable law, and is only carried out in connection with legitimate business activities.
  - (2) Adopting strict security control mechanisms to protect personal data to prevent illegal intrusion and access to data.

#### **Article 10 Occupational health and safety**

1. Wistron is responsible for ensuring a healthy and safe working environment for all employees. We have implemented an occupational health and safety management system to carry out risk assessments and improve procedures that reduce health and safety risks. We have formulated an occupational health and safety policy with the aim of:
  - (1) Improve the functioning and performance of the occupational health and safety management system.
  - (2) Strengthen employee consultation, participation and information.
  - (3) To prevent injuries and illnesses.
2. At the plant management, we take the following measures to protect all employees:
  - (1) Control and reduction of hazards through management, prevention and early warning system such as technical inspection and protective measures.
  - (2) Implementing maternity protection measures to protect pregnant women or breastfeeding mothers.
  - (3) Establishing emergency preparedness and planning regular exercises to respond to various emergencies.
  - (4) Establishing management procedures to prevent accidents and occupational diseases, as well as to help employees return to work.
  - (5) Regular maintenance and inspection of machines and equipment to prevent accidents.

- (6) Providing healthy, safe and hygienic food and accommodation.
- (7) Providing relevant training and publishing announcements to improve safety awareness.

### **Chapter III: Environmental Protection**

To reduce the negative impact of its activities on the environment, Wistron continues to develop high-quality environmentally friendly products and services, while committing to environmental friendliness and formulating environmental and energy policies to save energy and reduce carbon emissions, committing to:

1. To strive for energy savings and to increase the share of renewable energy sources in order to mitigate climate change.
2. To promote efficient energy installations and improve environmentally friendly programmes and technologies to reduce pollutant emissions.
3. To introduce water recycling and reduce waste production.
4. To provide green products and services and to apply the concepts of energy saving and carbon reduction, material saving, prohibition of harmful substances and resource recovery.

#### **Article 11**

We are implementing the Climate Financial Disclosure (TCFD), which includes the share of renewable energy sources, to ultimately reduce the impact on climate change.

#### **Article 12**

We will implement controlled water resource management and daily water conservation to improve water resource efficiency. We will properly treat wastewater before discharge and continuously carry out monitoring activities to ensure compliance with laws and other legislation.

#### **Article 13**

We will actively promote waste reduction and recycling without the use of banned substances and raw materials. Wistron will make technological improvements and look for environmentally friendly materials. We will evaluate or inventory the waste and

hazardous substances stream to minimize waste production. We will reduce the amount of pollutants through environmentally friendly technologies.

#### **Article 14**

We are committed to researching and developing products, design, manufacturing and services with respect to their life cycle. Wistron will integrate the concept of circular economy, sustainable design and development. We will maintain continuous resources that will help create a green cycle of sustainable business models.

### **Chapter IV: Management Mechanisms**

#### **Article 15 Responsible organizational unit**

The Sustainability Department has the primary authority and responsibility to implement this Code and to establish the necessary processes to ensure the implementation of this Code.

#### **Article 16 Compliance with the Code**

All Wistron employees will comply with all requirements of this Code and their actual implementation will be included in their performance evaluations and the results may have an impact on their compensation and promotions.

#### **Article 17 Training**

We will regularly train all employees on this Code of Ethics and evaluate the effectiveness of the training.

#### **Article 18 Penalties for violating the Code**

We apply a zero-tolerance policy to any violation of this Code and will thoroughly investigate and address reported violations in real time. In the event of a violation of this Code, Wistron may, depending on the gravity of the circumstances, impose penalties and withhold performance awards/annual bonuses, etc., and if the violation of this Code is serious, Wistron may terminate the employment contract in accordance with the applicable laws and regulations of the specific location and the provisions of the employment contract, and the violator will also be summoned and claimed in accordance with applicable laws and other legislation.



## **Article 19 Feeds**

Any questions regarding this Code can be submitted through the Sustainability Department. Subsidiaries and joint ventures with a significant influence in the company may set up their own information channels.

## **Article 20 Whistleblowing mechanisms**

Wistron Administration & Human Resources is the main organisational unit for receiving reports and can be contacted at *wcz-info@wistron.com*. Upon receipt of the notification, the relevant employee/organizational unit will decide, depending on the circumstances and content of the submission, to process it or to initiate an investigation. If the report concerns an ordinary employee, it will be reported to the Head of Department or Head of Administration and Human Resources, and if the report concerns the Chairman of the Board of Directors or Managing Director, it will be reported to the Head of Audit or Independent Director. The Audit Department is responsible for overseeing investigations and handling reports. Wistron is committed to maintaining the confidentiality of the whistleblower's identity and the content of the report, and to accepting anonymous reports to protect the whistleblower from ill-treatment from the time of reporting.

## **Article 21 Implementation and revision**

This Code will be implemented upon its adoption by the Board of Directors, as amended.