

Chicony Power Technology Co., Ltd.

Codes of Ethical Conduct

Article 1. Purpose of and basis for adoption

These Guidelines are adopted by the Company for the purpose of encouraging directors and managers (including general managers or their equivalents, assistant general managers or their equivalents, deputy assistant general managers or their equivalents, chief financial and chief accounting officers, and other persons authorized to manage affairs and sign documents on behalf of the Company) to act in line with ethical standards, and to help interested parties better understand the ethical standards.

Article 2. Content of the code

Taking the business needs into consideration, the Company shall adopt a code of ethical conduct that addresses at least the following eight matters:

1. Prevention of conflicts of interest:

The Company's directors or managers shall perform their duties in an objective and efficient manner, or when a person in such a position takes advantage of their position in the company to obtain improper benefits for either themselves or their spouse, parents, children, or relatives within the second degree of kinship, especially loans of funds, provisions of guarantees, and major asset transactions or the purchase (or sale) of goods involving the affiliated enterprise at which the aforementioned personnel.

If there is any major asset transactions or the purchase (or sale) of goods between the Company's directors or managers, or relatives within the second degree of kinship, or the affiliated enterprise of relatives within the second degree of kinship, shall voluntarily explain whether there is any potential conflict between them and the company.

2. Minimizing incentives to pursue personal gain:

The Company shall prevent directors or managers from engaging in any of the following activities:

- (1) Seeking an opportunity to pursue personal gain by using company property, information or taking advantage of their positions.
- (2) Obtaining personal gain by using company property, information or taking advantage of their positions.
- (3) Competing with the Company.

When the Company has an opportunity for profit, it is the responsibility of the directors or managers to maximize the reasonable and proper benefits that can be obtained by the Company.

3. Confidentiality:

The Company's directors or managers shall be bound by the obligation to maintain the confidentiality of any information regarding the Company itself or its suppliers and customers, except when authorized or required by law to disclose such information. Confidential information includes any undisclosed information that, if exploited by a competitor or disclosed, could result in damage to the company or the customers.

4. Fair trade:

The Company's directors or managers shall treat all suppliers and customers, competitors, and employees fairly, and may not obtain improper benefits through manipulation, nondisclosure, or misuse of the information learned by virtue of their positions, or through misrepresentation of important matters, or through other unfair trading practices.

5. Safeguarding and proper use of company assets:

All the Company's directors or managers have the responsibility to safeguard company assets and to ensure that they can be effectively and lawfully used for official business purposes; any theft, negligence in care, or waste of the assets will all directly impact the Company's profitability.

6. Legal compliance:

The Company shall strengthen its compliance with the Securities and Exchange Act and other applicable laws, regulations, and bylaws.

7. Encouraging reporting on illegal or unethical activities:

The Company shall raise awareness of ethics internally and encourage employees to report to managers, chief internal auditors, or other appropriate individual upon suspicion or discovery of any activity in violation of a law or regulation or the code of ethical conduct. To encourage employees to report illegal conduct, the Company shall establish a concrete whistle-blowing

system and make employees aware that the Company will use its best efforts to ensure the safety of informants and protect them from reprisals.

8. Disciplinary measures:

Where a director or manager is found in contravention of Rules Governing Code of Ethical Conduct, the relevant department shall report the issue to the internal audit head. The internal audit head shall, after checking and verifying the facts and proofs, report to the chairman and vice chairman to check and verify the method of discipline. In case of a serious offense, the issue shall be submitted to the board of directors to resolve the method of discipline and shall be informed to the **audit committee**. Where the alleged offender successfully proves himself or herself without violation of the Code, he or she may submit the grievance to the Company forthwith.

In case of the aforementioned fact, the Company shall, based on the responsibility of the wrongdoer, adopt statutory measures as appropriate and shall have such information including the date of default, facts of the violation, violated rules and outcome of treatment disclosed onto the Market Observation Post System (MOPS).

Article 3. Procedures for exemption

If any exemption for the Company's directors or managers from compliance with this Code is necessary, shall adopt by a resolution of the board of directors, and that information on the date on which the board of directors adopted the resolution for exemption, objections or reservations of independent directors, and the period of, reasons for, and principles behind the application of the exemption be disclosed without delay on the MOPS, in order that the shareholders may evaluate the appropriateness of the board resolution to forestall any arbitrary or dubious exemption from the code, and to safeguard the interests of the Company by ensuring appropriate mechanisms for controlling any circumstance under which such an exemption occurs.

Article 4. Disclose methods

The Company shall disclose this adopted Code, and any amendments to it, on the Company website, in Annual Reports and prospectuses and on the MOPS.

Article 5. Enforcement

The Code of Ethical Conduct of the Company shall be implemented after the board of directors grants approval. The same procedure shall be followed when the principles have been amended.