

Sanwei Technical Ltd.

24F, No. 161, Song De Road, Taipei 110032, Taiwan, R.O.C

Tel: +886-2-2346 6368

Fax: +886-2-2346 2216

山威實業有限公司 110032 台北市信義區松德路 161 號 24 樓



SANWEI TECHNICAL LTD - SUPPLIER CODE OF CONDUCT

Sanwei Technical Ltd. (known in this document as, “Sanwei”) is committed to ensuring high standards of business, social, and environmental responsibility throughout our supply chain. All Suppliers, including their designated manufacturing facilities and their sub-tier suppliers involved in any aspect of the manufacturing process, are to maintain a high level of ethics, environmental responsibility, and labour relations to support our commitment to corporate social responsibility. This document outlines Sanwei’s expectation of its Suppliers in areas including human rights and the environment; and sets out important business practices. This Supplier Code of Conduct (“Code”) outlines the Supplier’s obligations to do business with Sanwei.

For the purposes of this document, "Supplier" means any company, corporation, or other entity that sells, or seeks to sell, goods or services to Sanwei. Sanwei’s Supplier shall abide by this Code and all applicable laws and regulations of the country or countries in which they are doing business, including labour, health and safety, environmental and criminal law. Failure to comply with this Code may result in Supplier disqualification from doing business with Sanwei. Sanwei’s direct Supplier is responsible for their sub-tier suppliers further down the supply chain and for ensuring the same standards as set out herein, are applied. Sanwei reserves the right to audit all entities in the supply chain for compliance.

A Supplier must, in all areas of its business operations, comply with all applicable laws, regulations, and directives of the countries and regions in which it operates. Additionally, each Supplier must ensure that its employees receive information and training in relation to all relevant legal, regulatory and internal requirements that apply to their jobs.

LABOUR

The Supplier should recognise and be committed to uphold the human rights of all employees. The Supplier should go beyond legal compliance, drawing upon internationally recognised standards to advance social and environmental responsibility.

A. Health and Safety

The Supplier shall ensure they provide a healthy and safe working environment for employees. Conditions in all work facilities must be safe, clean, and in compliance with all applicable laws and regulations. The Supplier shall have systems to detect, avoid, and respond to potential risks to the health and safety of all associates.

Sanwei Technical Ltd.

24F, No. 161, Song De Road, Taipei 110032, Taiwan, R.O.C

Tel: +886-2-2346 6368

Fax: +886-2-2346 2216

山威實業有限公司 110032 台北市信義區松德路 161 號 24 樓



Sanwei recognises integrating sound health and safety management practices into all aspects of business is essential and requires the Supplier to commit to creating a healthy work environment and safe working conditions for all their associates.

At a minimum, the Supplier shall:

- a. Provide a healthy and safe working environment for all employees
- b. Maintain compliance with all applicable health and safety laws and regulations
- c. Provide employees access to potable water and adequate sanitary facilities
- d. Provide employees with appropriate personal protective equipment necessary to perform their jobs safely
- e. Train employees to perform their jobs safely and to maintain and use personal protective equipment correctly
- f. Develop and maintain emergency response plans and equipment including evacuation, fire, medical, and other disaster response, and employee training

B. Child Labour

The Supplier shall not engage in child labour. No worker shall be employed under the age of fifteen (15) or fourteen (14) where established by national laws in accordance with the International Labour Organisation (ILO) developing-country exception; under the age of completion of compulsory education or under the minimum age for employment in the country, whichever is greater. The Supplier shall maintain copies of legal age documentation of each employee.

C. Forced Labour and Human Trafficking

The Supplier shall not engage in involuntary, forced, prison, indentured or slave labour, human trafficking or the hiring of trafficking and debt bondage victims. All employees shall be guaranteed freedom of movement. Overtime work shall be voluntary. The Supplier shall conduct due diligence to prevent the recruitment/hiring of victims of trafficking, debt bondage or other types of exploitation by third parties of such as labour brokers or contractors.

The Supplier should refer to the International Labour Organisation Conventions No. 29 and 105, the Supplementary Convention on the Abolition of Slavery, the Slave Trade and Institutions and Practices, and the Protocol to Prevent, Suppress, and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention Against Transnational Organised Crime. Prison labour shall mean labour conducted by convicts or labour conducted in lawful confinement.

Sanwei Technical Ltd.

24F, No. 161, Song De Road, Taipei 110032, Taiwan, R.O.C

Tel: +886-2-2346 6368

Fax: +886-2-2346 2216

山威實業有限公司 110032 台北市信義區松德路 161 號 24 樓



D. Harassment or Abuse

The Supplier shall ensure no worker is subject to any physical, sexual, psychological, or verbal harassment or abuse. Employees are to be treated with respect and dignity.

E. Discrimination

Discrimination in employment, including recruitment, hiring, training, working conditions, job assignments, pay, benefits, promotions, discipline, termination, or retirement on the basis of gender, race, ethnicity, social origin, religion, age, disability, sexual orientation, national origin, political opinion or any other status protected by country law is prohibited. Hiring, pay, benefits, training, advancement, discipline, termination, retirement, or any other employment-related decision shall be based on relevant and objective criteria.

F. Working Hours

The Supplier shall ensure working hours of employees comply with national laws and are not excessive. Employees shall be allowed at least one (1) day off in every seven (7) day period. The Supplier shall comply with applicable laws, which entitle employees to breaks, vacation time, leave periods, and holidays.

G. Wages and Benefits

Wages are essential for meeting the basic needs of employees. The Supplier shall compensate their employees by providing wages, including overtime pay, and benefits that satisfy all applicable laws and regulations.

H. Freedom of Association

The Supplier is required to respect the rights of employees to establish and join a legal organisation (including trade unions) of their own choosing without being penalized for their non-violent exercise of these rights.

Sanwei Conflict Minerals Statement

If requested by Sanwei, business partners who provide parts, products or raw materials that contain one or more 'conflict minerals' and source from the Democratic Republic of Congo or the nine countries surrounding it, must be willing to cooperate to conduct due diligence as per the requirements of the Dodd-Frank Act, and the 'Conflict minerals' are columbite-tantalite (coltan), cassiterite, gold, wolframite or their derivatives (tin, tungsten and tantalum) according to the Securities and Exchange Commission definition.

ENVIRONMENT

Sanwei Technical Ltd.

24F, No. 161, Song De Road, Taipei 110032, Taiwan, R.O.C

Tel: +886-2-2346 6368

Fax: +886-2-2346 2216

山威實業有限公司 110032 台北市信義區松德路 161 號 24 樓



A Supplier should recognise that environmental responsibility is integral to producing high quality products. In manufacturing operations, adverse effects on the environment and natural resources are to be minimised. The Supplier should be committed to a culture of continuously improving their operations, processes, and products to conserve resources, prevent pollution, and minimise adverse impacts to people and communities.

At a minimum, the Supplier shall:

- a. Comply with all applicable environmental laws and regulations.
- b. Notify Sanwei in writing of any change in manufacturing location or sub-contract third party suppliers.
- c. Maintain and comply with all applicable permits and reporting requirements.
- d. Implement an Environmental Management System (EMS) that includes, but not limited to, the following:
 - Statement of commitment (Environmental Policy, Position or Statement)
 - Identification of person(s) responsible and accountable for implementing programs and systems
 - System by which a Supplier can identify applicable laws and regulations
 - Risk management process
 - Employee training
 - Communications process
 - Processes for completing audits and assessments, and corrective actions
 - Documentation and recordkeeping
- e. Minimise the risks and environmental impacts from storage, use, transportation, and disposal of hazardous substances.
- f. Not use substances in operations, processes, or products banned by international conventions (i.e. Ozone Depleting Chemicals, Perfluorooctane-sulfonates, etc.).
- g. Implement pollution prevention and resource conservation program to reduce environmental impacts.
- h. Provide chemical or other environmental compliance data (upon request) for products and materials supplied to Sanwei, including, but not limited to:
 - EU RoHS
 - EU WEEE
 - EU ELV
 - EU REACH
 - Ozone Depleting Chemicals Product & Manufacturing Bans (U.S. Stratospheric

Sanwei Technical Ltd.

24F, No. 161, Song De Road, Taipei 110032, Taiwan, R.O.C

Tel: +886-2-2346 6368

Fax: +886-2-2346 2216

山威實業有限公司 110032 台北市信義區松德路 161 號 24 樓



Ozone Protection Act/Clean Air Act and EU Directives)

- IMDS/GADSL
- Other product chemical regulatory disclosures
- Full material disclosure

- i. Create and maintain documents and records to ensure regulatory and Code of Conduct compliance; and
- j. Maintain documentation to support compliance with all the above.

ETHICS

Sanwei is committed to conducting business in accordance with the highest ethical standards and in compliance with all applicable laws. Suppliers should report any ethical issue (or potential ethical issue) or violation of this Code to Sanwei immediately. This includes any potential ethical issue by Sanwei or a Supplier employee; concerns about ethical issues in the procurement process; or any other ethical concerns. There will be no negative reflection on any person or company for reporting an ethical concern in good faith.

The Supplier is expected to uphold the highest standards of ethics including:

a. No Corruption, Extortion, or Embezzlement

All forms of corruption, extortion, and embezzlement are strictly prohibited resulting in immediate termination and legal actions.

b. Disclosure of Information

The Supplier may have access to Sanwei's confidential (non-public) information. The Supplier shall hold this confidential information in the strictest confidence and shall not (except as required by law) disclose it to anyone without Sanwei's prior approval and then only on a need-to-know basis. Sanwei retains exclusive ownership of its confidential information. The Supplier shall not buy or sell Sanwei's equity or debt securities based on, or otherwise take advantage of, material, non-public information relating to Sanwei or its businesses.

c. No Improper Advantage

Bribes or other means of obtaining undue or improper advantages are not to be offered or accepted. The Supplier shall not engage in any activity on behalf of Sanwei including,

Sanwei Technical Ltd.

24F, No. 161, Song De Road, Taipei 110032, Taiwan, R.O.C

Tel: +886-2-2346 6368

Fax: +886-2-2346 2216

山威實業有限公司 110032 台北市信義區松德路 161 號 24 樓



without limitations, projects, transactions, lobbying, charitable or political donations and appearances before Governmental entities, officials, or representatives.

d. Anti-bribery – Kickbacks, Bribes and Payoffs

Suppliers shall comply with all anti-bribery laws, regulations, and legislations. Suppliers must not offer nor accept anything of value to secure an improper advantage or benefit. The Supplier shall not offer or accept, either directly or indirectly, kickbacks, bribes or payoffs in cash or any other form. It does not matter that a prohibited payment may be demanded by a public official; the prohibited payment still may not be made. The Supplier shall not facilitate payments on our behalf nor engage in any activity on behalf of Sanwei

including, without limitations, lobbying, charitable or political donations and appearances before Governmental entities, officials, or representatives.

Supplier should maintain standards in compliance with the Foreign Corrupt Practices Act ("FCPA"), the UK Bribery Act 2010 ("UK Bribery Act"), and similar anti-bribery laws of other countries (together, "Anti-Bribery Laws").

e. Fair Business, Advertising and Competition

Standards of fair business, advertising, and competition are to be upheld. A Supplier shall not engage in bid collusion and/or customer/market allocation with other Sanwei Suppliers. The Supplier shall comply with all applicable antitrust, trade regulation, and competition laws.

Our suppliers are expected to follow this Code of Conduct or an equivalent. Those reporting Code of Conduct concerns in good faith have the right to whistle-blower protection if the need arises.

In the event of that a breach in this Code of Conduct or supporting policy is suspected:

- a. It will be investigated
- b. In the event of that a breach is found, the employee(s) concerned will be subject to disciplinary action and the company may report the matter to the relevant authorities
- c. Feedback on the progress of the investigation will be given to the person reporting the concern

Confidential reporting or clarifications of this and related policies can be made to: ethics@sanwei-asia.com