

天鈺科技股份有限公司 商業道德政策

天鈺科技以誠信與透明為立業根本，恪守國際商業道德標準，營運所在地法規及相關國際規範。我們致力於建立公開、公平、負責任的企業文化，本政策適用於本公司及所屬子公司、合資公司、供應商、合作夥伴及其他具實質控制能力之關係企業組織。

一、誠信經營與反貪腐

- 堅持廉潔經營，禁止任何形式的貪污、賄賂、勒索、詐欺及不當利益輸送。
- 所有商業往來應公開透明，並依規記錄與申報，不得偽造文書或隱匿資訊。
- 禁止提供或接受不當禮品、款待或其他利益，以影響商業決策。

二、反洗錢與資金透明

- 嚴格遵守《洗錢防制法》及相關國際規範，確保資金流向透明、合法。
- 對高風險客戶、交易或地區實施加強審查，並依法執行客戶盡職調查。
- 禁止任何形式的洗錢行為，包括隱匿資金來源、虛假交易等。

三、公平交易與競爭

- 遵守公平交易原則，禁止壟斷、聯合行為、合謀定價或其他妨礙市場競爭之行為。
- 禁止與競爭對手討論敏感商業資訊，如價格、客戶、市場劃分等。
- 所有商業行為應基於誠信與公平原則，不得利用不正當手段獲取競爭優勢。

四、責任採購與衝突礦產管理

- 不採購來源不明或涉武裝衝突、人權侵害之金屬（如衝突礦產及其他高風險礦物）。
- 要求供應鏈夥伴落實盡職調查，並提供相關證明，以確保礦產採購符合道德標準。

五、智慧財產權保護

- 恪遵相關法律規範及契約要求，尊重並維護客戶、供應商等合作夥伴之智慧財產權，並嚴禁未經授權之使用、複製、修改、散布或揭露。
- 嚴格管理公司營業秘密、專利、商標及技術資料，落實員工保密義務與競業禁止規範，確保相關資訊之安全與合法運用。

六、資訊揭露與透明度

- **財務與非財務資訊揭露**：我們承諾即時、準確、公平地揭露公司之財務、業務、公司治理及永續發展等重大資訊，確保利害關係人（包括投資人、員工、客戶與社會大眾）能充分了解公司營運狀況。
- **溝通管道**：透過公司官網、年報、永續報告書及公開資訊觀測站等多元公開管道，主動進行資訊溝通。
- **反綠色漂洗（Anti-Greenwashing）**：所有於永續發展、環境保護與社會責任方面之聲明與報告，均需基於事實與具體證據，不得有誤導、誇大或欺瞞之情事。

- **供應鏈透明度：**針對衝突礦產、人權盡職調查及關鍵道德風險領域，我們將適度揭露管理方針與績效，以展現負責任的供應鏈管理承諾。

七、隱私與個人資料保護

- **合規管理：**我們承諾遵循《個人資料保護法》及全球營運據點之隱私保護法規，對個人資料之蒐集、處理、利用及傳輸，皆以合法、公平、透明為原則。
- **最小化蒐集與安全維護：**僅蒐集業務所需之最小必要個人資料，並採取嚴密的技術與組織安全措施（如加密、存取控制）予以保護，防止未經授權的存取、洩露、篡改或毀損。
- **尊重主體權利：**保障個人對其資料之查詢、更正、刪除及撤回同意等權利，並設立明確受理管道。
- **供應鏈與第三方管理：**要求所有涉及處理個人資料的供應商與合作夥伴，必須遵守同等級的隱私保護標準。

八、檢舉人保護與不報復承諾

- 提供多元且保密之檢舉管道（包括匿名檢舉），供內外部利害關係人反映違規行為。
- 確保檢舉人安全，禁止任何形式之報復、騷擾或歧視，並對檢舉案件進行公正調查。

九、持續提升道德水準

- 定期檢視商業道德政策與執行情形，並進行內部稽核與改善。
- 推動全員道德教育訓練，強化誠信意識與法規遵循能力。
- 因應社會情勢與利害關係人期望，持續優化道德管理體系。

我們呼籲所有員工、供應商及合作夥伴共同遵循本政策，若有任何違規疑慮或建議，請透過以下管道反映，我們將嚴肅處理每一項檢舉，並持續推動誠信經營與永續發展。

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林永杰

董事長暨永續發展委員會主任委員

2025 年 11 月



Fitipower Integrated Technology Inc.

Business Ethics Policy

Fitipower Integrated Technology upholds integrity and transparency as the foundation of our business. We strictly adhere to international business ethics standards, local laws where we operate, and relevant international regulations. We are committed to fostering a culture of openness, fairness, and accountability. This policy applies to the company, its subsidiaries, joint ventures, suppliers, partners, and other entities under substantial control.

1. Integrity and Anti-Corruption

- We insist on ethical business conduct and strictly prohibit all forms of corruption, bribery, extortion, fraud, and improper benefit exchange.
- All business interactions must be conducted transparently, accurately recorded and reported, with no falsification of documents or concealment of information.
- Offering or accepting inappropriate gifts, hospitality, or benefits to influence business decisions is strictly forbidden.

2. Anti-Money Laundering and Financial Transparency

- We strictly comply with the Money Laundering Control Act and relevant international standards to ensure legal and transparent financial flows.
- Enhanced due diligence must be conducted on high-risk customers, transactions, or regions, and customer due diligence must be performed in accordance with the law.
- Any form of money laundering—such as concealing sources of funds or engaging in fictitious transactions—is prohibited.

3. Fair Trade and Competition

- We adhere to fair trade principles and prohibit monopolistic practices, collusion, price-fixing, or any actions that hinder market competition.
- Exchanging sensitive business information—such as pricing, customers, or market segmentation—with competitors is prohibited.
- All business practices must be based on integrity and fairness, without seeking undue competitive advantages.

4. Responsible Sourcing and Conflict Minerals

- We do not procure metals of unknown origin or those associated with armed conflict or human rights abuses (e.g., conflict minerals or other high-risk minerals).
- We require supply chain partners to implement due diligence and provide proof to ensure that mineral sourcing meets ethical standards.

5. Intellectual Property Protection

- We comply with applicable laws and contractual obligations, and respect and safeguard the intellectual property rights of customers, suppliers, and partners. Unauthorized use, duplication, modification, distribution, or disclosure is strictly prohibited.
- Trade secrets, patents, trademarks, and technical information are to be rigorously managed. Employees must honor confidentiality obligations and non-compete agreements to ensure the secure and lawful use of such information.

6. Information Disclosure and Transparency

- Financial and Non-financial Disclosure: We are committed to timely, accurate, and fair disclosure of material information related to finance, operations, corporate governance, and sustainability, ensuring stakeholders—including investors, employees, customers, and the public—are well-informed.
- Communication Channels: We communicate through various public platforms, including the company website, annual reports, sustainability reports, and public information systems.
- Anti-Greenwashing: All statements and reports regarding sustainability, environmental protection, and social responsibility must be fact-based and supported by concrete evidence. Misleading, exaggerated, or deceptive claims are not allowed.

- Supply Chain Transparency: For conflict minerals, human rights due diligence, and key ethical risk areas, we will disclose management policies and performance as appropriate to demonstrate our commitment to responsible supply chain practices.
7. Privacy and Personal Data Protection
- Compliance Management: We commit to complying with the Personal Data Protection Act and global privacy regulations at our operating sites. All collection, processing, use, and transfer of personal data shall be lawful, fair, and transparent.
 - Minimization and Security Measures: We only collect the minimum necessary personal data for business purposes and employ strict technical and organizational security measures (e.g., encryption, access control) to protect against unauthorized access, leakage, tampering, or destruction.
 - Respecting Data Subject Rights: Individuals have the right to access, correct, delete, or withdraw consent regarding their data. Clear reporting channels are provided.
 - Supply Chain and Third-Party Management: All suppliers and partners handling personal data must adhere to the same privacy protection standards.
8. Whistleblower Protection and Non-Retaliation Commitment
- We provide diverse and confidential whistleblowing channels (including anonymous reporting) for internal and external stakeholders to report violations.
 - The safety of whistleblowers is ensured. Retaliation, harassment, or discrimination in any form is prohibited. All cases are investigated fairly.
9. Ongoing Ethical Advancement
- We regularly review our business ethics policy and its implementation through internal audits and improvements.
 - Company-wide ethical education and training are promoted to enhance awareness of integrity and regulatory compliance.
 - We continuously optimize our ethical management systems in response to societal developments and stakeholder expectations.

We call upon all employees, suppliers, and partners to comply with this policy. Any concerns or suggestions regarding violations should be reported via the following channels. We treat every report seriously and are committed to promoting ethical business and sustainable development.
Email: wb@fitipower.com, fitivoice@fitipoewr.com



Yung-Chieh Lin
Chairman & Chair of the Sustainability Committee
November 2025