



Code of Conduct

This Code of Conduct is a set of guidelines to provide high ethical standards for employees in HTC Group in conducting HTC Group's business activities. All employees in HTC Group must follow these ethical standards regardless of their position, grade, and location.

This Code of Conduct applies to HTC Corporation, its subsidiaries, any incorporated foundation in which its accumulated contributions from HTC Corporation, direct or indirect, exceed 50 percent of the total funds of the foundation, and other institutions or juristic persons substantially controlled by HTC Corporation (collectively, "HTC Group" or the "Company").

This Code of Conduct is superior to any other local regulations except certain mandatory laws/acts issued by the local government. Any violation of this Code of Conduct and applicable policies may cause disciplinary action up to and including the termination. Employees are responsible for understanding and complying with this Code of Conduct as well as other applicable HTC polices/rules.

Content

1.0 General Guidelines

While maintaining a work culture that ensures the company's success, HTC Group strives to treat each employee with fairness and dignity. HTC Group is also committed to complying with the labor laws of each country it operates in. Meanwhile, employees are under duties of confidentiality to HTC Group, and have responsibilities to protect HTC Group's assets and comply with internal company rules and external laws and regulations.

1.1 Work Environments

HTC Group is committed to establishing a safe and healthy workplace, free from recognized hazards, for employees in accordance with local laws and regulations, and is thoroughly dedicated to creating a work environment which is free of harassment (including sexual harassment) and discrimination for employees. Any language or behavior that would endanger physical or mental health of an employee is strictly prohibited, and the employee who becomes aware of such language or behavior shall report to the competent authority immediately.

1.2 Equal Opportunity

HTC Group's employment policy shall comply with all applicable laws and regulations. Hiring decisions are based on HTC Group's business needs and the applicant's abilities, and HTC Group provide equal employment opportunities for all applicants and employees without



regard to non-job-related factors, such as race, color, social class, language, religion, political affiliation, national origin, gender, sexual orientation, marital status, appearance, disability, previous union membership.

Everyone in HTC Group shall be treated with dignity, respect and honesty. This principle applies to all areas of employment, including but not limited to, recruitment, hiring, training, promotion, compensation, benefits, transfer, and club or recreational activities.

1.3 Confidentiality

During the employment with HTC Group and thereafter, all employees shall maintain strict confidentiality of Confidential Information (as defined below) about HTC Group, its customers and vendors/suppliers that they learn or hold during their employment to ensure its security and confidentiality and to prevent unauthorized use, disclosure or dissemination. Except for the use of Confidential Information under purposes of the disclosure and company rules, each employee shall not disclose it to a third party in any manner without the prior written consent of HTC Group.

“Confidential Information” means all non-public information, in relation to technique, finance, production, sales, or operations, that learned or possessed by HTC Group with intentions to keep confidential, whether or not such information (A) is owned by HTC Group, HTC Group’s customers or vendors/suppliers, or any third party with which HTC Group desires to establish a business relationship; (B) is in oral, written, drawn or electronic media form; (C) is subject matter for the application of patents, trademarks, copyrights, or other intellectual property rights; or (D) is labeled with “Confidential” or an equivalent word. Confidential information may include, but is not limited to the following:

- 1) Business plans, manufacturing and marketing plans, procurement plans, product development plans, product design records, product test plans and reports, product software and source codes, product pricing, product appearance, personnel information, financial information, customer lists, vendors/supplier lists, distributor lists, raw materials and product inventory information, all quality records, trade secrets, and other information related to the Company’s business activities;
- 2) Computer programs, including their related documents and databases in the process of development ;
- 3) Discoveries, concepts, ideas, designs, sketches, engineering drawings, specifications, circuit layouts, circuit diagrams, mechanical drawings, flow charts, production processes, procedures, models, molds, samples, components, troubleshooting guides, chips and other know-how; and
- 4) A third party’s proprietary information that the Company has a duty of confidentiality pursuant to contracts or required by applicable laws.

1.4 Protection of Assets and Personal Data



The Company's assets are not limited to tangible assets, such as equipment and facilities, but also include intangible assets, such as know-how and intellectual property rights. Each employee shall protect, keep and use the Company's assets properly, and shall not use the Company's assets for self-interest.

The collection, processing, and use of personal data of personnel in HTC Group shall be in accordance with applicable data protection laws. Except as permitted by law, personal data of personnel in HTC Group shall not be disclosed or shared arbitrarily.

1.5 Fair Trade

Each employee shall treat all vendors/suppliers, customers and competitors fairly, and may not obtain improper benefits through manipulation, concealment, or misuse of the information learned by virtue of their positions, or through misrepresentation of important matters, or through other unfair trading practices.

HTC Group shall engage in business activities in accordance with applicable competition laws and regulations, and may not fix prices, make rigged bids, establish output restrictions or quotas, or share or divide markets by allocating customers, vendors/suppliers, territories, or lines of commerce.

1.6 Prohibition of Infringement of Intellectual Property Rights

Intellectual property, such as copyright, trademarks, patents, and trade secrets, is protected by relevant laws and regulations. Each employee shall comply with applicable laws and regulations, HTC Group's internal operating procedures and contractual agreements related to intellectual property. Except as permitted by law, HTC Group Personnel may not use, disclose, dispose of or damage intellectual property without the prior consent or authorization of the intellectual property rights holder to avoid intellectual property infringement.

2.0 Vendors/Suppliers and Customers Relationship

It is a basic principle in Company business operations to maintain a good relationship with our vendors/suppliers and customers.

2.1 Firm and Rational Attitude

In order to establish long-term and stable relationships with our customers and vendors/suppliers, each employee shall provide necessary and accurate information about our products and services. In securing and negotiating business, all employees shall attempt to establish long-term relationships with our customers and vendors/suppliers by providing essential and accurate information about our products and services.

Each employee shall demonstrate their professionalism with a sincere, firm, and rational attitude while dealing with customers and vendors/suppliers. Unnecessary conflicts caused



by irrational attitudes or emotional languages are strictly prohibited.

2.2 Product Quality and Safety

The Company is committed to pursue excellence and maintain quality at all times, and strives to continuously improve the quality of its products and services in accordance with applicable laws and regulations related to safety to achieve world-class competitiveness and create benefits for its customers and vendors/suppliers. To ensure HTC Group's valuable reputation and the benefit of its customers and vendors/suppliers, all employees must comply with HTC Group's procedures and standards for product quality and safety assurance.

2.3 Performance of Contracts

Company contracts must be performed not only in accordance with the requirements of each contract, but also in compliance with all laws and regulations applicable to our industry. Any unfair or unreasonable terms and conditions shall be avoided. Purchasing decisions must be made in the best interests of HTC Group in considering the suitability, quality, price, and delivery of products or services provided by vendors/suppliers; special offers based on personal preference are not allowed. Purchasing agreements/sales contracts and related evaluation information shall be fully and clearly documented. The information of customers and vendors/suppliers, including but not limited to their names, price, delivery terms, payment terms, is considered Confidential Information of HTC Group, and shall be properly protected by each employee to prevent leakage or misuse of information.

2.4 Prohibition on Offering or Accepting Improper Benefits / Accepted Social Custom

All employees shall not offer, accept, promise, or request, directly or indirectly, any Benefits from customers, vendors/suppliers, or business-related personnel to establish business relationship or influence commercial transactions, except under one of the following circumstances: (1) the conduct is undertaken to meet business needs and is in accordance with local courtesy, convention, or custom during domestic (or foreign) visits, reception of guests, promotion of business, and communication and coordination; (2) participation in ordinary social activities based on accepted social custom, commercial purposes, or development of relationships; (3) invitations to guests or attendance at commercial activities or factory visits in relation to business needs, when the method of fee payment, number of participants, class of accommodations, and the time period for the event or visit have been specified in advance; (4) other situations that are in line with accepted social custom and are of an occasional nature, where the market value of such Benefits is no more than NT\$3,000 or US\$100, provided that the total market value of such Benefits offered to



the same party or coming from the same source within a single fiscal year shall not exceed NT\$6,000 or US\$2,00.

In the event of any of the above exceptions, employees shall report to their department head before the Benefit is offered or after it is received.

Benefit herein means any money, gratuity, gift, commission, position, service, preferential treatment, rebate, facilitating payment, entertainment, dining, or any other item of value in whatever form or name.

2.5 Business Travel

All employees are responsible for ensuring that their business travels are intended to further company business interests, and the business travel expenses, such as accommodations, meal and hospitality, shall be reasonable, economical, and in accordance with applicable company policies. As representatives of the Company, employees shall be aware that certain venues, whose entertainment nature or atmosphere may impact negatively on the Company's reputation, such as a sexually-oriented site or similar environment, are not appropriate for business-related meetings or activities. These venues are not acceptable even if the expenses incurred are not paid by the Company. Recreational activities such as golf hospitality, that are not at employees' own expense, shall be minimized even if such activities are common in the industry and in line with accepted social custom.

3.0 Conflict of Interest

All employees must avoid engaging in activities that compete with the Company's business or interfere with the performance of their duties.

3.1 Non-compete

All employees shall not engage in or carry on, for the benefit of their own or others, with their own name or the name of others, any business the same as or similar to the business of HTC Group, nor shall they invest in the entity carrying on such business exceeding 5% of its paid-in capital or its total number of issued shares.

All employees are prohibited to work either part-time or full-time for any competitors, customers, vendors/suppliers, subcontractors or outsourcers of HTC Group, nor may they provide services to or receive payments from such third parties. If any employee is invited to serve as a lecturer, or a director, supervisor, executive, consultant, service provider of a third party, the approval from the local top manager of Company is needed in advance. Even if an invitation is not the type mentioned above, permission from a top manager is still required. In general, employees are not restricted from being directors or supervisors of charitable or community organizations. After obtaining appropriate approval, employees are allowed to serve as directors, supervisors, executives, consultants, service providers



of other companies provided that these companies are invested by HTC Group or not HTC Group's competitors or service providers of such competitors.

3.2 Insider Trading

All employees shall not trade stocks or other equal-type securities of HTC Group or other companies, with their own name or the name of others, based on inside information, nor shall they disclose inside information to others in any way to make others have the opportunity to use such information for the aforesaid trading. Such inside information means information that have a material impact on the price of the securities of the issuing company and that is not normally known to persons outside the issuing company, such as a joint research and development project between the issuing company and its partner. The purpose of prohibition of insider trading is to maintain the fairness of trading in the securities market and to protect investors. The employee who engages in insider trading will lead to disciplinary actions due to violation of company rules, and will also be subject to criminal penalties for violating the law.

4.0 Report

If there is any violation of this Code of Conduct or other unethical conduct or misconduct, every employee has a duty to report such incident with specific evidence. The Company will conduct an investigation, keep the informant's identity and the content of the report confidential, and protect the informant from improper treatment due to the report.

Report a corruption issue: anti-corruption@htc.com