

Assessment item		Implementation status			Deviations from “Ethical Corporate Management Best Practice Principles for TWSE/GTSM Listed Companies” and Reasons
		Yes	No	Summary explanation	
I.	Establishment of Ethical Corporate Management Policies and Programs				
(I)	Did the Company formulate business ethics policies, approved by the board, and disclose its policy and practice of business ethics in charters and documents to external parties? Have the board and senior management proactively implemented these policies?	✓		(I) The Company has formulated and the board has approved the Principles of Ethical Businesses and Code of Moral Conduct. These are disclosed on the Company’s website and the Market Observation Post System, so that the board, management and employees can implement and comply.	None
(II)	Did the Company establish a risk assessment mechanism for unethical behaviors, conduct regular analysis and evaluation of the operating activities within the scope of business and with a higher level of risks for unethical behaviors, and refer to the findings for the structuring of action plans for prevention of unethical behaviors, by covering at least the preventive measures described in Article 7-2 of the Ethical Corporate Management Best Practice Principles for TWSE/GTSM Listed Companies?	✓		(II) The Company has established an effective accounting system and internal control system for operating activities exposed to high risks of unethical behavior. Audit Office and external accountants regularly inspect the internal and operating activities. It is prohibited to act illegally such as bribery giving or acceptance, illegal political donations or trade secret infringements. A whistleblowing system has been put in place to prevent dishonest behavior.	None
(III)	Did the company establish policies to prevent unethical conduct with clear statements regarding relevant procedures, guidelines for conduct, punishment for violation, rules of appeal, and implement the policies with commitment?	✓		(III) The Company has formulated "Procedures for Ethical Management and Guidelines for Conduct". These procedures define unethical behavior, stipulate disciplinary measures for rule breaches, and establish a complaint system. Periodical reviews and modifications are made. A whistleblowing and complaint channel at the Company’s website is provided to report any improper behavior.	None
II.	Implementing ethical corporate management				
(I)	Did the company evaluate business partners’ ethical records and include ethics-related clauses in business contracts?	✓		(I) The Company’s contract signing with external parties is reviewed and executed by legal personnel, in order to enhance clauses on business ethics. Contracts may be terminated or canceled anytime in case of any unethical behavior.	None
(II)	Did the Company established a dedicated (or part-time) unit under the board to advocate business ethics, and report to the board regularly (at least once a year) regarding the implementation and supervision of business ethics policies and prevention of unethical behaviors?	✓		(II) Audit Office under the board and Administration Department work together to promote business ethics. Periodical inspections and monitoring are performed on internal and business activities. Relevant operations and oversight initiatives are reported to the board once per annum.	None
(III)	Did the company establish a policy to prevent conflict of interest and provide appropriate channels for disclosure. If so, are they implemented?	✓		(III) The Company's Ethical Corporate Management Best Practice Principles and Regulations Governing Procedure for Board of Directors Meetings specify the policy of conflict of interest — all relevant personnel shall refrain from any conflict of interest with personal interests or those who may have an interest in the Company, and the Company shall establish channels for whistle-blowing and complaint to enforce their implementation.	None
(IV)	Did the Company establish an effective accounting system and internal control system to implement business ethics, formulate audit plans according to the results of risk assessments conducted by internal auditors on unethical behavior risks, and refer to these plans as the basis for inspection and prevention of unethical behaviors or as the basis for audits by external accountants?	✓		(IV) The Company has established an effective accounting system and internal control system. Based on risk assessments, Audit Office sets up the annual audit plan for inspections. Inspection results are reported to the board for follow-ups and improvements. Self-assessments by different departments and audits by external accountants are conducted once a year. A statement for internal control is issued accordingly.	None
(V)	Did the company regularly hold internal and external educational training on operational integrity?	✓		(V) The Company advocates from time to time at monthly or internal meetings and provides internal training so that employees understand the importance of code of conduct and business ethics.	None
III.	Implementation status of the Company’s whistle-blowing system				
(I)	Has the Company established a specific whistle-blowing and reward system, and set up a channel to facilitate whistle-blowing, and assigned appropriate staffs to deal with the object of whistle-blowing?	✓		(I) The Company has established a whistle-blowing and complaint system and channels in the "Procedures for Ethical Management and Guidelines for Conduct" and assigned the audit office to be responsible for them. Whistle-blowing email address: audit@mail.gtg.com.tw	None
(II)	Has the Company formulated standard procedures for investigating of whistleblowers’ reports, follow-ups and relevant confidentiality mechanisms after the completion of investigations?	✓		(II) The Company has established mechanisms for handling whistle-blowing, investigation procedures, examination and confidentiality in the “Procedures for Ethical Management and Guidelines for Conduct”.	None
(III)	Does the company take measures to protect the whistleblowers from improper treatment as a result of the whistleblowing?	✓		(III) The Company clearly regulates the protection mechanism and shall not dismiss, transfer or give any other unfavorable discipline for any whistle-blowing or grievance.	None
IV.	Enhance disclosure of corporate social responsibility information				
(I)	Has the Company disclosed the content and effectiveness of implementing its Ethical Corporate Management Best Practice Principles on its website and the Market Observation Post System?	✓		The Company discloses the information related to the Ethical Corporate Management Best Practice Principles on the Company's website and the Market Observation Post System	None
V.	If the Company has established its Ethical Corporate Management Best Practice Principles based on the “Ethical Corporate Management Best Practice Principles for TWSE/GTSM Listed Companies”, please describe any discrepancy between the Principles and their implementation: The Company’s board of directors approved the amendments to the Ethical Corporate Management Best Practice Principles, Procedures for Ethical Management and Guidelines for Conduct, etc., and their operations do not differ materially from the Ethical Corporate Management Best Practice Principles for TWSE/GTSM Listed Companies.				
VI.	Other important information to help understand the Company’s ethical corporate management (e.g., the status of the review and amendment of the Company’s Ethical Corporate Management Best Practice Principles):				
	1. The Company’s Ethical Corporate Management Best Practice Principles was partly amended by resolution of the Board of Directors on March 16, 2021.The Company shall establish a mechanism to assess the risk of dishonest acts and regularly analyze and evaluate the operating activities within the scope of business that have a higher risk of dishonest acts.				
	2. The company has a channel for whistle-blowing and complaints. Anyone with dishonest behavior could be reported or complained through the Internet, telephone or in writing.				
	3. The Company’s audit office establishes an annual audit plan to regularly review the Company’s internal operations and reports the performance to the board of directors on a regular basis.				