



仁寶電腦工業股份有限公司 COMPAL ELECTRONICS, INC.

Anti-Corruption Policy

Compal Electronics, Inc. and its subsidiaries (collectively referred to as "Compal") are committed to the establishment of the corporate culture of ethical management. Compal upholds the principle of "zero tolerance" for unethical conduct, including bribery and corruption. In addition, Compal also recognizes and complies with the "United Nations Convention against Corruption," the regulations of the "Ethical Corporate Management Best Practice Principles for TWSE/GTSM Listed Companies," "Guidelines for the Adoption of Codes of Ethical Conduct for TWSE/GTSM Listed Companies," etc. of Taiwan.

To reduce the risk of corruption, in addition to explicitly specifying regulations for recusal in case of conflict of interest and prohibition on transfer of benefits between interested parties in the "Regulations Governing Procedure for Board of Directors Meetings" and "Corporate Governance Best Practice Principles," Compal has also established internal control systems and relevant operational regulations, such as the "Ethical Corporate Management Best Practice Principles," "Code of Conduct for Directors and Managers," "Employee Code of Conduct," "Code of Ethics," etc. Furthermore, Compal has also implemented the operations of self-assessment, self-evaluation, internal audit, etc. to enhance control and management, thereby actively preventing unethical or corrupt conduct.

Compal has established a whistleblowing system and an independent investigation mechanism, and also protects and provides rewards to whistleblowers. In case where any one discovers that an employee of Compal is subject to the likelihood of violation of code of conduct, engaging in crime, fraud or violation of laws, he or she may file a whistleblowing case. Compal does not tolerate such unethical conducts.

Compal requests all employees and all cooperating partners to jointly comply with this policy, aforementioned codes and the "Regulations for Handling Internal/External Personnel Whistleblowing Cases" announced by the company in light of establishing an operational environment of sustainable development.

■ Supplementary Provisions

Article 1 The Principles take effect after approval of the board of directors and also could be revised as the same approval.

Article 2 The Policy was adopted of BOD Meeting on Nov. 11, 2019.