

PERSONNEL CODE OF CONDUCT

2020 / 02 / 06 REVIEW

1. Purpose of this Code
 - 1-1 We hereby make this Code to fulfill our business concept and vision and to embody our business spirit and value.
 - 1-2 Our corporate visions are:
 - 1-2-1 to become the world-leading company in this industry;
 - 1-2-2 to become the first-tier company for high value-added, high quality, productivity with innovation and service; and
 - 1-2-3 to pursue the satisfaction of customers, employees and shareholders and fulfill our social responsibility.
2. Scope of the Application of this Code
 - 2-1 This Code shall apply to Unimicron Technology Corp. (“Unimicron”) and its Affiliates (collectively as “Group/We/we/us”) and the Group’s employees, including but not limited to chairman, CEO, general managers, managers, employees and representatives (collectively as “Personnel”).
 - 2-2 The term “Affiliates” mentioned above shall mean any entities:
 - 2-2-1 more than fifty percent (>50%) of whose shares, capital or fund are held, provided or donated by the Group; or
 - 2-2-2 controlled by Unimicron directly or indirectly in human resources, finance, business or management.
3. Our Environment, Safety and Health Policies are:
 - 3-1 to build a safe and comfortable working environment in accordance with government regulations and customers’ requirements;
 - 3-2 to educate all Personnel and relevant stakeholders the mutual responsibilities of treasuring natural resources and meeting the safety goal of “zero incident”;
 - 3-3 to make Personnel have sufficient time and adequate resources to participate in the operation of health and safety management systems in order to achieve the purpose of full participation and consultation purposes;
 - 3-4 to practice continuous improvement And to prevent from pollution, injury and unhealthy factors to reduce risk management cost;
 - 3-5 to voluntarily enforce GHG (Green House Gas) inventory audit, control, and reduction and to promote material reduction, recycling and reuse.
 - 3-6 to establish and maintain the management and operation systems for environmental

protection and occupational safety and hygiene, and to improve the environmental and occupational health and safety performance.

3-7 to be open toward the public.

4. Corporate Responsibilities to Society:

4-1 It is our pleasure to undertake the responsibility of corporation and contribute for society; we will continuously hold and support:

4-1-1 the activities for promoting the development of education, science and culture;

4-1-2 the activities for caring disadvantaged minorities; and

4-1-3 the activities for promoting other public welfare.

4-2 We respect harmonious relationship with communities and are willing to actively join community activities.

4-3 We strictly forbid inappropriate donation or sponsorship. Any donation or sponsorship shall comply with the laws and the Group's internal rules and cannot be a disguise of bribery.

5. Corporate Responsibilities to Investors:

5-1 We promise that all the account books, financial reports and records of the Group shall be made in accordance with the general accounting principles or other governmental regulations, rules and laws. The contents of above documents shall completely, accurately and promptly reflect the transactions we made.

5-2 We promise that the information we declare/provide to Financial Supervisory Commission, such as Securities and Futures Bureau or other securities governing organization, or disclose to the publics shall be complete, accurate and prompt.

6. Customer Relationship

6-1 Honesty and credit is our value. We advocate the truth, and shall always reach the promise we make to our customers.

6-2 We shall establish and abide by the Group's quality policies by which we will provide products and/or service with high quality, reasonable price and competitive lead time to satisfy our customers and become the best partner of customers.

7. Supplier Relationship

7-1 The quality of products and/or service provided by suppliers will directly impact the quality of our products. In light of this, we deem all our suppliers as our partners to be mutually beneficial coexistent.

7-2 We are willing to provide fair examination and opportunity to every present and potential supplier. We will select trading parties with open and objective rules and take into consideration the quality, price and reliability of products and/or service provided by

suppliers, and the incorruptibility, moral and business ethics of suppliers.

7-3 We respect and advocate fair transactions; therefore, we require all our suppliers to be with high honesty, incorruptibility and morality when dealing with our Personnel, agents and/or representatives. We strictly prohibit all our suppliers from giving or promising to give any kind of commission, kickback, gift, treat or other beneficial behaviors to our Personnel for earning present or potential transactions and opportunities.

8. Our Promises to the Market

8-1 We undertake to abide by the market competition laws in every region, including but not limited to the Fair Trade Act of Taiwan, R.O.C., Antitrust Laws of U.S.A and competition laws of European Union; and will by no means:

8-1-1 fix purchase or selling prices or any other trading conditions with our competitors;

8-1-2 cause another enterprise to discontinue supply, purchase or other business transactions with a particular enterprise for the purpose of injuring such particular enterprise;

8-1-3 apply dissimilar conditions to equivalent transactions with other enterprises without reasonable reason;

8-1-4 cause the trading parties of our competitors to do business with us by coercion, inducement with interest, or other improper means;

8-1-5 cause another enterprise to refrain from competing in price, to take part in a merger or a concerted action by coercion, inducement with interest, or other improper means;

8-1-6 acquire the secret of production and sales, information concerning trading parties or other technology related secret of any other enterprise by coercion, inducement with interest, or other improper means;

8-1-7 limit our trading parties' business activity improperly by means of the requirements of business engagement;

8-1-8 make or disseminate any false statement that is able to damage the business reputation of another; and

8-1-9 offend any fair competition regulation, act or law.

9. Our Promises to the Personnel

9-1 We promise to make sustainable development and healthy management with respect to the operation, and will set up a mature welfare system for Personnel.

9-2 We promise to set up a mutually respectful, friendly, harmonious, equal, fair, lively and cheerful workplace, without solicitation and threat.

9-3 We promise to continuously prevent occupational hazard and reduce the frequency and severity of accidents in accordance with safety and health regulations. We will provide a safe, healthy and comfortable workplace to meet international standard.

9-4 We promise to set up a complete system and surrounding for learning and training and provide career-development plan for Personnel to assist Personnel for self-growth and self-development.

10. Expectation to Personnel

10-1 Use of the Group Resources

10-1-1 All Personnel shall realize and understand that the resources of the Group are limited and such resources shall be employed properly. Any misuse or waste will seriously weaken our competitiveness. All Personnel shall try his/her best to reduce all cost and maximize the integrated benefit of using resource.

10-1-2 Tangible Assets

- A. All Personnel shall use the tangible assets properly, legally, and authorizedly.
- B. It is prohibited to use the tangible assets for non-business purposes.
- C. Any corrupt activity to the tangible assets, including but not limited to appropriation, occupancy, steal, and fraud, is prohibited.
- D. All Personnel shall be responsible to protect the tangible assets, including but not limited to equipments, materials, factories, and funds, and be alert to the risk in destruction, misappropriation and steal.
- E. Personnel shall inform his/her supervisor, security department, audit department and/or legal department as soon as he/she finds out any ongoing corrupt activities to the tangible assets or even though there is reasonable reason for him/her to believe there is an existence of the same.

10-1-3 Intangible Assets

- A. Patentization of our technology: We shall be advocated in technical innovations and will build up patent policy to patentize our technologies in order to protect our core technology and competitiveness.
- B. Protection of our Trade secrets: We shall set up complete and safe system to protect our valued information, including but not limited to process, equipment, formula, other technologies which are not properly patented, and any other classified information related to business, management, finance or human resources.
- C. We respect intellectual property of others, including but not limited to patent,

trademark, copyright, and trade secret. All Personnel shall not do anything to infringe such intellectual property rights.

10-1-4 Regarding Information, Communication and Internet

- A. All information, communication, e-mail, and internet resources shall be used only for the purposes of Group's business.
- B. Software used in Group's shall obtain complete and legal license. It is prohibited to install or download any illegal or unauthorized software.
- C. It is prohibited to engage in any illegal activity, including but not limited to downloading, transmission, dissemination and distribution, through Group's information/communication system, e-mail and internet.

10-2 Requirement of Incorruptibility

10-2-1 Conflicts of Interest

- A. We highly require Personnel's honesty, loyalty, incorruption and morality.
- B. Any decision made by Personnel within his/her work range and/or duty shall achieve the Group's best benefit under law and prevent any damage to the Group.
- C. It is strictly prohibited to get any personal interest by using Group's resources, including but not limited to using Group's assets, information, position, or transaction opportunities.
- D. Except expressly authorized by Group, Personnel, within his/her work range and/or duty, shall not have Group do business with following person(s) or entity(s):
 - (1). himself/herself or his/her relatives;
 - (2). other Personnel or his/her relatives;
 - (3). former Personnel;
 - (4). any other person or entity asked expressly or impliedly by the person(s) mention in the forgoing three paragraph to act as the counterparty of the transaction;
 - (5). any entity controlled by Personnel or his/her relatives with more than fifty percent (>50%) of shares; or
 - (6). any entity controlled by Personnel or his/her relatives directly or indirectly in human resources, finance, business or management.
- E. Except expressly authorized by Group, it is prohibited to be a director, supervisor, manager, or employee of other entity when employed by Group.

Charity organizations are excluded.

- F. It is prohibited to destroy present or potential business relationship between Group and any other person or entity.

10-2-2 Strict Prohibition of Corruption and Bribe-taking

- A. Personnel is prohibited to take or ask for, either directly or indirectly, any substantial benefit, such as commission, kickback, gift, and treat, from Group's competitors, suppliers, or other business related people; provided, however, that any benefit from identical source in compliance with general business manners within any successive one-year period whose reasonably estimated value in total is no more than NT\$1,000 shall be permitted. If any such benefit is received, Personnel shall immediately report to his or her direct supervisor and return such benefit to the giver, by him- or herself or through the supervisor.
- B. Personnel is strictly prohibited to engage in any kind of activities which will cause damage to Group, including but not limited to lobbying or recruiting for Group's competitors, suppliers or other business related people.
- C. Personnel is strictly prohibited to give commission, kickback, gift, treat, and other alike benefits to other Personnel for Group's competitors, suppliers, or other business related people; provided, however, that any benefit to identical other Personnel in compliance with general business manners within any successive one-year period whose reasonably estimated value in total is no more than NT\$1,000 shall be permitted. Except it is (i) with Group logo, (ii) listed in the Group's gift catalogue or (iii) based on a normal business relationship and with the prior consent of the supervisor, any such benefit is given, Personnel shall immediately report to his or her direct supervisor and recapture such benefit from the recipient, by him- or herself or through the supervisor.

10-2-3 Other Improper Action

- A. With respect to the questions of "ought to" and "ought not to", Personnel shall cultivate him/herself the capacity to distinguish right from wrong. Any improper action not stipulated in this Code or any other bylaws of the Group shall not be deemed to constitute the release of such action. Supervisors shall not only ask themselves to be incorruptible but also set up the honesty values within their own departments.

10-2-4 To follow out the incorruptibility requirement stipulated in this Code, we hope Personnel at or above a specific grade to report honestly to Group the information

of: (i) his/her relatives working for Group's customers, distributors, suppliers or competitors; and (ii) any direct or indirect investment in Group's customers, distributors, suppliers or competitors.

10-3 Expectation to Former Personnel (Retire, Resignation or Lay-off)

10-3-1 We expect former Personnel will be able to still hold high morality and refuse to:

- A. engage in any kind of activities which will cause damage to the Group, including but not limited to lobbying or recruiting present Personnel for other enterprise, or give commission, kickback, gift, treat, or other alike benefits to present Personnel for any reason.
- B. engage in any other activities which will cause damage to the Group by his/her familiarity with the Group's personnel, operation, management and resources.

10-3-2 Rules about contact with former Personnel:

- A. Personnel is strictly prohibited to conspire with former Personnel in engaging with the activities as set forth in Section 10-3-1.
- B. In order to keep the quality of products and/or service provided to the Group's and prevent former Personnel from providing any information or support to the Group's suppliers by his/her familiarity with the Group's personnel, operation, management and resources, Personnel is strictly prohibited to contact or discuss, either directly or indirectly, with former Personnel for purchase or other business purposes.

10-4 Insider Trading

10-4-1 Insider trading is strictly prohibited. All Personnel must realize and understand insider trading is against civil and criminal laws and will seriously cause damage to the Group's operation, reputation and image. At present those transaction of securities such as stocks are to be exchanged in exchange or over-the-counter market, are all supervised by competent authority. No one shall count on luck that any security may be veiled.

10-4-2 According to the laws in force, insider trading means specific persons purchase or sell shares of the company listed on an exchange or an over-the-counter market upon knowing any information that will have a material impact on the securities price of the Group prior to the public disclosure of such information or within 18 hours after its public disclosure. The said "specific persons" means the following persons:

- A. a director, supervisor, and/or managerial officer,

- B. shareholders holding more than ten percent of the shares of the Group,
- C. any person learned the information by reason of occupational relationship,
- D. a person who lost the identity as set forth in paragraph A~C above within the last six months, or
- E. any person knew the information from any of the persons as set forth in foregoing paragraph A to D.

10-5 Information Disclosure

10-5-1 Only spokesperson of the Group or his/her deputy (collected as "Spokesperson") has the authority to release the information of the Group to the public. It is forbidden for other Personnel to disclose any information related to the Group in any circumstance without authority.

10-5-2 The Spokesperson shall disclose information:

- A. under the principle of fair,
- B. in responsible and extra care manner,
- C. without any false and dissimulation, and
- D. in crystal-clear base.

10-6 Confidentiality

10-6-1 All Personnel shall be obligate to protect the Group's confidential information or trade secrets, including but not limited to secrets in technology, finance, human resource, business, or other non-public information from suppliers or customers. Nobody shall disclose or distribute the confidential information without authority.

10-7 Financial Information

10-7-1 Chairman, CEO, general managers, CFO, financial managers and accounting managers shall expect himself/herself and require every executing Personnel to:

- A. hold honest, incorrupt, and moral faith,
- B. avoid any conflicts of interest,
- C. forbear from counterfeiting or misinterpreting any financial information,
- D. provide true, accurate, complete, related, and immediate information to ensure the information disclosed in public by the Group is adequate, fair, and in time, and
- E. supervise the Group resource has been used legally and reasonably.

10-8 Workplace

10-8-1 It is strictly forbidden for Personnel to threaten, insult, slander, or have other annoying behaviors to any person.

- 10-8-2 Any type of sexual harassment to any person is strictly forbidden.
- 10-8-3 We will try our best to set up an open, fair, positive workplace and prevent from any negative culture which may effect the Group's cooperation.
- 10-8-4 We expect Personnel can voluntarily render and verify problems with his/her supervisor without making or distributing any rumor.
- 10-8-5 Marriage and family values are highly respected. We expect Personnel s to back off any relationship against foresaid values.
- 10-8-6 The following persons shall not work in the same department or in different department with supervising/ subordinate relationship:
- A. relatives within the third degree of relationship by blood or by marriage;
 - B. husband and wife, or fiancé and fiancée.
- 10-8-7 The Group reserves the right to redeploy or do any other proper act when Personnel sits in 10-8-6.
- 10-8-8 We encourage Personnel to participate, hold activities which are useful, healthy to society, including the unions stipulated in Taiwan regulations.
- 10-8-9 We provide the appropriate religious places in the dorms; when the employees request reasonable religious activities, our management unit or supervisor will provide the necessary assistance.

10-9 Work Attitude

- 10-9-1 All Personnel ees shall:
- A. insist on and follow out his/her own positive target.
 - B. have pragmatic and decisive spirit and face adverse circumstances with positive, bright and cheerful attitude.
 - C. encourage and be attached to each other like brothers.
- 10-9-2 All managing officers shall:
- A. give brief orders; give adequate authorization; make decision decisively, immediately, and effectively; pursue anything new and better continuously.
 - B. be exceptional leaders and educate subordinate staff.

10-10 Law Compliance

- 10-10-1 Personnel shall comply with not only this Code and other the Group regulations but also local laws and regulations applicable while he/she executes his/her jobs or conducts other business related activities (including, but not limited to, the United States Foreign Corrupt Practices Act; the "FCPA").
- 10-10-2 Personnel shall not promise, promise to give or give bribe to any central or local

governmental officer to make him/her execute or disobey his/her duties.

10-10-3 Personnel shall not use the Group resource to provide any political contribution or other donations to any public candidate without authority or approval of the Group's chief officer(s).

10-10-4 Legal Department shall check the latest status of local and foreign anti-bribery statutes (including, but not limited to, FCPA). In the event of any addition, deletion or modification of the statutes, Legal Department shall review the statutes section by section, and shall amend, or notify the department in charge to amend, the Group's regulations accordingly as soon as possible.

11. Report and Claim

11-1 We encourage Personnel to report any violation of this Code, Group regulations, or laws.

11-2 Please report foresaid violation or submit complaint to proper person(s) in accordance with the Ethics Rules. We will not disclose reporter's name and will assign appropriate department(s) to investigate and handle the report.

11-3 Report Channel:

11-3-1 Report Line: +886-3-3500386 Extension: 13307

11-3-2 Report mailbox: whistleblower@ unimicron.com (This e-mail will automatically forward the letter to the first-level supervisor of the auditing office and the first-level supervisor of the human resources division.)

11-4 Information Reporter Shall Provide:

11-4-1 The name and correct contact information of reporter or anonymity.

11-4-2 The name of the person being reported or other information sufficient to identify the identity of the person being reported.

11-4-3 Specific evidence which is able to be investigated.

11-5 Procedure:

11-5-1 In the event that the foresaid violation involves any general employee, the person in charge shall report to the supervisor of the department; In the event that the foresaid violation involves any director or high-level managers, the person in charge shall report to SBU President or Chairman. When the foresaid violation is verified, if it is a serious violation or the Group is in danger of serious damage, the person in charge shall report it to the audit committee, and report its handling method and subsequent review and improvement measures to the board of directors.

11-5-2 The receiving department and the reported supervisor or person in the preceding paragraph shall ascertain the relevant facts, and shall be assisted by the relevant

department when necessary, and shall give the opportunity for the person being reported to present his or her opinion

11-5-3 Written documents or electronic files of report acceptance, investigation process, and investigation results shall be retained and kept for five years. The preservation can be done electronically. Before the expiration of the preservation period, when relevant lawsuits against the content of the report occur, the relevant materials shall be kept until the end of the lawsuit.

11-6 Report Investigation Disqualification:

11-6-1 If the person in charge has a second-parent relationship with the report or the person being reported, has an interest in the matter being reported, or may affect the fair investigation and handling of the reported case, the person in charge should disqualify himself or herself actively, the reporter or the person being reported also have the right to disqualify the person.

12. Punishment

12-1 Personnel will be punished in different grades according to distinct violation unless remitted by the Group.

12-2 When a director, supervisor, and/or managerial officer, who violates the morality principles which the board resolves and reports to Financial Supervisory Commission, we will disclose on the Market Observation Post System (MOPS) under the laws about the date of violation, the reason of violation, the article of violation, and/or dealing process and so on.

13. Language

13-1 In the event of any discrepancy between the English and Chinese version of this code, the Chinese version will prevail.