



Employee Code of Conduct

員工行為準則

版本異動紀錄 Revision History

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一、 Preface/Purpose 前言/目的

PRIMAX firmly adheres to the business purpose of "bringing the best benefits to customers and making employees work happily". In order to achieve such a goal, we need to gain the trust and support of customers, business partners, and the public, and employees who are honest, credible, and law-abiding are an important foundation.

致伸科技堅定奉行經營宗旨「帶給顧客最好的收益，並讓員工快樂的工作」的經營宗旨。為了達到這樣的目標，我們需要獲得客戶、事業夥伴、以及大眾的信任與支持，而誠實、信用、遵紀守法的員工即成為重要基礎。

This "Employee Code of Conduct" is the basic standard of conduct that all PRIMAX employees should abide by when performing relevant business activities, including personal moral standards, norms for gifts and entertainment, protection of business secrets, avoidance of conflicts of interest, compliance with fair trade, safe and Healthy working environment, reporting methods, principles of punishment, etc.

本「員工行為準則」為致伸科技所有員工執行相關業務活動時，應遵守的基本行為標準，包括個人道德標準、饋贈及招待的規範、營業祕密的保護、利益衝突的迴避、公平交易的遵守、安全與健康的工作環境、禁止歧視及騷擾、舉報方法、懲處原則等。

In addition to the text itself, we believe that everyone can understand the integrity-based spirit of this code, and can uphold the spirit of integrity to devote themselves to work, perform duties with a professional attitude, and treat our customers and all business partners with due diligence.

除了文字本身以外，我們相信各位能瞭解本準則以誠信為本的精神，並能秉持誠正的精神全心投入工作，以專業的態度執行職務，同時善盡職責對待我們的客戶以及所有事業夥伴。

In addition, we must also abide by the business norms and work regulations of each unit in addition to this code. We also need to abide by and strive to understand the legal regulations that affect the company and the scope of their respective responsibilities. The company reserves the right to make certain additions or

changes in response to feasible legal regulations or the necessity of the company's consideration. If you are unsure whether a situation violates applicable laws, regulations, binding policies or company codes, you should consult with your supervisor, the Company's Human Resources Department, and the Legal Department for advice and assistance.

另外，我們亦必須遵守本準則之外，各單位的業務規範及工作規範，也需要遵守並努力瞭解影響公司以及各自職責範圍的法律規定。公司保留權利因應可行之法律規定或公司考量之必要性做一定之增補或變更。如果不能確定某種情形是否違反適用的法律、法規、具約束力的政策或公司規範，您應該向您的主管、公司的人力資源部門、法務部門諮詢，尋求建議和協助。

二、 Scope of application 適用範圍

This "Employee Code of Conduct" applies to all PRIMAX employees, and PRIMAX expects all business partners to have equal or higher standards of conduct.

本「員工行為準則」適用於 PRIMAX 所有員工，致伸科技期望所有的事業夥伴能有相等或更高的行為標準。

三、 Personal moral standards 個人道德標準

The company does not attempt to control the private lives of its employees, but it should be remembered that individual actions can affect how others perceive the company. When working or representing the Company, please behave appropriately and avoid all conduct that may raise questions about legal requirements or ethical standards. Be honest, respect the work of others, and keep the following principles in mind:

公司不試圖控制員工的私人生活，但應謹記，個人行為會影響他人對本公司的印象。當在工作或代表公司的場合，請保持行為舉止得體，避免所有可能導致法律要求或道德標準方面出現問題的行為。請保持誠信、尊重他人的工作態度，並謹記下列原則：

1、 Drunks and drugs are prohibited.

禁止酗酒、吸食毒品。

- 2、 Possession of guns, knives and other dangerous weapons or dangerous chemicals is prohibited.

禁止持有槍械、刀等危險武器或危險化學物品。

- 3、 Threatening or insulting others in verbal, physical, and written forms is prohibited, and violence is also strictly prohibited.

禁止以言語、肢體、書面等方式威脅或辱罵他人，亦嚴禁暴力行為。

- 4、 Discrimination or sexual harassment is prohibited.

禁止歧視或性騷擾行為。

- 5、 Prohibition of stealing, reselling, embezzling company products, raw materials, property or equipment.

禁止竊取、轉售、侵佔公司產品、原物料件、財物或設備器材。

- 6、 It is forbidden to obtain any personal guarantee or loan for yourself or your relatives with the assistance of individuals or institutions that have business dealings with the company due to the convenience of your position.

禁止因職務之便，藉由與公司有業務往來的個人或機構之協助，為您本人或親屬取得任何私人擔保或借貸行為。

- 7、 Prohibition of participating in gambling behavior: You should uphold correct judgment and avoid engaging in or indulging in high-risk gambling investments with customers, business partners or colleagues.

禁止參與賭博行為：應該秉持正確判斷，避免和客戶、事業夥伴或同仁從事或沉迷於高風險的賭博性投資。

- 8、 Prohibition of fraud and deception: Do not use your position to bluff outside, impersonate or forge the signature and seal of others, and do not falsely report overtime work or swipe the access control card for others.

禁止詐騙、欺瞞行為：不得利用職務之便在外招搖撞騙、不得冒充或偽造他人簽名與印信、亦不得謊報加班或替他人代刷門禁卡。

9、 Prohibition of falsification of accounting records: Account-related matters should be true and not falsified; application for expenses should be accompanied by original vouchers, and false reports or untrue submissions are not allowed.

禁止偽造帳務記錄：帳務相關事項應符實，不得造假；費用申請應檢附原始憑證，不得虛報或檢附不實。

- ❖ Work with integrity and respect for others 應秉持誠信、尊重他人的工作態度
- ❖ Carrying dangerous items, using violence, threatening or deceiving behavior is strictly prohibited. 嚴禁攜帶危險物品、使用暴力、威脅或欺瞞行為
- ❖ Zero tolerance for workplace harassment and prohibition of all forms of discrimination. 職場性騷擾零容忍，禁止各種形式之歧視行為

四、 Specifications for gifts and hospitality 餽贈及招待的規範

We shall not solicit or accept any cash, gifts, dividends, loans, kickbacks, commissions, bribes, and free or preferential hospitality such as food, accommodation, and entertainment from any customer, supplier, colleague, or competitor. Receiving such gifts may interfere with our ability to make objective and unbiased decisions. However, if there is a relevant situation for the purpose of promoting business friendship and in line with normal social etiquette, the following principles must be followed:

我們不得向任何客戶、供應商、同仁或競爭者索取或接受任何現金、禮品、分紅、借貸款、回扣、傭金、賄賂以及食、宿、娛樂等免費或優惠招待。接受這類餽贈可能會影響我們客觀、公正的決策能力。但若因為促進業務交誼之目的且符合正常社會禮儀有相關之情事，則必須遵守以下原則：

1、 Pre-evaluation and reporting 事前評估與報備：

When we receive gifts or hospitality, we need to evaluate and respond carefully. Cash, gifts equivalent to cash (including gift certificates, stored value cards, checks, securities, etc.), gifts and activities that exceed the normal range of etiquette and

are too luxurious must be rejected on the spot. Gifts should not be accepted when the business relationship between the parties may be affected or perceived to be affected by it. If you have any doubts, please clarify and consult with your supervisor first.

我們在收到餽贈或招待時，需慎重地進行評估及回應。對於現金、等同現金的禮品(含禮券、儲值卡、支票、有價證券等)、超出正常禮節範圍、過於奢華的禮品及活動，皆必須當場拒絕。而當雙方的商業關係可能因此受到影響或被認為會受到影響時，都不應該接受餽贈。若有任何一絲的疑慮，請先向您的主管釐清及諮詢。

2、Principles for accepting gifts or entertainment 接受饋贈或招待之原則：

If it is necessary to accept gifts or entertainment due to the need to maintain business relationships, the upper limit is RMB 500 (or the equivalent in local currency). The number of times should not be frequent, and the principle should be sporadic and not actively requested. The total number of gifts and entertainment received by each person in the same year is limited to three times. Acceptance of gifts with company names is not subject to this limitation.

若因維護商業關係之必要需接受餽贈或招待時，以人民幣五百元(或等值的當地貨幣)為上限。次數亦不宜頻繁，應以偶發性且不主動索取為原則。同一年度每人接受之餽贈招待總次數以三次為上限。接受印有公司名稱之禮品則不在此限。

3、No third party shall act on behalf of 不得由第三人代為：

Receiving gifts or entertainment in the name of a third party, such as receiving and re-delivering gifts by relatives, is also prohibited.

藉由第三人名義接受饋贈或招待，如由親屬接受餽贈再轉達者，亦屬禁止範圍。

- ❖ Accepting cash or cash-equivalent gifts is strictly prohibited. 嚴禁接受現金或等同現金之禮品
- ❖ It is strictly forbidden to receive commission or other improper benefits due to the convenience of the position. 嚴禁因職務之便收取回扣或其他不當利益

五、 Protection of Confidential information 機密資訊的保護

As a member of PRIMAX, we must understand that the company's confidential information is an important asset for PRIMAX to maintain its competitiveness. We are all obliged to protect all undisclosed confidential information (such as ongoing research and development, unpatented technology, trade secrets, etc.), handle them with prudence and prevent them from being violated or improperly disclosed.

身為致伸科技的一員，我們必須了解，公司的機密資訊是致伸科技保有競爭力的重要資產。對於公司的所有未公開機密資訊（例如：進行中的研發、尚未申請專利的技術、營業秘密等），我們均有義務保護，以審慎的態度處理並防止其受侵害或不當揭露。

1、 Definition of trade secret 營業秘密定義：

Refers to the technology or business secrets that employees know, acquire, or develop due to their daily work or job relationship, including but not limited to:

係指員工因日常工作或因職務關係得知、獲取、開發的技術或業務機密，包括但不限於：

- 1.) Production methods, marketing techniques, procurement information, pricing policies, valuation procedures, customer information, supplier, dealer information and other information related to PRIMAX's business activities and methods.

生產方法、行銷技巧、採購資料、定價政策、估價程序、顧客資料、供應商、經銷商之資料及其他與致伸科技營業活動及方式有關之尚未對外公開資料。

- 2.) Financial information such as financial information, investment plans, merger and acquisition plans, and financial forecasts that the company has not announced to the public.

財務資料、投資計劃、併購計劃、財務預測等公司尚未對外公告之財務相關資訊。

- 3.) Related documents, including drafts, research records, diagrams, patent search reports, etc., of products, technologies, solutions, services, whether under development or already developed, encompassing various stages of development, such as computer program source code and top-level and detail

design data. Product engineering specifications, high-level design specifications (TOP LEVEL DESIGN SPEC), low-level design specifications (DETAIL DESIGN SPEC), mechanism design diagram, circuit diagram, ASIC design diagram, flow chart, process, process, model, model tools, test reports, research reports and other documents or entities.

欲發展或已開發之產品、技術、解決方案、服務等之相關文稿 (樣稿)、研發紀錄、圖說、專利檢索報告等，包含各開發階段之電腦程式原始碼及高低階設計資料(TOP LEVEL DESIGN , DETAIL DESIGN)等文件產品工程規格、高階設計規格(TOP LEVEL DESIGN SPEC)、低階設計規格(DETAIL DESIGN SPEC)、機構設計圖、電路圖、ASIC 設計圖、流程圖、製程、流程、模型、模具、測試報告、研究報告等文件或實體。

- 4.) Documents or entities marked as "密", "機密", "極機密" or "CONFIDENTIAL", "HIGHLY CONFIDENTIAL" by the company, or disclosed through other intangible means, with the information being identified as confidential at the time of disclosure.

經公司標示為“密”、“機密”、“極機密”或“CONFIDENTIAL”、“HIGHLY CONFIDENTIAL”等文件或實體；非實體者有以其他方法（例如：於檔案名稱、資料夾名稱、附加說明等處）標記機密字樣者。

- 5.) Information that the company is obliged to keep confidential to a third party in accordance with the contract or law.

公司依約或依法令對第三人負有保密責任之資訊。

2、Avoid improper disclosure 避免不當揭露：

Any confidential information shall be kept strictly confidential until the individual or unit that has the right to publish the information discloses it in accordance with relevant laws and regulations. Except for performing obligations or performing duties in accordance with the law, no matter inside or outside the company, it should not be discussed in public, nor should it be disclosed to a third party who has not obtained written authorization from the company and has not signed a written confidentiality agreement. If you are not sure whether a certain

information can be made public, please consult Legal and Intellectual Property Department or the person in charge of the project, the person in charge of the business department or the top person in charge of the general management office.

任何機密資訊，在有權發佈該資訊的個人或單位未對外揭露之前應嚴予保密。除依法履行義務或執行職務外，不論於公司之內部或外部，都不應該在公開場合進行討論，也不應該向未獲得公司書面授權以及未簽署書面保密協議的第三人透露。若您不確定某項資訊是否能公開，請先諮詢法務暨智權部、專案負責人或公司最高負責人。

3、Return of information 資訊交還：

When our employment is terminated or requested by the company, we must hand over the work and return all files, materials and information to the company. Even after the employment relationship is terminated, the obligation to protect the company's confidential information still exists, and any company's confidential information must not be continued to be used.

我們於雇傭終止或公司要求時，必須確實交接工作，交還全數檔案、資料及資訊予公司。即使在雇傭關係終止後，保護公司機密資訊的義務仍然存在，亦不得繼續使用公司任何的機密資訊。

❖ It is strictly forbidden to disclose the company's Confidential information. 嚴禁

洩漏公司機密資訊

❖ If you are not sure whether the business or technical information can be disclosed, please consult Legal and Intellectual Property Department or the person in charge of the project, the person in charge of the business department or the top person in charge of the general management office.

若不確定商業/技術資訊是否能公開，請先諮詢法務暨智權部、專案負責人，事業部負責人或總管理處最高負責人

六、Avoidance of conflicts of interest 利益衝突的迴避

When we perform our duties, we should uphold the principles of fairness and justice, and not use our position rights to seek benefits for ourselves or specific related parties. You should also be vigilant and try to avoid activities where your

private interests may conflict with the company's business. The above-mentioned interests include all kinds of property interests, such as cash, securities, creditor's rights, etc., as well as non-property interests such as employment, transfer, rewards and punishments and other personnel rights and interests. If you believe you have a conflict of interest, please immediately disclose it to your supervisor and recuse yourself.

我們在履行職務的時候，應該秉持公平、公正的原則，不藉由職務的權利為自己或特定關係人牟取利益。對於私人利益可能與公司業務發生衝突的活動，也應該保持警覺且極力避免。上述利益包括各類財產上的利益，如現金、有價證券、債權等，以及非財產上的利益如錄用、調動、獎懲等人事權益。若您認為自己發生利益衝突的狀況，請立即向您的主管揭露並迴避。

1、 Avoidance of job interests 職務利益迴避：

We prohibit employees from privately engaging in business activities that have direct or indirect interest in suppliers or customers by taking advantage of their positions.

我們禁止員工藉由職務之便，私下與供應商或客戶有直接或間接利益關係的業務活動。

2、 Avoidance of relationship business interests 關係業務利益迴避：

We prohibit the recommendation or referral of the company's business activities to the company directly operated by the third-class relatives of the employees, but if it is necessary for business, it must be written in advance to the person in charge of the company's business department or the top person in charge of the general management office. Those who report and approve are not subject to this restriction. After approval, when an individual or relative operates or invests in business negotiations with the company, we should still take the initiative to inform the unit supervisor and related units and apply for withdrawal to avoid being involved in this business activity.

我們禁止推薦或轉介公司業務活動給予員工具三等親內關係之親屬所直營之公司，但如因業務上之需要，經書面事先向公司事業部負責人以上或總管理處最高負責人報備核准者，不在此限。經核准後，個人或親屬經營或投資之事業與公司進行業務洽談時，我們仍應主動告知單位主管及相關單位並申請迴避，避免自己涉入此項業務活動。

3、 Specifications for self-operated business 自營業務的規範：

Do not engage in business that directly or indirectly conflicts with the company's interests by itself or through a third party.

不得自行或透過第三人從事與公司有直接或間接利益衝突的業務。

4、 Specifications for part-time jobs 兼職的規範：

If you need to work concurrently with other organizations due to special reasons, you should avoid conflicts of interest between the organization and the position and the company. At the same time, it should also avoid affecting the normal performance of the company's business execution due to part-time jobs or reducing loyalty to the company due to external interests. Before accepting a part-time job, please inform your supervisor in advance, and report to the human resources department, and the company reserves the right of discretion when necessary.

如因特殊事由需兼任其他組織的工作，應該避免該組織及職務有與公司有利益衝突的情況。同時也應避免因為兼職而影響在公司執行業務的正常表現或因為外部利益降低對公司的忠誠度。在接受兼職工作之前，請事先知會您的主管，並且向人力資源部門報備，公司得保留必要時的裁量權。

❖ Obtaining commercial benefits through any illegal commercial behavior is strictly prohibited. 嚴禁因職務之便圖利特定關係人

❖ It is strictly forbidden to use illegal means to infringe on competitors' trade secrets. 嚴禁在外經營與公司產品屬性相關之業務

七、 Observance of fair trade 公平交易的遵守

We are committed to competing fairly and honestly, gaining a competitive advantage with excellent quality and service, and abandoning immoral and illegal business practices. We must respect and treat customers, suppliers and competitors fairly and comply with all competition and trade laws.

我們致力於公平誠實地展開競爭，以優異的品質和服務贏得競爭優勢，摒棄不道德、

不合法的商業行為。我們必須尊重並公平的對待客戶、供應商和競爭者，遵守所有競爭和貿易法規。

1、 Prohibition of illegal business practices 禁止非法商業行為：

We prohibit employees from manipulating, concealing, intimidating, abusing information, distorting facts, maliciously injury or any other illegal business practices. 我們禁止員工為獲取商業利益而進行操縱、隱瞞、脅迫、濫用資訊、歪曲事實、惡意中傷或其他任何非法商業行為。

2、 Avoid misrepresentations 避免不當表述：

Fair and accurate sales practices are important to maintaining our goodwill with our customers and the public. In the publicity and business activities of enterprises and products, we should abide by the laws and various internal regulations of the company, and avoid inappropriate expressions. All statements must be true and have a reasonable basis, and must be verified by department heads and the legal department before publication or dissemination.

公平準確的銷售行為對於維護我們在客戶及大眾中的商譽非常重要。在企業和產品的宣傳活動及經營活動中，應遵守法律和公司內部的各項規定，避免不當的表述。所有的陳述都必須真實，並有合理的依據，在刊登或傳播之前必須經過部門主管以及法務部門的核實。

3、 Prohibition of joint monopolies 禁止聯合壟斷：

We prohibit entering into illegal agreements with competitors, customers, suppliers, etc. to avoid unfair trade practices.

我們禁止與競爭者、客戶、供應商等達成違法協議，避免不公平的交易行為。

❖ Obtaining commercial benefits through any illegal commercial behavior is strictly prohibited. 嚴禁透過任何非法商業行為獲取商業利益

❖ It is strictly forbidden to use illegal means to infringe on competitors' trade secrets. 嚴禁採用違法手段侵犯競爭者的商業秘密

八、 Safe and healthy working environment 安全與健康的工作環境

PRIMAX values the safety and health of its workers, integrating sound safety and hygiene practices into its operations and establishing relevant management regulations to create a safe and healthy working environment, thereby ensuring the safety and health of its workers.

致伸集團重視工作者安全與健康，將健全的安全與衛生作法融入營運中，並制定相關管理規定，創造安全衛生的工作環境，進而保障工作者安全與健康。

When performing our duties, it is essential to comply with workplace safety and health-related laws and regulations. When working at the premises of clients, suppliers, or other entities, we must also adhere to their safety and health regulations. When visitors, clients, suppliers, partners, contractors, or third parties visit the premises of PRIMAX, we should inform them about applicable safety and health requirements.

我們在執行職務時，務必遵守工作地點的安全衛生相關法律及規定。如在客戶或供應商等處所工作時，我們也必須遵守客戶或他人的安全與衛生規定。當有客戶、供應商、合作夥伴、承攬商或第三人於致伸集團所在地拜訪時，我們應向其說明適用的安全與衛生要求。

If you work in the PRIMAX facility and encounter or suspect any of the following situations, please immediately report them to your immediate supervisor or the safety and health management personnel:

如您在致伸所屬廠區工作時，發現或懷疑有以下情況，請立即通報您的直屬主管或安全衛生管理人員：

- 1、 Being asked to perform unsafe work. 被要求從事不安全的工作。
- 2、 Being asked to perform work without receiving relevant training and that may pose a risk to oneself or others. 被要求從事未經接受過相關培訓且可能對自己或他人有危害的工作。
- 3、 Discovering others engaging in unsafe work. 發現他人正從事不安全的工作。
- 4、 Unsafe machinery, equipment, or work environment. 機械、設備或工作環境不安全。
- 5、 Injury, illness, or emergencies occurring in the workplace, including false alarms. 在工作場所受傷、生病或危急的情況，包括虛驚事件。

6、 Other safety and health issues. 其他安全衛生問題。

九、 Prohibition of discrimination and harassment 禁止歧視及騷擾

To establish a diverse, inclusive, friendly, and harmonious work environment, we prohibit any form of discrimination and harassment. We strictly adhere to relevant laws and adopt a zero-tolerance policy to ensure that all members of the PRIMAX are treated with respect, fairness, and equality in the workplace, free from discrimination or harassment. Therefore, employees are prohibited from engaging in any form of sexual harassment or other acts of violence, threats, intimidation, or unlawful behavior. Furthermore, employees must not exploit their positions to engage in inappropriate relationships with clients, suppliers, partners, or other members of the organization, nor engage in harassment, discrimination, theft, intimidation, coercion, or other improper conduct.

我們為建立多元共融、友善和諧且具歸屬感的工作環境，禁止任何形式之歧視及騷擾，恪遵相關法律並採取零容忍原則，以確保致伸所有成員於工作環境中能受到應有的尊重、合理與平等的對待，免遭受歧視或騷擾。爰此，員工不得有任何性騷擾或其他暴力、威脅、恐嚇或其他不法行為。且不得利用職務之便，與客戶、供應商及合作夥伴或其他集團成員涉入不正常男女關係，或為騷擾、歧視、偷竊、恐嚇、脅迫或其他不當行為。

1、 Prohibition of discriminatory behavior 禁止歧視行為：

To create a diverse, open, and equal-friendly work environment, we strictly prohibit any form of discrimination based on, but not limited to, nationality, race, age, gender, sexual orientation, gender identity, religious beliefs, political views, language, birthplace, appearance, skin color, facial features, disabilities, medical history, pregnancy, zodiac sign, blood type, or any other characteristics. We maintain a zero-tolerance policy towards any form of discriminatory behavior in employee recruitment, promotion, and treatment. All individuals should be treated fairly and equally.

為營造一個多元、開放、平等之友善職場環境，嚴禁包含但不限於國籍、種族、年齡、性別、性傾向、性別認同、宗教信仰、政治傾向、語言、籍貫、出生地、容貌、膚色、五官、身心障礙、疾病史、懷孕、星座、血型等為由，於員工招募、升遷及給予待遇時而為差別待遇或不平等之對待。我們對於任何形式之歧視行為採零容忍態度。

2、 Prohibition of harassment behavior 禁止騷擾行為：

- 1.) Sexual harassment: Refers to behavior that is related to sex or gender and goes against the will of another person, excluding sexual assault crimes. It includes acts where submission or rejection of such behavior by the other person is used as a basis for affecting their conditions related to work, education, training, services, programs, or activities, whether it involves gaining, losing, or impairing their rights. It can also occur through the display or transmission of text, pictures, sounds, images, or other materials, or through discriminatory or insulting words or actions, or by other means that harm the dignity of others, create an atmosphere of fear, hostility, or offense, or inappropriately impact their work, education, training, services, programs, activities, or normal living.

性騷擾行為：指性侵害犯罪以外，對他人實施違反其意願而與性或性別有關之行為，且以該他人順服或拒絕該行為，作為其獲得、喪失或減損與工作、教育、訓練、服務、計畫、活動有關權益之條件。抑或是以展示或播送文字、圖畫、聲音、影像或其他物品之方式，或以歧視、侮辱之言行，或以他法，而有損害他人人格尊嚴，或造成使人心生畏怖、感受敵意或冒犯之情境，或不當影響其工作、教育、訓練、服務、計畫、活動或正常生活之進行。

- 2.) Stalking harassment: Refers to behavior that occurs in the workplace or utilizes work opportunities, where specific individuals are repeatedly or persistently subjected to unwanted acts related to sex or gender. This can be carried out through personnel, vehicles, tools, equipment, electronic communications, the internet, or other means. Such behavior causes fear or intimidation to the extent that it impacts their daily life or social activities.

跟蹤騷擾：指於工作場所或利用工作機會，以人員、車輛、工具、設備、電子通訊、網際網路或其他方法，對特定人反覆或持續為違反其意願且與性或性別有關之行為，使之心生畏怖，足以影響其日常生活或社會活動。

- 3.) Other forms of harassment: This includes acts of harassment towards others, such as physical, violent, psychological, or verbal harassment.

其他騷擾：如對他人施以身體、暴力、心理、言語等騷擾行為。

十、 How to report 舉報方法

We are obliged to report any violations of law, violations of this Code, or other unethical behavior to our department heads, human resources, and legal departments. The reported information must be detailed, as far as possible, record the situation you know in detail and provide it to the investigation unit for further investigation. All reporting investigations will be conducted in a confidential manner to protect bona fide whistleblowers and prevent retaliation.

如果發現任何違法、違反本準則或其他不道德行為，我們皆有義務將其舉報給部門主管、人力資源部門、法務部門。舉報的資訊必須詳實，盡可能將您認知的狀況詳盡記錄並提供給調查單位知悉，以便進行後續的調查。所有舉報的調查工作都將以保密形式進行，以保護善意舉報人，杜絕報復事件的發生。

1、 Reporting channels 舉報管道：

For violations of the law or this code, in addition to directly reporting to the department head, human resources department, and legal department, we can also report through the following channels:

對於違法或違反本準則之情事，除了直接向部門主管、人力資源部門、法務部門申報以外，我們也可以透過以下管道進行舉報：

Report mailbox: impeach@PRIMAX.com, ER.HR@primax.com.cn and Enterprise WeChat Employee Feedback Platform.

舉報信箱：impeach@PRIMAX.com、ER.HR@primax.com.cn 及企業微信員工意見平台。

2、 Confidentiality 保密：

To protect the rights and interests of employees, the company will keep the names and identities of the employees who report the report confidential, and will not disclose the identity of any whistleblower or person involved in the relevant investigation, unless the employee who submitted the report allows or is required by laws and regulations to disclose.

除非提交舉報的員工允許或法律法規要求披露，為保障員工權益，對於舉報的員工姓名和身份公司會予以保密，不會披露任何舉報人或參與相關調查的人之身份。

3、Protection against retaliation 防止報復：

Any employee who retaliates against a colleague who makes a good-faith report or assists in the investigation of such a violation will be subject to disciplinary action, up to and including termination of employment. No one will be penalized by the company, demoted or face other adverse consequences for refusing to engage in inappropriate conduct, etc.

若任何員工對基於善意舉報的同事或協助調查此類違規行為的同事施以報復，將受到紀律處罰，最高可予以解雇。所有人都不會因為拒絕參與不當行為等而遭到公司的懲罰、降職或面臨其他不良後果。

4、Malicious smearing is prohibited 禁止惡意抹黑

Any reporting of violations of laws or violations of this code and company policies out of good faith will not be punished in any form even if the report is wrong. However, if it is verified that it is a malicious report or smearing a specific person, the company will take appropriate punishment.

任何出於善意舉報違法或違反本準則以及公司政策的行為，即使舉報錯誤也不會受到任何形式的懲戒。但若經查證為惡意舉報或抹黑特定人員，公司將採取適當的懲處。

5、Reward system 獎勵制度：

We encourage you to speak up and report violations of the law or this Code. After the investigation confirms that the report is true, a minimum reward of NTD 1,000 (or equivalent currency) will be issued. If the investigation and reporting cause actual losses to the company, an additional NTD 3,000 (or equivalent currency) will be issued Incentive money, and meritorious service awards as appropriate.

我們鼓勵各位勇於發聲，舉報違法或違反本準則的情事。經調查確認舉報的情事屬實，將酌發最低新台幣一千元 (或等值貨幣)的獎勵金，若經調查檢舉情事造成公司實際損失，則加發新台幣三千元(或等值貨幣)以上獎勵金，並酌情記功嘉獎。

十一、Punishment Principles 懲處原則

When any company within the Primax Group becomes aware of or receives reports of a member of the Primax Group being involved in unethical conduct, it shall investigate the relevant facts. Relevant personnel must cooperate with the investigation and provide relevant information. If it is confirmed that a member of the Primax Group has indeed violated relevant laws or the Employee Code of Conduct, the Primax Group may, depending on the severity of the situation, take one or more of the following measures or enforce any applicable local employment regulations, and may also pursue civil or criminal liabilities under the law.

致伸集團各公司如發現或接獲檢舉致伸成員涉有不誠信行為時，應查明相關事實。相關人員應配合調查，並提供有關資料。如經證實致伸成員確有違反相關法令或員工行為準則之行為時，致伸集團除得視情節之輕重，依照下列其中之一種或多種方式或依當地適用之工作規則予以懲處外，並得依法追究其民、刑事責任。

- 1、 They will be given a reprimand and asked to immediately cease the related behavior. 予以訓誡，並要求其立即停止相關行為。
- 2、 They will receive further education and training on the code of conduct and undergo an assessment. 再次接受行為準則之教育訓練與測驗。
- 3、 They will be given a warning or reprimand as a disciplinary action. 予以申誡或記過之處分。
- 4、 They may have their performance bonuses and dividends withheld, be demoted, or even dismissed as disciplinary measures. 扣發績效獎金、紅利、降級及免職等處分。
- 5、 If a violation of this code of conduct is deemed severe, the Inven Global group may also, in accordance with applicable local laws and the terms of the employment contract, terminate the employment contract. 如致伸成員違反本準則情節嚴重者，致伸集團亦得依照各地相關法令及聘僱契約之約定，終止僱用契約。
- 6、 If a member's immediate supervisor is found to have exercised inadequate supervision or knowingly protected or failed to report a subordinate's violation of this code of conduct, disciplinary action may also be taken against the supervisor,

depending on the severity of the situation. This action may include a warning, reprimand, or dismissal, as appropriate. 該名致伸成員之直屬主管若有督導不周，或明知所屬人員違反本行為準則，而予以庇護或不予舉發者，亦將視情節輕重，予以申誡、記過或是解僱之處分。

十二、Q&A 範例與解答

1、Personal moral standards 個人道德標準

- 1.) Question: The new colleague has a very humorous personality. Although the atmosphere in the office has become very relaxed after he came, his jokes sometimes make me feel offended. What can I do?

問：新來的同事個性很幽默，雖然辦公室氣氛在他來之後變得很輕鬆，但他開的玩笑有時候讓我覺得被冒犯，我能夠怎麼做呢？

Answer: We hope that colleagues can respect each other. If you feel offended by a colleague's words, you should express your thoughts to him directly but tactfully, and ask him to stop this behavior. If you feel that you cannot resolve the situation in person with a colleague, you may take the initiative to seek assistance from your supervisor or Human Resources.

答：我們希望同仁彼此皆能相互尊重，若同仁的言語讓您覺得被冒犯，您應該直接但委婉的向他表達您的想法，要求他停止這種行為。若您認為自己無法親自面對同仁解決這個狀況，您可以主動尋求主管或人力資源部門的協助。

- 2.) Question: I have been in the company for less than half a year, and I have just been promoted to foreman. Recently, I have observed that some senior colleagues in the production line swipe their cards on behalf of each other. I don't want to cause a gap between us by pointing out this matter. Besides, they have not affected the normal operation of the production line. I will continue to turn a blind eye alright?

問：我進公司不到半年，才剛升上領班。最近我觀察到一些比較資深的產線同事互相代刷卡的現象，我不希望因為指出這件事造成我們的隔閡，況且他們沒有影響到產線的正常運作，我還是繼續睜一隻眼閉一隻眼好了？

Answer: Every colleague should be aware that swiping a card on behalf of someone is deceptive and violates the company's policies. As management, you are responsible for supervising and managing subordinates, and it is up to you to establish whether the company can have a good moral atmosphere. You must clearly understand that pointing out and properly punishing colleagues who violate the Code is a necessary process for the company to establish a good moral atmosphere.

答：每位同仁都應該認知到代刷卡是欺瞞、違背公司政策的行為。身為管理階層，您肩負監督與管理部屬的責任，公司是否能有良好的道德風氣皆由您建立起。您必須清楚了解，指出並讓違反準則的同仁受到適當懲戒，是公司建立良好道德風氣必經的過程。

- 3.) Question: When I represent my company at an event, can I consume alcoholic beverages provided at the event venue?

問：當我代表公司出席活動時，可以飲用活動會場提供的酒精飲料嗎？

Answer: Please use your good judgment in assessing whether the situation warrants the consumption of alcoholic beverages in moderation. If you will be discussing business, returning to work, or driving a vehicle, it is important that you avoid alcohol.

答：請您運用良好的判斷力評估該情況是否適合酌量飲用酒精飲料。若您將洽談公事、回到工作場所或駕駛車輛等情況，請您務必避免飲酒。

2、Specifications for gifts and entertainment 餽贈及招待的規範

- 1.) Question: How to evaluate and report in advance?

問：如何事前評估與報備？

Answer: If you have any doubts, please clarify and consult with your supervisor first. If you need further consultation, you can contact the human resources department or the legal department.

答：若有任何一絲的疑慮，請先向您的主管釐清及諮詢。若需要進一步諮詢可透過

人力資源部門、或法務部門。

- 2.) Question: I am not sure how much the gift from the supplier is worth, what should I do?

問：我不確定供應商送來的禮品價值多少，應該怎麼辦？

Answer: Basically, you should avoid accepting gifts. Please let suppliers know about the company's rules on gifts and entertainment. If you have any questions, please consult your supervisor in advance.

答：基本上您應該避免接受禮品，請讓供應商了解公司對於餽贈及招待的規範，若有疑問請事先與您的主管諮詢。

- 3.) Question: During the New Year's Eve, our suppliers always come to visit with a special gift box for the New Year's Eve. It's really shameful not to accept the gift. Am I sure I can't accept it?

問：我們的供應商年節時，總是特地帶年節禮盒來拜訪，不收禮實在太不給面子了，我一定不能收下嗎？

Answer: Please communicate with the supplier as much as possible in advance. The company policy is not to accept gifts that do not have their company name printed on them.

答：請您盡可能事先與供應商溝通，公司政策為不得接受未印有其公司名稱之禮品。

- 4.) Question: Recently, I am selecting raw material suppliers, and one of the candidate suppliers gave me a gift box today, the value of which is within the upper limit of the company's regulations. This gift will not affect my choice, and as a member of the company, I will definitely choose the manufacturer based on the interests of the company, so can I accept this gift box?

問：最近我正在選擇原料供應商，其中一間候選廠商今天送我禮盒，價值在公司規定的收禮上限內。這個禮物並不會影響到我的抉擇，而身為公司的一員，我也一定會以公司的利益為選擇廠商的依歸，如此可以收下這個禮盒嗎？

Answer: You are facing a time when the business relationship between the two

parties may change. Even if you uphold ethics and abide by company norms, the outside world and other suppliers may think that you accept bribes and make decisions out of selfishness. Please be sure to decline to accept gifts and entertainment.

答：您正面臨雙方商業關係可能產生變化的時間點，縱使您秉持道德、遵守公司規範，但外界及其他供應商有可能認為您接受賄賂，以私心做決策。請您務必婉拒接受禮品、招待。

- 5.) Question: I have a good relationship with the supplier, he recently invited me to go on vacation, can I go?

問：我跟供應商關係很好，他最近邀請我一同去度假，我可以去嗎？

Answer: Under normal circumstances, if the two parties travel together and pay for the travel separately, it is regarded as an employee's private activity, and there is no problem. But please note that if the other party subsidizes your travel expenses in full or in part, or if the other party is vying for company business, please decline to participate.

答：在正常情況下若雙方一同出遊且旅行費用各自支付，即使是員工私人的活動，是沒問題的。但請注意，若是對方全額或部分補助您旅行費用，或遇到對方正在爭取公司業務時，請您婉拒參加。

- 6.) Question: Suppliers often send me admission tickets for sports games or exhibitions, can I accept it?

問：供應商常常送我體育比賽或是展覽的入場卷，我能接受嗎？

Answer: Please refrain from accepting any entertainment and gifts. If it must be accepted to maintain a commercial relationship, please consider the status of the relationship between the two parties, the value of the entertainment and gifts, and the frequency of giving.

答：任何招待及禮品，皆請您避免接受。若因維護商業關係必須接受，請考量雙方關係的狀態以及招待和禮品的價值、贈予頻率決定。

3、 Protection of confidential information 機密資訊的保護

- 1.) Question: I am responsible for accepting orders from company X. A colleague who has no business contact with company X asked me whether I have received orders from company X recently. Can I answer such questions?

問：我負責接 X 公司的單，有個業務跟 X 公司完全沒接觸的同事，聊天時問我最近是否有接到 X 公司的單，這樣的問題我能回答嗎？

Answer: Before the company officially announces to the public, any information related to business and finance shall not be disclosed.

答：在公司正式對外公告之前，不得透露任何與業務及財務相關之資訊。

- 2.) Question: My nephew hopes to use our company's products as research targets because of the needs of school research projects. What information can I provide him?

問：我姪子因為學校研究專題的需要，希望以我們公司的產品當研究標的，我能提供什麼資訊給他呢？

Answer: You can provide product information that the company has disclosed to the public, and any information that the company regards as confidential must not be disclosed to the outside world.

答：您可以提供公司已對外公開的產品訊息，任何公司視為機密的資訊絕不得對外透露。

- 3.) Question: The supplier of the company's second source proposed to me the process parameters of the main source as an analysis basis for development needs. How much information can I provide him?

問：公司 second source 的供應商為了開發需求，向我提出需要 main source 的製程參數做為分析依據，我能提供他什麼程度的資訊呢？

Answer: Please pay attention to whether the company has signed a confidentiality agreement with the main source manufacturer, and pay attention to avoid violating such regulations. Before you provide information

to a supplier, please discuss it with your supervisor.

答：請您注意公司與 main source 的廠商是否有簽訂保密協定，並注意避免違反此類規定。在您提供資訊予供應商前，請先與您的主管討論。

4、 Avoidance of conflict of interest 利益衝突的迴避

- 1.) Question: My wife' s family business quotes for the company with very competitive prices and products. Can the company choose to cooperate with them?

問：我太太他們家族企業以非常有競爭力的價格、產品替公司報價，公司能選擇跟他們合作嗎？

Answer: The company stipulates that the company directly operated by the third-class relatives of the employees, if they contact the company for business, need to report to the person in charge of the company's business department or above or the top person in charge of the general management office for approval in advance. Third-degree relatives include your spouse, you and your spouse's parents, (outside) grandparents, (outside) great-grandparents, children, (outside) grandchildren, brothers and sisters, uncles, uncles, aunts, uncles, aunts, nieces, Nephews and their spouses. So in this case, you must obtain approval before the company can cooperate with your wife's family business.

答：公司規定員工具三等親內關係之親屬直營的公司，若與公司接洽業務，需要事先向公司事業部負責人以上或 總管理處最高負責人報備核准。三等親包括您的配偶、您及您配偶的父母、(外)祖父母、(外)曾祖父母、子女、(外)孫子女、兄弟姊妹、叔、伯、姑、舅、姨、姪子女、外甥子女等及其配偶。所以在此種情況，您必須先徵得核准，公司才有可能與您太太家族企業合作。

- 2.) Question: The company founded by my former classmate strongly invited me to use my off-duty time to regularly help their factory personnel take professional and technical courses. Can I agree?

問：我以前同學創立的公司大力邀請我利用下班時間，定期幫他們的工廠人員上專業技術課程，我可以答應嗎？

Answer: You should pay attention to whether your friend's company belongs to the same industry or competes with the company. Please seek the advice and consent of your supervisor and the Legal Department before teaching a course.

答：您應該留意您朋友的公司是否與公司屬於同產業或競爭的狀況。在教授課程之前，請先徵詢您的主管及法務部門的意見與同意。

- 3.) Question: I just got promoted to the supervisor position this month, and the company opened by my friend is also in the same industry. Recently, he is trying to become a supplier of another BU of our company. Should I pay attention to anything?

問：我這個月剛升上主管職，我朋友開的公司也是同業，最近他在爭取成為我們公司另一個 BU 的供應商，我應該注意什麼嗎？

Answer: If you are a company operated by a person with a relationship within the third degree, or are currently negotiating business for your department, please take the initiative to report to your supervisor and avoid participating in this business negotiation. Although this incident does not meet the above conditions, please avoid discussing matters related to their cooperation with colleagues in charge of this business.

答：若是您具三等親以內關係的人所營業之公司，或是目前洽談的為您部門的業務，請您主動向您的主管報備，並迴避參與本次業務洽談。本次事件雖不符合上述情況，但仍請您避免與負責此項業務的同仁談論有關他們合作相關事項。

- 4.) Question: I found a high-quality supplier that is not a third-degree relative, which should improve the company's cost. How should I recommend it? Is there any procedure to follow?

問：我發現某家非三等親之優質供應商，對公司應該有成本上的改善，我要如何推薦？請問有程序可依循嗎？

Answer: Please provide the information to the project manager of the Sourcing unit. After a formal evaluation, it will be included in the ranks of qualified suppliers after going through the application process and approved by the top supervisor of the procurement and development department.

答：請將資訊提供給採購開發 (Sourcing) 單位之項目負責主管。經由正式評估後，經過申請程序並經由採購開發部門最高主管核准後納入合格供應商行列。

5、Observance of fair trade 公平交易的遵守

- 1.) Question: I heard that a colleague in the industry does not want to accept customer A' s products anymore, because he thinks that customer A' s PM has a bad attitude, and often slanders them and utters bad words. Can I inform customer A of this rumor?

問：聽說某同業不想再接 A 客戶的產品，因為覺得 A 客戶的 PM 態度不佳，時常拗他們，且口出惡言，我可否將此傳言告知 A 客戶？

Answer: Even though it may be beneficial to our company to inform customer A of this rumor, based on the principle of adhering to fair trade, we should enhance our own strength and avoid gaining the company's interests by defaming or spreading rumors.

答：縱使將這則傳言告知 A 客戶可能對我們公司有利，但基於遵守公平交易的原則，應提升自己的實力，避免藉由詆毀或傳播謠言獲取公司利益。

- 2.) Question: What does unfair trading practice mean?

問：不公平的交易行為指的是？

Answer: This includes entering into agreements with competitors or discussing related business topics such as prices, sales, market allocation, competing contracts, boycotting customers or suppliers, etc.

答：包括與競爭者達成協議或討論價格、銷售額、分配市場、競爭合約、抵制客戶或供應商等相關商業主題。

6、Safe and healthy working environment 安全與健康的工作環境

- 1.) Question: I received a work instruction that clearly specifies the tasks to be performed. However, after starting the work, I discovered that the actual conditions are different from what was initially anticipated. I believe that continuing the work according to the instruction could potentially be unsafe.

What should I do?

問：我接獲一個工作指令，明確列明需要履行的工作。在開始該工作後，發現實際條件與原計畫所預期的條件不同。並認為按照工作指令繼續該工作有可能不安全。我該怎麼做？

Answer: You have the responsibility and the right to stop or refrain from starting any work that you deem unsafe. Communicate your concerns to your supervisor, as they have the responsibility to investigate, understand, and address the issue.

您有責任也有權停止或不開始您認為不安全的工作。並將顧慮告知主管。主管有責任調查、瞭解並解決問題。

7、 Prohibition of discrimination and harassment 禁止歧視及騷擾

- 1.) Question: When I encounter situations where a colleague or supervisor makes me feel uncomfortable through physical or verbal actions, including instances of sexual harassment, what should I do?

問：當我遇到同仁或主管以肢體或言語讓我感受到不舒服甚至被性騷擾的情況下，我該怎麼做？

Answer: We have a zero-tolerance policy towards workplace harassment, including sexual harassment. If you are experiencing any form of workplace harassment, we encourage you to bravely report it to the company. We take all complaints seriously and will promptly establish an investigation team to ensure confidentiality and fairness throughout the investigation process.

答：我們對於職場性騷擾持零容忍態度和立場。如您正遭遇任何形式的職場性騷擾，請勇敢向公司提出申訴，公司將嚴正對待所有申訴，立即成立調查小組，並確保調查過程保密性及公正性。

8、 How to report 舉報方法

- 1.) Question: My supervisor has asked me to do something that I believe violates company policy and I am concerned that if I refuse it will affect my PRD, what

should I do?

問：主管要求我進行我認為違反公司規範的事，我擔心如果拒絕會影響我的 PRD，該怎麼辦呢？

Answer: You should say no to anyone who asks you to do something that violates regulations or company codes. If you are not sure whether this behavior is inappropriate, please consult with the legal department and human resources department first, or use the aforementioned reporting mailbox to report. All processes will be kept confidential, and you do not need to worry about affecting your PRD or being retaliated against for asking or reporting.

答：不管任何人要求您進行違反法規或公司規範的行為，您都應該要拒絕。若您不確定此項行為是否不妥，請您先與法務部門、人資部門諮詢，或利用前述舉報信箱反映。所有過程將保密，您不需擔心因為詢問或舉報影響您的 PRD 或遭到報復。

- 2.) Question: I suspect that a department colleague accepts bribes from the manufacturer. Should I report him? If it is proved that he did not accept bribes, will I be punished?

問：我懷疑部門同事接受廠商賄賂，我應該要檢舉他嗎？如果證明他沒有收賄，我會受到懲處嗎？

Answer: If you observe bribery, please report it bravely. The company strictly prohibits any bribery. We will investigate immediately after receiving the report, and if the situation is true, we will punish it appropriately; if it is purely a misunderstanding, you do not need to worry about being punished for your good faith behavior.

答：若您觀察到賄賂發生的情形，請您勇敢舉報。公司嚴禁任何賄賂行為，我們在收到檢舉後會立即展開調查，若情況屬實將予其適當的懲處；若純屬誤解，您也不需擔心因為自己善意的行為而遭受任何處分。