



# **WT MICROELECTRONICS**

## **Anti-corruption, Anti-bribery & Anti-money laundering Policy**

Effective November 2023; last updated March 2025



## **Article 1: Establishment of Purpose and Applicability**

With integrity as our core value, WT takes a zero-tolerance approach to preventing corruption, bribery and money laundering. WT hereby establishes Anti-corruption, Anti-bribery & Anti-money laundering Policy (hereinafter referred to as "the Policy" ).

The previously mentioned Stakeholders extend their purview to encompass not only the Company itself but also its subsidiaries, denoted hereinafter as the "Group." This includes all directors, executives, employees, and substantial controllers associated with the Group. Through the devoted enforcement of this Policy, the Company ardently aspires to realize its overarching objectives of professionalism, integrity, and the enduring sustainability of its operations."

## **Article 2: Anti-corruption, Anti-bribery & Anti-money laundering**

### **Commitment**

#### **(1) Prohibition of bribes and gratuities:**

When engaged in business activities, the Company and its Stakeholders are expressly prohibited from either directly or indirectly bestowing upon or soliciting from clients, agents, contractors, suppliers, public officials, or other relevant parties any form of illicit advantage.

#### **(2) Prohibition of illegal political donations**

The Company and its Stakeholders shall adhere to the Political Donations Act and the Company's internal operational procedures when making direct or indirect contributions to political parties, organizations involved in political activities, or individuals. Such contributions must not be sought as a means to secure commercial gains or business advantages.

#### **(3) Prohibition against improper charitable donations or sponsorship**



When making or offering donations and sponsorship, the Company and its Stakeholders shall comply with relevant laws, regulations and the Company's internal operational procedures and shall not surreptitiously engage in bribery.

(4) Prohibition against unreasonable gifts, hospitality, or other improper benefits

The Company and its Stakeholders shall not directly or indirectly offer or accept any unreasonable present, hospitality or other improper benefit to establish business relationship or influence commercial transactions.

(5) Anti-Money Laundering

The Company and its Stakeholders shall comply with anti-money laundering laws and regulations, prohibits and combats money laundering, tax evasion, sanctions violations and other criminal activities.

### **Article 3: Types of benefits**

The term "Benefits," as stipulated in this Policy, pertains to any valuables, including, but not limited to, the direct or indirect provision, bestowal, or receipt of monetary funds, gifts, commissions, positions, services, privileges, rebates, or any comparable forms or denominations of value. Benefits received or given occasionally in accordance with accepted social customs and that do not adversely affect specific rights and obligations shall be excluded.

### **Article 4: Periodic Auditing and Risk Assessment**

To fortify the foundations of ethical corporate governance, a collaborative effort is undertaken by the Human Resources, Legal, and Auditing Office to establish the 'Ethical Management Team.' The Chief Human Resources Officer presides as the team's leader, while the Board of



Directors assumes the role of supervisor and highest governing body. Delegation of authority is exercised, aligning with the responsibilities and purview of each department, to construct and supervise the formulation of policies and preventive measures for ethical corporate management, ensuring the resolute adherence to ethical business precepts.

The Ethical Management Team routinely presents annual reports to the Board of Directors, elucidating the outcomes of the previous year's implementation of ethical business practices, and provides valuable assistance to the Board of Directors in appraising the effectiveness of WT's preventive measures for ethical business operations."

#### **Article 5: Education and Training**

WT mandates the rigorous implementation of ethics and integrity training, including onboarding sessions for new hires, along with periodic retraining and awareness campaigns for all employees and relevant Stakeholders within the group. This educational effort is designed to fortify the significance of compliance with this Policy, while concurrently elevating staff awareness and vigilance in countering money laundering and fraud.

#### **Article 6: Risk Assessment and Audit**

The Company systematically develops annual audit plans for each operational site through routine risk assessments. The execution of this Policy is integral to the broader risk assessment process, encompassing considerations of the suitability, sufficiency, and efficacy of this Policy. In circumstances deemed reasonable and necessary, existing policies will be revised based on the results of risk assessments to audit relevant business practices, detect potential misconduct, and oversee compliance with the implementation of this Policy



## **Article 7: Whistleblowing and protection**

WT has instituted a whistleblowing platform on its official website (<https://www.wtmec.com/aboutus/contact-us/>) to facilitate the submission of reports by both internal and external individuals. The Ethical Management Team handles reported cases. If the reported matter involves regular employees, the case is forwarded to the highest authority in the relevant department for investigation, with subsequent tracking of the final resolution. In cases involving directors or senior executives, the matter is to be reported to the independent directors.

Records pertaining to the acceptance of cases, investigation procedures, outcomes, and associated documentation are meticulously maintained. The confidentiality of whistleblowers' identities and the content of their reports is rigorously upheld, with provisions for anonymous submissions. Furthermore, the Company is fully committed to shielding whistleblowers from any unjust retaliation stemming from their act of disclosure.

## **Article 8: Disciplinary Actions for Violations**

Any violation of this policy, including but not limited to bribery, corruption, illegal political contributions, improper charitable donations or sponsorships, acceptance of unreasonable gifts or hospitality, and money laundering, shall be considered a breach of this policy.

If it is substantiated that a relevant stakeholder has engaged in such violations:

- (1) For employees, disciplinary actions shall be imposed based on the severity of the violation, which may include demotion, reassignment, salary reduction, or termination of employment in accordance with applicable local laws and employment regulations.
- (2) For directors and managerial officers, appropriate legal actions



shall be taken in accordance with relevant laws, which may include, but are not limited to, removal from office.

#### **Article 9: Implementation**

The Policy shall enter into force after adoption by Chairman.

Signed

A handwritten signature in black ink, appearing to read 'Guo Cheng', written in a cursive, flowing style.

Chairman of the Board

WT Microelectronics Co., Ltd