



## Sino-American Silicon Products Inc.

### **Measures for the Report on Illegal, Unethical and Dishonest Conducts**

#### **Article 1 (Basis)**

This “Measures for the Report on Illegal, Unethical and Dishonest Conducts” (hereinafter, the “Measures”) is hereby established to implement the enforcement of this Company’s rules as specified in “Codes of Ethical Conduct” and “Ethical Corporate Management Best Practice Principles”, and to encourage reports on any illegal act or violation of the foregoing rules.

#### **Article 2 (Purpose)**

This “Measures” is to foster employees of this Company to fully comply with internal “Codes of Ethical Conduct” and “Ethical Corporate Management Best Practice Principles”, and to secure both whistleblower and adverse party’s legitimate rights.

#### **Article 3 (Reception Unit)**

1. Spokesperson: Hearing of reports by stockholders, investors and other stakeholders.
2. Human resource manager: Hearing of reports by this Company’s internal staff, consumers, suppliers and contractors.
3. Legal staff: Hearing of reports by persons as specified above, and management of reporting email inbox as well as amendments to and elaborations on this “Measures”.

#### **Article 4 (Reporting Access)**

Reports can be submitted via “Staff Complaint Box” and “Email”.  
Email address: whistleblower@saswafer.com.

#### **Article 5 (Principles of Report-handlings)**

1. Each reception unit shall notify the legal unit when a report case is received. The legal unit shall make certain the essence of such reports; if any potential violation of law, unethical or dishonest conduct is found, the legal unit shall submit with evidence to the chairperson for allocation of subsequent proceedings and simultaneously notify independent directors of such a case.
2. This Company shall deal with reported cases on a confidential basis, investigate through independent sources, fully protect whistleblowers and keep the identity of whistleblowers strictly confidential. Relevant personnel of this Company handling reported cases shall declare with a written statement that they will keep the identity of whistleblowers and the content of such reports confidential, and such personnel shall refrain from participating in the case if there is a conflict of interest.
3. This Company assures that whistleblowers will not be treated adversely due to the filing



of such reports.

4. In order to secure adverse parties' rights against intentional false accusations, this Company shall offer adverse parties opportunities to appeal and, when necessary, call for a hearing conducted by the human resource arbitration committee.

#### **Article 6 (Handling Procedures)**

1. Whistleblowers shall at least provide the following information:
  - i. Whistleblower's name, ID number and available contact information such as address, phone number or email address. Whistleblowers may also choose to file an anonymous report.
  - ii. Adverse party's name or any other information sufficient to distinguish the identity of such person.
  - iii. Concrete evidence readily available for investigation.
2. Handling units shall handle reports pursuant to the following procedures:
  - i. Report cases involving non-managerial employees shall be handled by human resource unit, legal unit may offer support when necessary. Human resource and legal units shall jointly handle reports involving managerial employees. The foregoing procedures may be duly adjusted by chairperson. Report cases involving board members will be handled by the audit committee or any person designated by the audit committee.
  - ii. If any illegal act or violation of this Company's policies or rules regarding ethical management is confirmed, designated units shall immediately demand such adverse parties to cease relevant conducts and adopt appropriate measures; where necessary, cases shall also be reported to the competent authority or referred to the judicial authority for investigation, and that damage awards are to be claimed through legal resolutions to ensure this Company's goodwill and legitimate rights.
  - iii. Written records of hearings of reports, investigation processes and investigation results shall be kept for five years; the foregoing record-keeping may be conducted by electronic means. If relevant litigations are to be raised prior to the expiration date of record-keeping, such records shall be continuously kept until such litigations come to an end.
  - iv. For reported cases found to be true, designated units shall demand that relevant units of this Company review relevant internal control system and operating procedures, and propose improvement measures to prevent the same conducts from happening again.
  - v. The legal unit shall report once a year to board of directors regarding reported cases (regardless of whether the case is verified), number of reported cases, handling measures being adopted, and subsequent review and improvement measures of that particular year.

#### **Article 7**

For reported cases found to be true which constitute a major offense, aside from handling pursuant to laws, regulations or this Company's relevant rules, proper rewards may be granted to whistleblowers depending on the significance of such cases. When internal staff is found to



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falsely file reports or maliciously make accusations, disciplinary measures shall be taken against such person, and such person shall be dismissed from his or her position when such offenses are considered major.

#### **Article 8**

This "Measures" shall be implemented after board of directors grant approval; the same shall apply when this "Measures" is to be amended.

#### **Article 9**

The "Measures" was approved on March 22, 2016.

The first amendment was made on November 13, 2018.

The second amendment was made on March 21, 2019.

The third amendment was made on November 12, 2019.

The fourth amendment was made on December 8, 2022.

The fifth amendment was made on November 10, 2023.

The sixth amendment was made on May 9, 2025.