

## **Pili International Multimedia Co., Ltd. Code of Ethical Conduct**

### Article 1. Purpose and Basis

This Code of Ethical Conduct (“hereafter referred to as “The Code”) has been adopted by Pili International Multimedia Co., Ltd. (hereafter referred to as “The Company”) for the purpose of encouraging directors and managerial officers (including the President or the equivalent, Deputy President or the equivalent, Assistant Managers or the equivalent, chief financial officers, chief accounting officers, and other persons authorized to manage affairs and sign documents on behalf of the Company) to act in line with ethical standards, and to help interested parties better understand the ethical standards of the Company.

### Article 2. Scope

The Company shall adopt a code of ethical conduct that addresses at a minimum the eight following matters based on its particular circumstances and requirements:

#### (I) Preventing conflicts of interest:

Conflicts of interest occur when personal interests interfere or may interfere with the overall interests of the Company. Examples include when a director or managerial officer of the Company is unable to perform their duties in an objective and efficient manner, or they use their position with the Company to obtain improper benefits for themselves, their spouse, or relatives within the second degree of kinship. The Company shall pay special attention to loans, guarantees, major asset transactions, and the purchase (or sale) of goods involving affiliated enterprises that the aforementioned persons. The Company shall define a policy for preventing conflicts of interest and provide suitable channels for directors or managerial officers to voluntarily explain any potential conflicts of interests with the Company.

#### (II) Minimizing incentives for personal gain:

The Company shall prevent directors or managerial officers from engaging in the following conduct: (1) Taking advantage of Company assets, information or their position to seek opportunities for personal gain; (2) Taking advantage of Company assets, information or their position for personal gain; (3) Compete against the Company.

When an opportunity for profit is offered to the Company, it is the

responsibility of directors or managerial officers to increase the reasonable and legal profits that can be obtained by the Company.

(III) Confidentiality:

It is the duty of directors or managerial officers to maintain the confidentiality of information relating to the Company or its customers (suppliers) unless disclosure is authorized or required by laws and regulations. Confidential information includes any undisclosed information that can be exploited or leaked by competitors to the detriment of the Company or customers.

(IV) Fair trade:

Directors and managerial officers shall treat all suppliers and customers, competitors, and employees fairly, and may not obtain improper benefits through the manipulation, nondisclosure, or misuse of information learned by virtue of their positions, through misrepresentation of important matters, or through other unfair trading practices.

(V) Protection and appropriate use of Company assets:

It is the duty of all directors and managerial officers to protect the Company's assets and to ensure that they can be effectively and legally used for official business; all theft, negligence and waste have a direct impact on the profitability of the Company.

(VI) Compliance with laws and regulations:

The Company shall strengthen compliance with the Securities and Exchange Act as well as other laws and regulations.

(VII) Encouraging the reporting of all illegal or unethical conduct:

The Company shall strengthen internal awareness on ethics and encourage employees to report any suspected or known violations of laws, regulations, or the Code to the independent directors, managerial officers, internal audit officer or other appropriate personnel. To encourage employees to report illegal activities, the Company shall define a concrete whistle-blower system and make it known to employees that all effort will be made to protect the safety of the whistle-blower and protect them against reprisal.

(VIII) Disciplinary measures:

When a director or managerial officer violates the Code, the Company shall handle the matter in accordance with the disciplinary measures defined in the Code. If their business conducts results in a travel ban, investigation or

prosecution by law enforcement, led to litigation, administrative penalties, administrative litigation, or criminal conviction, the offending party, the date of the violation, description of the violation, the articles of the Code violated, and the handling of the matter shall be disclosed on the Market Observation Post System in a timely manner. The Company should also establish an associated grievance mechanism to provide those who violated the Code with a venue of appeal.

#### Article 3. Procedures for exemption

The code of ethical conduct adopted by the Company must require any exemptions for directors or managerial officers from compliance with the Code can only be authorized by a resolution of the Board of Directors. The date of the exemption, the dissenting or qualified opinions of independent directors, the period of exemption, the reason for exemption, and the exempt articles must be posted to the MOPS in a timely manner. This is to ensure that shareholders can evaluate the appropriateness of the Board resolution and forestall any arbitrary or dubious exemptions from the Code, and to safeguard the interests of the Company by ensuring that appropriate controls are in place for any exemptions from the Code.

#### Article 4. Method of disclosure

The Company shall disclose the adopted code of ethical conduct on the corporate website, annual report, prospectuses and the MOPS. Amendments shall follow the same procedure.

#### Article 5. Implementation

The Company Code of Ethical Conduct shall be implemented upon its approval by the Board of Directors. It shall also be submitted to all independent directors and the shareholders meeting. Amendments shall follow the same procedure.

#### Article 6. Supplemental Provisions

These rules were established on October 31, 2013.

The 1st amendment was made on March 16, 2015.

The 2nd amendment was made on August 11, 2020.