

ThinTech Materials Technology Co., Ltd.

Code of Ethical Conduct

Article 1 (Purpose and rationale for this guideline)

In order to guide the behavior of the Company's personnel in conforming to ethical standards and to enable the Company's stakeholders to understand the Company's standards of ethical behavior, I hereby formulate this standard with reference to the "Reference Sample of Code of Ethical Conduct for Listed and OTC Companies".

Article 2 (Scope of application of the Guidelines)

This standard applies to "officers of the Company", which includes the directors and all employees of the Company.

Article 3 (Standards of Ethical Behavior)

In the performance of their duties, the Company's personnel shall comply with the relevant laws and regulations and the provisions of this Code, and shall adopt a proactive and responsible attitude, abandon selfishness, emphasize teamwork, and adhere to the principles of honesty and credit, in order to comply with the Company's required standards of ethical behavior.

The Company's directors and managers (i.e., those who are in charge of each division of the Company at the factory level or above and equivalent, auditors, and others who have the right to manage the Company's affairs and sign the contract) shall take the lead in setting an example and promoting the implementation of the provisions of this Code.

Article 4 (Prevention of conflict of interest)

The officers of the Company shall perform their duties faithfully and conduct business in an objective and efficient manner for the benefit of all shareholders. In the event of a conflict between his/her own interests and the interests of the Company, he/she shall give priority to the interests of the Company and shall refrain from utilizing his/her position or duties in such a way as to give improper benefits to the following persons or enterprises:

1. Relatives including himself/herself, his/her spouse, parents, children, or third degree of kinship.
2. Enterprises in which the person in the preceding paragraph has a substantial financial interest, directly or indirectly.
3. Enterprises in which the person himself/herself is also the chairman of the board of directors, an executive director, or a senior manager.

The Company shall pay special attention to any loan of funds, significant asset transactions, purchase (sale) transactions, or provision of guarantees to any of the persons

or enterprises listed in the preceding paragraph.

Article 5 (Competition Prohibition)

If a director engages in an act of competing with the Company, he/she shall report to the shareholders' meeting and obtain permission in advance in accordance with the Company Law; if a manager engages in an act of competing with the Company, he/she shall report to the board of directors and obtain permission in advance in accordance with the Company Law.

Article 6 (Avoidance of Opportunities for Self-Interest)

The Company shall avoid opportunities for personal gain by the Company's officers (1) through the use of Company property, information, or by virtue of their official position; (2) through the use of Company property, information, or by virtue of their official position; and (3) in competition with the Company. Whenever there is an opportunity for the Company to make a profit, it shall be the duty of the directors or managers to increase the amount of legitimate and lawful benefits available to the Company.

Article 7 (Obligation to report the truthfulness of transactions)

If an employee of the Company engages in a transaction with another person in connection with the performance of his or her duties, he or she shall accurately report the contents of the transaction and shall not conceal or misrepresent the transaction in a manner that would jeopardize the Company's rights and interests.

Article 8 (Duty of confidentiality)

Unless authorized or required by law to do so, employees of the Company shall be responsible for the careful management and confidentiality of matters or confidential information that come to their knowledge in the course of their duties. Unless disclosed by the Company or provided for the purpose of carrying out duties, the information shall not be divulged to others or used for purposes other than those for which it was provided; the same applies to information provided after termination of employment.

The information that should be kept confidential in the preceding paragraph includes the Company's personnel and customer information, inventions, business secrets, technical information, product design, manufacturing expertise, financial accounting information, intellectual property rights, and all other unpublished information that may be used by competitors or leaked to the detriment of the Company or its customers.

Article 9 (Fair Dealing)

The Company's personnel shall treat business counterparts, competitors and employees fairly and shall not obtain improper benefits through manipulation, concealment, misuse of information obtained in the course of their duties, misrepresentation of material matters

or other unfair dealing practices.

Article 10 (Insider Trading)

Any information that comes to the attention of the Company's personnel in the course of their duties that may materially affect the trading price of the Company's securities shall be kept strictly confidential in accordance with the Securities and Exchange Act and shall not be utilized to engage in insider trading until the information is disclosed to the public.

Article 11 (Protection and Proper Use of Company Assets)

It is the responsibility of the Company's personnel to protect the Company's assets and to ensure that they are used effectively and lawfully in the conduct of the Company's affairs to avoid theft, neglect or waste.

Article 12 (Compliance)

The Company's personnel shall comply with all laws and regulations and company policies governing the Company and shall comply with the Securities and Exchange Act.

Article 13 (Political Contributions and Activities)

Company personnel should refrain from influencing Company employees in any way to make political contributions, to support particular parties or candidates, or to engage in other political activities.

Article 14 (Reporting Obligations and Protections)

The Company shall promote ethics within the Company and encourage employees to take the initiative to report any violation of laws, regulations or this Code to their managers, internal audit supervisors or other appropriate supervisors, and to provide sufficient information to enable the Company to deal with the situation in a timely manner. To encourage employees to report violations, the Company shall establish a specific reporting system that allows for anonymous reporting and lets employees know that the Company will make every effort to protect the safety of the reporting party from threats. The person reported shall not threaten or retaliate against the person who made the report.

Article 15 (Handling of Violations of the Guidelines)

In the event that an employee of the Company violates the provisions of this Code, he or she shall be punished in accordance with the relevant regulations, depending on the severity of the violation; the same applies to department heads who knowingly fail to correct the violation or who fail to comply with the Company's regulations.

In the event that a director or manager is suspected of violating the Code of Ethical

Conduct, the Company shall deal with the matter in accordance with the relevant internal regulations of the Company, and shall immediately disclose on the Market Observation Post System (MOPS) of the Taiwan Stock Exchange Corporation (TSE) the name of the person who violated the Code of Ethical Conduct, his/her name, the date of the violation, the reasons for the violation, the criteria for the violation, and the circumstances under which the violation was dealt with, in accordance with the law.

Any employee of the Company who is penalized for violating the provisions of this Code of Ethics may file a complaint for relief in accordance with the relevant regulations.

Article 16 (Procedures for Exemption)

Directors and managers may be exempted from the application of certain provisions of these Guidelines after the board of directors resolves to exempt them for justifiable reasons.

The foregoing information shall be immediately disclosed on the Market Observation Post System of the Taiwan Stock Exchange Corporation (the "Market Observation Post System") to disclose the title and name of the exempted person, the date of the Board of Directors' approval of the exemption, the period of time during which the exemption is applicable, the reason for the exemption, and the criteria for the exemption.

Article 17 (Method of Disclosure)

The Company shall disclose this Code of Ethical Conduct on the Company's website, annual reports, public statements, and the Market Observation Post System (MOPS), as well as in the event of any amendments thereto.

Article 18 (Organization and Responsibility)

In order to soundly implement the Code of Ethical Conduct, the Company shall establish a dedicated unit responsible for the formulation of the Code of Ethical Conduct and programs, which shall be supervised by the auditors and reported to the Board of Directors on a regular basis.

Article 19 (Enforcement)

After the Audit Committee's approval, the Board of Directors' Meeting shall approve the implementation of these standards and submit them to the shareholders' meeting for approval, and the same applies to any amendments.

Article 20 This Code was established on March 17, 2015

The first amendment was made on April 27, 2021