

1.0 Scope

All employees of Arcadyan must be strictly abided by Business Ethics Policy; if an employee violates this code, he will face disciplinary action, and if the circumstances are serious he will be dismissed; therefore, every employee has the responsibility to understand and abide by it.

2.0 Purpose

The company's business ethics code is used to stop unethical behavior and promote honest and ethical behavior, including the ethical handling of actual and apparent conflicts of interest between individuals and professions.

3.0 Duty

- 3.1 The Human Resources Administration Department is responsible for formulating and implementing policies on business ethics, and regularly investigates and evaluates the effectiveness of the policies.

4.0 Content of Execution

- 4.1 Every employee in Arcadyan must be honest and upright when dealing with problems, without making any compromises by unethical behavior, and must maintain high standards of business ethics and personal morality.
- 4.2 Ethics code refer to moral codes such as judging good and evil, legitimacy, justice, honor, honesty, rights and obligations.
- 4.3 All employees should be honest and ethical when interact with colleagues, customers, suppliers and all third parties, Arcadyan does not participate in the illegal activities of related enterprise alliances, and forbid to form alliances with same business to raise or lower the price of materials, and to deceive customers and the society. Any person has the right and obligation to disclose and criticize this behavior.
- 4.4 Arcadyan definitely prohibits employees from using any means to obtain any forms of illegal remuneration or benefits, such as rebates, commissions, etc., provided by customers or suppliers, nor to bribe people who have business dealings with the company. Once discovered, it will be dealt with in accordance with legal procedures.
- 4.5 All employees of Arcadyan have the right to report any unethical activity to senior executives and Arcadyan promise to provide protection of identity or appropriate rewards for reporters.
- 4.6 Employees must respect the rights of colleagues, subordinates, and third parties without having the behavior of discrimination, insults, defamation. No matter the age, race, gender, sexual orientation, color, creed, religion, nationality, marriage, disability, everyone should be granted the equal rights.
- 4.7 Arcadyan communicates with employees about professional ethics occasionally, to make sure that employees have the cognition of dedication, honesty, trust.

4.8 The company's basic code of ethics is as follows:

- 4.8.1 Do not maliciously harm others
- 4.8.2 Do not spy on other people's files
- 4.8.3 Do not steal
- 4.8.4 Do not misappropriate, use or disclose the intellectual property achievements of others (including ex-employers)
- 4.8.5 Be fair and not discriminate
- 4.8.6 Respect other's privacy
- 4.8.7 Keep the secret(confidentiality)
- 4.8.8 Ensure that employees' private files are kept and not leaked to protect employees' privacy rights
- 4.8.9 Stopped the discrimination in employee ethical behavior and provide the relevant education and training

4.9 Conflict of Interest

- 4.9.1 Conflict of Interest confirmation: When the personal interests of employees involve in any form the interests of the company as a whole, employees should extremely avoid behaviors where personal interests affect the overall interests of the company, in a nutshell, the following statements should be regarded as conflict of interest.
- 4.9.2 Business Competition : No employee can apply for other companies' position that compete with our company during the employment.
- 4.9.3 Business Opportunity : No employee can use company's property, information, or their position to gain the opportunities of company's business, for the benefit of themselves or third parties.
If any employee uses company's property, information, or their position to obtain business opportunities within the company's business scope, all belong to the company's business interests.
- 4.9.4 Property Interest: No employee has the right to either directly or indirectly through the relationship of his or her spouse or other family member property interests (equity or otherwise) of other business establishments, if such property interests affect the employee's right to the company performance of duties and responsibilities; nor can he devote his or her time to other affairs for the benefit of such property; employees cannot enjoy the rights and interests of companies that compete with Arcadyan; if the employee's responsibilities include management and supervision shall not enjoy the rights and interests of Arcadyan if Arcadyan has business transactions; loans and other financial transactions: no employee may obtain a loan or personal debt guarantee from a significant customer, supplier or competitor of Arcadyan or

sign any private financial transactions; this norm does not prohibit long-term transactions with recognized banks or other financial institutions trade.

4.9.5 Disclosure of Conflicts of Interest : The company requires employees to fully disclose any situation that may give rise to a conflict of interest.

When an employee is aware the conflict of interest, or what others believe to be a conflict of interest, they must immediately report to their supervisor for reporting (Annex I). Principles for dealing with stakeholder relations: "Stakeholder relations" refer to the relationship between employees and customer's relationships between stakeholders, including customers, business partners, competitors, regulators and other employees. Member workers shall treat customers, business partners, competitors, regulators and other employees fairly.

4.9.6 Family Members and Effects: The actions of family members outside the workplace may create conflicts of interest because the family members may influence the subjectivity of employees in making decisions on behalf of the company. If an employee's family member wishes to do business with Arcadyan, employees should report to their supervisor or the executive that any conflict of interest may arise. So called "Family members" in this Code include spouses, siblings, parent's in-laws and children.

4.10 Gifts and Business Hospitality

4.10.1 Employees and suppliers, contractors, customers, and people all walks of life (including government agencies) related to the company's business are not allowed to accept or give any gifts or hospitality in the course of business behavior or decision-making, thereby affecting normal business relations and judgment, and all bribery should be strictly prohibited.

4.10.2 When gifts or hospitality must be accepted, in addition to complying with the principles in 4.10.1 they must also comply with the following regulation:

4.10.2.1 Do not accept cash, check or any other securities (such as gift certificates, stocks, etc.)

4.10.2.2 When it is necessary to accept gifts or hospitality by polite, the upper limit is NT\$3,000 dollars or its equivalent.

4.10.2.3 If you have concern about the unequal refusal so temporarily accept gifts that exceed those specified in 4.10.2.2(NT\$3,000), you should hand over to the Human Resources Administration Department for the follow up processing.

4.10.2.4 Do not accept any customer or vendor offers stock subscriptions or any other similar offers except the liberal market.

4.10.3 In order to maintain and promote normal business relations, the company may give gifts to business-related persons when necessary, not only comply with the principles of 4.10.1, but also the following requirements:

- 4.10.3.1 The given gift should be included the company's name.
- 4.10.3.2 Choose the appropriate gift for the recipient, and the upper limit value of gifts is NT\$ 3,000 dollars.
- 4.10.4 The company's business behavior is based on "fair transactions", and the company's business ethics should be notified to partners. Any employee should implement the company's anti-corruption and anti-bribery measures, and should not accept bribes or bribe others or secretly accept commissions and other personal interests. Any activities related to gifts, bribes, and kickbacks should be terminated immediately and reported to the relevant supervisor. Kickbacks or bribes include any form of advantage intended to obtain better treatment by improper means.
- 4.11 Protection and Use of Company Assets
 - 4.11.1 Employees are expected to protect company assets and ensure that they are used effectively only for legitimate business purposes. Negligence and waste have a direct impact on a company's profits. We strictly prohibit our employees from using any assets and funds of company, whether for personal or any illegal and improper purpose.
 - 4.11.2 For the protection and proper use of company assets, each employee shall comply with the following:
 - 4.11.2.1 Protect company property against theft, damage and misuse.
 - 4.11.2.2 Report actual or suspected theft, damage and misuse of company property promptly.
 - 4.11.2.3 Maintain all electronic materials, documents and communications from improper use by others.
 - 4.11.2.4 The company property only for legitimate business purposes use.
- 4.12 Intellectual Property Rights and Confidentiality
 - 4.12.1 All inventions, creative works, computer software, technology or trade secrets obtained by employees in the course of performing their duties through the use of company materials and technical resources shall be considered as company's property.
 - 4.12.2 The company implements a strict confidentiality policy, and must keep confidential the information of customers, suppliers and other parties obtained when conducting business; employees must abide by all written or non-written confidentiality rules and policies during their employment, and perform their own duty of confidentiality obligations and responsibilities.
 - 4.12.3 In addition to performing responsibilities related to their position, without prior approval from the company, employees can't disclose or publish commercial business or other commercial information of the company, nor use commercial information.

4.12.4 Except for the work time, employees should keep vigilant and do not disclose important information about the company or company partners.

4.12.5 The obligations of confidentiality for employee remain effective even after the employee terminates the employment relationship with the company until the company willingly discloses this information.

4.12.6 Once terminate the employment contract, the employee must return all company property, including all forms of confidential information, no copies are allowed to keep.

4.13 Competition and Fair Trade

Arcadyan seeks a competitive strength through superior performance rather than use unethical or illegal business practices, and outperforms its competitors fairly and honestly. It is prohibited to steal proprietary information and the confidential transaction information without owner's consent or ask other company's incumbent or former employees to disclose the information. Every employee should extremely respect the customers, suppliers, competitors and employees' right fairly. Employees should not gain unreasonable benefits through any manipulation, concealment, abuse of privileged information, mislead of material facts and other illegal trading actions.

4.14 Anti-Money Laundering

Arcadyan abide all of the relative anti-money laundering regulations indeed. The company only engages in legitimate business activities with those reputable clients who have legitimate capital. All employees of Arcadyan are expected to take reasonable steps to ensure that Arcadyan does not will accept payments known to be or suspected of money laundering, such as cash payments.

4.15 Violate the Regulation

4.15.1 All of the employees have the responsibility to report any known or suspected misconduct, including violations of law, regulation, rules and company policy. This action is to protect the reputation and credibility of the company and the employees.

4.15.2 Employees who aware of or suspect someone violate this Code are responsible for reporting to the executive about the violation behavior immediately, the company will carefully deal with all questions and reports.

4.15.3 The company is strictly forbidden to disclose the informant's name, department, company, etc., and it is strictly prohibited to disclose the accusation to the individual who was accused. When investigating and verifying this situation, the original or photocopy of the accusation shall not be exposed to the individual who was accused, and the anonymous accusation letters and files shall not be authenticated, and the informant files shall not be arbitrarily analyzed and borrowed.

4.15.4 The company strictly prohibits retaliation against informant, those employees who take retaliatory measures or leak information do some violation of regulations will be dismissed and their employment contracts will be

terminated. If they violate the law, they will be transferred to Judiciary for the procedure.

5.0 Appendix

Conflict of Interest Report

6.0 Implementation and Revision

6.1 This document will be implemented after the general manager's approval, and the same as revised.