**Aero Win Technology Corporation**

**2023 annual report on the performance of corporate integrity management**

| Item | Implementation Status | | | Deviations from “Ethical Corporate  Management Best Practice Principles  for TWSE/GTSMlisted Companies” and Reasons |
| --- | --- | --- | --- | --- |
| Y | N | Abstract |
| I. Establishment of ethical  corporate management policies  and programs  (I) Does the company formulate  ethical corporate management  policy that approved by the  board of directors, and declare  its policies and procedures in its  guidelines and external  documents, as well as the  commitment from its board and  top executives to implement the  policies?  (II) Does the company established an evaluation mechanism to assess the unethical conducts risk, and regularly analyzes and evaluates business activities with highpotential unethical conducts, and formulates a precaution plan which at least covered listed activities stated in Article 2, Paragraph 7 of the Ethical Corporate Management Best- Practice Principles for TWSE/TPEx Listed Companies?  (III) Does the company establish  policies to prevent unethical conduct with clear statements regarding relevant procedures, guidelines of conduct, punishment for violation, rules of appeal, the commitment to implement the policies, and review the policy regularly? | V  V  V |  | (I) The company has always been upholding integrity in all business activities, and stipulated "honesty Guidelines for Operating Procedures and Behaviors of Credit Management" (established on November 5, 2021), "Company Integrity Code of Conduct for Credit Management" (established on May 13, 2011, revised for the third time on November 9, 2010) and "Directors Ethical Code of Conduct for Business and Managers” (2011.5.13, 2020.11.9 third revision). Employees sign the service commitment letter on entry (signature rate 100%), directors and senior executives sign a statement of compliance with the Code of Integrity (signature rate 100%), strict requirements for directors, supervisors, management and every employeeWorkers actively implement the commitment of operating policies.  (II) The company conducts risk assessment and analysis based on each business activity every year, and targets Based on the analysis results, the business activities with higher risks are based on the internal control and audit system Carry out relevant inspections, and the content of the inspections has included "Integrity of Listed OTC Companies"  The preventive measures for the behaviors of Article 7, Paragraph 2 of the Code of Conduct are included in Inside.  (III) On May 4, 2016, the board of directors of the company passed the "reporting illegal and immoral or immoral Measures for Handling Cases of Integrity Behavior” clearly stipulates that violations of “honest business operation Business Procedures and Behavior Guidelines", "Code of Ethical Conduct for Directors and Managers" and "Corporate Integrity Management Code" related content, acceptance units, reporting channels, handling procedures, etc., will not be disclosed from time to time Publicize in the factory through the company website and bulletin board. In order to ensure the integrity of the To implement, the company has established an effective accounting system and internal control system. Every donation and sponsorship must be signed by the approval supervisor, and must comply with the relevant Laws and internal operating procedures; sign the most "preferential treatment agreement" with suppliers Integrity Guarantee Agreement", no gift money, no deductions, and any violation will be terminated immediately Cut off contact and seek compensation in order to seek the most reasonable quotation, best quality and best Good service; formulate "work rules" and sign "service commitments" with employees Promise" to prevent dishonest behavior of employees. | No Significant Variation  No Significant Variation  No Significant Variation |
| II. Fulfill operations integrity policy  (I) Does the company evaluate  business partners’ ethical records and include ethics-related clauses in business contracts?  (II) Does the company establish  An exclusively dedicated unit supervised by the Board to be in charge of corporate integrity, and regularly (at least once a year) report to the Board about the implementation of ethical corporate management policy and the plan against unethical conducts?  (III) Does the company establish  policies to prevent conflicts of interest and provide appropriate communication channels, and implement it?  (IV) Has the company Established effective systems for both accounting and internal control to facilitate ethical corporate management, and audit the implementation of policies of preventing unethical conduct, either by internal auditors or CPAs on a regular basis?  (V) Does the company regularly  Hold internal and external educational trainings on operational integrity? | V  V  V  V  V |  | (I) Sign the most favorable treatment and cleanliness guarantee agreement with suppliers, no gift money, no deductions, if there is any violation, we will sever contact and seek compensation, in order to obtain the most reasonable quotation, the best quality and the best service.  (II)The part-time unit of the company that promotes the company's honest management is the Management Office, which is responsible for formulating and revising the "Corporate Honest Management Code" and "Integrity Management Operation Procedures and Behavior Guidelines", and supervises the performance of each unit of the company, and regularly reports to the board of directors every year for implementation. As a result, the date of the most recent report to the Board is January 22, 2024.  The implementation status of integrity management in the past 2023 years is as follows:   |  |  | | --- | --- | | Supplier Commitment | Establish a supplier manual and sign the "Most Favorable Treatment and Integrity Guarantee Agreement" and "Confidentiality Agreement". | | Education Training | ●A total of 112 people (763 hours) completed integrity and legal compliance education.  ●A total of 198 people (743 hours) completed safety and health education. | | Promise | Employee registration is a service commitment letter (100%). Directors and senior executives signed the Declaration of Compliance with the Code of Business Integrity(100%). | | Propaganda | Promote integrity and confidentiality responsibilities through announcements and emails, and establish a reporting system，[Report appeal email ：susan@aerowin.com](mailto:Report%20appeal%20email%20：susan@aerowin.com) 。 |   (III) The company's "Directors and Managers Ethical Code of Conduct" and "Company Integrity In the "Code of Conduct", there are policies to prevent conflicts of interest, and the company The directors also uphold the high degree of discipline. For the proposals listed by the board of directors, if they are not related to their own When the legal person or the legal person it represents has an interested relationship, thereby detrimental to the interests of the company, Do not participate in discussion and voting and shall be avoided. In addition, the company has a "work "Working Rules", which clearly stipulates that all employees of the company shall not use their powers to benefit others or To prevent employees from sacrificing the rights and interests of the company due to personal interests; internally: The internal website has a "misconduct reporting" mechanism and employee mailboxes. External: There is a complaint channel in the "Stakeholders Zone" of the company's website.    (IV) In order to ensure the implementation of honest management, the company has established an effective accounting system and Internal control system, the audit unit regularly audits the relevant compliance matters of each unit of the company Items, accountants also review the implementation of the company's internal control system every year. if special When special circumstances occur, special inspections will be arranged separately.  (V) The company has established the "Company Integrity Management Code", which builds the belief of integrity management into the corporate culture, and publicizes it in supervisory meetings and regular employee internal education and training from time to time, so that supervisors and employees can fully understand the company's concept of integrity management And relevant norms, in order to achieve the effectiveness of education and publicity. | No Significant Variation  No Significant Variation  No Significant Variation  No Significant Variation  No Significant Variation |
| III. Operation of the integrity  channel  (I) Does the company establish Both a reward/punishment system and an integrity hotline? Can the accused be reached by an appropriate person for followup?  (II) Does the company establish  standard operating procedures for confidential reporting on investigating accusation cases and measures for follow-up?  (III) Does the company provide  proper whistleblower protection? | V  V  V |  | (I) On May 4, 2016, the company's board of directors passed the"Measures for Handling Cases of Reporting Illegal, Unethical or Dishonest Behaviors", and announced the relevant regulations on the company's website, and established a corporate governance area on the company's website to provide more convenient reporting channels , the whistleblower can implement it in writing or electronically, and set up a special person to accept the relevant whistleblowing matters (1. Spokesperson: accept the whistleblowing of shareholders, investors and other interested parties. 2 Audit supervisor: accept the company's internal colleagues, customers, suppliers , contractors, etc.), anyone who violates the integrity regulations will be punished in accordance with the company's relevant laws and regulations‧In 2023 years, there has not been any investigation case that violated integrity regulations.  (II) The company has formulated the relevant reporting system, punishment and complaint system in the "Handling Measures for Reporting Illegal, Unethical or Dishonest Behavior Cases" and "Integrity Management Operation Procedures and Behavior Guidelines".  (III) According to the company's "Company Integrity Management Code" and "Handling Measures for Reporting Illegal, Immoral or Dishonest Behavior Cases", the company will keep confidentiality and protection for the whistleblower or those involved in the investigation. | No Significant Variation  No Significant Variation  No Significant Variation |
| IV. Strengthening information  disclosure  Does the company disclose Its ethical corporateManagement policies and the results of its implementation on the company’s website and MOPS? | V |  | The company has disclosed the "Company Integrity Management Code" And "Integrity Management Operation Procedures and Behavior Guidelines", and on the company website "Corporate Governance"Regulations Zone" reveals the relevant norms and implementation of integrity management. | No Significant Variation |
| V. If the company has established the ethical corporate management policies based on the Ethical Corporate Management Best-Practice Principles for TWSE/TPEx Listed Companies, please describe any discrepancy between the policies and their implementation: There have been no differences. | | | | |
| VI. Other important information to facilitate a better understanding of the company’s ethical corporate management policies (e.g., review and amend its policies):   * + 1. The company complies with the Company Law, Securities Exchange Law, Commercial Accounting Law, Listing Regulations and other relevant laws and regulations as the basis for implementing honest management.     2. The company's "Board of Directors' Rules of Procedure" stipulates the director's interest avoidance system. If the board of directors' proposal has an interest relationship with itself or the legal person it represents, so that it is harmful to the company's interests, it may state its opinions and answer questions, and discuss and vote. shall be withdrawn, shall not participate in discussions and votes, and shall not exercise voting rights on behalf of other directors.     3. The company formulated the "Code of Ethical Conduct for Directors and Managers" and the "Management Measures for Preventing Insider Trading", which clearly stipulate that the company's directors, managers and employees should take care and loyalty as good managers, and be honest Conduct business on the principle of credit, and sign a confidentiality agreement. Directors, managers and employees who are aware of the important internal information of the company shall not disclose the important internal information they have learned to others. Directors, managers, and employees of the company are not allowed to inquire or collect undisclosed material internal information of the company that is not related to their personal duties from those who know the company's internal material information. Material information should not be disclosed to others. | | | | |