

Supplier Code of Conduct

Atrust Computer Corp. (“Atrust”) is committed to the highest standards of social responsibility across its worldwide supply chain, guided by its core values of integrity, quality, respect and innovation. Atrust expects and insists that all its suppliers treat workers with dignity and respect, provide safe working conditions, operate in an environmentally responsible manner, and represent the high ethical standards. This Supplier Code of Conduct (“Code”) outlines such expectations and all of Atrust suppliers are required to adhere to it.

1. Compliance with Laws, Regulations, and International Standards

Atrust suppliers shall comply with international standard codes of conduct released by the Electronic Industry Citizenship Coalition (EICC), as well as applicable laws, codes, or regulations of the countries in which they operate, including, but not limited to, laws relating to environmental, occupational health and safety, and labor practices. Atrust suppliers shall require their suppliers to do the same.

2. Environmental Protection

Atrust suppliers shall certify that products it supplies to Atrust is compliant with applicable restrictions on hazardous substances, including but not limited to the EU Directives 2011/65/EU for the Restriction of the use of certain Hazardous Substances in Electrical and Electronic Equipment (RoHS) issued on June 8, 2011, and EU Regulation concerning Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) effective on 1 June 2007 (EC No 1907/2006).

Atrust suppliers shall comply with all environmental laws and regulations applicable to their operations worldwide, including but not limited to air emissions, waste reduction, recovery and management, water use and disposal, as well as greenhouse gas emissions.

3. Sourcing of Minerals

Atrust suppliers shall assure that tantalum, tin, tungsten and gold in the products they supply do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human right abuses in the Democratic Republic of Congo or an adjoining country. Atrust suppliers shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to Atrust upon Atrust’s request.

4. Labor Practices

Atrust expects its suppliers to adopt sound labor practices and treat their workers fairly in accordance with local laws and regulations. Suppliers shall not employ child labor and shall

comply with the minimum working age laws and requirements or the International Labor Organization (ILO) standards. Focus areas include (but not limited):

- (a) Freedom of Association: Workers may associate or not to associate with any group, as permitted by and in accordance with all applicable laws and regulations.
- (b) Legal Status: Suppliers shall employ workers who are legally authorized to work in their location and facility and are responsible for validating employees' eligibility to work status through appropriate documentation.
- (c) Hiring Practices: Suppliers shall not use any form of slave, forced, bonded, indentured, or involuntary prison labor, nor shall they engage in human trafficking or exploitation, or import goods tainted by slavery or human trafficking. They shall not retain employees' government-issued identification, passports or work permits as a condition of employment.
- (d) Anti-Discrimination: Suppliers shall promote and maintain a workplace free from discrimination and treat their employees with fairness, dignity and respect. No form of physical, sexual, psychological or verbal harassment or abuse shall be tolerated.
- (e) Working Hours: Employees shall be allowed at least one day off every seven days, and any overtime worked shall be voluntary. If local law allows, employees may voluntarily work overtime on rest days, provided that they are allowed at least one day off within the next seven days. Continuous working days are never to exceed 21 days without a rest day. If the local standard is higher than the afore-mentioned, local standards shall be followed.
- (f) Underage Labor: Suppliers shall ensure that no underage labor has been used in the production or distribution of their goods or services. A child is any person under the minimum employment age according to the laws of the facility's country, or, in the absence of law, under the minimum age for completing required education. Suppliers shall not employ anyone younger than 14, regardless of the country's minimum working age.
- (g) Wages and Benefits: Suppliers shall ensure that their workers are paid lawful wages, including overtime, premium pay, and equal pay for equal work without discrimination. There shall be no disciplinary deductions from pay.

5. Ethical Business Practices

Atrust expects its suppliers to conduct their businesses with integrity. Suppliers shall conform to the following requirements:

- (a) Fair Trade Practices. Suppliers shall not engage in collusive bidding, price fixing, price discrimination, or other unfair trade practices in violation of antitrust laws.
- (b) No Bribery, Kickbacks, and Fraud. Suppliers shall not promise, offer, give or accept bribes,

kickbacks, undue advantage, or other payments that are likely to influence or compromise the conduct of Atrust employees.

(c) Compliance with Anti-corruption Law. Suppliers shall comply with all anti-corruption legal requirements and refrain from giving anything of value to government officials, political parties, party officials, or candidates for public office, be they local or foreign, for the purposes of obtaining or retaining business.

(d) Confidentiality and Intellectual Property Rights. Suppliers shall respect the intellectual property rights of others, especially Atrust, its affiliates, and business partners. Suppliers shall take appropriate steps to safeguard and maintain confidential and proprietary information of Atrust and shall use such information only for the purposes specified for use by Atrust. Suppliers shall observe and comply with all requirements on use of Atrust intellectual properties as established by Atrust.

6. Monitoring and Compliance

Suppliers shall maintain books and records to demonstrate compliance with this Conduct and shall regularly conduct audits and inspections to ensure their compliance. If a supplier identifies areas of non-compliance, the supplier agrees to promptly notify Atrust of its plans to remedy any such non-compliance. Supplier will not be retaliated against or subject to any form of reprisal for raising a good faith concern under this Code or participating in an investigation into any such concerns. Retaliation is a serious violation of this Code and should be reported immediately.

Atrust or its representatives may engage in inspections of facilities, use of questionnaires, review of publicly available information, or other measures necessary to assess suppliers' compliance to this Supplier Code of Conduct.

7. Additional standards

Suppliers shall support and comply with code of conducts required by Atrust customers.

If you would like to file a report on actual or potential breach of this Supplier Code of Conduct, any of which shall be kept confidential by Atrust, please contact Atrust's Legal Department by sending electronic mails to legal@atrustedcorp.com. Reports may also be sent to Atrust's Legal Department at the following address: 3F, No. 361, Fusing 1st Rd., Gueishan District, Taoyuan City 333, Taiwan, R.O.C.