Giant Manufacturing Co., Ltd.
Code of Ethical Conduct

Approved by the Board of Directors on November 6, 2015
Amended by the Board of Directors on March 23, 2018

1. **Purpose and Basis**
   To guide the behavior of the company's directors and managers (including the General Manager and equivalent levels, Deputy General Manager and equivalent levels, Assistant General Manager and equivalent levels, heads of the Finance Department, heads of the Accounting Department, and other persons responsible for company management and signing authority) to meet ethical standards, and to help stakeholders better understand the company's ethical standards, this code is established for compliance.

2. **Contents**
   The company's code of ethical conduct includes the following eight items:
   (1) **Prevention of Conflicts of Interest:**
   Conflicts of interest arise when personal interests interfere or may interfere with the overall interests of the company. For example, when a director or manager cannot objectively and efficiently manage public affairs, or when their position in the company results in improper benefits for themselves, their spouse, parents, children, or relatives within the second degree of kinship. The company should pay special attention to situations involving loans or guarantees to related enterprises of the aforementioned personnel, significant asset transactions, and procurement (sales) transactions. The company should establish policies to prevent conflicts of interest and provide appropriate channels for directors or managers to proactively explain any potential conflicts of interest with the company.
   (2) **Avoidance of Opportunities for Personal Gain:**
   The company should prevent directors or managers from:
      i. Taking advantage of opportunities for personal gain through the use of company property, information, or their position;
      ii. Using company property, information, or their position to obtain personal benefits;
      iii. Competing with the company.
      When the company has profit opportunities, directors or managers have a responsibility to increase the legitimate and lawful interests the company can obtain.
   (3) **Confidentiality Obligations:**
   Directors or managers have a duty to keep confidential information about the company itself or its procurement (sales) customers, except when authorized or required by law to disclose. Confidential information includes all unpublished information that may be used by competitors or that could harm the company or customers if disclosed.
   (4) **Fair Trading:**
   Directors or managers should treat the company's procurement (sales)

customers, competitors, and employees fairly, and should not gain improper benefits through manipulation, concealment, misuse of information obtained through their position, making false statements about important matters, or other unfair trading practices.

(5) **Protection and Proper Use of Company Assets:**
Directors or managers are responsible for protecting company assets and ensuring their effective and lawful use for public affairs. Theft, negligence, or waste directly affects the company's profitability.

(6) **Compliance with Laws and Regulations:**
The company should comply with the Securities Exchange Act and other laws and regulations.

(7) **Encouragement to Report Any Illegal or Unethical Behavior:**
The company should strengthen the promotion of ethical concepts internally and encourage employees to report to managers, internal audit supervisors, or other appropriate personnel if they suspect or discover any violations of laws, regulations, or the code of ethical conduct. To encourage employees to report illegal activities, the company should establish a specific whistleblowing system and inform employees that the company will do its utmost to protect the safety of whistleblowers from retaliation.

(8) **Disciplinary Measures:**
When directors or managers violate the code of ethical conduct, the company should handle it according to the disciplinary measures stipulated in the code of ethical conduct. The company has also established relevant appeal systems to provide remedies for those who violate the code of ethical conduct.

3. **Procedures for Exemption**
The company's exemption of directors or managers from complying with the code of ethical conduct must be approved by the Board of Directors and immediately disclosed on the Market Observation Post System, including the date of the Board's approval, the opposing or reserved opinions of independent directors, the period of exemption, the reasons for exemption, and the standards for exemption, to allow shareholders to evaluate whether the Board's decision is appropriate, to prevent arbitrary or questionable exemptions from the code, and to ensure that any exemptions from the code are properly controlled to protect the company.

4. **Disclosure Method**
The company should disclose its code of ethical conduct on its website, annual report, and the Market Observation Post System, and the same applies when amendments are made.

5. **Implementation**
The company's code of ethical conduct shall be implemented after approval by the Board of Directors, and the same applies to amendments.