

Ethical Corporate Management

Evaluation Items	Implementation Status			Deviations and the Reasons
	Yes	No	Summary description	
1. Establishment of ethical corporate management policies and programs				
(1) Does the company formulate ethical management policies approved by the Board of Directors, and specify such policies and practices in both the company's guidelines and external documents, as well as the commitment of the Board of Directors and top management to actively implement the policies?	✓		The Company's Ethical Corporate Management Best-Practice Principles, established and resolved by Board of Directors in 2014, is a guideline to provide high ethical standards for all employees. The principles are disclosed in the annual report and on the company website. The Board of Directors and the top management place the greatest importance in adopting the highest standards of integrity and ethics in corporate management and employee work conduct.	None
(2) Does the company establish a risk assessment mechanism for unethical behavior, regularly analyze and evaluate the business activities with high risk of unethical behavior within the business scope, and based on which to formulate preventive measures and shall at least cover the preventive measures on unethical behavior stipulated in Paragraph 2, Article 7 of "Ethical Corporate Management Best-Practice Principles for TWSE/TPEX Listed Companies"?	✓		The Company has established risk assessment mechanism stipulated by "Ethical Corporate Management Best Practice Principles for TWSE/TPEX Listed Companies" Article 7 Paragraph 2. Each department needs to periodically analyze and evaluate higher risk operating activities to prevent unethical behaviors. In addition, Legal Department (Compliance Team included) establishes company's regulatory compliances and provides training to ensure compliance with regulations. It also disseminates preventative measures against unethical conduct.	None
(3) Does the company specify the relevant procedures, conduct guidelines, punishment for violations, and rules of appellate in the formulated preventive measures against unethical behavior, as well as implement and regularly review the revise the aforementioned measure?	✓		The Company's Procedures for Ethical Management and Guidelines for Conduct have established preventive measures against unethical conduct, offering and accepting bribes and improper benefits, or being present in the meeting involving any potential conflict of interest. The aforementioned principles and regulations also cover systems for rewards, penalties,	None

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			complaints, and related disciplinary measures. Human Resources Department (HRD) is responsible for establishing and supervising the implementation of the ethical corporate management policies and prevention programs to achieve sound ethical corporate management.	
2. Ethical Management Practice				
(1) Does the company assess the ethics records of those it has business relationships with and include ethical conduct related clauses in the business contracts?	✓		The company has standardized the requirements for the integrity record assessment and the signing of the integrity behavior clause in the “Ethical Corporate Management Best Practice Principles.” The company shall avoid engaging in commercial activities with suppliers involved in unethical conduct or against its sustainability policies. When entering into contracts with suppliers, the company shall include terms requiring compliance with ethical principles and sustainability policy. If the content violates any of the above terms, the company may cancel or suspend the relevant contract.	None
(2) Has the company set up a dedicated unit to promote ethical corporate management under the board of directors, and does it regularly (at least once a year) report to the board of directors on its ethical corporate management policy and program to prevent unethical conduct and monitor their implementation?	✓		The Company designated the Human Resources Department (HRD) to be in charge of establishing ethical corporate management policies and the preventive measures against unethical behavior, and supervising their implementation. In addition, HRD assists the Board of Directors and management in verifying and assessing the effectiveness of the preventive measures taken for the purpose of implementing ethical management, and regularly reports to the Board in December each year. The contents of the report made on the Board of Directors’ meeting held on December	None

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			23, 2025 are summarized as follows: 1. Policies on Ethical Management In order to prevent any unethical behavior of employees, the Company's top management emphasized in the monthly managerial meetings and announced to all employees that all business activities must be in accordance with the competition laws, prevention of insider trading, information security policy, and confidential information protection, etc. 2. Ethical Management risk assessment According to Ethical Corporate Management Best Practice Principles and Guidelines for Conduct, the Company establishes effective risk assessment mechanism and conducts a review each year. The results appraised by all departments in 2025 revealed that all business activities were at "low" risk level and current control systems could remain unchanged. 3. Training on Ethical Management related issues (1)The Company organized orientation courses on ethical management and morality, anti-bribery and anti-corruption policies, competition compliance and general data protection regulation (GDPR) in 2025 and 126 new employees completed the courses. (2)The Company organized an e-learning course on management of the prevention of insider trading in 2025. There were 2,501 employees completed the	

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			courses and test. The completion rate was 100%. 4. Complaint mailbox No case against code of conduct was received via the complaint mailbox in 2025.	
(3) Has the company established policies to prevent conflict of interests, provided appropriate communication and complaint channels, and properly implemented such policies?	✓		To prevent conflicts of interests and provide appropriate communication channels, the Company established the Ethical Corporate Management Best-Practice Principles, Procedures for Ethical Management and Guidelines for Conduct in 2014 and 2015 respectively. Through internal control system, audit system and all kinds of management regulations, the Company ensures that the enforcement of the systems are showing results.	None
(4) Does the company have effective accounting and internal control systems in place to enforce ethical corporate management? Does the internal audit unit follow the results of unethical conduct risk assessments and devise audit plans to audit compliance with the systems to prevent unethical conduct or hire outside accountants to perform the audits?	✓		The company has established an effective accounting system, Internal control system and Internal audit procedures, the unethical conduct is prohibited. The same is reviewed from time to time in order to ensure sustained design and operating effectiveness of the systems. The company also formulate annual audit plans based on the result of each department's periodically risk assessment result of high risk operating activities. The audit plans will be carried out to check the effectiveness of prevention program and the compliance of said systems.	None
(5) Does the company provide internal and external ethical corporate management training programs on a regular basis?	✓		The Company delivers integrity policies through various channels, such as monthly departmental meetings, e-Bulletin Board, and management's remarks. For new employees, training on ethical management and morality, anti-bribery and anti-corruption	None

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			policies, competition compliance and general data protection regulation (GDPR) were carried out during the orientation for 126 newcomers in 2025. In addition, the on-line course on management of the prevention of insider trading was carried out in 2025. A total of 2,501 employees completed the courses and test.	
3. Implementation of Complaint Procedures				
(1) Has the company established specific whistle-blowing and reward procedures, set up conveniently accessible whistle-blowing channels, and appointed appropriate personnel specifically responsible for handling complaints received from whistleblowers?	✓		The Company has established the “Employee Complaint Regulations” as a basis for the employees to seek redress for violations of their rights, unfair treatment, or illegal behavior by other employees. An independent whistle-blowing mailbox is set up for internal and external personnel to submit reports. This mailbox is under the responsibility of a dedicated personnel.	None
(2) Has the company established standard operation procedures for investigating the complaints received, follow-up measures taken after investigation, and mechanisms ensuring such complaints are handled in a confidential manner?	✓		The procedure of general whistle-blowing cases shall apply to the company grievance and appeal policies. The complainer may raise the case verbally, in writing or report anonymously. The Company then should make records, investigate and give a response to the complainer within 10 working days or extend the latest date of response up to 30 working days when necessary. The identity of the complainer and the contents of the complaint are kept confidential. The complainer is protected from any inappropriate treatment due to the complaint.	None

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(3) Has the company adopted proper measures to protect whistleblowers from retaliation for filing complaints?	✓		The Company takes whistleblower protection seriously and cases will be handled by designated Human Resources Managers. The Company shall promise confidentiality of the identity of whistle-blowers and the content of reported cases and measures for protecting whistle-blowers from inappropriate disciplinary actions due to their whistle-blowing.	None
4. Strengthening Information Disclosure Does the company disclose its ethical corporate management policies and the results of their implementation on its website and the Market Observation Post System (MOPS)?	✓		The Company's Ethical Corporate Management Best-Practice Principles and the results of our implementation have been posted on the Company's website (https://www.evergreen-marine.com/emc/policy/jsp/EMC_EthicalCorporateManagement.jsp?lang=zh-tw) and MOPS.	None
5. 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: None				
6. Other important information to facilitate a better understanding of the company's ethical corporate management policies (e.g., review and amend its policies): None				