



Universal Scientific Industrial (Shanghai) Co., Ltd. Supplier Code of Conduct

Universal Scientific Industrial (Shanghai) Co., Ltd., and its subsidiaries (hereafter referred to as "USI"), being a responsible corporate citizen, have taken proactive measures to ensure the highest standards of professional and ethical business conduct. We believe that USI's long-term operation and success shall rely on the corporate sustainability and realization of corporate social responsibilities. Since the supply chain is a critical extension of USI's business value chain, we are actively devoted to developing supply chain to ensure that our suppliers, contractors, service providers and subcontractors (collectively, "Suppliers") collectively achieve the goal of sustainability.

Universal Scientific Industrial (Shanghai) Co., Ltd., and its subsidiaries (hereafter referred to as "USI") is fully committed to ensuring safe working conditions, ethical and environmentally responsible business operations, and worker dignity in our business and supply chain. As part of our commitment, we established this Supplier Code of Conduct ("Code") following ASE Technology Holding Co., Ltd. Supplier Code of Conduct. The Code also references the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the International Labor Organization's Declaration of Fundamental Principles and Rights at Work, and the Responsible Business Alliance ("RBA", formerly EICC) Code of Conduct. Suppliers are required to comply with this Code and the laws and regulations of the countries/regions in which they operate. USI also expects suppliers to hold their suppliers, contractors, services providers, and subcontractors to adopt and comply with this Code. Suppliers' compliance status with this Code will be one of the considerations for USI's purchasing evaluation.

The Code is made up of five sections. Sections A, B, and C outline standards for Labor, Health and Safety, and the Environment, respectively. Section D adds standards relating to business ethics. Section E outlines the elements of an acceptable system to manage conformity to this Code.

A. LABOR

Suppliers are expected to uphold the human rights of their workers, and to treat them with dignity and respect as understood by the international community. This applies to all their workers including temporary, migrant, student, contract, direct employees, and any other type of worker. Labor standards suppliers should comply with are referenced from the RBA Code of Conduct.

The labor standards are:

(1) Freely Chosen Employment

Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company- provided facilities including, if applicable, workers' dormitories or living



quarters. As part of the hiring process, all workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment. Foreign migrant workers must receive the employment agreement prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker's contract. Suppliers, their agents, and sub-agents' may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Suppliers can only hold documentation if such holdings are required by law. In this case, at no time should their workers be denied access to their documents. Workers shall not be required to pay Suppliers' agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

(2) Young Workers

Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 16, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Suppliers shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime.

Suppliers shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable laws and regulations. Suppliers shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns, and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks. If child labor is identified, assistance/remediation is provided.

(3) Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover, and increased injury and illness. Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Suppliers shall allow their workers at least one day off every seven days.

(4) Wages and Benefits

Suppliers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, Suppliers shall compensate their workers for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.



(5) Humane Treatment

There is to be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

(6) Non-Discrimination/Non-Harassment

In respect to the ILO Discrimination (Employment and Occupation) Convention (No.111), Suppliers should be committed to a workplace free of harassment and unlawful discrimination. Suppliers shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Suppliers shall provide their workers with reasonable accommodation for religious practices. In addition, their workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way.

(7) Freedom of Association

In conformance with local law, Suppliers shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Suppliers should ensure their workers and/or their representatives are able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

B. HEALTH AND SAFETY

In addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace. Suppliers are expected to implement, maintain, and enforce management systems that monitor the health and safety of their workplaces.

Recognized management systems such as ISO 45001 and ILO Guidelines on Occupational Safety and Health were used as references in preparing the Code.

The health and safety standards are:

(1) Occupational Safety

Worker potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) are to be identified and assessed, mitigated using the Hierarchy of Controls, which includes eliminating the hazard, substituting processes or materials, controlling through proper design, implementing engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and



providing ongoing occupational health and safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards. Reasonable steps must also be taken to remove pregnant women and 'nursing mothers from working conditions with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers, including those associated with their work assignments, and provide reasonable accommodations for nursing mothers.

(2) Emergency Preparedness

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills. Emergency drills must be executed at least annually or as required by local law, whichever is more stringent. Emergency plans should also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment, and property.

(3) Occupational Injury and Illness

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work.

(4) Industrial Hygiene

Worker exposure to chemical, biological, and physical agents is to be identified, evaluated, and controlled according to the Hierarchy of Controls. If any potential hazards were identified, suppliers shall look for opportunities to eliminate and/or reduce the potential hazards. If elimination or reduction of the hazards is not feasible, potential hazards are to be controlled through proper design, engineering, and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment free of charge. Protective programs shall be ongoing and include educational materials about the risks associated with these hazards.

(5) Physically Demanding Work

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks is to be identified, evaluated, and controlled.

(6) Machine Safeguarding

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks, and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

(7) Sanitation, Food, and Housing

Workers are to be provided with ready access to clean toilet facilities, potable water and



sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Supplier or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting and heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

(8) Health and Safety Communication

Suppliers shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation.

C. ENVIRONMENT

Suppliers recognize that environmental responsibility is integral to producing world-class products. Suppliers shall identify the environmental impacts and minimize adverse effects on the community, environment, and natural resources within their manufacturing operations, while safeguarding the health and safety of the public. Recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) were used as references in preparing the Code and may be a useful source of additional information.

The environmental standards are:

(1) Environmental Permits and Reporting

All required environmental permits (e.g., discharge monitoring), approvals, and registrations are to be obtained, maintained, and kept current and their operational and reporting requirements are to be followed.

(2) Pollution Prevention and Resource Reduction

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

(3) Hazardous Substances

Chemicals, waste, and other materials posing a hazard to humans, or the environment are to be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

(4) Solid Waste

Suppliers shall implement a systematic approach to identify, manage, reduce, and



responsibly dispose of or recycle solid waste (non-hazardous).

(5) Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations are to be characterized, routinely monitored, controlled, and treated as required prior to discharge. Ozone-depleting substances are to be effectively managed in accordance with the Montreal Protocol and applicable regulations. Suppliers shall conduct routine monitoring of the performance of its air emission control systems.

(6) Materials Restrictions

Suppliers are to adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

(7) Water Management

Suppliers shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Suppliers shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

(8) Energy Consumption and Greenhouse Gas Emissions

Suppliers are to establish a corporate-wide greenhouse gas reduction goal. Energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions are to be tracked, documented, and publicly reported against the greenhouse gas reduction goal. Suppliers are to look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

D. ETHICS

To meet social responsibilities and to achieve success in the marketplace, Suppliers and their agents are to uphold the highest standards of ethics including:

(1) Business Integrity

The highest standards of integrity are to be upheld in all business interactions. Suppliers shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

(2) No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper



advantage. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

Suppliers shall not deceive, coerce, or use any devious scheme to cause USI personnel to accept and/or jointly make up false bargain materials, or to improperly reveal business information that could affect trading price or trading conclusion, or to breach his/her duties to USI or undertake any other behavior which would cause detriment to USI. At the same time, Suppliers undertakes to actively resist and notify USI of any bribes requested or accepted by USI personnel. If Suppliers become aware of any USI personnel's request that is unreasonable and improper, or any unethical behavior, Suppliers undertakes to inform the superior of USI personnel to report on such request or unethical behavior. Supplier may report on an anonymous basis and an anonymous whistleblower shall however provide specific facts to assist USI in the investigation.

(3) Disclosure of Information

All business dealings should be transparently performed and accurately reflected on the Supplier's business books and records. Information regarding supplier's labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

(4) Intellectual Property

Intellectual property rights are to be respected, transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and supplier information is to be safeguarded.

(5) Fair Business, Advertising and Competition

Standards of fair business, advertising, and competition are to be upheld. Suppliers shall be in compliance with all applicable antitrust laws, and shall not engage in collusive bidding, price fixing, price discrimination, or other unfair trade practices in violation of antitrust laws.

(6) Protection of Identity and Non-Retaliation

Programs that ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers are to be maintained, unless prohibited by law. Suppliers should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

(7) Responsible Sourcing of Minerals

Rare metals, such as gold, tin, tantalum, tungsten, and cobalt, are usually sourced from conflict-affected and high-risk areas that may directly or indirectly finance or benefit armed criminal groups that commit severe human rights abuse ("Conflict Minerals"). Conflict Minerals should be sourced following the OECD Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and from smelters or refineries certified as conflict-free by an industrially recognized organization, such as the Responsible Minerals Initiative ("Conflict-Free Minerals"). Suppliers shall exercise due diligence on Conflict Minerals and assure only



Conflict-Free Minerals are used for or incorporated in the products procured by USI. Suppliers are also required to comply with USI Corporate Policy for Sourcing Conflict Minerals and provide information relevant to the due diligence upon USI's or our customers' request. If any products supplied by Suppliers contain Conflict Minerals, Suppliers should immediately notify USI of the presence of such Conflict Minerals.

(8) Privacy

Suppliers are to commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

(9) Avoidance of Conflicts of Interest

Any suspected conflicts of interest involved in the business activities between USI and Supplier shall be avoided. Suspected conflicts of interest include, but not limited to, situations where an USI's employee or his/her close relative (parent, child, spouse or sibling) is employed by Suppliers, or owns significant investment interest in Suppliers. Any unnecessary or over frequently social activities between Suppliers and the counterpart from USI might possibly constitute a concern with, or appearance of conflicts of interest. Therefore, any contact between Suppliers and USI's personnel shall observe the discipline for general business activities, and any conflicts of interest shall be reported to USI immediately once existed. If Suppliers become aware of any potential conflict of interest, Suppliers shall report such incident immediately to USI and take appropriate measures to prevent any possible improper conduct that could be possibly resulted therefrom.

(10) Comply with Import and Export Laws

Suppliers shall acknowledge and comply with any and all laws and regulations related to the importation, exportation and transportation of products that are delivered to, or on behalf of USI, including laws and regulations on the export control or customs adopted by the country where the goods are originally exported, laws and regulations on the import and customs adopted by the country of destination, payment for custom duties or other mandatory taxes required by laws, and laws and regulations on local transportation. Operation procedures and training should be provided by Suppliers to their employees, suppliers, contractors, services providers and subcontractors to ensure their compliance with the foregoing laws and regulations.

(11) Confidentiality Obligations

Suppliers undertakes that any and all unpublished information (including information of USI or USI's customers), whether in any form or through any medium, tangible or intangible, explicitly classified as confidential, restricted, or others with similar meaning related to USI's operations, production, sales, research and development, finance and management that is accessed, possessed or acquired by, or known to Suppliers in the process of business discussion, conclusion of contract or performance, shall be treated by Suppliers as confidential information. Suppliers undertake to strictly observe the confidentiality obligations, and shall never publish, reveal, leak or distribute confidential information to any 3rd party. Suppliers and their



employees shall observe USI's regulations on access and security management, including but not limited requirements of arrival time, route and location, and prohibition against photograph-taking, voice/video-taping, steal or smuggling of information and documents, and overtime, lingering or overnight stay. Suppliers and their employees also agree to be subject to the surveillance and inspection by security guards or other relevant personnel of USI.

(12) Honesty and Commitment Fulfillment

Suppliers warrant that any and all information and documents provided to USI in the process of business discussions, conclusion of contract or performance, including but not limited to company registration records (special permission for operation included), company certificates, profile of company and its individuals, residence, product information, specifications, quality, service standards, commercial instruments, and warranties and limitation of rights thereof are true and correct in all aspects, and are not false, cheating or falsified . If there is any change of the documents, Suppliers shall notice USI as soon as possible within a reasonable time, and shall implement principles of good faith at all times throughout the performance of business contract.

E. MANAGEMENT SYSTEMS

Suppliers shall adopt or establish a management system with a scope that is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the supplier's operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement.

The management system should contain the following elements:

(1) Company Commitment

Corporate social and environmental responsibility policy statements affirming Supplier's commitment to compliance and continual improvement, endorsed by executive management, and posted in the facility in the local language.

(2) Management Accountability and Responsibility

The Supplier clearly identifies senior executive and company representative(s) responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management systems on a regular basis.

(3) Legal and Customer Requirements

A process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.



(4) Risk Assessment and Risk Management

A process to identify the legal compliance, environmental, health and safety and labor practice and ethics risks associated with Supplier's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

(5) Improvement Objectives

Written performance objectives, targets and implementation plans to improve the Supplier's social, environmental, and health and safety performance, including a periodic assessment of Supplier's performance in achieving those objectives.

(6) Training

Programs for training managers and workers to implement Supplier's policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.

(7) Communication

A process for communicating clear and accurate information about Supplier's policies, practices, expectations, and performance to workers, suppliers, and customers.

(8) Worker Feedback, Participation and Grievance

Ongoing processes, including an effective grievance mechanism, to assess workers' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement. Workers must be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.

(9) Audits and Assessments

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements related to social and environmental responsibility.

(10) Corrective Action Process

A process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.

(11) Documentation and Records

Creation and maintenance of documents and records to ensure regulatory compliance and



conformity to company requirements along with appropriate confidentiality to protect privacy.

(12) Supplier Responsibility

Suppliers shall adopt a corporate procurement policy to ensure the responsible sourcing and the sustainability of its supply chain and shall establish a process to communicate this Code's requirements to suppliers and to monitor suppliers' compliance with this Code.