

# The ESG Policy of Getac Holdings Corp.

Revision Date: December 26,2022

## I. PREFACE

Getac Holdings Corp. (hereinafter referred to as Getac) fulfills corporate social responsibility, attaches importance to the rights and interests of stakeholders, strengthens high added value while pursuing sustainable operation, and cultivates the company's sustainable competitiveness. In order to promote sustainable operations in accordance with common norms and standards for global operating bases and employees, Getac integrates international advocacy trends, local legal requirements, self-promoting goals and other different norms to establish sustainability policies. The content of the policy summarizes the Company's governance, social, environmental and other related concepts into specific implementation guiding principles, guiding employee behavior and responding to the expectations of all stakeholders.

## II. SCOPE

The ESG policy of Getac Holdings Corp. is based on the [Code of Conduct of Responsible Business Alliance, RBA](#), and is formulated on the basis of the "[UN Universal Declaration of Human Rights](#)," "[The UN Global Compact](#)," "[The UN Guiding Principles on Business and Human Rights](#)", "[Declaration of Fundamental Principles and Rights at Work](#)" of International Labor Organization, ILO and [OECD Due Diligence Guidance for Responsible Business Conduct](#) , **covering all Getac Holdings Corp., subsidiaries<sup>1</sup>, contractors and supply chains.**

## III. RESPONSIBILITIES AND STRUCTURE

The Board of Directors of Getac Holdings Corp. is the highest governance body of the company's sustainable management. It has set up a corporate sustainable development committee, with the chairman as the chairman, and at least two independent directors as the standing committee members. The term of office of the members of this committee is the same as that of the appointed board of directors; if the members are dismissed for some reason and the number is less than three, they shall be reappointed within three months.

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<sup>1</sup> Subsidiaries refers to corporate bodies directly or indirectly controlled by Getac Holdings Corporation including the following companies or associates: 1.Getac Technology Corporation, 2.Atemitech Corporation, 3.MPT Solution (Kunshan) Co., LTD., 4.MPT Solution (Suzhou) Co., LTD., 5.Getac Technology (Kunshan) Co. Ltd., 6.MPT Solution (Vietnam) Company Limited, 7.Getac Precision Technology (Changshu) Co., Ltd., 8.Getac Precision Technology (Changshu) Co., Ltd. Kunshan Branch, 9.Getac Precision Technology Vietnam Co., Ltd. Vendor agrees that the Getac Holdings Corp. is entitled to update the list of corporate bodies above at any time.

Functional groups are set up under the committee, including but not limited to corporate governance team, employee and social care team, environmental safety and health team, supply chain management team, customer relationship team, risk management team and climate change risk team, to promote and implement the company's sustainable development goals.

The members of each functional team are appointed by the chairman and asked the general manager of each subsidiary to assist. Adjustments may be made if necessary. In addition, the executive promotion team is tasked with assisting in handling general committee affairs, communicating, coordinating and tracking the resolutions of the committee. The committee meets at least twice a year, and can review the performance of the company's various sustainability projects in person or via video conference, and can hold interim meetings as needed.

The main function of ESG committee is to supervise and administer the following matters:

- (1). Fulfill the responsibility of corporate citizenship and strive to implement sustainable operation.
- (2). Establish a good corporate governance system and strengthen management functions.
- (3). To enable the Company to perform and protect the rights and interests of all stakeholders.
- (4). Strengthen the disclosure of corporate social responsibility information.

## **IV. POLICIES AND STANDARDS**

This policy consists of six parts, namely A. Integrity management, B. Labor and human rights, C. Health and safety, D. Environmental protection, E. Responsible minerals, F. Information and Communication security, G. Management system to implement this policy.

### **A. Ethical Management**

Upholding honesty, transparency, and responsible business philosophy, the Company is committed to establishing a corporate culture of honesty and integrity, complying with relevant laws and regulations, and establishing good corporate governance and risk control mechanisms, and to implement these truthfully in the internal management and business activities to eliminate behaviors violating the code of business ethics and create a sustainable business environment.

The Company's ethical corporate management principles encompass the following :

- (1). Comply with the Company Act, Securities and Exchange Act, Business Entity Accounting Act, Political Donations Act, Anti-Corruption Act, Government Procurement Act, Act on Recusal of Public Servants Due to Conflicts of Interest, Listing-related Regulations or other business conduct related laws and regulations and accept the supervision of the Competent Government Agencies.
- (2). Prohibit unethical conduct
- (3). Business activities shall be conducted in a fair and transparent manner based on these corporate ethical management principles
- (4). Prohibit bribery and acceptance of bribes
- (5). Prohibit illegal political donations.
- (6). Prohibit improper donations or sponsorship.
- (7). Prevent infringement of trade secrets, trademark rights, patent rights, copyrights and other intellectual property rights.
- (8). Prohibit any form of conduct involving unfair competition.
- (9). Prevent damage to stakeholders caused by products and services.
- (10). Comply with the Company's conflict of interest policy, prevent the risk of dishonest behavior, establish and follow effective accounting system and internal control system.
- (11). Develop a plan to protect the confidentiality of the identity of the whistleblower.

## **B. Labor and human rights**

The Company is fully committed to safeguarding basic human rights and fully complies with all requirements set forth in the RBA Code of Conduct. The company upholds the UNGP Human Rights Convention (United Nations Guiding Principles on Business and Human Rights) and eradicates any form of conduct in violation of human rights. The ultimate goal is to raise the human rights awareness of all employees and stakeholders. All operating bases of the company strictly abide by local labor laws and regulations. Cooperating suppliers are also required to comply with the spirit and basic principles of universal human rights.

Getac human rights policies and initiatives include the following :

- (1). Compliance with local labor rights and regulations and acceptance of inspections and monitoring by competent authorities.
- (2). Provide a safe, friendly, equal and equal working environment for all employees. Employment and promotion do not differ due to race, skin color, gender, age, language, region, or politics. Unequal treatment, discrimination, sexual harassment

and workplace bullying are prohibited.

- (3). Prohibition of child labor
- (4). Respect employees' right to freely choose their work, and under no circumstances shall use forced or coercive means to restrict employees' labor.
- (5). Employee working hours management and salary payment meet or exceed regulatory standards
- (6). Respect the rights of employees to organize and participate in trade unions of their choice, to bargain collectively and to participate in peaceful assemblies.
- (7). Provide a smooth grievance mechanism, anyone can file a formal complaint, and shall not be discriminated against or retaliated against. We strive to ensure that this process is transparent, and that all grievance will be dealt with anonymously.

### **C. Health and Safety**

The Company values every employee, and “Happy Enterprise and Safe Workplace” is our goal. In addition, to comply with local safety and health regulations and standards, Getac takes strict safety and health control measures to establish internal policies, and continuously improves through regular and irregular inspections to prevent occupational disasters and minimize injuries. Furthermore, we actively promote the physical and mental health of employees through event planning and achieve the balance of work and life.

Getac health and safety policy:

- (1). Follow the local safety and health regulations and standards, actively pay attention to global safety and health issues, assess risks in advance, and build a good working environment.
- (2). Construct a Safety and Health Management System, adopt strict safety and health control measures, and continuously review and improve to reduce occupational disasters.
- (3). Organize safety and health education and training according to the plan to deepen the awareness and responsibility for safety and health for all employees.
- (4). Strengthen safety and health education through cooperation and publicity with suppliers and contractors, to jointly reduce occupational safety risks.

### **D. Environmental Protection**

The Company is committed to innovative research and development to create maximum value for customers, and actively pays attention to global climate change trends as a corporate citizen at the same time, takes environmentally friendly actions, and continues to improve energy resource consumption efficiency, waste management and pollution

prevention and control performance. In addition to deepening all employees' awareness and responsibility for environmental protection, we also actively cooperate with customers and suppliers to jointly establish a green and sustainable supply chain.

Getac Environmental Policy includes:

**(1). Compliance with Laws and Regulations, Prevention of Risks**

Actively pay attention to global climate change trends, assess related risks and opportunities, conduct management and prevention in advance to grasp the development of laws and regulations, and ensure that operations comply with domestic and foreign environmental laws and regulations, such as EU RoHS, WEEE, and REACH; uphold the principle of clean production and strictly implement product and environmental management, build a green product platform and organize green supply chain management to meet customer requirements.

**(2). Energy-saving, Carbon-reduction, Circular Innovation**

In response to the carbon reduction action of controlling the global warming within 1.5 degrees Celsius, formulate energy resource reduction (water, energy, carbon emissions, waste) policies and goals, invest resources to implement effective energy and water conservation, and maximize the efficiency of energy resource use; reduce carbon emissions through green manufacturing processes and innovative technologies; continue to improve waste and pollution management performance, reduce emissions and waste in every production link, to achieve the goal of sustainable development and resource recycling/reuse.

**(3). Green Products, Environmentally Friendly**

Advance the environmental protection design of products, restrict the use of toxic and hazardous substances, and select environmentally friendly materials, such as plastic cases that comply with EU RoHS and are free of brominated flame resisting agents. The energy consumption design of the product conforms to the requirements of international energy labels, such as Energy Star, and achieves lightweight packaging, minimized material types, and optimized volume. Under the premise of meeting customer requirements, encourage the use of recycled raw materials and environmentally friendly materials, and reduce the use of packaging materials to reduce environmental impact.

**(4). Information Transparency, Communication Initiative**

Establish communication and consultation channels, disclose information related to

environment, and communicate environmental policies with stakeholders. Proactively advocate and publicize sustainable issues, raise the environmental awareness of stakeholders, and leverage corporate influence to jointly promote environmental protection.

## **(5). Continuous Improvement, Effective Management**

Establish the environmental goal regular review through the Environmental Management System, and continuously improve environmental management performance through appropriate publicity and training, implementation in daily management—in addition to deepening all employees' awareness and responsibility for environmental protection—and actively cooperate with customers and suppliers to jointly establish a green and sustainable supply chain.

## **E. Responsible Minerals**

The Company promises to work with suppliers to take responsibility for social and environmental protection, support and comply with the Responsible Minerals Initiative and not use conflict minerals mined through human rights abuses or armed coercion, especially gold, Tantalum, tungsten, tin, cobalt, mica and other minerals or their derivatives mined in the Democratic Republic of the Congo and its neighboring countries. The suppliers will fulfill the aforementioned statement and will notify the Company and provide evidence to assist in the investigation of sources of minerals and the production and sale supervision process.

## **F. Information and Communication Security**

To maintain the security of information in the operating environment of the Company, Getac is committed to fully protecting and preventing company and personal information from damage, theft, leakage, tampering, abuse, and infringement. The Company formulates Information and Communications Security Policy and shall be enforced to each relevant business functions and levels. The methodology of Plan-Do-Check-Act is adopted for promoting information and communication security continual improvement; it is preserving confidentiality, integrity, and availability of information security to give confidence to interested parties that risks are adequately managed.

The Company's Information and Communications Security Policy is as follows:

- (1). All employees of Getac and external personnel shall abide by the Information and Communications Security Policy and relevant safety regulations. If a violation occurs, the Company will enforce the violator's legal and contractual responsibilities according to

the circumstances; employees of the Company may be penalized in accordance with relevant HR protocols.

- (2). Personal identifiable information from employees, third party vendors, and customers are entitled from the protection of applicable laws and regulations of privacy and personal information protection; Personal identifiable information shall not be used until the individual's consent is obtained. All other information assets are owned by the company. The Company has the right, in accordance with applicable law, to check, store, transfer, exchange, and copy such information assets.
- (3). All employees of the Company and external unit personnel, who use any of the Getac's information assets, have the responsibility and obligation to prevent unauthorized access, tampering, destruction, and improper disclosure. All Getac information assets should be accessed and used in accordance with the Company's information security regulations.
- (4). The Company's Employees are obliged to protect trade secrets and intellectual property learned from operations. It is strictly forbidden to disclose trade secrets and intellectual property information to colleagues, manufacturers, and other personal who are not related to the business.
- (5). It is strictly forbidden for all personnel to install, use, or download illegal or unauthorized software on the company's information assets.
- (6). In order to safeguard the Company's business-related data, the Company must properly identify each employee's job responsibilities and segregation of duties; only grant the necessary authority and information to complete the employee's work.
- (7). All personnel, Getac employees and its external service providers, should be alert at all times to information security incidents and violations of security policies and procedures, and should promptly notify the Company's local Information management unit in accordance with the procedures.
- (8). The Company shall establish a continuous operation plan in according to business needs and annually exercise the drill to maintain its applicability.
- (9). Maintaining Information and Communications Security is of utmost importance. All units

should have a clear understanding of the Information and Communications Security policy and should follow the relevant regulatory procedures to maintain information security and sustainable operation of all of the Company's businesses.

## **E. MANAGEMENT SYSTEMS**

Suppliers shall adopt or establish a management system whose scope 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 with reference to OECD Due Diligence Guidance for Responsible Business Conduct.

The management system should contain the following elements:

### **(1). Company Commitment**

A 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 system 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 Participant's social, environmental, and health and safety performance, including a periodic assessment of Participant'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**

A process to communicate Code requirements to next-tier suppliers and to monitor their compliance to the Code.

## V. DATE OF AMENDMENTS

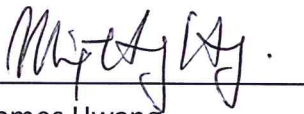
This code of conduct was established on Nov 1, 2021.

The 1st amendment was made on March 18, 2022.

The 2nd amendment was made on December 26, 2022

## VI. : REFERENCES

1. [Responsible Business Alliance \(RBA\) Code of Conduct](#)
2. [The UN Global Compact](#)
3. [The ILO Declaration on Fundamental Principles and Rights at Work](#)
4. [The UN Universal Declaration of Human Rights](#)
5. [OECD Due Diligence Guidance for Responsible Business Conduct](#)
6. [The UN Guiding Principles on Business and Human Rights](#)



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