



## **Realtek Semiconductor Corp. Employee Code of Conduct**

### **I. Policy and purpose**

Integrity, ethical conduct and acting within proper behavioral norms are established policies of the Company. Each member of the Company shall voluntarily comply with these practices and resolutely uphold the honest, upstanding reputation of the Company and his or her personal reputation, in order to maintain trust and cooperation from customers, suppliers, and society.

Honesty and upstanding practice are core tenets of the Company's culture and are fundamental to its operations. For all members of the Company to have a reference to follow, the Company established this Employee Code of Conduct in accordance with the "Guidelines for the Adoption of Codes of Ethical Conduct for TWSE/GTSM Listed Companies." Employees shall abide by the code to ensure the sustainable development of the Company.

### **II. Applicable subjects**

This Code of Conduct shall be followed by all members of the Company. Each employee shall read the code, understand its content, and join all other employees of the Company in acting ethically.

### **III. Code of Conduct**

#### **1. Integrity and ethics**

Honesty, upstanding practice and ethics are core tenets of cooperation. All members of the Company shall act in a trustworthy manner and adhere to business ethics, in order to promote and develop honest and collaborative business networks. Each employee shall value team cooperation, respect intellectual property, and strictly prohibit improper benefits. Personal integrity, ethics and civility shall be part of all dealings, and compliance with domestic and international laws and regulations shall be maintained. All employees have an obligation and a responsibility to respect these core tenets. When carrying out duties, any employee who has questions regarding integrity or ethics-related issues shall consult with a supervisor or seek professional advice from the legal department to uphold proper fulfillment of duties.

## 2. Upholding fairness

Each member of the Company shall endeavor to act fairly towards all parties they engage in business transactions. Fairness shall also be adhered to in all organizational planning. No discrimination or bias shall be permitted on the basis of gender, race, religious beliefs, political party, sexual orientation, nationality, or age. All employees shall work together towards building a fair and friendly organization and work environment.

## 3. Preventing conflict of interest and wrongful pursuit of personal gains

All members of the Company shall use organizational and administrative standards as a basis for objectively and efficiently planning and executing their professional duties. They shall fulfill organizational expectations for fairness and justice by avoiding conflicts of interest or wrongfully seeking personal benefits.

At the same time, members of the Company shall not seek an opportunity to pursue personal gain, or gains for parties they have an interest in, by using Company property or information or taking advantage of their positions. They shall fulfill their professional duties and shall not take advantage of their positions in the Company to obtain improper benefits for either themselves or relatives within the second degree of kinship. They also shall not help third parties compete with the Company.

## 4. Confidentiality obligations and responsibilities

The Company's employees shall be aware of and strictly uphold confidentiality obligations. They are bound to maintain the confidentiality of any matters or information known by themselves or their teams, shall not use confidential information for a purpose other than fulfilling their work duties, and shall not disclose confidential information except when the information is disclosed by the Company, when disclosure of the information is necessary during the course of conducting professional duties, or when disclosure is authorized by the Company. Confidential information includes any undisclosed information relating to the Company's employees and clients, business secrets, designs and inventions, manufacturing professional knowledge, finances and accounting, human resources, or R&D technology that, if exploited by a competitor or disclosed, could result in damage to the Company or its suppliers and customers. After terminating employment, former employees must also follow these rules.

#### 5. Fair trade and competition

Fair trade builds trust and opportunities. Employees of the Company shall act with integrity and not use misleading methods when conducting business. Whether seeking benefits for the Company or personal gain, the Company employees shall not harm fair trade by engaging in manipulation, concealment, or misuse of information obtained through their positions. They shall not make false assertions in material matters or use any other unfair trade tactics in the pursuit of improper benefits, including kickbacks, gifts, bribes, or entertainment. When offering gifts, preference shall be given for Company commemorative items or items with symbolic meaning. Acceptance of a gift may be permitted in cases when declining it may be unacceptable due to custom or ceremony (including, but not limited to, presents, cash, or equivalent monetary goods, such as vouchers, checks, or shares), but the value of the gift shall not exceed NT\$1,500 (the giving unit shall be limited to one such gift per year).

#### 6. Compliance with laws and regulations

The Company strictly follows government laws, regulations, and commands, including those on insider trading, intellectual capital protection, and securities and exchange, in order to ensure safe organizational operations. Employees at each level of the Company shall comply with all of the Company's rules, systems, and methods, in order for the full organization to fulfill its operational and management goals.

#### 7. Protection and proper use of Company assets

Supervisors and employees at each level of the Company are responsible for protecting the Company's assets and ensuring that the assets are used effectively and legally in support of the Company's business. When conducting business, employees shall use assets correctly and avoid neglect or waste. At the same time, the employees shall prevent data, information systems, network equipment, and other related resources from hacking, interference, disturbances, damage, or infiltration, in order to protect the confidentiality, integrity, and use of the Company's information.

### **IV. Whistleblowing and complaint channels**

The Company established ethical principles to be followed by all members of the Company. Departments responsible for management and planning execution of ethics standards shall be responsible for promoting and inspecting moral and ethical issues within the organization. The Company shall use a variety of promotional channels to support moral and ethical practices, and it shall encourage employees, supervisors of all levels, and professional units to report illegal incidents or inquire about cases of moral doubt. A solution and protection shall be provided to prevent unfair treatment or

revenge. When complaints or other related incidents are found to be true following an investigation, the Company shall assess the seriousness of the situation and carry out appropriate sanctions.

The Company's whistleblowing channels to report ethical or moral violations include operational-level managers, departmental supervisors of all levels, the intellectual property rights legal department, financial inspection units, human resources management hotlines, and internal audit units.

#### **V. Comprehensive, accurate information**

When conducting business-related duties, all members of the Company shall verify all forms of the documents, accounting books, and signing records that they handle to ensure they are complete and accurate. At the same time, they shall check the authenticity of the documents and ensure proper preservation. Members of the Company shall not purposely use manipulative or misleading statements, either directly or indirectly, to affect Company audits. All information disclosed externally must be accurate and verified and cannot have any major errors. As a listed company, Realtek has a dedicated system for making statements or disclosing information. Without the authorization of the responsible unit and related supervisors, employees shall not externally release documents or make statements about the Company or their positions.

#### **VI. Exemptions and applicability procedures**

All members of the Company shall comply with the regulations stipulated by this Code of Conduct. Under special circumstances and with a valid reason or reasons, exemptions can be made with the approval of the relevant department's highest manager.

#### **VII. Disciplinary actions for violations**

This Code of Conduct serves as a standard that employees shall follow when conducting business activities. When the Code of Conduct is violated, and the violation is verified by the responsible unit or units at the Company, a formal request for correction shall be made or disciplinary actions shall be taken, including warnings or demerits or conducting performance reviews. Incidents shall be handled in accordance with labor-related regulations and legal actions shall be taken when necessary.

### **VIII. Methods of disclosure, amendments, and enforcement**

The Company shall disclose this Code of Conduct in its annual reports and prospectuses, on the Company website, and on the Market Observation Post System (MOPS).

The Code of Conduct, and any amendments hereto, shall be implemented after adoption by resolution of the Board of Directors.