Article 1 Purpose and Scope

The Company, to create a sustainable business environment, hereby enacts the Principles based on "Ethical Corporate Management Best Practice Principles for TWSE/TPEx Listed Companies" to establish its principles of honesty, transparency and responsibility and corporate culture and sound development in accordance with the principles of integrity and honesty, good commercial operational model and risk control mechanism.

The Principles are applicable to the Company's business groups and organizations of such TWSE/GTSM listed company, which comprise its subsidiaries, any foundation to which the TWSE/GTSM listed company's direct or indirect contribution of funds exceeds 50 percent of the total funds received, and other institutions or juridical persons which are substantially controlled by such company ("business group").

Article 2 Unethical Conduct Prohibited

When engaging in commercial activities, the Company's directors, managers, employees, mandataries or persons having substantial control over the Company ("Substantial Controllers") shall not directly or indirectly offer, promise to offer, request or accept any improper benefits, nor commit unethical acts including breach of ethics, illegal acts, or breach of fiduciary duty ("Unethical Conduct") for purposes of acquiring or maintaining benefits.

Parties referred to in the preceding paragraph includes civil servants, political candidates, political parties or members of political parties, state-run or private-owned businesses or institutions, and their directors, supervisors, managers, employees, Substantial Controllers or other stakeholders.

Article 3 Benefits

"Benefits" in the Principles means anything of value, including money, endowments, commissions, positions, services, preferential treatment or rebates of any type or in any name. Benefits received or given occasionally in accordance with accepted social customs and that do not adversely affect specific rights and obligations shall be excluded.

Article 4 Legal Compliance

The Company complies with the Company Act, Securities and Exchange Act, Business Entity Accounting Act, Political Donations Act, Anti-Corruption Statute, Government Procurement Act, Act on Recusal of Public Servants Due to Conflicts of Interest, or other laws or regulations regarding commercial activities, as the underlying basic premise to facilitate ethical corporate management.

Article 5 Policy

The Company abides by the operational philosophies of honesty, transparency and responsibility, base policies on the principle of good faith and obtain approval from the board of directors, and establish good corporate governance and risk control and management mechanism so as to create an operational environment for sustainable development.

The board-approved policy mentioned above shall refer to the Principles and "LINE Pay Taiwan Limited Procedures for Ethical Management and Guidelines for Conduct."

Article 6 Prevention Programs

The Company's ethical corporate management policy clearly and thoroughly prescribes the specific ethical management practices and measures to forestall unethical conduct (referred as "Prevention Programs" below), including operational procedures, guidelines, and training.

The Prevention Programs shall comply with relevant laws and regulations of the jurisdictions where the Company and its Business Group are located.

The Company should communicate with employees, unions, key business partners, and relevant stakeholders when developing Prevention Programs.

Article 7 The Scope of Prevention Programs

The Company develops systematic practices for evaluating risks of unethical conduct, and regularly analyze and evaluate business activities that are susceptible to higher risk of unethical conduct. Prevention Programs shall then be developed accordingly with appropriateness and effectiveness reviewed on a regular basis.

The preventive program formulated by the Company covers the preventive measures for the following:

1. Offering and acceptance of bribery.
2. Illegal political donations.
3. Improper charitable donations or sponsorship.
4. Offering or acceptance of unreasonable gifts, hospitality, or other improper benefits.
5. Misappropriation of trade secrets and infringement of trademark rights, patent rights, copyrights, and other intellectual property rights.
6. Engaging in unfair competitive practices.
7. Directly or indirectly damaging the rights or interests of consumers or other stakeholders in the course of research and development, procurement, provision, or sale of products and services.

Article 8 Undertakings and Executions

The Company requests its directors and senior management to issue statements of compliance with the ethical corporate management policy and require in the terms of employment that employees comply with such policy.

The Company and its Business Group clearly specify in their management rules and external documents and on the company website the ethical corporate management policies and the commitment by the board of directors and the managers to rigorous and thorough implementation of such policies, and carry out the policies in internal management and in external commercial activities.

The Company compiles documented information on the ethical management policy, statement, commitment, and implementation mentioned in Paragraphs 1 and 2 above and retain said information properly.

Article 9 Management of Commercial Activities in Good Faith

The Company engages in commercial activities in a fair and transparent manner based on the principle of ethical management.

Prior to any commercial transactions, the Company takes into consideration the legality of

its agents, suppliers, clients or other trading counterparties, and whether any of them are involved in Unethical Conduct, and avoids any dealings with persons so involved.

When entering into contracts with its agents, suppliers, customers, or other trading counterparties, the Company should include in such contracts provisions demanding ethical corporate management policy compliance and that in the event the trading counterparties are suspected of engaging in Unethical Conduct, the Company may at any time terminate or cancel the contracts.

Article 10 Offer and Acceptance of Bribery Prohibited

When conducting business, the Company and its directors, managers, employees, mandataries and Substantial Controllers, shall not directly or indirectly offer, promise to offer, request or accept any improper benefits in whatever form to or from clients, agents, contractors, suppliers, public servants, or other stakeholders.

Article 11 Unlawful Political Donations Prohibited

When directly or indirectly offering a donation to political parties or organizations or individuals participating in political activities, the Company and its directors, managers, employees, mandataries and Substantial Controllers, shall comply with the Political Donations Act and the Company's own relevant internal operational procedures, and shall not make such donations in exchange for commercial gains or business advantages.

Article 12 Unlawful Charitable Donations or Sponsorships Prohibited

When making or offering donations and sponsorship, the Company and its directors, managers, employees, mandataries and Substantial Controllers shall comply with relevant laws and regulations and internal operational procedures, and shall not covertly engage in bribery.

Article 13 Unreasonable Presents, Hospitality or Interests Prohibited

The Company and its directors, managers, employees, mandataries and Substantial Controllers shall not directly or indirectly offer or accept any unreasonable presents, hospitality or other improper benefits to establish business relationship or influence commercial transactions.

Article 14 Infringement of Intellectual Property Rights Prohibited

The Company and its directors, managers, employees, mandataries and Substantial Controllers shall comply with applicable laws and regulations, the Company's internal operational procedures, and contractual provisions concerning intellectual property; and the Company may not use, disclose, dispose, or damage intellectual property or otherwise conduct activities that might infringe intellectual property rights without the prior consent of the owners of intellectual property rights.

Article 15 Unfair Competitive Practices Prohibited

The Company shall engage in business activities in accordance with applicable competition laws and regulations, and may not fix prices, make rigged bids, establish output restrictions or quotas, or share or divide markets by allocating customers, suppliers, territories, or lines of commerce.

Article 16 Avoidance of Damages Caused to the Stakeholder

In the course of research and development, procurement, manufacture, provision, or sale of products and services, the Company and its directors, managers, employees, mandataries and Substantial Controllers shall comply with applicable laws and regulations and international standards to ensure the transparency of information about, and safety of, their products and services. The Company shall also adopt and publish a policy on the protection of the rights and interests of consumers or other stakeholders, and carry out the policy in its operations, with a view to preventing its products and services from directly or indirectly damaging the rights and interests, health, and safety of consumers or other stakeholders. Where there are sufficient facts to determine that the Company’s products or services are likely to jeopardize the safety and health of consumers or other stakeholders, the Company shall, in principle, stop selling those products or suspend the services immediately.

Article 17 Organization and Responsibilities

The Company’s board of directors, managers, employees, mandataries and Substantial Controllers shall exercise due diligence of a good manager, urge the Company to prevent Unethical Conduct, always review the results of the preventive measures and continually make improvements so as to ensure thorough implementation of the ethical corporate

management policies.

To achieve sound ethical corporate management, the Company should establish a dedicated unit that is under the board of directors, and the unit shall be supported with adequate resources and staffed with competent personnel to serve as the dedicated unit responsible for establishing and supervising execution of the ethical corporate management policies and Prevention Programs. The Committee shall perform the following duties, and report to the board of directors on a regular basis (at least once a year).

Article 18 Compliance in the Course of Business

The Company's directors, managers, employees, mandataries and Substantial Controllers shall comply with laws and regulations and Prevention Programs when conducting business.

Article 19 Avoidance of Conflicts of Interest

The Company shall enact policies for preventing conflicts of interests in order to identify, monitor, and manage risks possibly resulting from unethical conduct, and offer appropriate means for directors, managers and other stakeholders attending or present at board meetings to voluntarily explain whether their interests would potentially conflict with those of the Company.

When the Company's director, manager or any other stakeholders attending or present a board of directors meeting, themselves or the legal entity they represents have an interest in the proposals for board discussion, such party shall state the important aspects of the interest at the meeting, and, where there is a likelihood that the interest of the Company would be prejudiced, such person shall not participate in the discussion or vote on that proposal, and shall recuse himself or herself from any discussion and voting, and shall not exercise voting rights as proxy on behalf of another director. The directors shall practice self-discipline and must not support one another in improper dealings.

The Company's directors, managers, employees, mandataries and Substantial Controllers shall not take advantage of their positions or influence in the Company to obtain improper Benefits for themselves, their spouses, parents, children or any other person.

Article 20 Accounting and Internal Controls

The Company shall establish effective accounting systems and internal control systems for business activities which may be at a higher risk of being involved in Unethical Conduct, not have under-the-table accounts or secret accounts, and conduct reviews regularly so as to ensure that the design and enforcement of the systems are showing results.

The Company's internal audit unit shall, based on the assessed risk of unethical conduct, devise audit plans of appropriate subject, scope, emphasis, and frequency, and audit employees' compliance with Prevention Programs. Internal auditors may engage CPAs to perform audit on behalf, and may approach outside professionals for assistance if necessary.

Findings of the above audit shall be reported to the senior management and ethical corporate management unit, whereas audit reports are to be prepared and presented to the board of directors.

Article 21 Operational Procedures and Guidelines

The Company has established "LINE Pay Taiwan Limited Procedures for Ethical Management and Guidelines for Conduct", concretely prescribing the instructions for directors, managers, employees, mandataries and Substantial Controllers to conduct business. The Procedures for Ethical Management and Guidelines for Conduct contains the following matters:

1. Standards for determining whether improper Benefits have been offered or accepted.
2. Procedures for offering legitimate political donations.
3. Procedures and the standard rates for offering charitable donations or sponsorship.
4. Rules for avoiding work-related conflicts of interests and how they should be reported and handled.
5. Rules for keeping confidential trade secrets and sensitive business information obtained in the ordinary course of business.
6. Regulations and procedures for dealing with suppliers, clients and business transaction counterparties suspected of unethical conduct.
7. Handling procedures for violations of such Principles.

8. Disciplinary measures on offenders.

Article 22 Training and Assessment Programs

The chairman, general manager, or senior management of the Company shall periodically convey the importance of corporate ethics to directors, employees, and mandataries.

The Company shall periodically organize training and awareness programs for directors, managers, employees, mandataries and Substantial Controllers and invite the Company's commercial transaction counterparties so they understand the Company's resolve to implement ethical corporate management, the related policies, prevention programs and the consequences of committing Unethical Conduct.

The Company shall apply the policies of ethical corporate management when creating its employee performance appraisal system and human resource policies to establish a clear and effective reward and discipline system.

Article 23 Whistleblower System

The Company shall develop and implement a whistleblower system that encompasses at least the following:

1. Misconduct reporting channels available to insiders and outsiders, including dedicated mailboxes and hotlines that are operated by the Company or by independent third-party institutions.

2. Personnel or unit assigned specifically to handle reported misconducts, along with classification criteria and standard operating procedures for reported misconducts. Misconduct reports that involve directors or the senior management are to be escalated to independent directors or supervisors.

3. Subsequent measures to be undertaken depending on the severity of the case involved and the outcome of investigation. Misconduct reports may be escalated to the authority or the judicial department if necessary.

4. Procedures for acceptance and investigation of reported misconducts, and documentation and preservation of investigation outcome.

5. Protection of informant's identity and the content of reported cases, and tolerance for anonymous reporting.

6. Protection for informants against retaliation.

7. Whistleblowing incentives.

The unit or personnel responsible for handling whistleblowing is required to file report and notify independent directors or supervisors in writing upon discovery of any major violation or any occurrence that has the potential to cause significant damage to the Company.

Article 24 Reporting, Punishment and Complaint System

The Company shall establish a well-defined disciplinary and complaint system to handle violations of the Principles, and immediately disclose on the Company's internal website the offender's job title, name, date the violation was committed, violating act and the situation of how the matter was handled.

Article 25 Information Disclosures

The Company shall continuously analyze and assess the effectiveness of the promotion of ethical management policy and shall disclose the status of the enforcement of the Principles on its websites, annual reports and prospectuses, and shall disclose their ethical corporate management best practice principles on the Market Observation Post System.

Article 26 Review of and Amendments to the Policies and Measures

The Company shall at all times monitor the development of relevant local and international regulations concerning ethical corporate management, and encourage directors, managers and employees to make suggestions so as to review and improve the adopted ethical corporate management policies and measures for implementation and achieve better results from implementing the Principles.

Article 27 Implementation

The Principles shall be implemented after the board of directors grants the approval, and shall be sent to the supervisors and reported at a shareholders' meeting. The same procedure

shall be followed for any amendments to the Principles hereto. The Principles are enacted on September 26, 2023.

When the Principles be submitted to the board of directors for discussion, the board of directors shall take into full consideration each independent director's opinions. Any objections or reservations of any independent director shall be recorded in the minutes of the board of directors meeting. An independent director that cannot attend the board meeting in person to express objections or reservations shall provide a written opinion before the board meeting, unless there is some legitimate reason to do otherwise, and the opinion shall be specified in the minutes of the board of directors meeting.

After the Company's public offering, an audit committee will be established to replace the supervisors. The provisions regarding supervisors in these Principles shall apply mutatis mutandis to the audit committee.