

Shining Building Business Co., Ltd

Integrity Management Operating Procedures and Behavior Guidelines

(The English Version is Based on Traditional Chinese Version for November 9, 2018)

1. Purpose: The Company engages in business activities based on the principles of fairness, honesty, trustworthiness, and transparency. In order to implement the integrity management policy and actively prevent dishonest behaviors, in accordance with the " Ethical Corporate Management Best Practice Principles for TWSE/GTSM Listed Companies " and the location of the Company and group companies and organizations where they operate laws and regulations, which stipulate this Operating Procedures and Behavior Guidelines, and specifically regulate the matters that the Company's personnel should pay attention to when performing business.
2. Scope: The scope of application of this Operating Procedures and Behavior Guidelines and the Company's subsidiaries, consortium legal persons whose direct or indirect donation funds exceed 50%, and other institutions or legal persons with substantial control capabilities and other group enterprises and organizations.

The personnel of the Company mentioned in this Operating Procedures and Behavior Guidelines refer to the directors, supervisors, managers, employees, persons appointed and persons with substantial control ability of the Company and group companies and organizations.

The Company's personnel are presumed to be the Company's personnel by providing, promising, requesting or accepting any illegitimate benefits from a third party.

3. Responsibilities: According to this Operating Procedures and Behavior Guidelines.
4. Operating Contents:

4-1. Dishonest Behavior

The dishonest behavior in this Operating Procedures and Behavior Guidelines refers to the Company's personnel who directly or indirectly provide, accept, promise or request any illegitimate benefits in order to obtain or maintain benefits, or engage in other violations of integrity and illegality, or violate the fiduciary duty.

The objects of the preceding paragraph include public officials, candidates for political participation, political parties or party officials, as well as any public or private enterprises or institutions and their directors, supervisors, managers, employees, and have substantial control competent persons or other interested persons.

4-2. State of Interest

The benefits mentioned in this Operating Procedures and Behavior Guidelines refer to money, receive gifts, gifts, commissions, positions, services, preferential treatments, rebates, facilitating payments, entertainment, entertainment, and other things of value in any form or name.

4-3. Legal Compliance

The Company should abide by 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, relevant rules and regulations related to TWSE/GTSM listed companies, or other relevant laws and regulations on business conduct as a way of implementing integrity the basic premise of operation.

4-4. Dedicated Units

The Company designates the Business Management Division in General Supervisory Office as a dedicated unit to handle the revision, implementation, interpretation, consulting services and other related operations of this Operating Procedures and Behavior Guidelines, and to supervise the implementation, and report to the Board of Directors regularly.

The preventive plan should include preventive measures for the following behaviors:

- (1). Bribery and receiving bribery.
- (2). Provide illegal political donations.
- (3). Improper charitable donations or sponsorship.
- (4). Offer or accept unreasonable gifts, entertainment or other improper benefits.
- (5). Infringement of trade secrets, trademark rights, patent rights, copyrights and other intellectual property rights
- (6). Engaging in unfair competition.
- (7). Products and services directly or indirectly damage the rights, health and safety of consumers or other interested parties when they are researched and developed, purchased, manufactured, provided or sold.

4-5. Various Preventive Measures

- (1). Bribery and receiving bribery.

When performing business, must not directly or indirectly provide, promise, request or receive any form of illegitimate benefits, including rebates, commissions, facilitation payments, or through other channels to customers, agents, contractors, suppliers, public officials or other interests related parties provide or receive improper benefits. However, those who comply with the located laws of the place of operation are not subject to this limit.

- (2). Provide illegal political donations.

Direct or indirect donations to political parties or organizations or individuals participating in political activities shall comply with the Political Donations Act and relevant internal operating procedures of the Company, and shall not be used to seek commercial interests or trading advantages.

- (3). Improper charitable donations or sponsorship.

For charitable donations or sponsorships, relevant laws and regulations and internal operating procedures shall be complied with, and bribery shall not be disguised.

- (4). Offer or accept unreasonable gifts, entertainment or other improper benefits.

Do not directly or indirectly provide or accept any unreasonable gifts, entertainment or other improper benefits in order to establish business relationships or influence business transactions.

- (5). Infringement of trade secrets, trademark rights, patent rights, copyrights and other intellectual property rights.

It is necessary to strictly abide by the Company's various confidentiality measures, not to disclose known company commercial secrets to others, and not to inquire or collect non-job related company commercial secrets. Comply with the relevant laws and regulations of intellectual property, the Company's internal operating procedures and contract provisions; without the consent of the intellectual property owner, no use, leakage, disposal, damage or other infringement of intellectual property rights is allowed.

- (6). Engaging in unfair competition activities shall be conducted in accordance with relevant competition laws and regulations, and shall not fix prices, manipulate bids, restrict output and quotas, or share or divide the market by allocating customers, suppliers, operating areas or business types, etc.

- (7). Products and services that harm consumers or other interested parties in the process of product and service research and development, procurement, manufacturing, provision or sales, should follow relevant laws and regulations and international standards to ensure the transparency and safety of information about products and services.

4-6. Prohibition of Providing or Receiving Improper Benefits

When the Company's personnel directly or indirectly provide, accept, promise or request the benefits specified in paragraph 4-2, except for the following conditions, they shall comply with the provisions of the " Ethical Corporate Management Best Practice Principles for TWSE/GTSM Listed Companies " and this Operating Procedures and Behavior Guidelines, and it can only be done after it is handled in accordance with the relevant procedures:

- (1). Based on business needs, when visiting, receiving foreign guests, promoting business and communication and coordination at home (foreign), according to local courtesy, conventions or customs.
- (2). Participate in or invite others to organize normal social activities based on normal social etiquette, commercial purposes or promoting relationships.
- (3). Customers are invited or invited to participate in specific business activities, factory visits, etc. due to business needs, and the cost-bearing method, number of participants, accommodation level and period of the pre-opening activities have been specified.
- (4). Participate in folk festivals held in public and inviting the general public to participate.
- (5). Supervisor's rewards, assistance, condolences, etc.
- (6). Property donated due to betrothal, marriage, childbirth, housewarming, employment, promotion, retirement, resignation, injury, illness, death of oneself, spouse or immediate family, etc.

(7). Others complying with the Company's regulations.

4-7. Operating Procedures for Receiving Improper Benefits

When the Company's personnel directly or indirectly provide or promise to give the benefits specified in paragraph 4-2, except for the circumstances specified in paragraph 4-5, regardless of whether there is a positional interest, they should be rejected or returned, and reported to his/her immediate supervisor.

4-8. Interest Avoidance

Persons of the Company who have interests in the proposals listed on the Board of Directors, themselves or the legal persons they represent, shall explain the important content of their interests at the current Board of Directors. If they are harmful to the interests of the company, they shall not participate in the discussion and voting, and it shall be avoided during discussions and voting, and shall not act on behalf of other directors to exercise their voting rights. The directors should also be self-disciplined and have to support each other.

The personnel of the Company shall not conflict with their own interests or the legal persons they represent when performing the Company's business, or situations that may cause them, their spouses, parents, children, or their interested parties to obtain improper benefits.

4-9. Declare the Integrity Management Policy to the Outside

The Company should disclose its integrity management policy in internal regulations, annual reports, company websites or other publicity, and announce it at product launch conferences, legal person briefings and other external events in a timely manner to enable suppliers, customers, or other business-related organizations and personnel can clearly understand their integrity management philosophy and norms.

4-10. Explain the Integrity Management Policy with Business Partners

When engaging in business activities, the Company's personnel should explain the Company's integrity management policy and related regulations to the transaction partner, and clearly refuse to directly or indirectly provide, promise, request or accept any form or name of improper benefits.

4-11. Avoid Dealing with Dishonest Operators

The Company's personnel should avoid engaging in business transactions with agents, suppliers, customers or other business dealings involved in dishonest conduct. If they are found to have dishonest business dealings or cooperation partners, they may immediately stop their business dealings with it is listed as a refusal object to implement the Company's integrity management policy.

4-12. Report and Discipline

The Company encourages external personnel to report dishonest or improper conduct through the official website customer service mailbox and internal personnel through the unit supervisor, human resources department or audit unit to report dishonest behavior or improper behavior, the inspection unit and the identity and content of the informant are truly confidential.

After the unit supervisor or the human resources department or the audit unit verifies that the

misconduct is true, report it to the director of General Supervisory Office and the Chairman, and proceed in accordance with the Company's "Employee Rewards and Punishment Measures" according to the severity of the report.

4-13. Handling of Dishonest Conduct by Others to the Company

When the Company's personnel are engaged in dishonest acts against the Company, the Company should notify the judicial and prosecutorial organs of the relevant facts if their conduct involves illegal activities; if they involve public agencies or public servants, they should also notify the government's anti-corruption agencies.

4-14. Accounting and Internal Control

The Company's accounting and internal control should be designed and implemented in accordance with the principle of good faith management, and should be reviewed at any time to ensure that the implementation of the system continues to be effective.

4-15. Education Training

The Company shall organize or encourage its personnel to participate in internal and external education and training related to integrity management in order to fully convey the importance of integrity management.

4-16. Implementation

This Operating Procedures and Behavior Guidelines is adopted by the Board of Directors for implementation, and the amendment is also the same.