Whistleblowing Mechanism & Handling Procedure

I. Legal Basis:

To effectively implement Article 21 of the Company's Code of Business Integrity, this procedure is formulated to establish reporting channels for stakeholders regarding unethical conduct by employees and to ensure full compliance therewith.

II. Scope of Whistleblowing

(1) Actions that violate laws, regulations, or statutory rules applicable to the Company.

(2) Actions that breach the Company's internal policies, operating procedures, ethical principles, or codes of conduct.

(3) Any action that damages or poses a risk of damaging the Company's rights and interests, such as fraud, embezzlement of corporate assets, or accepting improper benefits.

III. Whistleblowing System:

(1) Reporting Channel: The Company has established a dedicated reporting email address: whistleblower@soft-world.com.tw (accessible strictly by the Company's designated representatives only).

(2) Designated Handling Unit: The Human Resources Department serves as the designated unit responsible for receiving reports from internal and external stakeholders, including shareholders, investors, directors, managers, employees, or other parties, regarding suspected or identified violations of the Company's "Ethical Code of Conduct," "Code of Business Integrity," applicable laws and regulations, or other internal policies and rules.

(3) Reporting Acceptance Procedures:

1. The scope of reports is strictly limited to matters related to the Company. If the informant fails to provide their name, gender, affiliated organization/company, contact details, or sufficient identifying information regarding the subject of the report, the Company may decline to initiate an investigation.
2. The informant must provide at least the following details to facilitate investigation:
   (1) Appropriate contact information for the informant.
   (2) A clear account of the illegal or improper conduct, supported by concrete evidence for investigation. Where possible, the details should include the following:
   Who: The name, department, unit, job title, or other identifying characteristics of the subject being reported.

What: A detailed account of how the event occurred.

When: The specific date and time of the occurrence.

Where: The location where the incident took place.

What Evidence: Tangible evidence proving the illegal or improper behavior, such as receipts, vouchers, financial reports, contracts, correspondence, audio recordings, video footage, photographs, or other supporting documentation.

Reports must be complete, concrete, clear, and accompanied by supporting evidence or documentation to allow for investigation and appropriate follow-up. Reports failing to meet these criteria will not be processed. Informants who knowingly submit false or fabricated reports shall bear full legal responsibility.

3. All reported matters shall be investigated impartially to ascertain the facts, and handled fairly in accordance with applicable laws, regulations, and internal company procedures.
4. If the handling unit determines a report is vague or does not involve violations of laws, the "Ethical Code of Conduct," "Code of Business Integrity," or internal rules, it shall record the case for reference and submit it to the regular task force meeting to confirm whether an investigation is needed. Recommendations for management improvement shall be forwarded to the competent unit for reference or handled via appropriate means.
5. The handling unit shall investigate reports based on the contents and evidence, with full cooperation from relevant departments. Confirmed illegal acts or unethical conduct shall be reported through internal approval channels and handled via internal disciplinary rules, or reported to competent authorities or judicial bodies for prosecution if necessary. Before issuing penalties or legal notices, the subject shall be given an opportunity to state their case and appeal. If an investigation reveals major violations, threats of material harm, or involvement of directors or senior management, an immediate written report shall be submitted to the Audit Committee, and necessary preventive or emergency measures shall be taken.
6. Written records of the receipt, investigation process, and findings of all whistleblowing cases shall be retained for five years, with electronic storage permitted. If litigation related to the reported matter arises prior to the expiration of the retention period, relevant documents shall continue to be preserved until the conclusion of the proceedings.

7. If the designated personnel or handling unit discovers a major violation or a risk of material harm to the Company during the investigation, they shall immediately prepare a report and notify the Independent Directors in writing.
8. Upon verification that the subject of a report has indeed violated relevant laws, regulations, or the Company's ethical management policies and rules, the subject shall be ordered to immediately cease the non-compliant conduct. Appropriate actions shall be taken, and when necessary, legal proceedings shall be initiated to claim damages, thereby safeguarding the Company's reputation, rights, and interests.

(4) Confidentiality of Informants' Identities and Report Contents: The content of reports and the identity of informants shall be kept confidential to the extent permitted by law. Except as required for investigation purposes or under applicable laws and regulations, such information shall not be disclosed to any third party without the informant's consent.

(5) Protection of Informants: The Company shall protect informants who report violations or participate in investigation procedures from unfair retaliation or discriminatory treatment.

(6) Reward Measures: If an investigation confirms that a reported case is true and brings benefits or eliminates harm to the Company, or if the informant provides critical clues or evidence for major cases, the responsible personnel shall report to the General Manager to grant appropriate rewards to the informant or meritorious personnel.