

Soft-World International Corporation Code of Ethical Conduct

Article 1

For the purpose of providing guidance to directors and managerial officers of the Company in order to act in line with ethical standards, and to help interested parties better understand the ethical standards, the Company establishes this Code for compliance.

Article 2

The “Regulations” is applicable to the Company’s directors and managerial officers, including general managers and equivalents, deputy general managers and equivalents, junior general manager and equivalents, financial department heads, accounting department heads and others who are responsible for the Company’s managerial affairs and who have the rights to sign company documents.

Article 3

Directors and Managers of the Company shall handle official duties in an objective manner with efficiency, and shall not allow themselves, their spouses or kindred within the 2nd tier under the Civil Code access to illicit benefits by making use of their job positions and functions.

For any loaning of funds, provision of guarantees, and major asset transactions or the purchase (or sale) of goods involving the affiliated enterprise at which a director or managerial officer works, relevant directors and managerial officers of the Company shall voluntarily explain whether there is any potential conflict between them and the Company.

Article 4

The company shall prevent its directors or managerial officers from engaging in any of the following activities: 1. Seeking an opportunity to pursue personal gain by using company property or information or taking advantage of their positions; 2. Obtaining personal gain by using company property or information or taking advantage of their positions; 3. Competing with the company. When the company has an opportunity for profit, it is the responsibility of the directors and managerial officers to maximize the reasonable and proper benefits that can be obtained by the company.

Article 5

Directors or managerial officers of the Company shall be bound by the obligation to maintain the confidentiality of any information regarding the Company itself or its customers of purchase (sales), except when authorized or required by law to disclose such information. Confidential information includes any undisclosed information that, if exploited by a competitor or disclosed, could result in damage to the company and customers.

Article 6

Directors and managerial officers shall treat all suppliers and customers, competitors, and employees fairly, and may not obtain improper benefits through manipulation, nondisclosure, or misuse of the information learned by virtue of their positions, or through misrepresentation of important matters, or through other unfair trading practices.

Article 7

The Company’s directors or managerial officers all have the responsibility to protect the Company’s assets and ensure that they have been used effectively and legally in official

business to avoid theft, negligence or waste that is detrimental to the Company's profitability.

Article 8

The Company's directors or managerial officers shall comply with the Company's relevant policies, the Securities and Exchange Act and other laws and regulations.

Article 9

The Company shall have the directors or managerial officers who have violated the code of ethics punished accordingly. It is advisable that the company establish a relevant complaint system to provide the violator with remedies.

Article 10

The exemption of the directors or managerial officers from complying with the "Regulations" must be with the approval of the Board of Directors. The approval date of the said exemption by the Board of Directors should be disclosed on the Market Observation Post System immediately, including the objection or reservation of the independent directors, the duration of the exemption, the reason for granting the exemption, the Regulations applicable to the exemption, etc., that enable shareholders to assess whether or not the resolutions made by the Board of Directors are appropriate in order to prevent arbitrary or suspicious exemptions from occurrence and to ensure that any exemption from compliance with the regulations is with the appropriate control mechanisms for the protection for the Company.

Article 11

This Code of Conduct shall be disclosed at the official website, annual reports, prospectus of the Company and MOPS. The same procedure is applicable to any amendment thereto.

Article 12:

The Code of Ethical Conduct of the Company shall be implemented after the board of directors grants the approval, and reporting to the shareholders' meeting. The same procedure shall be adopted for amendments thereof.

The "Regulations" was adopted on March 22, 2017 with the 1st amendment made on March 16, 2022.