Code of Conduct

Revision History

Date	Version	Description
Jul. 3, 2017	1.0	First Release
Jun. 15, 2023	2.0	1. Revise the principles for
		conflict of interest.
		2. Adjust the texts based on
		actual practice.
	Jul. 3, 2017	Jul. 3, 2017 1.0

Code of Conduct

Classification : L1 Code : CPG-07 Version : 2.0 Page : 2

1 Purpose

This Code of Conduct is adopted for the purpose of building a common understanding of the ethical standards of CHC and its subsidiaries (hereinafter individually or collectively referred to as "the Company") to be abided by all Directors, Supervisors, managers, and employees of the Company (hereinafter "Company Personnel") and to help stakeholders better understand the Company's ethical standards.

2 Principle of Integrity

Company Personnel are expected to conduct themselves in a professional manner and uphold the principle of integrity at all times when conducting business on behalf of the Company.

3 Conflict of Interest

Company Personnel shall strive to perform their duties in an objective and efficient manner, and shall not take advantage of their positions in the Company to obtain improper benefits for either themselves, their spouse or relatives within second degree of kinship.

The Company shall issue a regulation for the management of conflict of interest. Whenever there is an actual or potential conflict of interest between a Company Personnel, their spouse or relatives within second degree of kinship and the Company, such Company Personnel shall proactively report to the Company, and address the conflict situation in a legal and proper manner or recuse him/herself in accordance with applicable law, regulations, or Company regulations. If a conflict of interest issue is required by law, regulations, or Company regulations to be submitted to the Board of Directors, it shall first be presented to the Audit Committee for their approval and then submitted to the Board of Directors for approval.

4 No Pursuit of Personal Gain

When the Company has an opportunity to profit, Company Personnel has the responsibility to increase legitimate and legal interests for the Company, and shall abstain from the following actions:

- Pursue personal gain through use of Company assets, information, or their position within the Company.
- (2) Compete with the Company.

5 Trade Secrets

Unless otherwise authorized or required by law to disclose, Company Personnel bear the responsibility to keep confidential any and all proprietary information accessed in their position

Code of Conduct

within the Company or confidential information of the Company.

The information mentioned in the preceding paragraph includes, but is not limited to confidential business information, technical data and all other non-public information which may be exploited by a third party, or the disclosure of which may jeopardize the Company or its clients.

6 Fair Trade

Company Personnel must conduct all business dealings with clients, competitors, and employees in a fair manner, and may not obtain improper benefits through manipulation, concealment, or abuse of information accessed in their position, misrepresentation of important matters, or other unfair business practices.

7 Prevention of Insider Trading

Company Personnel must comply with all laws, regulations, and Company regulations concerning prevention of insider trading, and other securities regulations regarding purchase and sale of securities, and material information verification and disclosure. Upon actually knowing of any information that will have a material impact on the price of the securities of the Company or the Company's ability to pay principal or interest, after the information is precise, and prior to the public disclosure of such information or within 18 hours after its public disclosure, Company Personnel shall not purchase or sell, in the person's own name or in the name of another, shares, any other equity-type securities, or bonds of the Company.

8 Company Assets and Intellectual Properties

It is the responsibility of Company Personnel to protect Company's assets and ensure that they are efficiently and legally used for Company's business. Company Personnel shall protect Company's intellectual properties and prevent any illegal infringement according to law, regulations, and Company's regulations.

9 Compliance with Law, Regulations, and Company's Regulations

Company Personnel shall abide by law, regulations, and Company's internal regulations.

10 Reporting and Non-Retaliation

The Company shall disseminate this Code of Conduct internally. Any Company Personnel, upon discovery or reasonable suspicion of any violation of the law, regulations, or this Code of Conduct within the Company, shall report to the Company according to the Company's whistleblowing policy. The Company will protect the whistleblower, any threat or retaliatory

Code of Conduct

Classification : L1 Code : CPG-07 Version : 2.0 Page : 4

actions against the whistleblower is forbidden.

11 Disciplinary Action and Appeal Process

When a Company Personnel violates any provision of this Code of Conduct, the Company Personnel will be subject to internal review or disciplinary actions according to the Company's relevant regulations. If such violation is considered to be material based on the Company's internal investigation and finding, the case shall be reported to the Board of Directors. The report to the Board of Directors shall specify the name and position of the person, date and the details of the cause of the violation, provision(s) being violated, and how the case was disposed of. The Company Personnel being disciplined may appeal to the Company.

12 Disclosure

This Code of Conduct, and all amendments hereafter, must be disclosed via internal announcement and published on the Company website and the Market Observation Post System.

13 Related Policies

The Company shall establish relevant policies and regulations to effectively implement this Code of Conduct.

14 Implementation

This Code of Conduct, and all amendments hereafter, are approved by the Board of Directors of CHC, and shall enter into force upon internal announcement.