

Ethical Corporate Management

| Evaluation Item | Implementation Status | | | Deviations from “the Ethical Corporate Management Best-Practice Principles for TWSE/TPEX Listed Companies” and Reasons |
|---|-----------------------|----|--|--|
| | Yes | No | Abstract Illustration | |
| <p>1. Establishment of ethical corporate management policies and adopted measures</p> <p>(1) Does the Company formulate ethical management policies approved by the Board of Directors, and specify such policies and practices in both the Company’s guidelines and external documents, as well as the commitment of the Board of Directors and top management to actively implement the policies?</p> | ✓ | | <p>The Company’s Ethical Corporate Management Best-Practice Principles (https://csr.evergreen-marine.com/csr/tw/jsp/CSR_EthicalManagementRule.jsp) were established and resolved by the Board of Directors on Dec. 22, 2014. The Company’s ethical management policies and practices, as well as the commitment of the Board of Directors and top management to actively implementing the policies are specified in the Principles. In addition, the principles are publicly disclosed in the “Ethical Management Zone” (https://csr.evergreen-marine.com/csr/tw/jsp/CSR_EthicalManagement.jsp) of the Company’s website and on the internal bulletin board.</p> | None |
| <p>(2) Does the Company establish a risk assessment mechanism for unethical behavior, regularly analyze and evaluate the business activities with high risk of unethical behavior within the business scope, and based on which to formulate preventive measures and shall at least cover the preventive measures on unethical behavior stipulated in paragraph 2, Article 7 of “Ethical Corporate Management Best-Practice Principles for TWSE/TPEX Listed Companies”?</p> | ✓ | | <p>The Company has implemented a risk assessment mechanism and standardized preventive measures in accordance with Article 7, paragraph 2 of the “Ethical Corporate Management Best Practice Principles for TWSE/TPEX Listed Companies” as stipulated by the Taiwan Stock Exchange. These measures are specifically designed to address business activities that carry a high risk of unethical behavior, and all departments of the Company are required to implement them. The Legal Division, including the Competition Compliance</p> | None |

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| (3) Does the Company specify the relevant procedures, conduct guidelines, punishment for violation, and rules of appeal in the formulated preventive measures against unethical behaviour, as well as implement and regularly review and revise the aforementioned measure? | ✓ | | <p>Team, is responsible for promoting the Company’s regulatory compliance policies, providing education and training on fair trade law, and continuously promoting risk control measures to prevent unethical behavior. This ensures that the Company’s business activities are conducted with proper procedures and adhere to ethical standards.</p> <p>The Company’s Procedures for Ethical Management and Conduct Guideline (https://csr.evergreen-marine.com/csr/tw/jsp/CSR_EthicalManagement-Guideline.jsp) were established and resolved by the Board of Directors on Mar. 26, 2015. This guideline states the preventive measures against unethical behavior, offering and accepting bribes and improper benefits, or attending meeting or business activities involving any potential conflict of interest. The guideline also covers the punishment for violation and rules for appeal. The responsible department of the Company shall promote and supervise the implementation of the ethical corporate management policies and preventive measures.</p> | None |
| <p>2. The implementation of ethical corporate management policy</p> <p>(1) Does the Company evaluate business suppliers’ ethical records and include ethics-related clauses in business contracts?</p> | ✓ | | <p>The company has established standardized requirements for ethical record assessments and the signing of the ethical behavior clause, as outlined in the “Ethical Corporate Management Best-Practice Principles.” The company is committed to avoiding any</p> | None |

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| (2) Does the Company establish an exclusively dedicated unit supervised by the Board to be in charge of ethical corporate management promotion and regularly (at least once a year) report to the Board regarding the ethical management policies, preventive measures against unethical behavior and implementation status? | ✓ | | <p>commercial activities with suppliers who engage in unethical behavior or violate the company’s CSR policies. When entering into a contract, both parties must comply with CSR policies and ethical principles, which should be included in the contract’s terms. The company reserves the right to terminate or revoke the contract if the supplier violates these policies and principles, resulting in a significant impact on the environment and society of the supply source community.</p> <p>The Human Resources Department (HRD) has been designated by the Company to oversee the establishment of ethical corporate management policies and preventive measures against unethical behavior, as well as supervise their implementation. Furthermore, the HRD assists the Board of Directors and management in verifying and assessing the effectiveness of the preventive measures taken to implement ethical management. The HRD regularly reports to the Board in December each year. The report presented at the Board of Directors’ meeting held on December 22, 2023 is summarized as follows:</p> <p>1. Policies on Ethical Management:</p> <p>To prevent any unethical behavior by employees, the Company’s top management emphasized in monthly managerial meetings and announced to all employees that all business activities must comply with competition laws, prevent insider trading, adhere to information</p> | None |

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| | | | <p>security policies, and protect confidential information, among other policies.</p> <p>2. Ethical Management Risk Assessment: In accordance with the Ethical Corporate Management Best Practice Principles and Guidelines for Conduct, the Company has established an effective risk assessment mechanism and conducts an annual review. The results appraised by all departments in 2023 revealed that all business activities were at a “low” risk level, and current control systems could remain unchanged.</p> <p>3. Training on Ethical Management Related Issues: (1)The Company organized orientation courses on ethical management and morality, anti-bribery and anti-corruption policies, competition compliance and general data protection regulation (GDPR) in 2023 and 94 new employees completed the courses. (2)The Company organized an e-learning course on management of the prevention of insider trading in 2023. There were 2,462 employees completed the courses and test. The completion rate was 100%.</p> <p>4. Complaint Mailbox: No cases against the code of conduct were received via the complaint mailbox in 2023.</p> | |

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| (3) Does the Company establish policies to prevent conflicts of interest and provide appropriate communication channels, and implement it? | ✓ | | In order to prevent conflicts of interest and establish effective communication channels, the Company has implemented the “Ethical Corporate Management Best-Practice Principles” and “Procedures for Ethical Management and Conduct Guidelines” in 2014 and 2015, respectively. These policies are enforced through the use of the corporate internal control system, audit system, and various internal management regulations. | None |
| (4) Has the Company established effective systems for both accounting and internal control to facilitate ethical corporate management, and are internal auditors or CPAs check the risk assessment results on high-risk unethical behavior and conduct an audit plan for prevention programs? | ✓ | | The company has established an effective accounting system, internal control system, and internal audit implementation rules. The internal audit unit conducts an annual internal audit to examine the implementation status of the internal control system, continuously reviews the company’s operating procedures, and develops an audit plan based on the assessment results of the risks associated with unethical behavior. This plan is designed to examine the implementation status of preventive measures against unethical behavior. | None |
| (5) Does the Company regularly hold internal and external educational trainings on operational integrity? | ✓ | | The Company delivers integrity policies through various channels, such as monthly departmental meetings, e-Bulletin Board, and management’s remarks. For new employees, training on ethical management and morality, anti-bribery and anti-corruption policies, competition compliance and general data protection regulation (GDPR) were carried out during the | None |

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| | | | orientation for 94 newcomers in 2023. In addition, the on-line course on management of the prevention of insider trading was carried out in 2023. A total of 2,462 employees completed the courses and test. | |
| <p>3. Operation of the Company’s integrity system</p> <p>(1) Does the Company establish both reward/punishment system and integrity hotline, as well as a convenient integrity channel? Can the accused be reached by an appropriate person for follow-up?</p> | ✓ | | <p>The Company encourages both internal and external personnel to report any acts of unethical behavior or misconduct. In addition to the integrity system outlined in the “Ethical Corporate Management Best-Practice Principles,” the Company has established the “Employee Complaint Regulations.” Once a whistleblower reports or appeals to their supervisors at all levels and the Human Resources Department, the case will be filed and investigated or reported to the independent director. The Company has also established a relevant reward/punishment system in its management rules. Additionally, an independent whistleblowing mailbox (comment@evergreen-marine.com) has been made available and Disclosed on the “Stakeholder Zone” of the Company’s website and on the internal e-bulletin board. This mailbox serves as a convenient integrity channel and is under the responsibility of the Human Resources Department supervisor.</p> | None |

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| (2) Does the Company establish standard operating procedures for confidential reporting on investigating accusation cases? | ✓ | | According to the “Ethical Corporate Management Best-Practice Principles” and “Employee Complaint Regulations,” whistleblowers are permitted to report cases verbally, in writing, or anonymously. The company is then responsible for recording the report, gathering relevant information, conducting an investigation, and providing a response to the whistleblower within 10 working days. If necessary, the response time may be extended for an additional 10 days, but this extension is limited to two times. Additionally, the “Ethical Corporate Management Best-Practice Principles” require that the contents of the report be handled confidentially and that whistleblowers be protected from any inappropriate treatment resulting from their complaint. | None |
| (3) Does the Company provide proper whistleblower protection? | ✓ | | The designated Human Resources Managers will be responsible for handling the cases. The relevant regulations outline the procedures and methods for investigating and handling cases, as well as provisions for protecting whistleblowers from any inappropriate treatment resulting from their complaints. These measures are in place to ensure the protection of whistleblowers. | None |
| 4. Strengthening information disclosure (1) Does the Company disclose its ethical corporate management policies and the results of its implementation on the Company’s website and MOPS? | ✓ | | The Company’s Ethical Corporate Management Best-Practice Principles and the results of our implementation have been posted on the Company’s website (https://www.evergreen-marine.com/emc/policy/jsp/EMC_EthicalCorporateManagement.jsp?lang=zh-tw) and MOPS. | None |

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| 5. If the Company has established the ethical corporate management policies based on the Ethical Corporate Management Best-Practice Principles for TWSE/TPEX Listed Companies, please describe any discrepancy between the policies and their implementation: None | | | | |
| 6. Other important information to facilitate a better understanding of the Company's ethical corporate management policies (e.g., review and amend its policies): None | | | | |