

# Advanced Analog Technology, Inc.

## Code of Integrity in Business Operations

### Article 1 Purpose and Scope of Application

In order to deepen the corporate culture of business integrity, promote sound development, and establish a sound business operation framework, the Company has adopted this Code.

This Code shall also apply to the Company's subsidiaries, foundations to which the Company directly or indirectly contributes more than 50% of total funds, and other institutions or legal entities over which the Company has substantive control (hereinafter collectively referred to as "Group Enterprises and Organizations").

### Article 2 Prohibition of Dishonest Conduct

The Company's directors, independent directors, managers, employees, or persons with substantial control (hereinafter referred to as "persons with substantial control") shall not, in the course of conducting business, directly or indirectly offer, promise, request, or accept any improper benefits, or engage in any other dishonest acts—such as those violating integrity, laws, or fiduciary duties—for the purpose of acquiring or maintaining benefits (hereinafter referred to as "dishonest conduct").

The counterparties to the aforementioned conduct include public officials, political candidates, political parties or party officials, as well as any public or private enterprises or institutions and their directors, supervisors, managers, employees, persons with substantial control, or other stakeholders.

### Article 3 Types of Benefits

The term "benefits" as used in this Code refers to anything of value, including but not limited to money, gifts, commissions, positions, services, preferential treatment, rebates, or benefits in any form or under any name. However, this does not include normal social customs of hospitality that are occasional in nature and unlikely to affect specific rights or obligations.

### Article 4 Compliance with Laws and Regulations

The Company shall comply with the Company Act, the Securities and Exchange Act, the Business Accounting Act, the Political Donations Act, the Anti-Corruption Act, the Government Procurement Act, the Act on Recusal of Public Servants Due to Conflicts of Interest, the relevant rules and regulations for listed and over-the-counter companies, and other laws and regulations related to business conduct, as the fundamental premise for implementing business integrity.

### Article 5 Policy

The Company shall, based on the principles of integrity, transparency, and responsibility, establish policies founded on business integrity, and shall put in place sound corporate governance and risk control mechanisms to create a business environment for sustainable development.

Article 6 Commitment and Implementation

The Company and its Group Enterprises and Organizations shall expressly state their policy of business integrity in their regulations and external documents. The Board of Directors and management shall commit to actively implementing this policy and ensure its effective execution in both internal management and external business activities.

Article 7 Business Integrity in Commercial Activities

The Company shall conduct business activities in a fair and transparent manner. Before engaging in any business dealings, the Company shall consider the legality of its agents, suppliers, customers, or other transaction counterparties, as well as whether they have any record of dishonest conduct, and should avoid transactions with parties that have such records.

When the Company enters into contracts with others, the contract terms should include compliance with the business integrity policy, and provisions allowing the Company to terminate or rescind the contract at any time if the counterparty is involved in dishonest conduct.

Article 8 Prohibition of Bribery and Acceptance of Bribes

The Company, its directors, independent directors, managers, employees, and persons with substantial control shall not, in the course of conducting business, directly or indirectly offer, promise, request, or accept any form of improper benefits—including kickbacks, commissions, facilitation payments, or other means of providing or receiving improper benefits—from customers, agents, contractors, suppliers, public officials, or other stakeholders. However, this restriction shall not apply where such conduct complies with the laws of the place of operation.

Article 9 Prohibition on Providing Illegal Political Contributions

The Company, its directors, independent directors, managers, employees, and persons with substantial control shall ensure that any direct or indirect contributions to political parties, organizations engaged in political activities, or individuals comply with the Political Donations Act and the Company's internal procedures. Such contributions must not be made with the intent to obtain business interests or transactional advantages.

Article 10 Prohibition on Improper Charitable Donations or Sponsorships

The Company, its directors, independent directors, managers, employees, and persons with substantial control shall ensure that any charitable donations or sponsorships comply with relevant laws and internal procedures. Such contributions must not serve as disguised forms of bribery.

Article 11 Prohibition on Unreasonable Gifts, Hospitality, or Other Improper Benefits

The Company, its directors, independent directors, managers, employees, and persons with substantial control shall not, directly or indirectly, offer or accept any unreasonable gifts, hospitality, or other improper benefits for the purpose of establishing business relationships or influencing business transactions.

Article 12 Organization and Responsibilities

The Company's Board of Directors shall exercise the duty of care of a good administrator to supervise the Company in preventing dishonest conduct, and shall review the effectiveness of implementation at all times and make continuous improvements to ensure the thorough enforcement of the integrity management policy.

To strengthen the management of integrity operations, the Company should designate a dedicated unit responsible for formulating and supervising the execution of integrity management policies and prevention programs, and regularly report to the Board of Directors.

Article 13 Compliance with Laws in Business Operations

The Company's directors, independent directors, managerial officers, employees, and persons with substantial control shall, in the course of business operations, comply with applicable laws and regulations as well as the Company's prevention programs.

Article 14 Avoidance of Conflicts of Interest by Directors, Independent Directors, and Managerial Officers

The Company shall establish policies to prevent conflicts of interest and provide appropriate channels for directors, supervisors, and managerial officers to proactively disclose any potential conflicts of interest with the Company.

Directors shall uphold the highest level of self-discipline. For any proposal on the board meeting agenda where a director or the legal entity they represent has an interest that may be detrimental to the Company, such director may express opinions and respond to inquiries but shall not participate in discussions or voting. During the discussion and voting, the director shall recuse themselves and may not act as a proxy for another director in exercising voting rights. Directors shall also practice mutual self-discipline, refraining from providing inappropriate mutual support.

Directors, supervisors, and managerial officers shall not use their positions in the Company to secure improper benefits for themselves, their spouses, parents, children, or any other person.

Article 15     Accounting and Internal Controls

The Company shall establish effective accounting systems and internal control mechanisms for business activities with a higher risk of unethical conduct. The Company shall not maintain off-the-books accounts or undisclosed secret accounts and shall regularly review such systems to ensure that their design and implementation remain effective.

Internal audit personnel shall periodically examine compliance with the aforementioned systems and prepare audit reports to be submitted to the Board of Directors.

Article 16     Operating Procedures and Code of Conduct

The Company shall establish operating procedures and a code of conduct that clearly stipulate the matters to be observed by directors, independent directors, managers, employees, and persons with substantial control when conducting business. Such content shall at least include:

1. Criteria for determining the provision or acceptance of improper benefits.
2. Procedures for handling lawful political contributions.
3. Procedures and monetary standards for making legitimate charitable donations or sponsorships.
4. Rules to avoid conflicts of interest related to duties, as well as procedures for reporting and handling such conflicts.
5. Confidentiality requirements for proprietary and commercially sensitive information obtained in the course of business.
6. Standards and procedures for dealing with suppliers, customers, and other business counterparties involved in unethical conduct.
7. Procedures for handling violations of the Company's Code of Ethical Business Conduct.
8. Disciplinary actions to be taken against violators.

Article 17     Education, Training, and Evaluation

The Company shall periodically conduct education, training, and awareness programs for directors, independent directors, managers, employees, and persons with substantial control, and shall also invite business counterparties to participate. The purpose is to ensure full understanding of the Company's determination,

policies, preventive measures, and the consequences of engaging in unethical conduct.

The Company shall integrate its ethical business policies into employee performance evaluations and human resource policies, and establish clear and effective reward and disciplinary mechanisms.

**Article 18 Whistleblowing and Disciplinary Actions**

The Company shall provide proper whistleblowing channels and ensure strict confidentiality regarding the identity of whistleblowers and the contents of their reports.

The Company shall establish clear disciplinary and appeal mechanisms for violations of ethical business conduct regulations. It shall promptly disclose on the Company's internal website the violator's job title, name, date of violation, details of the violation, and the handling outcome.

**Article 19 Information Disclosure**

The Company shall disclose the implementation status of its Ethical Corporate Management Best Practice Principles on its official website, in the annual report, and in the prospectus.

**Article 20 Review and Amendment of the Ethical Corporate Management Best Practice Principles**

The Company shall keep abreast of developments in domestic and international regulations related to ethical corporate management, and shall encourage directors, independent directors, managerial officers, and employees to provide suggestions. Such input shall be used to review and improve the Company's Ethical Corporate Management Best Practice Principles, in order to enhance the effectiveness of ethical corporate management.

**Article 21 Implementation**

These Principles shall be implemented after approval by the Board of Directors and shall be submitted to the shareholders' meeting. The same procedure shall apply to any amendments.

**Article 22 Formulation and Amendment**

These Principles were established on March 15, 2011.