

Anti-Bribery Management System Handbook

FIH Mobile Limited

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(This English handbook is a translation of the Chinese draft handbook dated 2 December 2024. In case of discrepancy, the Chinese handbook shall prevail.)

Foreword**Anti-Bribery Commitments**

Dear all,

Since its founding in 2003, FIH Mobile Limited (“FIH”, or “we”) has always adhered to integrity as an important core value, and the adherence to integrity as well as respect is one of our important business philosophies.

As a leading company in the communications equipment manufacturing industry, FIH deeply understands that as a responsible corporate citizen, it does not only have to comply with the requirements of laws and regulations, but also has to practice the highest level of business ethics and fulfill the responsibility of integrity. Our belief is to establish a positive corporate governance and culture of integrity to fulfill our commitments to integrity, respect and sustainability.

We uphold a zero-tolerance policy against bribery and a culture of ethics. FIH does not tolerate bribery and corruption in any business situation, country, business partner or business relationship. We commit to establish and continuously improve an anti-bribery management system that matches FIH's business objectives and ensure its smooth operation to help FIH operate with integrity and achieve sustainable business development.

We hereby commit that FIH conduct all affairs in accordance with ethics, professional standards and legal regulations, take integrity as the basis of business operation, fully support the fight against bribery or corruption, and does not tolerate any bribery or corruption activity. If you have any concerns or questions, please do not hesitate to speak up.

The Board of directors (the “Board”) and the Senior Management of
FIH Mobile Limited

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1. General

The first chapter of this handbook summarizes the general understanding of anti-bribery management at FIH. It also outlines the basics and fundamentals of the design and implementation of the anti-bribery management system.

1.1. Scope and purpose

This handbook contains specific requirements and descriptions of the anti-bribery management system applicable to FIH Mobile Limited ("FIH") and legal entities substantially controlled by FIH, aiming to provide standards and guidelines of anti-bribery management to enable business activities continuously and steadily meet relevant requirements of business partners and applicable laws and regulations. In this Handbook, the "Company" refers to FIH and all legal entities controlled by FIH.

1.2. Definition of bribery and corruption

According to the Organization for Economic Co-operation and Development, **corruption is the abuse of public or private office for personal or corporate gain. It includes acts of bribery, embezzlement, nepotism or state capture. It is often associated with and reinforced by other illegal acts, such as bid rigging, fraud, money laundering or any promise (anything of value).**

Some of the main bribery and corruption scenarios include:

- Active bribery: Offering of cash or gifts and/or hospitality to business partners to win business.
- Passive bribery: Accepting bribes to decide in favor of a certain party.
- Facilitation payments: To receive more quickly an (official) service (which is legally entitled).
- Bribery to potential business partners through sponsorship or donation.
- Bribery to an ultimate business partner by engaging a third party on behalf of the company.

1.3. **Definition of the anti-bribery management system**

The Company is exposed to potential bribery and corruption risks in its business. In order to prevent the Company from suffering financial and reputational losses, as well as to prevent employees from suffering losses while conducting business, the Company has designed and implemented an anti-bribery management system to sustainably manage its business.

The anti-bribery management system supports the Company to identify, manage and respond to bribery and corruption matters, and to systematically define the design and execution of organizational and procedural components. The anti-bribery management system comprises corporate governance, policies and procedures established based on the objectives set by the Company's management.

The purpose of the system is to identify, mitigate and reduce systematic bribery risks, and to establish a systematic and consistent approach for compliance awareness building, prevention and response. The system does not provide absolute assurance that potential bribery and corruption will not occur, but it helps to identify such risks and ensure appropriate and consistent response.

The overall design of the anti-bribery management system encompasses the development of a favorable anti-bribery culture, the definition of anti-bribery management objectives, the process for identifying and analyzing bribery risks, the process for establishing the anti-bribery management system, the structure of the anti-bribery management organization, the development of a communication process as well as procedures for monitoring and improving the anti-bribery management system.

The Board of FIH has the full and ultimate responsibility for the design, implementation, operation and supervision of the system.

2. Context of the organization

2.1. Internal and external context of the organization

2.1.1. Organizational environment

FIH is a limited company incorporated in the Cayman Islands and commenced business in 2003, of which the shares were listed on the Hong Kong Stock Exchange in 2005. The Company is registered as a registered non-Hong Kong company and has an office location in Hong Kong. FIH is a subsidiary of Hon Hai Precision Industry Co. Ltd. (a company incorporated in Taiwan, whose shares are listed on the Taiwan Stock Exchange, "The Group") and a global leader in the mobile phone industry. FIH is an investment holding company. The Company mainly serves as a vertically integrated manufacturing service provider for the global mobile phone industry, providing customers with a wide range of mobile phone manufacturing services. The principal activities of the Company are carried out by the subsidiaries.

2.1.2. Business functions and organizational structure

FIH has established the Board, the Senior Management (including the Chief Executive Officer ("CEO"), Chief Financial Officer ("CFO"), Director of Business Development, Senior Director of Finance, etc.), General Office of Finance and Accounting, Enterprise Risk Management Office, Internal Audit Services (IAS), Human Resources Department, Legal Department, Business Control Department, FIH Global Strategic Sourcing & Supplier Management, Secretariat, ESG Team and other departments. The roles and function of each department are as follows:

- CEO: Responsible for operation of the Company, accountable for financial reporting and operating results, responsible for the long-term development strategy layout, and accountable to the Board.
- CFO: Responsible for accounting, internal and external financial reporting, financial planning, taxation, investment management, internal control, investor relationship management, corporate governance, risk management and performance review.
- Director of Business Development: Responsible for business operation development and project management.
- Senior Director of Finance: Responsible for fund management, financial investment and financial risk management of the Company.
- General Office of Finance and Accounting: Functions of the Finance Department and the Accounting Department are separated. The function of the Finance Department includes fund management, foreign exchange management, insurance management, capital lending, endorsement guarantee, derivatives trading, and other operations related to public announcement. The function of the Accounting Department includes bookkeeping, preparing financial statements, tax planning, and keeping the Company's executives or shareholders informed of the dynamics of the Company's assets, equity and liabilities.
- Enterprise Risk Management Office: Responsible for the design of the Company's enterprise risk management system, implementation and continuous monitoring of the enterprise risk management evaluation.
- Internal Audit Services: Responsible for the Company's internal audit and follow-up, whistleblowing and investigation, anti-bribery related training, and review of the anti-bribery management system., etc.
- Human Resources Department: Responsible for the operation of various human resource functions within the Company, including recruitment, training, utilization, and retention (hiring, promotion, transfer, and departure), participating in the setup and optimization of the organization, responsible for the promotion of corporate culture and employer branding, formulating and supervising the implementation of the Company's personnel regulations, thoroughly implementing the Company's anti-fraud policy and promoting ESG-related work.

- Legal Department: Responsible for reviewing the Company's contracts, identifying, evaluating and managing various legal risks the Company is exposed to, providing legal support and advice, and managing all legal compliance related issues of the Company.
- Business Control Department: Responsible for the review and approval of relevant payment documents, asset inventory and cost management., etc.
- FIH Global Strategic Sourcing & Supplier Management: Mainly responsible for FIH raw material procurement, cooperating with the Central Procurement Department of Honhai and serving all BUS.
- Secretariat: Responsible for the meeting operations of the Board, board committees and shareholders, as well as corporate governance-related matters.
- ESG Team: Responsible for formulating and implementing ESG-related development plans of the Company, and monitoring ESG-related performance, strategies, policies, objectives, regulations and quarterly progress.

2.1.3. Legal environment

The Company's main business operations are carried out in Mainland China, India and Vietnam. Its holding company, FIH, is listed on the Hong Kong Stock Exchange and is subject to the legal jurisdiction of the Mainland China and Hong Kong. The relevant anti-bribery management laws and regulations include but are not limited to the Anti-Unfair Competition Law of the People's Republic of China, the Criminal Law of the People's Republic of China, Prevention of Corruption Act (1988) of India, the Anti-Corruption Law, 2018 of Vietnam and the Prevention of Bribery Ordinance of the Hong Kong Special Administrative Region. Besides, the anti-bribery management of the Company is also in accordance with the requirements of the international standard ISO 37001: 2016, Anti-bribery management system – Requirements with guidance for use.

2.2. Understand the needs and expectations of stakeholders

Stakeholders related to the anti-bribery management system and their expectations are as follows:

No	Stakeholders	Needs and expectations
1	Shareholder	Expect the Company develop steadily, continuously create value and increase revenue as well as profits
2	Board of directors	Require the Company's management team to comply with laws and regulations, operate sustainably and abide by professional ethics
3	Sales personnel	Expect customers increase orders, so as to increase revenue of the Company and enhance performance of sales personnel
4	Customers that are related party within the Company	Expect that the Company supplies high-quality products with price advantages stably according to sales orders
5	End customers	Expect the Company adapt to the changing demand, accelerate production while meeting delivery requirements, and comply with laws and regulations
6	Service provider	Expect the Company increase service orders and cooperate with the Company for a long time
7	Supplier designated by customers	Expect to maintain a good relationship with the Company
8	Supplier selected by the Company	Expect the Company increase purchase orders and cooperate with the Company for a long time
9	RBA (Responsible Business Alliance)	Expect the Company's business activities are legal and compliant, and that labor risks are reduced
10	Hong Kong Stock Exchange	Expect the Company to comply with the anti-corruption requirements of Hong Kong laws and regulations, establish

No	Stakeholders	Needs and expectations
		a whistleblowing policy to provide a channel for employees, customers, and suppliers to anonymously report wrongdoing, and develop an anti-corruption policy to fulfill the requirements of anti-corruption regulations and to promote a corporate culture of anti-corruption

2.3. Scope of the anti-bribery management system

The Company's anti-bribery management system covers all activities of R&D, procurement, production, sales, human resources, finance, tax and legal initiated, executed, controlled and supervised by the Company. The anti-bribery management system is designed to address the following bribery matters in relation to the Company's activities:

- Bribery in the public, private and non-profit sectors
- Bribery committed by the Company
- Bribery committed by the Company's personnel on behalf of or for the benefit of the Company
- Bribery committed by the Company's business partners on behalf of or for the benefit of the Company
- Bribery received by the Company
- Bribery received by the Company's personnel in relation to the Company's activities
- Bribery received by the Company's business partners in relation to the Company's activities
- Direct and indirect bribery (e.g., offering or receiving bribes through or by a third party)
- Introduction of bribes¹

The purpose of the anti-bribery management system is to establish requirements and standards applicable to handle the bribery related issues, in order to help the Company prevent, detect and respond to bribery and comply with anti-bribery laws and regulations, normative documents and voluntary commitments applicable to its activities. It does not deal with fraud, cartels, anti-trust/competition offences, money-laundering or other crimes or activities related to corruption.

¹ Introduction of bribes: (1) Introducing the acceptance of bribes received: Acting according to the intentions of the bribe recipient, looking for targets of extortion on their behalf, acting as an intermediary, and conveying the demands of the bribe recipient to the briber.; (2) Introducing offering of bribes: Accepting the commission of the briber, looking for targets for bribery on their behalf, smoothing the channels for bribery, recommending recipients of bribes, conveying information about bribery, delivering bribes on behalf of the briber, and conveying the demands of the briber to the recipient of the bribe, etc.

3. Bribery risk assessment

Bribery risk assessment is a periodical and independent evaluation of the Company's exposure to bribery and corruption risks, aiming to systematically identify the nature and scope of bribery and corruption risk exposure. It is an integral part of the core and basis of the anti-bribery management system.

3.1. Bribery risk assessment process

Bribery risk assessment is conducted through the enterprise risk management system as part of the enterprise risk assessment process. The responsible personnel from each business unit are required to submit the enterprise risk assessment form in the system twice a year (in May and October). Using the Risk Priority Number ("RPN") model, they assess business units by combining the severity, occurrence and low-detection capability to arrive at a final score. Risk level is assigned based on the final score and the business units should take action accordingly:

RPN score	Risk level	Measures should be taken
<60	Low	Submit the Enterprise Risk Assessment Form
60≤RPN<80	Medium	The head of the business unit should closely monitor for potential bribery risks.
≥80	High	Establish appropriate plans for potential bribery risks and respond accordingly and conduct re-assessments.

Detailed assessment procedures and methods can be referred to the RPN Scoring Guidelines and the FIH ERM System Training Material.

Before the personnel from each business unit submits the Enterprise Risk Assessment Form, the Internal Audit Services (IAS) conducts interview with each risk owner (the head of each business unit) once a year to understand and update the identification of enterprise risks and corresponding risk control measures. In addressing bribery risks, when the IAS interviews risk owners, the issues to be considered include but are not limited to:

- Potential bribery risk indicators within each business unit;
- Common forms of bribery seen by each business unit;
- Bribery risk assessment of employees;
- Risk assessment of the third parties;
- Whether there have been bribery cases in the past, the frequency and scope of cases;
- Whether employees are aware of the Company's anti-bribery management policies;
- How to control and respond to bribery risks; and
- Whether there are deficiencies in the existing internal control processes.

Please refer to Appendix 1 for the Bribery Risk Interview Questionnaire Template.

In addition to the annual assessment, the bribery risk assessment of each business unit should be re-conducted at other times if necessary. Circumstances that may trigger a bribery risk assessment include but are not limited to:

- Changes in the legal and economic environment, applicable regulatory requirements and other significant events;
- Significant changes in business model and company strategy;
- Major reorganizations or personnel changes; and/or
- Commence new business or services.

3.2. Bribery risk assessment methodology

Risk assessments generally include identification of systemic risks of bribery and corruption², gross risk¹ evaluation, control evaluation and residual risk^{II} evaluation, control improvements and remediation, and assessment of the residual acceptable risk^{III}. The residual acceptable risk level is determined by the Board based on its position and risk appetite in terms of the overall bribery/corruption risk spectrum.

I Gross risk: Risks to the business ignoring internal controls and risk management.

II Residual risk: The remaining net risk after implementation of mitigation measures to control the gross risks.

III Residual acceptable risk: Any remaining risk after implementation of control activities and the Board is comfortable at the risk level.

The identification of bribery risk considers the following factors:

- Country risk: Refer to the Corruption Perceptions Index³
- Sectoral risk: Assess the bribery risk in the sector of communications equipment manufacturing based on industry experience, and also refer to the Bribe Payers Index published by Transparency International which ranks business sectors according to the likelihood of bribers being paid by companies of these sectors⁴
- Business partners' risk: Possible corruption and bribery activities conducted by third-party partners (e.g. suppliers, customers, etc.)
- Specific transaction and business activity's risks: Pay attention to potential corruption and bribery activities in business transactions with large amount, lack of transparency and sophisticated structures (e.g. service procurement, procurement exceeding a certain amount, etc.)
- Government and public sector risk: Focus on the compliance and reasonableness of interactions with government or other public officials

In general, bribery and corruption risks can be categorized into active bribery risks (such as offering, promising or giving bribes, including bribery of public officials) and passive bribery risks (including soliciting, agreeing to receive or accepting bribes).

3.3. Bribery risk assessment of employee and position

The Company assesses the bribery risk levels (low risk, medium risk, high risk) of each position from the perspectives of business nature, rank and frequency of bribery risk incidents, and implements different anti-bribery management procedures for employees and positions according to their bribery risk levels (Refer to 7.3 for details).

The bribery risk score of employee and position is assessed based on the risk indicators in the Employee Bribery Risk Assessment Form (Refer to Appendix 2 for a template), and then the employee and position's bribery risk level is determined in accordance with the total risk score. During the annual bribery risk assessment interview, the Internal Audit Services (IAS) confirms with the Human Resources Department and the heads of each business unit whether the risk indicators and scoring criteria in the Employee Bribery Risk Assessment Form are appropriate or need to be updated and confirms the results of bribery risk assessment of employee and position.

The Employee Bribery Risk Assessment Form is to be filled out, updated and retained by the Human Resources Department. The Enterprise Risk Management Office conducts periodical spot checks.

² Systemic risk: the risk caused by external factors of the company such as political, economic and social environment and beyond the control of the company itself.

³ Corruption Perceptions Index: <https://transparency.am/en/cpi>

⁴ Bribe Payers Index: <https://www.transparency.org/research/bpi/overview>

The bribery/corruption risk assessment of employee and position should be performed at least annually and when necessary. When there is a major business restructuring or personnel changes, it shall be reassessed.

3.4. Bribery risk assessment of third-party partner

The Company conducts bribery risk assessment (low risk, medium risk, high risk) based on identified bribery risk indicators related to third-party partner and carries out different anti-bribery management procedures for third-party partners according to their bribery risk levels (Refer to 8.1.1 for details).

The scope of third parties includes but not limit to:

- Raw material suppliers (including suppliers selected by the Company and suppliers designated by customers);
- Service providers (including but not limited to labor dispatch companies);
- Consultants or other intermediaries (e.g. legal, tax, financial advisers and consultants, etc.);
- Construction contractors;
- Maintenance service providers;
- Consumables suppliers;
- Customers; and/or
- Targets of acquisition and merger transactions.

The Company should conduct a bribery risk assessment on third parties with which it has had business within the past year and obtain sufficient information to assess the nature and extent of bribery risks associated with the entities, transactions and personnel. For third parties with which there have been no business for one year or longer, if the business partnership is resumed, the Company should also conduct a bribery risk assessment in accordance with the requirements of this handbook.

The bribery risk score of third-party partners is evaluated based on the risk indicators in the Third-Party Bribery Risk Assessment Form (Refers to Appendix 3 for a template), and the bribery risk level is determined in accordance with the total risk score. During the annual bribery risk assessment interview, the Internal Audit Services (IAS) confirms with the heads of each business unit whether the risk indicators and scoring criteria in the Third-Party Bribery Risk Assessment Form are appropriate or need to be updated and confirms the results of the third-party bribery risk assessment.

The Third-Party Bribery Risk Assessment Form is to be filled out, updated and retained by the business unit responsible for the assessment, and the assessment results are to be compiled and reported to the Enterprise Risk Management Office. The Enterprise Risk Management Office conducts periodical spot checks.

The bribery/corruption risk assessments of third-party partner should be completed before the Company establishes a business relationship with them and should be reviewed and updated at least once a year. A reassessment of bribery risk should be conducted when significant changes are identified in the third party itself or in the cooperation with the Company during the third-party management process. Circumstances that require a reassessment of bribery risk include but not limit to:

- Significant changes in contract amounts and payment arrangements
- Significant changes in the content of the cooperation
- Changes in the transaction location, etc.

4. Leadership

4.1. Governing body and top management

4.1.1. Definition and responsibilities of governing body

The governing body refers to the Board of FIH. Roles and Responsibilities of the governing body regarding anti-bribery management include:

- Approve the Company's anti-bribery policies and guidelines
- Ensure that the company's strategy is consistent with the anti-bribery management system
- Require sufficient resources for effective operation of the anti-bribery management system
- Exercise oversight over the implementation of the anti-bribery management system
- Issue a statement emphasizing the importance of an anti-bribery management system and disseminate it to employees and stakeholders
- Periodically (at least once a year) receive and assess reporting from top management and the Internal Audit Services (IAS) about the operation of the anti-bribery management system, and retain corresponding meeting minutes or written reports

4.1.2. Definition and responsibilities of top management

The top management includes the CEO, CFO and the heads of functional departments directly reporting to the CEO or CFO (including but not limited to the General Office of Finance and Accounting, FIH Global Strategic Sourcing & Supplier Management, Human Resources Department, Legal Department, Internal Audit Services (IAS), Business Control Department, etc.).

The top management has the overall responsibility to ensure that the anti-bribery management system is effectively implemented, maintained and reviewed across the Company; this includes the following:

- Identify and respond to bribery risks by reinforcing a robust bribery risk assessment (Refer to 3. Bribery risk assessment) to ensure that bribery risks are adequately addressed
- Ensure that the anti-bribery management system is integrated into the Company's existing business management processes
- Allocate sufficient resources and competent personnel to support the implementation of the anti-bribery management system
- Communicate internally and externally the Company's position on bribery
- Promote an anti-bribery culture within the Company, emphasizing the importance of an effective anti-bribery management system as well as the importance of complying with requirements of the system
- Instruct and encourage employees to contribute to the effective operation of the anti-bribery management system and ensure that the objectives of the anti-bribery management system are achieved
- Encourage employees to use reporting channels within the Company to report suspected or actual violations of the anti-bribery policies without fear of retaliation
- Periodically (at least once a year) report to the Board on the operation of the anti-bribery management system
- Periodically (at least once a year) receive and review reporting from the Internal Audit Services (IAS) on the operation of the anti-bribery management system
- Promote continuous improvement of the anti-bribery management system

4.2. Anti-bribery management function and authority

The Company's anti-bribery management function is assigned to the Internal Audit Services (IAS). Key responsibilities and authorities related to anti-bribery management assigned by the top management to the Internal Audit Services (IAS) include:

- Periodically (at least once a year) receive trainings related to anti-bribery management and pass relevant exams to ensure that they have appropriate competence of anti-bribery management;
- Have direct access to the governing body and top management, and have sufficient powers to directly interact with management at all levels and departments;
- Oversee the design and implementation of the Company's anti-bribery management system;
- Provide advice and guidance to employees on the anti-bribery management system and bribery issues;
- Ensure that the Company's anti-bribery management system achieves the requirements of ISO 37001;
- Operate the anti-bribery management system across the Company through integration of cross-departmental collaboration; and
- Periodically (at least once a year) report to the governing body and top management about the operation of the anti-bribery management system (including but not limited to bribery risks, the status quo of the anti-bribery management system, existing problems and corresponding solutions, achievements, etc.), and retain relevant documents and records.

In addition, management of all departments should ensure that their departments or responsibilities apply and comply with the requirements of the anti-bribery management system.

When the top management delegates decision-making authority to employees on issues with the risk of bribery, it is necessary to ensure that the authorized person has the appropriate capability of decision-making and that there is no actual or potential conflict of interest. The top management should ensure that the reasonableness of authorizations is periodically assessed.

5. Anti-bribery policy

The FIH Mobile global code of conduct is the policy foundation of the anti-bribery management system, which was signed and approved by the chairman of FIH on December 6, 2023. The requirements of the FIH Mobile global code of conduct are clearly explained and supplemented by the FIH Responsibility Standard issued on the same day. The FIH Mobile global code of conduct and the FIH Responsibility Standard are available in English and Chinese, in which specifically require that:

- Uphold a zero-tolerance policy to prohibit bribery and corruption in any form, and commit to complying with applicable anti-bribery laws and regulations;
- Establish policies and procedures to ensure that objectives of the anti-bribery management are achieved;
- Designate responsible personnel to monitor and implement relevant policies and procedures;
- Encourage reporting of bribery and corruption incidents without fear of retaliation; and
- Conduct investigation and impose penalties for bribery and corruption incidents, etc.

The second edition of the FIH Whistleblowing Policy, signed and approved by the CFO on 1 December 2022, is available in both English and Chinese. It specifies the reporting processes and policies applicable to bribery and corruption issues, including reporting channels and the person in charge of the investigation.

The FIH Mobile global code of conduct, FIH Responsibility Standards and FIH Whistleblowing Policy are released to all employees through the Company's internal networks (including the intranet and internal applications of "Believe 相信" and "Ipound 員寶"). The FIH Mobile global code of conduct, FIH Responsibility Standards and information of reporting channels are released to the public and business partners through the Company's official website.

The Anti-Bribery Management System Handbook (the "Handbook"), as a level 1 document of the anti-bribery management system, further complements the Company's commitment to establish, implement and continuously improve the anti-bribery management system applicable to the Company's objectives, as well as the description of the anti-bribery management function from the policy perspective. This Handbook is issued in Chinese and English through the Company's internal networks and email.

6. Anti-bribery objectives and action planning

6.1. Objectives of anti-bribery management

The Company establishes the anti-bribery management objectives with considerations of the context of the Company, the needs and expectations of stakeholders and the results of bribery risk assessment, and then breaks them down to different departments which are responsible for achieving them. The objectives of the anti-bribery management must be consistent with the anti-bribery management system and policies and must be measurable and achievable.

The Internal Audit Services (IAS) periodically (at least once a year) compiles and monitors the progress of objective completion, and annually reviews the previous year's achievement of objectives with the governing body, top management and department heads, as well as set the objectives for the next year.

The company adheres to the zero-tolerance policy towards any acts of bribery and corruption, with the overall objective of anti-bribery management being zero bribery given and zero bribery received. Refer to Appendix 4 for the anti-bribery management objectives of each department.

6.2. Action planning

The Company achieves its anti-bribery management objectives by taking the following actions:

- The Board and the top management support and initiate the establishment of an anti-bribery management system, and approve this Handbook;
- The top management ensures that the anti-bribery management system is integrated into the Company's existing business management processes (Refer to 3. Bribery risk assessment, 5. Anti-bribery policy and 8. Operation of the anti-bribery management system for details), and authorizes the Internal Audit Services (IAS) to implement the anti-bribery management system across the Company through the integration of cross-departmental collaboration (Refer to 4.2 for details);
- Under the oversight of the Board, the top management allocates sufficient budget and resources to support the operation and continuous improvement of the anti-bribery management system (Refer to 7.1 for details); and
- The Board and the top management commit to continuously operating and improving the anti-bribery management system.

7. Resource and support

7.1. Resources

The Company ensures to provide sufficient resources to the anti-bribery management system and continuously updates and improves it. The resources provided by the Company include but not limit to:

- Human resources: Sufficient personnel with relevant capabilities are assigned to the Internal Audit Services (IAS) to be responsible for the anti-bribery management. If other business functional departments are involved in matters related to anti-bribery management in their business work, they need to fully cooperate with the Internal Audit Services (IAS) to carry out relevant work;
- Physical resources: Provide sufficient physical resources for the implementation and continuous improvement of the anti-bribery management system, such as computer software and hardware, training materials, office space, etc.; and
- Financial resources: In order to ensure effective operation of the anti-bribery management system, the Internal Audit Services (IAS) and various business functional departments should fully consider the budget requirement for anti-bribery management when formulating the overall budget, such as: professional anti-bribery management training courses for procurement, multi-channel background checks on employees with a high level of bribery risk before their onboarding, bribery risk assessment and due diligence on third-party partners, etc. When the approved budget is insufficient to achieve the requirements of anti-bribery management, the requesting department can apply for additional funding by submitting a request form and obtain approval in accordance with the provisions of the Approval Matrix (i.e. B 類授權表).

7.2. Professional competence

The personnel responsible for the anti-bribery management function must have the highest level of professional ethics and integrity, as well as the professional knowledge or skill certificates of anti-bribery management, be able to keenly identify potential bribery/corruption risks and have the skills and means of investigating bribery/corruption issues, as well as a good sense of confidentiality.

The Internal Audit Services (IAS) is responsible for organizing personnel engaged in anti-bribery management work to maintain and improve their professional competence by participating in professional training and retaining relevant documentation and records (Refer to 7.4.2 for details).

7.3. Employment procedures

According to the results of bribery risk assessment of employee and position (Refer to 3.3 for details), different procedures and requirements are implemented for employees and positions at different risk levels with regard to anti-bribery management:

Risk level	Employment procedures and requirements
Employees at all risk levels	<ul style="list-style-type: none"> • Before onboarding, the Human Resources Department performs primary background checks, such as education verification, and maintains corresponding records • Establish provisions in the labor contracts that require employees to comply with the Company's anti-bribery management system and policies • New employees have effective communication with their supervisor and Human Resources Department during orientation training to understand how to obtain the Employee Handbook, Code of Conduct and other anti-bribery policies • Require employees to participate in anti-bribery management training and pass the examination after their onboarding/transferring

Risk level	Employment procedures and requirements
	<ul style="list-style-type: none"> According to the Code of Conduct and Employee Handbook, the Company has the right to take disciplinary measures against employees who violate the anti-bribery policies In accordance with the Code of Conduct and the FIH Whistleblowing Policy, employees will not be subject to retaliation, discrimination or punishment for refusing to engage in any activity where there is a risk of bribery or for reporting suspected or actual bribery in good faith/based on reasonable judgment Consider whether there are bribery/corruption violations and whether anti-bribery training has been completed in the employees' performance review
Employees at a medium risk level	<ul style="list-style-type: none"> Prior to onboarding, multi-channel background checks must be performed by the Human Resources Department, such as inquiries from previous employers about working experience and performance (including whether there are bribery/corruption records), understanding whether employees have bribery/corruption in the past, and maintaining corresponding records Review employee compensation incentives and performance objectives on a regular basis (at least annually) An anti-bribery statement (Refer to Appendix 5) must be signed every two years to demonstrate employees' compliance with the Company's anti-bribery management requirements and records must be maintained by the Human Resources Department
Employees at a high-risk level	<ul style="list-style-type: none"> Prior to onboarding/transferring, multi-channel background checks must be performed by the Human Resources Department to understand the employee's previous working experience, whether there were bribery/corruption behaviors, whether there were interactions with a government institution or a government official, whether there was a conflict of interest with the Company's key third-party business partners, and retains relevant records Review employee compensation incentives and performance targets on a regular basis (at least annually) An anti-bribery statement (Refer to Appendix 5) must be signed on an annual basis to demonstrate employees' compliance with the Company's anti-bribery management requirements and records must be retained by the Human Resources Department

7.4. Training

Anti-bribery training provides a solid foundation for cultivating an anti-bribery culture. The purpose of the training is to promote employees' awareness of the anti-bribery culture, in particular:

- Anti-bribery policies and procedures;
- Risks of bribery and corruption to which employee individuals or the Company are exposed to;
- Prevention, detection and response measures of bribery/corruption in their daily work; and
- Response and reporting process for suspected bribery and corruption violations.

Anti-bribery training mainly includes:

- Training for all employees
- Professional training for anti-bribery management function

Anti-bribery training for all employees is included in the Company's annual training program and the new employee orientation programs. The training materials are updated annually by the Internal Audit Services (IAS).

7.4.1. Training for all employees

Anti-bribery training is provided to all employees through the online E-learning platform once a year. The Internal Audit Services (IAS) is responsible to prepare training materials. Annual anti-bribery training is also one of the new employee orientation programs. The training contents include but not limit to:

- Overview of existing anti-bribery policies and processes, channel of accessing specific relevant policies
- The Company's zero-tolerance position with regard to bribery and corruption
- When and how to use whistle-blowing channels
- When and how to seek advice on anti-bribery
- Knowledge and case study in relation to bribery/corruption

Employees are required to take and pass an examination before the end of training. Only upon passing the examination is the training considered complete.

The Human Resources Department is responsible for keeping track of the list of employees who have not completed the training and reminding them to complete the training and exam via email. For employees who fail to complete the training on time or at all, the relevant impact will be considered in the performance review.

7.4.2. Professional training for anti-bribery management function

The Internal Audit Services (IAS) is responsible for organizing the purchase of courses from external anti-bribery training institutions or hiring professional trainers from external institutions to provide professional skills certification training to personnel responsible for anti-bribery management. Personnel who conduct internal audits of the anti-bribery management system should also receive relevant professional training and be certificated. Before personnel start working on anti-bribery management, they need to receive professional training to ensure that they are adequately qualified and competent to perform the duty of anti-bribery management. The training contents include but not limit to:

- Anti-bribery requirements and changes in the external regulatory environment;
- In-depth discussion of the best practices in the industry in managing bribery and corruption risks; and
- Interpretation and implementation of the anti-bribery management system.

After participating in the professional training, personnel serving in the anti-bribery management function must take an examination and obtain a certificate issued by a professional training institution as the proof of their qualification and capabilities in anti-bribery management. After obtaining the certificate, the relevant personnel should attend training periodically to ensure that their knowledge and skills in relation to anti-bribery management are updated and improved.

The Internal Audit Services (IAS) reviews annually (at least once) whether the skill certificates or training records of the personnel engaged in anti-bribery management are valid, arranges for updates of expired certificates, and hires professional third-party institutions to organize professional training, so as to maintain and improve the professional competence of relevant personnel. The Internal Audit Services (IAS) is responsible for retaining course completion records, training materials and certificates.

7.5. Information communication

The Communication Plan (Refer to Appendix 6) summarizes internal and external communications in relation to anti-bribery management.

7.6. Documented information

The documented information of the Company's anti-bribery management system includes:

- 1) Documented information required by laws, regulations and ISO37001 standard; and
- 2) Other documented information determined by the Company as being necessary for the effectiveness of the anti-bribery management system.

7.6.1. Creating and updating

The written information of the Company's anti-bribery management system is created and updated by relevant responsible departments, mainly in electronic version. When creating and updating documented information, the type, number, version, and approver of the document must be specified.

7.6.2. Documentation control

Documents related to the anti-bribery management system must be properly retained. The Company establishes an Anti-Bribery Document Control List (Refer to Appendix 7), which is retained and maintained by the Internal Audit Services (IAS) to register the classification, numbering, version, revision date, responsible department, approver and other information of anti-bribery related documents.

8. Operation of the anti-bribery management system

8.1. Due diligence

When bribery risks have been identified in the Company's bribery risk assessment (Refer to 3.3 and 3.4 for details) relating to:

- Third-party business partners
- Transactions and engagements (e.g., subcontracting, outsourcing, mergers and acquisitions, etc.)
- Employees from certain departments and positions

The Company should perform due diligence procedures to obtain sufficient information to assess the nature and extent of bribery risk of the relevant entities, transactions and personnel. Due diligence procedures should be updated at a determined frequency based on different levels of bribery risk. The assessment of bribery and corruption risk is an integral component of a comprehensive due diligence process, instead of a stand-alone test.

The anti-bribery due diligence process consists of the following four steps:

- (1) Determine whether the subject is eligible for a due diligence test;
- (2) Calculate the bribery and corruption risk score of the subject based on the anti-bribery questionnaire;
- (3) Categorize the subject as low, medium or high bribery and corruption risk; and
- (4) Assess the subject based on pre-defined procedures.

The Company may follow the existing management policies and processes applicable to all third parties (such as Supplier Certification Process, Foxconn Supplier Requirements, etc.), in combination with the requirements of due diligence in the Anti-Bribery Management System Handbook to conduct due diligence.

8.1.1. Third-party business partners

Due diligence must be conducted on third-party partners including but not limited to:

- Raw material suppliers (including suppliers selected by the company and suppliers designated by customers);
- Service providers (including but not limited to labor dispatch companies);
- Consultants or other intermediaries (e.g. legal, tax, financial advisers and consultants, etc.);
- Construction contractors;
- Service repairers;
- Consumables suppliers;
- Customers; and/or
- Target of acquisition and merger transactions.

Basic, enhanced or comprehensive due diligence will be assigned for third-party business partners with a low, medium and high bribery and corruption risk score respectively:

- For third-party partners with a "low" risk score, business units are solely responsible to carry out the due diligence process. The Internal Audit Services (IAS) will carry out sample checks on whether the risk scoring has been adequately assessed by the business units.
- For third-party partners with a "medium" to "high" risk score, business units are responsible to carry out the due diligence process. Approvals from designated approvers of the business units, the Internal Audit Services (IAS) and the top management must be obtained in order to proceed in entering a business relationship with the third party.

The detailed procedures of due diligence are determined by the bribery and corruption risk score calculated in the Third-Party Bribery Risk Assessment Form.

	Low-risk entity	Medium-risk entity	High-risk entity
Assigned due diligence test	Basic	Enhanced	Comprehensive
Due diligence procedures	<ul style="list-style-type: none"> Inspection of basic information such as qualification, license and financial data Anti-bribery management self-assessment Require the third party to sign integrity provisions 	<ul style="list-style-type: none"> Inspection of basic information such as qualification, license and financial data Perform public research of the third party (including records of violations, bribery and corruption penalties and negative news, interaction with government institutes and officials) Preliminary assessment of anti-bribery management system (e.g., obtain anti-bribery policies and training records) Check whether there is conflict of interest between the third party and other major third-party business partners of the Company Require the third party to sign integrity provisions 	<ul style="list-style-type: none"> Inspection of basic information such as qualification, license and financial data Perform public research of the third party and its substantial shareholders (including records of violations, bribery and corruption penalties and negative news, interaction with government institutes and officials) Evaluate whether dealing with the third party will bring conflict of interest with other major third-party business partners (e.g., whether the entity is prohibited by existing third-party business partners of the Company, etc.) or other circumstances that violate the Company's conflict of interest policy Site visit Comprehensive evaluation of anti-bribery management system (such as obtain and review the anti-bribery management certification documents (if any), anti-bribery policies, training records, establishment of the anti-bribery function, anti-bribery commitments from the governing body and top management, anti-bribery control measures and other relevant documents) Obtain background check reports from professional institutions Require the third party to sign integrity provisions

	Low-risk entity	Medium-risk entity	High-risk entity
			and include the additional provisions in contracts ^{IV}
Executor	• Business units	• Business units	• Business units • External professional advisors (if applicable)
Approver	• Heads of the business units	• Heads of the business units • Internal Audit Services (IAS)	• Heads of the business units • Internal Audit Services (IAS) • Senior management
Timing and frequency	Prior to the commencement of business relationship, and then once every two years during the ongoing cooperation	Prior to the commencement of business relationship, and then annually during the ongoing cooperation	Prior to the commencement of business relationship, and then twice a year during the ongoing cooperation

^{IV} Include additional provisions in contracts with high-risk third parties:

Additional compliance clauses with regard to anti-bribery and corruption in contracts and agreements with high-risk third parties are a measure to mitigate risks identified, and also provides an extra layer of protection for the Company. The following items can be considered:

- Authority to perform audits;
- Restrictions on the third-party partners' ability to conduct business on behalf of the Company with government officials;
- Obligation to actively report investigations and enforcement actions to the Company; and/or
- Obligation to actively report motions or appeals to the Company regarding alleged corruption cases.

Due diligence procedures need to be reperformed in exceptional circumstances, including but not limited to:

- When the operating qualifications and circumstances of the third-party business partners change
- When contractual rights and obligations are transferred to other third parties

The procedures to assess the suitability of a third party to enter into a business relationship with the Company are aimed to be robust, objective, applied consistently and monitored. The results of the third-party due diligence process should be properly documented and retained by the business units that perform the due diligence. The Company prohibits initiating or maintaining business relationship with third parties that have not passed due diligence.

8.1.2. Transactions and projects with third-party partners

Before each transaction or project is carried out, the Company should conduct bribery risk assessment on the transaction or project based on the counterparty, transaction nature, transaction amount and

whether there is any change in contract terms. The Company has evaluated risk of the transactions and projects during the bribery risk assessment of third-party business partners (Refer to Appendix 3 Third-Party Bribery Risk Assessment Form for details). The business units should consider the nature and scope of bribery risks associated with transactions or projects that are assessed as medium or high risk. Further considerations should be made regarding whether to postpone or terminate the transactions, or to establish special preventive provisions. Items considered in due diligence include, but are not limited to:

- The form and complexity of the transaction
- Funding and payment arrangements
- Risk level of the third-party partners
- Scope of the engagement and available resources
- Location

8.1.3. Employees

For employees and positions with different levels of bribery risk, conduct due diligence procedures to different extent. (Refer to 7.3 for details).

8.2. Financial controls

Financial controls are the management process implemented by the Company to manage financial transactions and to record these transactions accurately, completely and timely. The Company mitigates the risk of bribery through the following financial controls:

- Implementing a segregation of duties, so that the same person cannot both initiate and approve a payment. For details, please refer to the Employee Expense Reimbursement Policy and the Approval Matrix (i.e. B 類授權表);
- Implementing different levels of approval authority depending on the amount of the payment as defined in the Approval Matrix (i.e. B 類授權表);
- Verifying that the services or products carried out have been reviewed and approved by the responsible business unit, the Business Control Department, the A/P accountant, and ultimately the Finance Department before the payments are made;
- Requiring at least two signatures for payment approval. Refer to the Approval Matrix (i.e. B 類授權表) for details;
- Requiring supporting documentation to be attached to the request for payment approval. For details, please refer to the Employee Expense Reimbursement Policy;
- Implementing effective petty cash control management measures. Refer to the Petty Cash and Reserve Fund Management Policy for details;
- Requiring accurate and truthful description of reasons and the counterparties for financial payment and accounting bookkeeping;
- Implementing periodical sample review of substantial transactions in each audit project by the Internal Audit Services (IAS); and
- Engaging an accounting firm to perform statutory financial audit on an annual basis according to the listing requirements of the Hong Kong Stock Exchange.

8.3. Non-financial controls

Non-financial controls are management processes that implemented by the Company to help ensure that procurement, sales, human resources, daily operations, commercial and other non-financial aspects are properly managed. The Company mitigates the risk of bribery through the following non-financial controls:

- Using suppliers approved by the Company through qualification review (including due diligence in 8.1.1). Refer to Supplier Certification Process.
- Performing evaluation of suppliers;
- Assessing the necessity and legitimacy of suppliers providing services to the Company prior to conducting business;
- Performing acceptance verification of services provided by suppliers;
- Assessing the appropriateness and reasonableness of payments to the counterparties (including suppliers and customers), especially to avoid the risk of these counterparties using the fund paid by the Company to engage in bribery activities on behalf of the Company;
- Implementing a fair and transparent bidding process prior to awarding business contracts (with three bidding competitors participating), except for suppliers designated by customers;
- Requiring at least two persons to evaluate the bidding competitors, approve and sign the contract respectively. Refer to the Approval Matrix (i.e. B 類授權表);
- Implementing a segregation of duties, so that personnel who request for contract budget are different from those approving contract budget and are from those managing and approving the contract. Refer to the Approval Matrix (i.e. B 類授權表);

- Requiring at least two persons to make modification to the contract items;
- Performing more rigorous due diligence on transactions that may present a high risk of bribery (Refer to 8.1 for details);
- Requesting appropriate approval for employees not from the procurement department to get access to documents containing sensitive information (such as quotation) which are retained by the procurement department;
- Providing relevant policies and guidelines to employees. Refer to the Approval Matrix (i.e. B 類授權表), Foxconn Supplier Requirements, etc.; and
- Requiring procurement personnel to strictly abide by the principle of "price comparison among three bidding competitors" in the process of price inquiry and negotiation. If there are less than three quotes, the bidding process must be restarted or otherwise recording and reporting exceptional cases under special circumstances.

8.4. Anti-Bribery controls in controlled organizations and business partners

8.4.1. Controlled organization

The Company requires all affiliated companies (including all subsidiaries and affiliated entities of the Company and all factories controlled or held by the Company) to implement the Company's anti-bribery management system.

8.4.2. Third-party business partner

For the third-party business partner that is not controlled by the Company, if the bribery risk assessment and due diligence conclude that it poses more than a low risk of bribery, the Company should require the third-party business partner to provide relevant evidence to determine:

- Whether the third-party business partner has in place anti-bribery controls;
- If the third-party partner does not have anti-bribery controls:
 - The Company should require the third-party business partner to implement anti-bribery controls in relation to transactions and projects
 - If it is not feasible for the Company to require the third-party business partner to implement anti-bribery control regarding to transactions and projects, it must be considered as a factor for assessing the bribery risk of the third-party business partner and the necessity of continuing the partnership with it

For the third-party partners that lack anti-bribery management capabilities but pose a medium or high risk of bribery, the Company cannot include them in the list of cooperating partners. For third-party partners that have been included in the list but exhibit the following risk indicators, the Company should consider whether to remove them from the cooperating list to the blacklist. While the blacklist is in effect, the Company is not allowed to establish business relationship with the listed third parties. Relevant risk indicators include but not limited to:

- The business relationship with a third party violates legal or regulatory requirements;
- The business relationship with a third party explicitly involves bribery and/or corruption;
- The third party is unwilling to cooperate with the anti-bribery risk assessment and/or due diligence; and
- The third party's reputation reflects an unethical culture that is inconsistent with the Company's understanding of strict anti-bribery management.

8.5. Anti-bribery commitments

For third-party business partners with medium or high risks of bribery as identified in bribery risk assessment and due diligence, the Company should require them to sign the Manufacturer Commitment Letter and Supplier Initiative Declaration Letter before entering into business relationship. The Company includes basic integrity clauses and protective provisions in all contracts and agreements signed with third parties, including:

- Adhering to the highest standards of integrity, prohibiting any form of corruption, extortion or similar conduct; not offering bribes to relevant personnel in any form; and
- The right to terminate the contract when there is a violation of the Company's anti-bribery management requirements or relevant regulations.

8.6. Gifts, hospitality, donations, sponsorships and similar benefits

The Company establishes and implements policies regarding to gifts, hospitality, donations, sponsorships and similar benefits to prevent and respond to the provision or acceptance of those benefits that are intended for bribery purposes or could reasonably be perceived as being intended for bribery purposes. The relevant benefits include but not limited to:

- Gifts or hospitality
- Donation
- Travel expenses for customers or government officials
- Publicity expenses
- Sponsorship expenses
- Membership fee
- Training
- Securities and assets
- Confidential information or data

The Company has established the Regulations on Dining and Gifts-offering between Employees and External Suppliers and the Approval Matrix (i.e. B 類授權表) to ensure that the above benefits are in accordance with relevant laws and regulations, reasonable and have been properly approved. At the same time, the Company establishes a register to record activities involving the provision and/or acceptance of gifts, hospitality, donations, sponsorships and similar benefits (Refer to Appendix 8 Records of Gifts, Hospitality, Donations and Sponsorship), which is to be filled in by each business unit in a timely manner and submitted to the Internal Audit Services (IAS) for preservation on a quarterly basis. The Internal Audit Services (IAS) reviews the accuracy and completeness of the records on a regular basis (at least once a year).

8.7. Managing inadequacy of anti-bribery controls

After conducting the bribery risk assessment and due diligence procedures, if the Company identifies that existing anti-bribery controls are unable to manage the risk of bribery for specific transactions, engagements or third-party business partners, and the Company is unable or unwilling to take additional measures (such as changing the nature of the transaction, engagement or partnership) or to improve existing anti-bribery controls to enhance management and enable the Company to manage the relevant bribery risks, the Company will take the following measures:

- For those ongoing transactions, engagements and partnerships, take appropriate measures based on the risk and nature to terminate, suspend or cancel the transaction, engagement or partnership as soon as feasible; and
- For those transactions, engagements and partnerships that are about to be initiated, postpone or cease further development.

8.8. Whistleblowing, investigation and handling

8.8.1. Basic principle

Whistleblowing mechanism and a commitment to support whistleblowing are key elements of the Company's integrity culture, helping to uncover potential compliance violations within the Company. An effective reporting mechanism allows employees and other relevant parties to report suspected unethical or illegal activities. The Company encourages:

- Employees and external third parties reporting suspicious violations or weaknesses in the Company's anti-bribery management system;
- Anonymous reporting;
- Confidentiality throughout the reporting and case handling process;
- Integrating the whistleblowing mechanism effectively into the Company's existing internal processes to ensure that whistleblowing cases are thoroughly reviewed and followed up (if necessary);
- Prohibition of any form of retaliation against whistle-blowers (protection of whistle-blowers); and
- Providing appropriate feedback to whistle-blowers to the greatest extent possible.

The Company collects reporting through multiple channels, and the Internal Audit Services (IAS) manages all reported cases. The Company clearly and proactively communicates all reporting channels both internally and externally.

8.8.2. Whistleblowing channel

Anyone, including employees and/or third parties, can report actual and/or suspected compliance violations or weaknesses in the anti-bribery management system. The Company proactively communicates internally and externally about the clear policies and guidelines on how to report information. The Company currently provides employees with five whistleblowing channels:

- Internal Audit Services (IAS) whistleblowing hotline: 566-79208 (China) and 560-62807 (Overseas)
- E-mail: fih-hb-ias@fih-foxconn.com
- Post Office Box: located in each office plant
- Whistleblowing website address: <http://ias.efih-foxconn.com/Outside/Index.aspx>
- "Ipound 員寶" APP: [應用]專區-[線上辦理]-[內審檢舉]

Third parties can report to the Group Internal Audit Services (IAS) via email address fih-hb-ias@fih-foxconn.com or the Internal Audit Services (IAS) whistleblowing hotline 86-755-28129588 (Transfer to 62807).

Employees and third parties can also directly report to the parent company, Hon Hai Group. Typically, reports involving FIH received by the Hon Hai Group will be transferred by the Group's Central Anti-Fraud Office to the FIH Internal Audit Services (IAS) for follow-up. Whistleblowing channels of Hon Hai Group are as follows:

- Internal email: 117@foxconn.com
- External email: jubaofoxconn@gmail.com; renrenjubao@163.com;
- Hotline: +886-2-2268-3466, 560-117; 0906586086 (Taiwan); 183-1699-4246 (Mainland)
- WeChat: 18316994246 Foxconn Reporting Center
- Employee relationship hotline: 560+70807

Reports received through unofficial channels: Employees/departments within the Company who receive potential violations of the requirements of the Company's anti-bribery management system must immediately notify the Internal Audit Services (IAS) and transfer the case. Failure to comply with these requirements may result in disciplinary action.

Please refer to the FIH Whistleblowing Policy for details on how to report.

8.8.3. Investigation and handling

The Company has established the Whistleblower Form (Refer to the FIH Whistleblowing Policy for details), and the Internal Audit Services (IAS) is responsible for registering the received whistleblowing cases, and implementing procedures to investigate and deal with whistleblowing cases, including but not limited to:

- Requiring appropriate measures to be taken when investigations reveal behaviors of bribery or violations of requirements of the anti-bribery management system;
- Authorizing or approving personnel to be the investigators;
- Requesting relevant personnel to cooperate during the investigation process;
- Reporting the status and results of the investigation to the governing body and top management if necessary;
- Adhering to the principle of confidentiality; and
- Appointing a third party to conduct investigations if necessary.

For details of investigation and handling, please refer to the FIH Whistleblowing Policy.

9. Performance evaluation of anti-bribery management system

9.1. Monitoring, measurement, analysis and evaluation of anti-bribery management system

The Internal Audit Services (IAS) is responsible for coordinating the ongoing monitoring, analysis and evaluation of the design and implementation of the anti-bribery management system, and reporting to the top management when necessary. Each business unit should cooperate with the Internal Audit Services (IAS) to supervise, inspect and record the operation of the anti-bribery management system within the business unit. Under the coordination of the Internal Audit Services (IAS), each business unit is required to periodically (monthly, quarterly or other appropriate frequency) collect data in relation to operation of the anti-bribery management system, analyze and evaluate it, and ensure the system operates normally. The monitoring, analysis and evaluation of the anti-bribery management system mainly include but not limited to:

- The effectiveness of training
- The execution of financial and non-financial controls
- Whether the allocation of anti-bribery management responsibilities needs to be updated
- The timeliness and effectiveness of dealing with reported incidents
- Whether internal audits of the anti-bribery management system have been performed as planned
- Instances where the requirements of the anti-bribery management system are not fulfilled
- The achievement of anti-bribery objectives
- The promotion of an anti-bribery culture

9.2. Internal audit of anti-bribery management system

The Internal Audit Services (IAS) annually makes an audit plan in accordance with ISO 37001 standards and the Company's internal requirements and conduct at least one special audit on the design and operation of the anti-bribery management system each year. The scope of each special audit may include the entire or part of the anti-bribery management system, to assess the sufficiency and effectiveness of the system's operation. If necessary, the Company may involve a third party to assist with the audit.

Auditors performing special audits on the anti-bribery management system must be independent to prevent auditors from reviewing their own work in the anti-bribery management system. The Internal Audit Services (IAS) should report the results of the special audits to the Board and top management, and retain documents related to the special audits, including but not limited to audit programs, working papers and audit reports.

9.3. Governing body and management review

The governing body and top management should periodically (at least once a year) receive and review reporting from the Internal Audit Services (IAS) on the operation of the anti-bribery management system and provide their assessment opinions, to ensure it operates stably and effectively in accordance with the ISO 37001 standards. Relevant reports and assessment opinions should be retained as written reports or meeting minutes.

10. Continual improvement

The Internal Audit Services (IAS) is responsible for continuously improving and enhancing the anti-bribery management system annually based on the review and evaluation results of the anti-bribery management system and the assessment opinions of the governing body and top management, to ensure the effectiveness of the anti-bribery system. Each business unit is required to cooperate with the Internal Audit Services (IAS) to formulate improvement and enhancement plans, identify responsible persons and determine completion deadlines. The Internal Audit Services (IAS) is responsible for following up on the implementation and completion of the improvement plans.

Appendix

Appendix 1 Bribery Risk Interview Questionnaire Template

Bribery Risk Interview Questionnaire for 202[x]			
Name of interviewer		Name of interviewee	
Department of interviewer		Department of interviewee	
Position of interviewer		Position of interviewee	
Date of interview		Location of interview	
Question	Response of interviewee		
1. Briefly describe your job responsibilities.			
2. What are the laws and regulations in your country that are relevant to managing bribery risk? Which are the ones the Company needs to comply with?			
3. Is bribery commonly happened in your country?			
4. Does your country proactively encourage and promote an anti-bribery culture?			
5. Is there any industry practice of paying extra fees to expand and achieve the business (e.g., referral fees, benefit fees, facilitation payments, etc.)?			
6. What are the potential bribery risk indicators within the business unit? What risks may exist in relation to bribery?			
7. What are the possible bribery methods in the business unit?			
8. Does the business unit involve interactions with third parties? What types of third parties are included? How to choose a third party to cooperate with? Are these third parties assessed for bribery risk and how?			
9. Which positions are responsible for interacting with third parties? How are bribery risks assessed of employees on these positions?			
10. How to prevent possible bribery risks within the business unit?			
11. Are you aware of the Company's anti-bribery management policies?			
12. Have bribery related cases ever happened in the business unit during			

the year? The scope of the case (e.g., how many employees and third parties are involved, the amount affected, etc.)? What response has been taken?	
13. Have bribery related cases ever happened in the business unit in previous years? Frequency of occurrence? The scope of the case (e.g., how many employees and third parties are involved, the amount affected, etc.)? What response has been taken?	
14. Is there a deficiency in the current internal controls within the business unit? How to improve?	
15. What is the risk level of corruption and bribery in the Company's industry?	
16. Are there any transactions or projects with special or complex arrangements that may give rise to risks of bribery and corruption? If yes, please specify.	
17. Do you know or have you heard of instances of abuse of power for personal gain within the company or within this business unit? If yes, please specify.	
18. Are you aware of or have you heard of instances where a conflict of interest (e.g., an employee's relationship with an external third party, government institute, or official) within the Company or within the business unit has led to bribery and corruption? If yes, please specify.	
19. Is there a relationship between a government institute /official and the cooperating third party? Has the relationship been used to facilitate the Company's business?	

Appendix 2 Employee Bribery Risk Assessment Form Template

Employee Bribery Risk Assessment Process Record Form (Template)

Department under assessment			
Position under assessment			
Rank of the position under assessment			
Assessor (name, position and department)			
Date of assessment			
No	Items	Scoring criteria	Score
1	Rank of the position	<ul style="list-style-type: none"> Rank [X] and above (3 points) Rank [X] or above, below [X] (2 points) Rank [X] or above, below [X] (1 point) Rank below [X] (0 point) 	
2	Whether the achievement of job performance objectives and compensation incentives are related to a third party (such as depending on the cooperation of the third party, etc.)	<ul style="list-style-type: none"> Yes (3 points) No (0 point) 	
3	Whether the position is required to interact with government institutes/public officials	<ul style="list-style-type: none"> Required, frequent interaction in daily work (3 points) Required, but low interaction frequency (2 points) Not required (0 point) 	
4	Whether the department of the position are required to interact with government institutes/public officials	<ul style="list-style-type: none"> Required, frequent interaction in daily work (3 points) Required, but low interaction frequency (2 points) Not required (0 point) 	
5	Whether the position is required to interact with third parties (except government institutes /public officials)	<ul style="list-style-type: none"> Required, frequent interaction in daily work (e.g. procurement) (3 points) Required, but low interaction frequency (2 points) Not required (0 point) 	
6	Whether the department of the position are required to interact with third parties (except government institutes /public officials)	<ul style="list-style-type: none"> Required, frequent interaction in daily work (e.g. procurement) (3 points) Required, but low interaction frequency (2 points) Not required (0 point) 	
7	Has there been any cases regarding to bribery occurred in the department of the position in the past 5 years?	<ul style="list-style-type: none"> Yes (2 points) Not occurred (0 point) 	
Total score			

Employee bribery risk score range and corresponding risk level are as follows:

Bribery risk score range	Risk level
[XX-XX]	High
[XX-XX]	Medium
[XX-XX]	Low

List of department and positions with high and medium bribery risk levels

No	Department	Rank of position	Bribery risk level
1	Procurement Department	Purchasing personnel (X level)	High
2	Sales Department	Business specialist (X level)	Medium
3			
4			

Appendix 3 Third-Party Bribery Risk Assessment Form Template

Name of the entity			
Type of the entity		Supplier/Customer/	
Industry of the entity			
Registered address of the entity			
Assessor (Name and title)			
Date of assessment			
No	Item	Scoring criteria	Score
1	Nature of the business	<ul style="list-style-type: none"> State-owned enterprises/government institute (2 points) Non-state-owned enterprises/non-governmental institute (1 point) 	
2	Registered capital	<ul style="list-style-type: none"> Below CNY100,000 (3 points) CNY100,000 and above, below CNY1 million (2 points) CNY1 million and above, below CNY5 million (1 point) CNY5 million and above (0 point) 	
3	Number of employees	<ul style="list-style-type: none"> Below 20 (3 points) 20 and above, below 50 (2 points) 50 and above, below 500 (1 point) 500 and above (0 point) 	
4	Business operations	<ul style="list-style-type: none"> Abnormal operation status, such as cancellation, revocation, bankruptcy, reorganization, etc. (2 points) Normal operation (0 point) 	
5	Risk level of the country in which the entity operates	<ul style="list-style-type: none"> High (3 points) Medium (2 points) Low (1 point) Extremely low (0 point) 	
6	Whether the entity has business qualifications in relation to the provision of contractual services	<ul style="list-style-type: none"> None (2 points) Yes (0 point) 	
7	Channel of introduction	<ul style="list-style-type: none"> Non-public bidding or designated by the customer (3 points) Introduction through other third-party partners (2 points) Public bidding (0 point) 	
8	Contractual payment/receipt arrangements	<ul style="list-style-type: none"> Payments to or receipts from non-contracting entities (2 points) Payments to or receipts from related parties of the contracting entity (1 point) Direct payment to or receipts from the contracting entity (0 point) 	
9	Whether there are subcontracting and outsourcing in the transaction	<ul style="list-style-type: none"> Yes (2 points) No (0 point) 	

10	Whether the entity cooperates in signing commitment provisions in relation to anti-bribery	<ul style="list-style-type: none"> Refused to sign (2 points) Agreed and signed (0 point) 	
11	Whether payment/collection of fees not in relation to contractual services is required to the entity, such as benefit fees, referral fees, etc.	<ul style="list-style-type: none"> Requirement (3 points) No relevant requirement (0 point) 	
12	Significant negative news and litigation in relation to bribery	<ul style="list-style-type: none"> Yes (3 points) No (0 point) 	
Total score			

The bribery risk score range and corresponding risk level are as follows:

Bribery risk score range	Risk level
[XX-XX]	High
[XX-XX]	Medium
[XX-XX]	Low

List of the third party with high and medium bribery risk levels

No	Name of the third party	Type (Customer/Supplier)	Date of onboarding	Bribery risk score	Bribery risk level	Date of the latest due diligence
1	XX Company	[Customer]	[To be completed after evaluation]	[To be completed after evaluation]	[High]	[To be completed based on past due diligence records]
2	XX Company	[Supplier]	[To be completed after evaluation]	[To be completed after evaluation]	[Medium]	[To be completed based on past due diligence records]
3	[To be supplemented after evaluation by the Company]	[To be supplemented after evaluation by the Company]	[To be supplemented after evaluation by the Company]	[To be supplemented after evaluation by the Company]	[To be supplemented after evaluation by the Company]	[To be completed based on past due diligence records]

Appendix 4 Anti-Bribery Management Objectives of Each Department

No	Responsible department	Objectives	Review frequency	Review department
1	Internal Audit Services (IAS)	<ul style="list-style-type: none"> Number of bribery incidents identified is 0 Timely response to reported bribery cases (notify the whistle-blower of case receipt within 10 working days) Timeliness of handling bribery reports (closed within 3 months) 100% completion rate of the Company's anti-bribery management training 	Regularly (At least once a year)	Internal Audit Services (IAS)
2	Human Resources Department	<ul style="list-style-type: none"> Zero bribery among recruiters 100% completion rate of the Company's anti-bribery management training 	Regularly (At least once a year)	Internal Audit Services (IAS), Human Resources Department
3	Business Control Department	<ul style="list-style-type: none"> No unapproved business hospitality No violation of the anti-bribery policy by employees 100% completion rate of the anti-bribery management training 	Regularly (At least once a year)	Internal Audit Services (IAS)
4	Legal Department	<ul style="list-style-type: none"> No violation of the anti-bribery policy by employees 100% completion rate of the anti-bribery management training 	Regularly (At least once a year)	Internal Audit Services (IAS)
5	New Product Technology Development Department	<ul style="list-style-type: none"> No violation of the anti-bribery policy by employees 100% completion rate of the anti-bribery management training 	Regularly (At least once a year)	Internal Audit Services (IAS)
6	Procurement Department	<ul style="list-style-type: none"> Zero bribery received No violation of the anti-bribery policy by employees 100% completion rate of the anti-bribery management training 	Regularly (At least once a year)	Internal Audit Services (IAS)
7	Sales Department	<ul style="list-style-type: none"> Zero bribery given No violation of the anti-bribery policy by employees 100% completion rate of the anti-bribery management training 	Regularly (At least once a year)	Internal Audit Services (IAS)
8	Manufacturing Department	<ul style="list-style-type: none"> No violation of the anti-bribery policy by employees 	Regularly (At least once a year)	Internal Audit Services (IAS)

No	Responsible department	Objectives	Review frequency	Review department
		<ul style="list-style-type: none"> 100% completion rate of the anti-bribery management training 		
9	Manufacturing Management Department	<ul style="list-style-type: none"> No violation of the anti-bribery policy by employees 100% completion rate of the anti-bribery management training 	Regularly (At least once a year)	Internal Audit Services (IAS)
10	Factory Administration Department	<ul style="list-style-type: none"> No violation of the anti-bribery policy by employees 100% completion rate of the anti-bribery management training 	Regularly (At least once a year)	Internal Audit Services (IAS)
11	Secretariat	<ul style="list-style-type: none"> No violation of the anti-bribery policy by employees 100% completion rate of the anti-bribery management training 	Regularly (At least once a year)	Internal Audit Services (IAS)
12	Enterprise Risk Management Office	<ul style="list-style-type: none"> No violation of the anti-bribery policy by employees 100% completion rate of the anti-bribery management training 	Regularly (At least once a year)	Internal Audit Services (IAS)

Appendix 5 Anti-Bribery Statement

1. Employee's Self-discipline Convention Commitment

員工自律公約切結書

集團廠區分佈全球，為避免員工個人行為抵觸當地法令、風土民情，造成個人、家庭及公司困擾，特訂定員工自律公約如下，以期善盡約束員工個人行為，保障員工安全，讓員工眷屬放心，並維護公司紀律及形象：

具切結書人_____任職鴻海科技集團 富士康國際股份有限公司，將嚴格遵守公司規定，以確保生活安全，保證遵守公約如下：

1. 禁止涉入任何幫派組織及活動。
2. 禁止聚眾賭博或涉嫌娼、吸毒。
3. 禁止貪污、受賄及接受廠商宴請、饋贈。
4. 禁止進入不正當之聲色場所消費、娛樂。
5. 禁止發生男女不正常關係 (婚外情)。
6. 禁止參與投機 (不法) 經營或與當地非經允許的經濟或資金往來。
7. 禁止參與有違身心健康之一切不正當相關活動。
8. 長假期間留守派駐地或於駐地國派駐地以外城市休假之人員，應依規定另簽署「派駐(出差)人員安全切結書」，確保公司掌握員工動向，落實動態管理。

凡未遵守公司規定或有違本自律公約，致發生任何個人安全事件，一切後果自負，完全與公司無關，必要時公司得逕行解除當事人相關職務即刻調回台北，或立即解雇，公司不負任何責任。

為保證忠實履行本自律公約，特立切結書以為憑據

此致

鴻海科技集團 富士康國際股份有限公司

單位：_____事業群/總處 _____處 _____部 _____課

具切結書人：_____ (簽章) 身分證字號：_____ 工號：_____

時間：公元 _____ 年 _____ 月 _____ 日

家庭地址：_____

附註：1. 切結書由本人簽署後繳回人力資源總處，存入人事資料備查。

2. 集團內跨法人轉調時，本資料隨人事資料移轉至調入單位，切結書仍屬有效。

2. Employee's Integrity Self-Declaration Form



鴻海/富士康科技集團

HON HAI/FOXCONN TECHNOLOGY GROUP

CONFIDENTIAL

員工廉潔自清聲報書

參照附件2，事業處欄

本人 本人名字 (工號: 本人工號) 任職於鴻海/富士康科技集團 ("富士康") 位名稱填寫
部門。現就自清行為聲報如下：

第一條 誠信廉潔

1. 本人鄭重聲明：自任職富士康之日起，本人及親屬從未發生下列違法、違規或其他不正當行為，包括但不限於：

- (1) 本人利用職權明示或暗示交易對象與本人指定的第三方進行交易；
- (2) 本人利用職權綁定物料的品牌、規格及參數等；
- (3) 本人利用職權協助交易對象圍標、串標或取得中標資格；
- (4) 本人利用職權協助交易對象獲取富士康交易機會或競爭優勢（如偽造資質文件、提供技術指導、打壓其他同類競爭者等）；
- (5) 本人以盜竊、挪用、欺詐等方式侵佔富士康財物；
- (6) 本人縱容、包庇他人違法違規行為或為他人實施違法違規行為提供便利條件；
- (7) 本人在交易對象任職、兼職、充當顧問或掛名管理人員；
- (8) 本人以不合理的高價進行採購或低價進行銷售；
- (9) 本人或親屬參加交易對象的宴請或娛樂招待（如飯局、卡拉OK、麻將、賭博、旅遊等）；
- (10) 本人或親屬接受交易對象贈送的禮品、購物卡等（價值超過人民幣三百元）；
- (11) 本人或親屬向交易對象索取、收受或約定任何形式的佣金、分紅等好處費；
- (12) 本人或親屬向交易對象高價出售、出租或低價購買、承租房屋、汽車等物品；
- (13) 本人要求或接受交易對象以安排親友工作為名，不實際工作卻獲取薪酬；
- (14) 本人或親屬在交易對象有直接投資或間接投資，包括實際出資持股分紅、持暗股接受分紅或合作投資開辦公司；
- (15) 本人或親屬與交易對象發生資金借貸；
- (16) 本人或親屬委託交易對象理財、兌換外幣等但獲取收益明顯高於應得收益；
- (17) 本人親屬任職之公司與本人所在單位發生交易，未事先聲報並經權責主管同意；
- (18) 本人或親屬通過其他手段直接或間接向富士康的交易對象索要（或暗示）、期約或收受任何賄賂或其他不正當利益，或對交易對象主管或監督之事務有直接或間接圖利之行為。

第二條 主動自清

2.1 本人保證，若本人或親屬曾實施或正在實施上揭違法、違規或其他不正當行為的，本人將於 2018 年 7 月 1 日之前通過如下方式向富士康自清專案委員會進行自清：

- (1) 自清專案熱線：560-117
- (2) 自清專案郵箱：117@mail.foxconn.com

2.2 本人承諾，向富士康自清專案委員會進行自清時，所述內容或所提交資訊（包括但不限於涉案嫌



疑人、涉案手法、涉案時間地點等)均真實有效,決不惡意隱瞞、捏造、中傷或誣謗。

2.3 本人知悉,凡主動自清者、主動返還不正當利益者、主動挽回富士康損失者或在自清過程中有立功表現者(如交代共犯、檢舉其他違法違規行為、提供查證案件的重要線索等),富士康將視其情節給予從輕、減輕或免除處分。

2.4 本人知悉,凡逾期未予主動自清而被查實者,集團將一律移交公安、檢調單位究辦,絕不寬貸。本人及親屬不得以任何理由搪塞推責或要求富士康予以諒解。

2.5 自聲報之日起,如本人有違反上述第一條誠信廉潔行為而未主動聲報者,本人同意:1) 將所獲取之不正當利益賠償予富士康;2) 造成富士康損失時承擔賠償責任,富士康可從本人薪資及各項獎金中直接扣取賠償金;3) 富士康得拒發所有獎金及終止所有集團福利;4) 接受富士康除名(開除)處分。

第三條 其他條款

3.1 本書相關定義,除依本書另做解釋外,均按本條理解:

(1) “富士康”係指富士康科技集團,亦即鴻海科技集團,包括但不限於鴻海精密工業股份有限公司、鴻準精密工業股份有限公司、富士康國際控股有限公司、富士康工業互聯網股份有限公司及上述企業之關係企業。上述公司之關係企業範圍得以公告、季報、半年報、年報等方式隨時予以更新。

(2) “關係企業”係指直接或間接的控制其他企業或受其他企業控制;或受同一企業控制;或企業與其他企業之法定代表人或持股半數以上股東相同之任何形態的營業組織。

(3) “交易對象”指與富士康進行交易或合作之任何公司或任何營業形態之組織或個人,包括但不限於供應商、承包商、客戶、協力廠商或其它服務廠商、仲介機構、聯營合作夥伴、招募公司,且不論交易或合作是否成交。

(4) “親屬”係指配偶、父母、子女、兄弟姐妹等三等親以內親屬。

3.2 本書自本人簽署之日起生效。

此致

富士康科技集團

立書人已詳閱本承諾書之文字,同意且無任何疑義。(請立書人確認後抄寫如下)

本人填寫: 立書人已詳閱本承諾書之文字,同意且無任何疑義

聲報人: 填寫本人名字

身份證字號: 填寫本人身份證號碼

日 期: 2018年6月21日

Appendix 6 Communication Plan

No	Communicating content	Communicating timing and frequency	Target	Communicating methods	Department responsible for communication
1	Policies in relation to anti-bribery management: <ul style="list-style-type: none">Employee HandbookCode of ConductResponsibility StandardFIH Whistleblowing PolicyAnti-Bribery Management System Handbook	All employees: <ul style="list-style-type: none">At onboardingThird parties:<ul style="list-style-type: none">Before Cooperation	<ul style="list-style-type: none">All employeesThird party	All employees: <ul style="list-style-type: none">Company intranetThe Company's internal applications "Believe 相信" and "Ipound 員寶" Third parties: <ul style="list-style-type: none">Company website	All employees: <ul style="list-style-type: none">Human Resources Department Third parties: <ul style="list-style-type: none">Related business units
2	Operation of the anti-bribery management system	Once a year	<ul style="list-style-type: none">Top managementThe governing body	<ul style="list-style-type: none">Meetings, reporting	Internal Audit Services (IAS)
3	Policy and principle of anti-bribery management	Communicate periodically according to different risk levels before cooperating with third parties	Third-party partners	<ul style="list-style-type: none">Oral communicationEmail deliveryContract provisionsExecution of letter of commitment	Relevant business units
4	Integrity management and corporate governance	Once a year	Shareholders and investors	<ul style="list-style-type: none">Enterprise Risk Management, Environmental, Social and Governance Report	ESG Committee

Appendix 7 Anti-Bribery Document Control List

No	Document title	Responsible department	Version No	Release date	Approver/Department
1	Employee Handbook	Central Human Resources Department of Hon Hai Group	Version 2021	2024/6	Central Legal Office of Hon Hai Group
2	FIH Mobile global code of conduct	Human Resources Department	2023/12/6	2023/12/6	CHIH Yu Yang
3	FIH Responsibility Standards	Human Resources Department	2023/12/6	2023/12/6	CHIH Yu Yang
4	FIH Whistleblowing Policy	Internal Audit Services (IAS)	2022-003	2022/12/1	TAM Danny
5	Anti-Bribery Management System Handbook	Internal Audit Services (IAS)	1.0	2024/12/23	CHIH Yu Yang
6	Employee Expense Reimbursement Policy	Accounting Management Office of Hon Hai Group	A-2P-001	2023/10/1	Central Finance Office of Hon Hai Group
7	Approval Matrix (i.e. B 類授權表)	Business Control Department of FIH	FIH JZ No. 2024-6-28	2024/6/28	CHIH Yu Yang
8	Petty Cash and Reserve Fund Management Policy	Central Finance Office of Hon Hai Group	N/A	2012/5/4	Central Finance Office of Hon Hai Group
9	Supplier Certification Process	Central Procurement Department of Hon Hai Group	SQ-3A0-003	2018/6/13	Central Procurement Department of Hon Hai Group
10	Foxconn Supplier Requirements	Central Procurement Department of Hon Hai Group	SQ-2A0-007	2022/4/16	Central Procurement Department of Hon Hai Group
11	Regulations on Dining and Gifts-offering between Employees and External Suppliers	FIH General Management Office	GMO JZ No. 2006092001	2006/9/20	TONG Wenxin

No	Document title	Responsible department	Version No	Release date	Approver/Department
12	Records of Gifts, Hospitality, Donations and Sponsorship	Internal Audit Services (IAS)	1.0	2024/12/10	Internal Audit Services (IAS)

Appendix 8 Records of Gifts, Hospitality, Donations and Sponsorship