DELPHA CONSTRUCTION CO., LTD.

Sustainable Development Code of Conduct

Chapter I – General Provisions

Article 1. Purpose

This Code is adopted in accordance with the "Corporate Social Responsibility Best Practice Principles for TWSE/TPEx Listed Companies" to promote corporate responsibility and facilitate economic, environmental, and social progress, thereby advancing the goal of sustainable development.

Article 2. Scope of Application

This Code applies to all operational activities of the Company and its Group Entities.

While conducting business operations, the Company shall actively pursue sustainable development in line with international trends, fulfill its corporate citizenship responsibilities, contribute to national economic progress, enhance quality of life for employees, communities, and society, and foster competitive advantages grounded in sustainability.

Article 3. Stakeholder Engagement and ESG Integration

The Company shall respect stakeholder rights and incorporate environmental, social, and governance (ESG) factors into its management policies and business operations while pursuing long-term profitability.

The Company should assess ESG-related risks relevant to its business, based on materiality, and adopt appropriate risk management policies or strategies.

Article 4. Principles for Sustainable Development

The Company's implementation of sustainable development shall adhere to the following principles:

1. Fulfilling corporate governance.
2. Developing an environmentally sustainable system.
3. Safeguarding public interest.
4. Enhancing disclosure of sustainability-related information.

Article 5. Sustainability Policy and Planning

The Company shall consider global sustainability trends, the relevance to core business, and its overall operational impact on stakeholders, and accordingly develop policies, systems, and specific action plans approved by the Board of Directors.

When shareholders submit proposals related to sustainable development, the Board should consider including such matters in the agenda of shareholders' meetings.

Chapter II – Corporate Governance

Article 6. Corporate Governance Structure

The Company shall follow applicable governance frameworks, including the "Corporate Governance Best Practice Principles for TWSE/TPEx Listed Companies," "Ethical Corporate Management Principles," and the "Model Guidelines for Ethical Conduct," and establish effective governance structures and ethical standards.

Article 7. Responsibilities of the Board

Directors shall act with the duty of care of a prudent manager to promote sustainable development and continuously review and improve its implementation.

When advancing sustainability goals, the Board shall consider stakeholder interests and address the following:

1. Formulating a sustainability mission or vision and related policies or management guidelines.
2. Integrating sustainability into business operations and approving specific action plans.
3. Ensuring timely and accurate disclosure of sustainability information.

Article 8. Training and Awareness

The Company shall periodically conduct training programs on sustainable development, including topics listed under Article 7.

Article 9. Sustainability Governance and Incentives

The Company should establish a governance structure for sustainability and designate a dedicated or concurrent unit to propose, execute, and report sustainability policies and programs to the Board.

A reasonable compensation policy shall be implemented to align with strategic objectives and stakeholder interests.

Employee performance evaluations shall incorporate sustainability performance and be

supported by effective incentive and disciplinary systems.

Article 10. Stakeholder Identification and Communication

The Company shall identify its stakeholders, establish a dedicated section on its website, and maintain appropriate communication channels to understand and respond to stakeholders' expectations and material sustainability concerns.

Chapter III – Environmental Sustainability

Article 11. Environmental Protection

The Company shall comply with environmental laws and international standards, and strive to minimize environmental impact during business operations and internal management.

Article 12. Resource and Energy Efficiency

The Company shall improve energy efficiency and promote the use of environmentally friendly renewable materials to ensure sustainable use of global resources.

Article 13. Environmental Management System

In accordance with industry characteristics, the Company shall establish suitable environmental policies and systems to reduce the ecological footprint of its operations.

Article 14. Environmental Personnel and Training

The Company shall, as needed, assign dedicated personnel or departments to develop and maintain environmental management systems and conduct regular training for management and staff.

Article 15. Sustainable Operations

The Company shall consider the ecological impact of its operations and adopt sustainable practices in procurement, production, operations, and services based on the following principles:

1. Reduce resource and energy consumption.
2. Reduce pollutants, hazardous substances, and waste, and manage waste properly.
3. Improve material and product recyclability.
4. Maximize the sustainable use of renewable resources.
5. Extend product durability.
6. Increase efficiency of products and services.

Article 16. Water and Pollution Control

The Company shall manage water resources sustainably and develop related policies.

It should establish or upgrade facilities to prevent water, air, and soil pollution, and adopt best available techniques to minimize negative impacts on human health and the environment.

Article 17. Climate Change and Carbon Management

The Company shall evaluate current and future risks and opportunities related to climate change and respond accordingly.

It should perform GHG inventories based on international standards, including:

1. Direct emissions (owned or controlled sources).
2. Indirect emissions from energy use.
3. Other indirect emissions from third-party activities.

The Company should track GHG emissions, water use, and total waste, and implement policies on energy saving, carbon reduction, water conservation, and waste management, including carbon credit strategies.

Chapter IV – Social Inclusion and Public Welfare

Article 18. Respect for Human Rights

The Company shall comply with all applicable laws and adhere to international human rights conventions, including gender equality, labor rights, and anti-discrimination.

To fulfill its human rights responsibilities, the Company is encouraged to establish the following policies and procedures:

1. Adopt a corporate human rights policy or statement.
2. Assess the human rights impact of its operations and internal management, and establish corresponding procedures.
3. Regularly review the effectiveness of the human rights policy or statement.
4. Disclose grievance procedures for stakeholders in the event of human rights violations.

The Company shall follow recognized international labor standards, including:

Freedom of association and collective bargaining rights, protection of disadvantaged groups, prohibition of child labor, elimination of all forms of forced labor, elimination of discrimination in employment and occupation

The Company shall ensure that human resource policies are free from discrimination based on gender, race, social status, age, marital or family status, and shall provide equal and fair opportunities in employment, compensation, benefits, training, evaluation, and promotion.

An effective and accessible grievance mechanism shall be in place to protect labor rights, ensure transparent processes, and provide appropriate responses to employee complaints.

Article 19. Labor Rights Awareness

The Company shall provide employees with information regarding their labor rights under local laws in the jurisdictions in which it operates.

Article 20. Health and Safety

The Company shall provide a safe and healthy work environment, including necessary health and first aid facilities. It shall reduce occupational hazards and conduct regular health and safety training.

Article 21. Career Development and Compensation

The Company shall foster an environment conducive to career development and establish effective training programs.

Business performance and outcomes shall be reasonably reflected in employee compensation policies to ensure talent recruitment, retention, and motivation in support of long-term sustainability.

Article 22. Employee Communication

The Company shall establish communication mechanisms that allow employees to access information and express opinions on operational and managerial matters.

The Company shall respect the rights of employee representatives to negotiate working conditions and shall provide necessary facilities and information to facilitate cooperation.

Employees shall be reasonably informed of significant operational changes that may impact their interests.

Article 23. Fair Customer Practices

The Company shall treat clients and consumers fairly and equitably in all engagements, including contract formation, duty of care, honest advertising, product/service suitability, disclosure, performance-based compensation, complaints handling, and personnel professionalism.

Execution strategies and concrete measures shall be developed accordingly.

Article 24. Product and Marketing Ethics

The Company shall take responsibility for its products and services and prioritize marketing ethics. Procurement, production, operations, and services shall ensure the transparency and safety of product and service information to prevent harm to consumer rights, health, and safety.

Article 25. Product Quality and Labeling

The Company shall comply with relevant government regulations and industry standards to ensure product and service quality.

All marketing and labeling practices shall comply with applicable laws and international guidelines. Deceptive, misleading, fraudulent, or trust-eroding behaviors are strictly prohibited.

Article 26. Operational Risk Management and Privacy

The Company shall assess and manage risks that could disrupt operations and mitigate potential social and consumer impacts.

It shall provide effective and transparent consumer complaint mechanisms and respond fairly and promptly.

The Company shall also comply with personal data protection laws and respect consumer privacy by safeguarding personal information.

Article 27. Supply Chain Responsibility

The Company shall assess the environmental and social impact of its procurement practices on local communities and work with suppliers to implement corporate social responsibility.

Before engaging in business transactions, the Company shall assess whether suppliers have negative records on environmental or social issues to ensure alignment with its sustainability policies.

Article 28. Community Engagement

The Company shall assess the impact of its operations on local communities and prioritize the employment of local labor to enhance community integration.

Through equity investment, commercial activities, in-kind donations, volunteer service, or other professional social engagements, the Company may support social enterprises or participate in community development, education, charities, and government-related initiatives.

Chapter V – Enhancing Sustainability Information Disclosure

Article 29. Information Disclosure

The Company shall disclose relevant and reliable sustainability information in accordance with

applicable laws and the "Corporate Governance Best Practice Principles for TWSE/TPEx Listed Companies" to improve transparency.

Article 30. Sustainability Reporting

If the Company prepares a sustainability report, it shall follow internationally recognized frameworks or guidelines to disclose progress and performance in sustainable development, and should seek third-party assurance to enhance information credibility.

Chapter VI – Supplementary Provisions

Article 31. Review and Improvement

The Company shall monitor global developments in sustainability and adjust its internal sustainability systems in response to changes in the business environment to enhance effectiveness.

Article 32. Implementation

This Code shall take effect upon resolution of the Board of Directors. Any amendments shall follow the same procedure.

Article 33. Enactment and Amendment History

Originally adopted on April 15, 2021.

First amended on May 12, 2022.