

POLICY ON CONFLICT OF INTEREST

The Company shall ensure that all its transactions are fair and transparent, and do not benefit a particular group or individual at the expense of public investors or stockholders.

General Policy - Directors, officers, and employees of the Company shall promote primarily the Company's interest. No director, officer, or employee shall use his position to profit or gain some benefit or advantage for himself and/or his related interests.

1. The Company's Manual provides that a director shall have the duty to conduct fair business transactions with the Company and to ensure that personal interest does not bias Board decisions or conflict with the interests of the Company. It is provided further that the basic principle to be observed is that a director should not use his position to profit or gain some benefit or advantage for himself and/or his related interests. He should avoid situations that may compromise his impartiality. If an actual or potential conflict of interest may arise on the part of a director, he should fully and immediately disclose it and should not participate in the decision-making process. A conflict of interest shall be considered material if the director's personal or business interest is antagonistic to that of the Company, or stands to acquire or gain financial advantage at the expense of the Company.

2. The duty to avoid and disclose actual and potential conflict of interest as outlined above is also expected from other officers and employees.

3. The Risk and Audit Committee shall also determine and resolve any possible conflict of interest between the Company and/or its group and their directors, officers, and major stockholders. The Risk and Audit Committee, together with the Company's engaged External Auditor, may review and identify the related party transactions. The Company may further engage third-party institutions to evaluate the fairness of major related party transactions.