

中鼎集團反貪腐、反賄賂、反洗錢政策

CTCI Group Anti-Corruption, Anti-Bribery, and Anti-Money Laundering Policy

2025.08.14

一、目的及適用範圍 Purpose and Scope

「最值得信賴」(Most Reliable)是中鼎的品牌精神，「專業、誠信、團隊、創新」是中鼎企業文化；「信守對利害關係人的承諾」是企業文化-誠信的定義，「廉潔、承諾、誠實」是誠信的行為目標。對於貪腐和賄賂中鼎採取零容忍的方式處理，我們承諾在全球進行的營業活動，不會有任何形式的貪腐及賄賂。中鼎及國內外子公司、合資公司及其他具有實質控制能力之集團關係企業所有董事、獨立董事(或監察人)、經理人、受僱人、受任人與實質控制者，並同時延伸至供應鏈、客戶與承攬商、夥伴(客戶、社區)等利害關係人，均應知悉並遵守本集團所制定之反貪腐、反賄賂、反洗錢相關規範。

"Most Reliable" is the brand spirit of CTCI, and "Professionalism, Integrity, Teamwork, Innovation" are the corporate culture of CTCI; "Keeping commitments to stakeholders" is the definition of corporate culture – integrity; "Integrity, commitment, and honesty" are the behavioral goals of trust. We are committed to zero tolerance towards corruption and bribery in the operations of the company, and we will ensure that there will be no forms of corruption or bribery in our global commercial activities. All directors, independent directors (or supervisors), managers, employees, mandataries, and actual controllers of CTCI and its domestic and foreign subsidiaries, joint ventures, and other group-related enterprises with substantial control capabilities, as well as extending to stakeholders such as the supply chain, customers, contractors, and partners (clients, communities), shall be aware of and comply with the anti-corruption, anti-bribery, and anti-money laundering regulations established by this group.

二、政策聲明 Policy Statement

中鼎及利害關係人應恪遵之《[道德行為準則](#)》、《[中鼎集團誠信經營守則](#)》及《[中鼎集團廠商行為準則](#)》等規定，中鼎員工並應恪遵《員工手冊》之道德行為細則及《[檢舉作業管理辦法](#)》等規定、依下列行動框架，以達反貪腐反賄賂與反洗錢目的：

CTCI and its stakeholders shall strictly adhere to the company's "[Codes of Ethical Conduct](#)" "[CTCI Group Ethical Corporate Management Best Practice Principles](#)" and "[CTCI Vendor Code of Conduct](#)" among other regulations. CTCI employees are also required to strictly comply with the "Guidelines for ethical conduct" in the employee handbook and "[Accusation Management Regulations](#)," and to follow the action below to achieve the objectives of anti-corruption, anti-bribery, and anti-money laundering:

1. 禁止貪腐及賄賂 Prevention of Bribery and Corruption

中鼎及中鼎董事、獨立董事(或監察人)、經理人、受僱人、受任人與實質控制者，於執行業務時，不得直接或間接向客戶、代理商、承包商、供應商、公職人員或其他利害關係人提供、承諾、要求或收受任何形式之不正當利益，包括回扣、佣金、疏通費或透過其他途徑向客戶、代理商、承包商、供應商、公職人員或其他利害關係人提供或收受不正當利益，藉以建立商業關係或影響商業交易行為，或加速或確保行政機關為相應舉措。

When engaging in commercial activities, CTCI and the directors, independent directors, supervisors, managers, employees, mandataries, and substantial controllers, may not directly or indirectly offer, promise to offer, request, or accept any improper benefits in whatever form to or from clients, agents, contractors, suppliers, public servants, or other stakeholders. The benefits include kickbacks, commissions, facilitation fees, or any improper benefits. It's not allowed to accept or receive what mentioned above from customers, agents, contractors, suppliers, public officials, or other interested parties through other means in order to establish business relationships, influence business transaction behaviors, or expedite or ensure that administrative agencies take corresponding actions.

2. 禁止不合理禮物、款待或其他不正當利益

Prohibition of Unreasonable Presents or Hospitality, or Other Improper Benefits

中鼎及中鼎董事、獨立董事(或監察人)、經理人、受僱人、受任人與實質控制者，不得有違背或利用職務之便而直接或間接提供或接受任何不合理禮物、款待或不得要求、期約或收受賄賂等情事，或收受

與我公司存在合約關係或將可能建立合作關係之下游廠商（合約乙方）所餽贈任何金錢及物品，包括但不限於：現金、禮券、禮品、娛樂票卷、水果、食品、酒、茶、文具、旅行招待、商品折價券、會員卡、畫作等財物或私人購買物品之優惠。

CTCI and the directors, independent directors, supervisors, managers, employees, mandataries, and substantial controllers shall not directly or indirectly offer or accept any unreasonable presents, hospitality and bribes, or accept any money or goods provided by downstream vendors (Contract party B) which have contractual relationship or may establish a cooperative relationship with CTCI Group, including but not limited to cash, vouchers, gifts, entertainment tickets, fruits, food, liqueur, tea, stationeries, travel entertainment, merchandise discount coupons, membership cards, paintings and other properties or private discount of purchasing items.

3. 禁止提供非法政治獻金 **Prohibition of Illegal Political Donations**

中鼎及中鼎董事、獨立董事(或監察人)、經理人、受僱人、受任人與實質控制者，對政黨或參與政治活動之組織或個人直接或間接提供捐獻，應符合政治獻金法及集團內部相關作業程序，應公開揭露捐贈對象與金額等資訊，並不得藉以謀取商業利益或交易優勢，符合誠信經營守則，杜絕賄賂與貪腐風險，若有任何涉及作為賄賂與腐敗手段的貢獻、捐款及贊助，經調查屬實後，將依中鼎《同仁獎懲辦法》懲處。

When directly or indirectly offering a donation to political parties or organizations or individuals participating in political activities, CTCI and the directors, independent directors, supervisors, managers, employees, mandataries, and substantial controllers, shall comply with the Political Donations Act and relevant internal operational procedures, the recipients and the amount of the donations should be publicly disclosed and shall not make such donations in exchange for commercial gains or business advantages. It should be in accordance with the integrity management code and free from risks of bribery and corruption. If any contributions, donations, or sponsorships are found to be related to bribery and corruption upon investigation, they will be punished in accordance with the company's 'Employees Reward and Punishment Regulations.'

4. 禁止不當慈善捐贈或贊助 **Prohibition of Improper Charitable Donations or Sponsorship**

中鼎及中鼎董事、獨立董事(或監察人)、經理人、受僱人、受任人與實質控制者，對於慈善捐贈或贊助，應符合相關法令及內部作業程序，不得為變相行賄。若有針對慈善的捐贈或贊助應公開揭露捐贈對象與金額等資訊。

When making or offering donations and sponsorship, CTCI and the directors, independent directors, supervisors, managers, employees, mandataries and substantial controllers shall comply with relevant laws, regulations and internal operational procedures, and shall not surreptitiously engage in bribery. If there are donations or sponsorships for charity, the recipients and the amount of the donations should be publicly disclosed.

5. 反洗錢 **Anti-Money Laundering**

本集團恪守反洗錢相關法規，禁止和打擊洗錢、逃稅、違反制裁和其他犯罪活動，對於洗錢犯罪採零容忍原則，致力於強化防制洗錢各項機制，配合往來金融機構之要求，提供確認身分所需之相關文件，並提升員工防制洗錢、防舞弊的意識與警惕。

CTCI strictly abides by anti-money laundering laws and regulations, prohibits and combats money laundering, tax evasion, sanctions violations and other criminal activities. We adopt the principle of zero tolerance for money laundering crimes, and strengthen the anti-money laundering mechanism. CTCI cooperate with the financial institutions and provide relevant documents needed to confirm identity. We improve employees' concepts and vigilance in preventing money laundering and fraud

6. 禁止從事不公平競爭之行為 **Prohibition of Engaging in Unfair Competitive Practices**

本集團應依相關競爭法規從事營業活動，不得固定價格、操縱投標、限制產量與配額，或以分配顧客、供應商、營運區域或商業種類等方式，分享或分割市場。

CTCI shall engage in commercial activities in accordance with applicable competition laws and regulations, and may not fix prices, make rigged bids, establish output restrictions or quotas, or share or divide markets by allocating customers, suppliers, territories, or lines of commerce.

三、風險管理 Risk Management

本集團依循 COSO 及 ISO 31000 風險管理架構及流程，建立完善的風險管控機制(準則及程序)，並將本政策之誠信經營(包含反貪腐等)風險納入控管，採系統化風險評估工具，定期辦理風險評鑑，確保風險有效辨識、分析及評估研擬風險減輕計畫據以執行，並列管追蹤。

The company follows the COSO and ISO 31000 Risk Management framework and process, establishes a comprehensive risk control mechanism (Regulations and Procedure), We incorporate the integrity operations risk (including anti-corruption and more) into our control measures, utilize systematic risk assessment tools, and conduct regular risk evaluations to ensure effective identification, analysis, and assessment of risks, formulate risk mitigation plans based on these evaluations, and implement monitoring and tracking.

四、記錄 Record

本集團所有財務行為包括對於餽贈及交際費之核銷、會計過帳與分錄，皆應以足夠詳細之可信方式，允當表達並妥適記錄於本集團帳冊而供檢查時使用，不得以任何方式誤導事實、遺漏資訊、或竄改記錄。對任何第三方之付款，皆應以其提供之貨品或服務相關並有文件證明其商業理由。

All financial activities of CTCI, including the verification of gifts and entertainment expenses, accounting postings, and entries, must be expressed in a sufficiently detailed and credible manner, properly recorded in account books for inspection. No information should be misrepresented, omitted, or altered in any way. Payments to any third party should be made in connection with the goods or services provided by that third party, and for documented business reasons.

五、稽核與監督 Audit and Monitoring

本集團會定期進行內部與外部稽核，並透過帳簿與紀錄，持續監督所有業務行為之紀錄是否完整且正確，亦會確認是否達成適用法規與本集團內部規範文件之要求，包含本政策所建立之原則與要求。作為公司內容監督程序之一部分，上述檢查將依據針對業務流程執行所建置之原則進行，包含檢查涉及本集團資產之業務執行是否具合法性與經濟合理性；並核實初始會計文件檢查費用是否適當，確認符合本政策之要求。

CTCI conducts regular internal and external audits and continuously monitors the completeness and adequacy of all business records through the inspection of the Company's books and records, and conduct reviews on the initial accounting documents to verify that the relevant costs and fees are appropriate. The Company also conducts reviews to verify whether the requirements under the applicable regulations and our internal standard documents, including the principles and requirements established by the Policy, have been properly complied with.

六、舉報管道 Reporting Channel

為維護本集團之利益，鼓勵知情者主動舉發不法或違規事件，中鼎已建立《[檢舉作業管理辦法](#)》，明定舉報機制之目的、範圍、各單位權責與管理程序。為防止不當行為，中鼎設有內部獨立之檢舉信箱，並透過第三方公正單位建置舉報平台，公司內部同仁或外部人員如發現集團內部或合作廠商有任何不法或不當行為，即將或正在對集團造成不良影響者，均可透過相關管道以匿名或具名方式主動舉發。

To safeguard the interests of CTCI and encourage insiders to actively report illegal events or violations, CTCI has established the '[Reporting Management Regulations](#)', which clearly define the purpose, scope, responsibilities of each unit, and management procedures of the reporting mechanism. To prevent misconduct, CTCI has set up an independent internal reporting mailbox and established a reporting platform through a third-party impartial organization. Internal employees or external personnel who discover any illegal or improper behaviors within the CTCI Group or its collaborating suppliers that may cause or is currently causing adverse effects on CTCI can actively report through relevant channels, either anonymously or with their names.

舉報平台 the reporting website : <https://secure.conductwatch.com/ctci/>

檢舉信箱 the dedicated reporting email address : CTCI@conductwatch.com.tw

如為一般檢舉案件由人力資源部受理及並提出初審建議送總管理處審理。如為一般檢舉案件屬人力資源部涉案之案件由稽核室受理並提出初審建議送總管理處審理。如為董事、經理人涉案之檢舉案件由稽核室受理並提出初審建議呈報審計委員會審議。各項案件內容如符合本集團舉報範圍，將由相關單位進行調查。

General reporting cases are handled by the Human Resources Department, which makes initial recommendations to the Executive Management Office for review. If the cases involve matters of the Human Resources Department, they are handled by the Audit Department, which submits initial recommendations to the Executive Management Office for examination. Cases involving directors or managers are handled by the Audit Department and initial recommendations are reported to the Audit Committee for review. If the contents of the various cases fall within the scope of reporting for our company, they will be investigated by the relevant units.

七、訓練與宣導 Training and Promotion

依《[中鼎集團誠信經營守則](#)》第二十二條教育訓練及考核規範，本集團之董事長、總經理或高階管理階層應定期向董事、受僱人及受任人傳達誠信之重要性。本集團宜適時對董事、獨立董事(或監察人)、經理人、受僱人、受任人及實質控制者舉辦教育訓練與宣導，並邀請與集團從事商業行為之相對人參與，使其充分瞭解集團誠信經營之決心、政策、防範方案及違反不誠信行為之後果。

每年對全體同仁（包含正式、約聘及派遣）定期舉辦道德行為準則、舉報管道、反貪腐反賄賂反洗錢等相關政策訓練與宣導，持續宣示強調中鼎反貪腐、廉潔、承諾與誠實的誠信理念。針對董事及經理人每年至少一次辦理防範內線交易管理準則及反貪腐反賄賂反洗錢相關法令之訓練與宣導，對新任董事、經理人及受僱人則適時提供訓練與宣導。

According to Article 22 of "[CTCI Group Ethical Corporate Management Best Practice Principles](#),"

Training and Performance Evaluation, the chairperson, general manager, or senior management of CTCI shall communicate the importance of corporate ethics to its directors, employees, and mandataries on a regular basis. CTCI may occasionally organize training and awareness programs for directors, independent directors, supervisors, managers, employees, mandataries, and substantial controllers and invite CTCI's commercial transaction counterparties so they understand CTCI's resolve to implement ethical corporate management, the related policies, prevention programs and the consequences of committing unethical conduct.

Every year, regular training and promotion on the code of ethical conduct, reporting channels, and Anti-Corruption, Anti-Bribery, and Anti-Money Laundering Policy are held for all colleagues (including permanent, contract, and dispatched staff), continuously reaffirming the integrity principles of CTCI, which emphasize anti-corruption, integrity, commitment, and honesty. Each year, at least once, training and promotion regarding the management guidelines for preventing insider trading and the relevant laws on anti-corruption and anti-bribery should be carried out for directors and managers. Timely training and promotion should also be provided for new directors, managers, and employees.

八、違反行為的處理程序 Procedures for Handling Violations

中鼎訂有《同仁獎懲辦法》並設置「獎懲評議委員會」。凡有違反本政策規定者，經由舉報管道舉發或內部獎懲提案，召開獎懲評議委員會議審議。依據獎懲決議，進行內部公告及後續懲處作業。如有損及公司權益之情事，則不排除依循法律程序，以維護本集團之權益。

CTCI has established the 'Employees Reward and Punishment Regulations' and set up a 'Reward and Punishment Committee'. Anyone who violates the provisions of this policy will be reported through the Reporting channel or through internal reward and punishment proposals, and the Reward and Punishment Review Committee will convene for examination. Based on the resolution of the rewards and punishments, internal announcements and subsequent disciplinary actions will be carried out. If there are circumstances that harm the company's interests, we reserve the right to pursue legal procedures to protect our company's interests.

九、違反政策的糾正或紀律處分 Corrective or Disciplinary Actions for Violating Policies

中鼎依《同仁獎懲辦法》，同仁如有違反相關政策或紀律者，經查證屬實，將依該規範進行懲處。懲處分為口頭申誡、書面申誡、記過及記大過等四種方式。懲處程度可審酌當事人行為動機、目的、手段、行為時所受之刺激、行為人之生活狀況、品行、行為造成之影響、損害及行為後態度等因素加重或減輕，最嚴重者，中鼎得不經預告，逕予記大過二次解僱，寄發解僱存證信函且不發給資遣費。有任何懲處案例發生，將於內部公告懲處結果及再次宣導相關政策規範。

CTCI follows the 'Employee Rewards and Penalties Regulations'. If an employee violates relevant policies or discipline, which is verified to be true, punishment will be carried out according to these regulations. There are four ways of punishment. Including Oral Censure, Paper Censure, Minor Demerit, and Major Demerit. The adjustment of the weight of punishment given shall depend on the motive of the wrong doer, the purpose of such behaviors, the kind of simulations at the time of wrong doing, the means adopted, and living condition of the person, the ethical conduct of the person, the influence and damage cause by the wrong doing, and the attitudes of the wrongdoers in the aftermath. Any cases of punishment that occur will be announced internally along with the results of the punishment, and related policy regulations will be promoted again.

十、保護機制 Protective Measures

本集團承諾對報復採取零容忍政策，檢舉人在舉報任何不當行為或不合規問題後，將受到保護，免遭報復或任何不利待遇，對舉報任何不當行為或不合規問題之檢舉人進行報復的情況下，將採取法律制裁處理。本集團將保護檢舉人，不因檢舉之案件而對檢舉人予以解雇、降職、減薪、損害其法令、契約或習慣上應享有之權益或其他不利處份。惟本集團同仁如有明顯虛報或惡意不實檢舉之情事者，則不受此保護。

CTCI is committed to zero tolerance policy against retaliation. Reporting person will be protected from retaliation or any adverse treatment after reporting any misconduct or non-compliance issues. Cases of retaliation against reporting person for reporting any misconduct or compliance issues, legal sanctions will be imposed. Our company will protect reporting person and will not terminate, demote, reduce the salary of, or harm the legal rights, contractual rights, or customary benefits of reporting person based on the cases reported, nor will they face any other adverse actions. However, if any employees of our company are found to have fabricated or maliciously made false reports, they will not be afforded this protection.

十一、核准與實施 Approval and Implementation

本政策之行動準則《道德行為準則》、《中鼎集團誠信經營守則》為經董事會通過施行，其餘規範經授權核決層級核准實施。

The action guidelines of this policy, namely the 'Codes of Ethical Conduct' and the 'CTCI Group Ethical Corporate Management Best Practice Principles' are implemented upon approval by the Board of Directors, while other regulations are authorized and approved at the designated levels.