

## Antitrust Policy

The policy is to define the guidelines and the principles of antitrust and competition law compliance for all NTC employees, especially for those High-Risk Employees who might encounter NTC's competitors, distributors, customers, or suppliers, or who might be involved in trade association activities, to prevent violations of the law, to discourage employees from engaging in inappropriate or unnecessarily risky activities, and to enhance employees' awareness and understanding of antitrust and competition law requirements. In addition, this Procedure also provides NTC with the opportunity promptly to discover potential violations of the laws and timely apply for leniency to eliminate or reduce investigation or litigation expenses. Proper antitrust and competition law compliance may also improve NTC's image and bring the company more employees or customers.

### 1. Corporate Culture

- Report to the BoD on the status of NTC's antitrust and competition law compliance and the material antitrust litigations or claims in which NTC is involved, if any.
- Promote the concepts and the importance of antitrust and competition law compliance through all-hands meeting or other public events.
- Survey changes in antitrust and competition law regulations and other important legal developments and provide updates to employees from time to time.

### 2. Training Program

- Schedule an annual training plan for employees to provide them with knowledge of antitrust and competition law compliance.
- From time to time, host seminars or other training programs to promote and enhance employees' understanding of the concepts of antitrust and competition law, depending on developments in the relevant regulations/laws and other factors.

### 3. No contacts

- Avoid any unnecessary contact with competitors.
- Not participate in any discussion of NTC's or competitors' prices, costs, capacity,

output, customers, markets, or any other competitively sensitive information.

- Walk away, if a competitor initiates a discussion of competitively sensitive information.
- Not participate in trade association activities without approval.

#### 4. Report

If an employee becomes aware of a possible violation of antitrust or competition law, the employees shall record and report the incident.

#### 5. Consultation

Employees shall immediately direct all questions about business conducts or practices which they have antitrust or competition law concerns.

#### 6. Auditing & Monitoring

Monitor and/or conduct an audit of activities of any employees for antitrust or competition law compliance purpose from time to time.

#### 7. Awards & Punishments

Establish and announce various rewards and punishments to encourage employees to be attentive to antitrust and competition law compliance.