



Trinity Securities Co., Ltd. (the “Company”) recognizes the importance of the Investment Governance Code (I Code), with a strong emphasis on the best interests of investors. Accordingly, the Company has established an Investment Governance Policy that focuses on cultivating and promoting an investment culture grounded in sound governance principles. This policy serves as a framework for employees to follow and act in accordance with the Company’s governance standards. At the Board of Directors’ Meeting No. 2/2025 held on February 27, 2025, the Board reviewed and approved the revision of the Investment Governance Policy as outlined below.

The Investment Governance Policy (I Code Policy) encompasses the following principles:

Principle 1: Investment Governance Structure

1. The Board of Directors approves the Investment Governance Policy and assigns the Private Fund Management Committee to implement the policy and report the implementation results to the Board of Directors.
2. The Board of Directors shall review the policy at least once a year, when there is a significant change, or in the event of a material event.
3. The Company requires the Private Fund Management Committee to implement processes that ensure responsible execution of duties, effective investment decision-making and monitoring, as well as active engagement with investee companies to ensure that they conduct their business with good corporate governance and responsibility towards society and the environment (ESG).
4. To ensure that investment management is conducted in the best interests of clients, the Private Fund Management Committee has established the following measures:
 - 4.1 Apply the Investment Governance Policy to all types of assets and across all regions where private funds are currently permitted to invest.
 - 4.2 Incorporate considerations of corporate responsibility factors—including economic, social, environmental, and good governance aspects of the investee companies into the investment decision-making process.
 - 4.3 Prevent corruption and bribery in investee companies by adhering to applicable legal requirements and industry standards.
 - 4.4 Manage the use of material non-public information related to price-sensitive changes of investee companies and prevent unfair trading practices and money laundering activities.



5. The company establishes communication and dissemination of an investment culture grounded in good governance, including the publication of the Investment Governance Policy, to ensure that all parties involved in the investment process, both internal and external to the company, are informed.
6. The company shall oversee any appointed investment management service providers (Outsource), if any, to ensure that they perform their assigned duties in accordance with the Investment Governance Policy.

Principle 2: There shall be adequate prevention and management of conflicts of interest to ensure the best interests of clients.

1. The company establishes written guidelines for managing conflicts of interest, which are included in the Compliance Manual under the Treasury Operations section.
2. The company implements systems, measures, and practices to prevent and manage conflicts of interest, including mechanisms for whistleblowing and disciplinary actions.
3. The company communicates these policies to relevant employees and sets measures to monitor, control, and review the appropriateness of such practices.
4. The company ensures communication with related service providers to disclose any potential conflicts of interest arising from the services provided and implements adequate measures to manage those conflicts.

Principle 3: Make decisions and closely monitor investee companies actively and in a timely manner

1. The company establishes a process to regularly monitor the operations of investee companies to stay informed about their performance and to identify issues early and promptly.
2. The company sets factors for evaluating investee companies, considering their sustainability aspects such as good corporate governance, social responsibility, and environmental factors.
3. The company ensures continuous monitoring of investee companies to maintain ongoing oversight of the investments.
4. If it is found that an investee company does not comply with good corporate governance principles, or there are concerns related to social responsibility, environmental issues, or warning signs that could affect the investment value, the company will consider appropriate actions based on the specific circumstances of each case.



Principle 4: Enhance the level of monitoring of investee companies when the monitoring under Principle 3 is deemed insufficient

1. The company establishes guidelines specifying events and approaches necessary to take further action with investee companies if regular monitoring is insufficient, allowing early involvement in problem resolution and investment value recovery.
2. The company identifies key issues related to events that warrant additional action with investee companies, including:
 - 2.1 Strategy, performance, and risk management
 - 2.2 Confidence in management's adherence to good corporate governance principles
 - 2.3 Social and environmental responsibility
3. The company stipulates that negotiations with investee companies can be conducted confidentially (without public disclosure) and prepares clear action plans to address cases where necessary corrective actions persist, but negotiations have not yet succeeded.
4. The company intensifies measures necessary and appropriate to address issues.
5. In cases where the company becomes aware of information that may impact share prices and has not been publicly disclosed, it ensures compliance with policies and procedures for handling insider information as prescribed in the company's policy and by law.

Principle 5: Disclosure of Voting Policy and Voting Results

1. The company established a policy on exercising voting rights at shareholders' meetings, specifying important matters subject to voting, issues where voting is withheld, decision-making processes to support or oppose, the number or proportion of shares for which voting rights will not be exercised, and cases of dissent or abstention.
2. The company reports the voting results to clients, including details of how voting rights were exercised, at least once a year.
3. The company discloses cases where proxy voting is assigned to others, specifying the type of service used, the name of the service provider, and compliance with information regarding voting according to recommendations (if any).

Principle 6: Collaboration with Other Investors and Stakeholders as Appropriate

1. The company establishes and discloses a policy on collaborating with other investors and stakeholders to encourage the invested companies to recognize the importance of the company's concerns. The policy specifies the types of situations in which collaboration with other investors will occur and the readiness to work with both formal and informal groups of investors.



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2. The company exercises caution and complies with relevant laws in cases where collaboration with a company in distress involves reaching an agreement to jointly manage the business.

Principle 7: Disclosure of Investment Governance and Policy Compliance to Clients on a Regular Basis

1. The company establishes a system for properly maintaining records of compliance with the investment governance policy and implements mechanisms to ensure that the information disclosed to clients is accurate, not misleading, and credible, demonstrating that the company performs its duties responsibly for the best interests of clients.
2. The company discloses the investment governance policy and reports on compliance results to clients through the company's website.