

Procedures for Insider Trading Prevention Management (Translation)

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Article 1 : Purpose

For the purpose of avoiding situations in which the Company or insiders inadvertently or intentionally violate insider trading regulations and result in litigation or cause reputational damage to the Company or insiders, This Procedures for Insider Trading Prevention Management ("the Procedures") is established to prevent insider trading, protect investors, and safeguard the interests of the Company.

Article 2 : Scope

The rules in the Procedures shall apply to the Company's insider trading prevention management operations; unless another law provides otherwise, the provisions of such law shall prevail.

Article 3 : Definition

A. Insiders:

In accordance with the provisions relating to the Company's insiders in the Securities and Exchange Act, those include in the Company's directors, managerial officers, and shareholders holding more than ten percent of the Company's shares. The related parties of insiders include:

1. Insiders' spouse, minor children and shares held under the names of other parties.

Representative of the juristic person director, the aforesaid representative's spouse, minor children and shares held under the names of other parties.

B. Regulated persons under the Procedures:

Other than the insiders mentioned in the preceding subparagraph, persons that have access to inside information owing to their occupations or control relationships, as well as persons that know about the information from the insiders.

Article 4 : Accountability

- A. The Chairman Office is responsible for the drafting and maintenance of the Procedures.
- B. The Company's spokesperson is responsible for announcing the Company's material information to the public.

Article 5 : Procedures

A. Pursuant to Paragraph 1, Article 157-1 of the Securities and Exchange Act, the following persons shall be governed in the scope of insider trading regulations:

1. The Company's directors, managerial officers, and natural persons designated to exercise powers as representatives pursuant to Paragraph 1, Article 27 of the Company Act.
2. Shareholders holding more than ten percent of the Company's shares.
3. A person who has learned information by reason of an occupational or controlling relationship.
4. A person who, though no longer among those listed in one of the preceding three subparagraphs, has only lost such status within the last six months.
5. Any person who has learned the information from any of the persons named in the Preceding four subparagraphs.

Pursuant to Article 22-2 of the Securities and Exchange Act, the calculation of shares held by directors, managerial officers, and shareholders holding more than ten percent of the Company's shares shall include shares held by their spouses and minor children and those held under the names of other parties.

B. Insider Trading:

Any persons defined in preceding articles violate regulations of Article 157-1 paragraph 1 and paragraph 2 of the Securities and Exchange Act considered to be insider trading, the regulations are as follows:

1. Upon actually knowing of any information that will have a material impact on the price of the securities of the issuing company, after the information is precise, and prior to the public disclosure of such information or within 18 hours after its public disclosure, the persons listed in the preceding paragraph shall not purchase or sell, in the person's own name or in the name of another, shares of the company that are listed on an exchange or an over-the-counter market, or any other equity-type security of the company.
2. Upon actually knowing of any information that will have a material impact on the ability of the issuing company to pay principal or interest, after the information is precise, and prior to the public disclosure of such information or within 18 hours after its public disclosure, the persons listed in the preceding paragraph shall not sell, in the person's own name or in the name of another, the non-equity-type corporate bonds of such company that are listed on an exchange or an over-the-counter market.

C. Pursuant to Paragraph 5, Article 157-1 of the Securities and Exchange Act, the information that have a material impact on the price of the securities of the Company includes:

1. The Company's financial or operational status that have a material impact on its stock price or on the investment decisions of a reasonably prudent investor.

2. The demand and supply as well as tender offer of those securities that have a material impact on its price or on the investment decisions of a reasonably prudent investor.

D. Pursuant to Regulations Governing the Scope of Material Information and the Means of its Public Disclosure Under Article 157-1, ways of material information disclosure are as following:

1. Material information related to the Company's financial or operational status by means of entering such information into the Market Observation Post System.
2. Material information related to market demand and supply by means of entering such information into the Market Observation Post System, public announcement of the information on the TWSE/TPEX Market Information System website, Coverage of the information by two or more daily national newspapers on non-local news pages, and by Coverage of national television news or electronic newspapers issued by any the aforesaid media.

E. Handling Procedures for Material Information:

1. The handling and disclosure of material inside information shall comply with applicable laws and regulations, the rules and regulations of the TWSE or the TPEX.
2. This Company's directors, managerial officers, and employees shall exercise the due care and fiduciary duty of a good administrator and act in good faith when performing their duties, and shall sign confidentiality agreements. Directors, managerial officers and employees who have access to material inside information shall not disclose any information to others. Directors, managerial officers, or employees of the Company may not inquire or collect any non-public material inside information not related to their individual duties from a person with knowledge of such information, nor may they disclose to others any non-public material inside information of this Company of which they become aware for reasons other than the performance of their duties.
3. Proper protection of confidentiality shall be given to files and documents containing the Company's material inside information when transmitted in written form. When transmitted by e-mail or other electronic means, such files and documents must be processed with appropriate security technology such as encryption or electronic signatures. Files and documents containing the Company's material inside information shall be backed up and stored in a secure location. The Company shall adopt adequate control measures for the firewalls and perform periodic testing.
4. Entities or persons outside of the Company that involve in the Company's merger or acquisition, major memorandum of understanding, strategic alliance, other business partnership plans, or the signing important contract shall be required to sign a confidentiality agreement, and may not disclose any material inside information to others.

5. The Company shall comply with the following principles when making external disclosures of material inside information:
 - (1). The information disclosed shall be accurate, complete, and timely.
 - (2). The information disclosed shall have a well-founded basis.
 - (3). The information shall be fairly disclosed.
6. Any disclosure of the Company's material inside information, except as otherwise provided by laws or regulations, shall be made by the Company's spokesperson, or deputy spokesperson in a confirmed sequential order. When necessary, the disclosure may be made directly by a responsible person of the Company. The Company's spokesperson or deputy spokesperson shall communicate to outside parties only information within the scope authorized by the Company, and no personnel of the Company other than those serving as the Company's responsible person, spokesperson, or deputy spokesperson may disclose any material inside information of the Company to outside parties without authorization.
7. The Company shall keep records of the following in respect of any disclosure of information to outside parties:
 - (1) The person who discloses the information, the date, and the time.
 - (2) Means of disclosure.
 - (3) The content of disclosure.
 - (4) The content of written material delivered.
 - (5) Any other relevant information.
8. When reported information in the media is inconsistent with the Company's Information disclosure, the Company shall promptly make clarification on the Market Observation Post System (MOPS) and request the media to correct the information.
9. Any director, managerial officer, or employee of the Company that becomes aware of any unauthorized disclosure of the Company's material inside information shall report to the responsible unit and the internal audit department the Company as soon as possible. Upon receipt of aforesaid report, the responsible unit shall formulate corresponding measures and invite members from the internal audit and other departments to meet for discussion of the measures when necessary, and shall keep a record of the results of the measures for future reference. The internal auditors shall also perform such audits as their duties may require.
10. The Company shall take measures to discover those responsible and take appropriate legal action against any personnel under either of the following circumstances:
 - (1) Any person of the Company discloses material inside information to the public without authorization, or violates the Procedures or any other applicable laws or regulations.

- (2) The content disclosed by the Company's spokesperson or deputy spokesperson exceeding the scope authorized thereto, or in violation of the Procedures or any other applicable laws or regulations.
- (3) Persons outside the Company disclose any material inside information of the Company, thereby causing property or interests damage to the Company, the Company shall pursue appropriate measures to hold the persons legally accountable.

Article 6 : Training

The Company shall provide training course with respect to the Procedures and related laws and regulations among directors, managerial officers, shareholders holding more than ten percent of the Company's shares and employees to promote awareness at least once a year.

The Company shall also provide training course to new director in a timely manner.

Article 7 : Files of Insiders

The Company shall establish and maintain files that contain insiders' information and report to the competent authority in accordance with required period and manner.

Article 8 : The blackout periods

The blackout periods begin at 30 days before publication of the annual or 15 days before quarterly financial statements and end on the day of publication of the financial results. The Company's Directors shall not trade during blackout periods.

Article 9 :

The Procedures shall be implemented upon its adoption at the Board of Directors meeting. The implementation of amendments shall follow the same procedures herein.