

Prevention and Management of Insider Trading

In order to prevent the Company's personnel from violating the regulations related to insider trading, the Company's Board of Directors has formulated the "Management Procedure for Insider Trading" as a basis for compliance by the Company's directors, managers, and those who are subject to insider trading regulations. In addition, in order to establish a sound internal mechanism for handling and disclosing material information of the Company to avoid improper disclosure of information and to prevent insider trading, the Company has established the "Procedures for Handling Material Internal Information" and the "Procedures for Company Spokespersons and Deputy Spokespersons". The above rules and regulations are publicized and posted on the Company's internal website for compliance by the employees.

Implementation Status

1. Year 2021

- 1.1 The Company launched, "Understanding Insider Trading", 1 hour online course with 93 designated participants (with 100% target audience participation rate).
- 1.2 On March 17, June 9, August 27, and December 6, the Company sent email reminder to its managers who are subject to insider trading regulation (the "Insiders") to improve awareness of its prohibition against insider trading and the prevention of conflicts of interest, requesting all Insiders to strictly comply with the prohibition of insider trading under Article 157-1 of the Securities and Exchange Act, as well as with the relevant internal rules and regulations of the Company.
- 1.3 On August 18 and September 3, the Company provided its Insiders with written case studies on insider trading.
- 1.4 On August 10, in response to the letter from the Taiwan Stock Exchange, the Company provided written guidance to its Insiders on the "Procedures and Guidance Notes for Changes in Insider Ownership" and the "Common Situations in which Reporting of Changes in Insider Ownership Violates the Securities and Exchange Act".
- 1.5 On December 22, the Company provided its Insiders with the "Q&A Manual on Insider Trading in Listed Companies".

2. Year 2022

- 2.1 The Company amended the "Management Procedure for Insider Trading" by adding the requirement that directors are prohibited from trading the Company's shares during the blackout period.
- 2.2 The Company amended the "Procedures for Handling Material Internal Information" by adding the evaluation process and criteria for the disclosure of material information to ensure the timeliness, accuracy, and completeness of the release of material information.
- 2.3 The Company launched, "Introduction to of TSRC Management Procedure for Insider Trading", 0.5 hour online course and quiz with 221 designated participants (100% target audience participation rate).
- 2.4 On January 24, March 15, May 27, August 16, October 25, and December 2, the Company sent email reminder to its Insiders to improve awareness of its prohibition against insider trading and the prevention of conflicts of interest, requesting all relevant persons to strictly comply with the prohibition of insider trading under Article 157-1 of the Securities and Exchange Act, as well as with the relevant internal rules and regulations of the Company.
- 2.5 On July 1 and October 3, the Company sent email reminder to all directors informing the prohibition of insider trading and the prohibition of trading the Company's shares during blackout periods.
- 2.6 On March 17 and June 24, the Company provided its Insiders with written case studies on insider trading and short-swing trading.
- 2.7 On January 17, April 13, and July 22, in response to the letter from the Taiwan Stock Exchange, the Company provided written guidance to its insiders on the "Common Situations in which Reporting of Changes in Insider Ownership Violates the Securities and Exchange Act".
- 2.8 On July 1, the Company provided written guidance to managers who were promoted in that year and signed the relevant managers' declarations.