



# 晶豪科技股份有限公司

Elite Semiconductor Microelectronics Technology Inc.

## Prevention of Insider Trading

1. The Company is a listed company. The disclosure of any material information that would impact shareholders' rights and share prices is strictly limited by law.
2. Material information is defined in Article 4 of Taiwan Stock Exchange Corporation Procedures for Verification and Disclosure of Material Information of Companies with Listed Securities.
3. Any disclosure of the Company's material internal information, except as otherwise provided by law or regulation, shall be made by spokesperson, or by a deputy spokesperson. Any personnel of the Company, unless otherwise authorized, is not allowed to disclose material information.
4. Personnel of the Company who have actual knowledge of material information are prohibited from dealing in the Company's securities/shares on their own or in the name of others, either before or within 18 hours after the information is not officially public or officially public. Persons who, not because of their position, are indirectly informed of material information that is not yet disclosed are also bound by relevant regulations.
5. Personnel is not allowed to inquire about or collect the Company's material information that is not related to individual duties.
6. The personnel of the Company are obligated to keep confidential to the business secrets and material undisclosed information of the Company. They shall perform their duties under the principles of honesty and integrity with the care of a good administrator, and shall not disclose to irrelevant personnel any material information concerning the business secrets and undisclosed information of the Company that is known to them due to their duties.
7. Any organization or person outside of the Company that is involved in any corporate action of the Company relating to an investment, merger or acquisition, procurement, strategic alliance, or the signing of a major contract or legal document shall be required to sign a confidentiality agreement, and may not disclose to another party any business secret and undisclosed material information of the Company.
8. Any personnel of the Company shall not discuss any topic involving the Company in the investment or share related social media or online platforms.
9. If there is any doubt as to whether certain conduct has breached laws related to insider trading, or whether any business secrets or undisclosed material information is disclosed, please ask the Legal and Intellectual Property Right Department or the Audit Department for assistance.
10. The Company's director shall be prohibited from trading its shares during the closed period of 30 days prior to the publication of the annual financial reports and 15 days prior to the publication of the quarterly financial reports.

In the 18th meeting of the 8th term of the Board of Directors on February 25, 2022, the Company promoted the prevention of insider trading regulations and provided explanations of relevant issues regarding the aforementioned item 10 "The Company's director shall be

prohibited from trading its shares during the closed period of 30 days prior to the publication of the annual financial reports and 15 days prior to the publication of the quarterly financial reports." Before the closed periods for the announcement of the various 2022 financial reports (including 30 days prior to the publication of the 2021 financial reports and 15 days prior to the publication of various 2022 quarterly financial reports), the Company shall notify the directors in advance the announcement dates of the financial reports to strengthen the promotion and remind the directors of the relevant regulations prohibiting them from trading stocks during the closed periods. There were no situations that directors traded their stocks during the closed period before the announcement of the financial statements in 2023.

According to the Regulations Governing Establishment of Internal Control Systems by Public Companies, the Company has formulated Prevention of Insider Trading Management Rules under the internal control system. Educational training is conducted every year as required. The Company completed the educational training featuring the prevention of insider trading through online learning in December 2023. A total of 550 people completed the training, with the achievement rate reaching 96.32%. For employees who haven't completed the training will be tracked closely in the education program in the following year.