

Implementation of Measures for Preventing Insider Trading

The Company has enacted "Regulations on Insider Trading" which clearly states that the directors, supervisors, managerial officers, and employees of the Company, the professional consultants designated by the Company, and any person who has learned of the information from any of them (regardless of whether or not the person is informed of in writing due to these Regulations, and regardless of whether or not the person has signed a written undertaking of confidentiality), shall fulfill their fiduciary duties of care and duties of loyalty to promote the best interests of the company. In accordance with relevant laws and regulations of the company, they must abide by their confidentiality obligations and strictly comply with Article 157-1 of the Securities and Exchange Act and related laws, prohibiting insider trading. Anyone who violates these obligations shall bear civil and criminal liability under the law. This internal regulation has been announced on the company's website.

The Company revised ""Regulations on Insider Trading" on November 3, 2022. This internal regulation clearly states that directors, supervisors (if any), managerial officers shall not purchase or sell shares or any other equity-type security of the Company from 30 days prior to the publication of annual financial report or 15 days prior to the publication of quarterly financial report until the insider trading restriction has been lifted pursuant to applicable laws. Other employee who acquires knowledge of the Company's financial report shall strictly comply with the preceding paragraph.

Implementation Status:

1. The Company periodically conducts internal training on insider trading and internal equity-related laws and precautions for directors and management team. For newly appointed directors, supervisors, and executives, education and training are arranged within three months of taking office.
2. Newly hired employees receive internal training on the Company's code of ethics, management policies, and regulations from the HR department upon reporting for duty. In addition, all policies are announced and disclosed on the Company's internal and external websites for employees to follow.
3. On August 18th, 2022, the Company provided related training to current directors and managerial officers. The course content included equity-related regulations (including short-term trading), false financial reporting, insider trading, recent revisions to corporate governance regulations, and course briefings for reference.
4. On November 3rd, 2022, the Company held a "Insider Trading Prevention Training Course" providing relevant education to current directors and managerial officers.

The course particularly reminded them not to trade their stocks during the thirty days before the annual financial report announcement and the fifteen days before each quarterly financial report announcement.

5. On November 3rd, 2022, the Company passed an amendment, so will notify the directors and managerial officers in advance not to trade the Company's stocks thirty days before the annual financial report announcement and fifteen days before each quarterly financial report announcement for preventing directors from violation of these internal rules by mistake.
6. Starting from November 2022, the Company has planned an online education and training course for preventing insider trading within the group and will introduce an online education system in 2023, gradually requiring all employees to take online education courses.