

Disclosure and handling of major internal information and prevention of insider transaction management operation procedures

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Article 1 Purpose

To establish the company's good internal major information processing and disclosure mechanism to avoid information

When leaking, ensure the consistency and accuracy of the information published by the company to the outside world, and strengthen the internal

For the prevention of online transactions, this operating procedure is specially formulated to follow.

Article 2 The internal major information processing shall be carried out in accordance with laws and regulations and this operating procedure

The company's internal major information processing and disclosure should be in accordance with relevant laws, orders and Taiwan

The regulations of the stock exchange and this operation procedure shall be applied.

Article 3 Applicable objects

This operation procedure applies to the company's directors, managers and employees.

Any other person who complies with the first paragraph of Article 157, Article 1 of the Securities Exchange Law and who actually knows the company's internal material information shall urge the company to abide by the relevant provisions of this operating procedure.

Article 4 Coverage of major internal information

The scope of internal material information referred to in this procedure is as follows:

1. According to the major news items listed in the "Regulations on the Management of the Scope of the Major Information and the Methods of Disclosure of Items 5 and 6 of Article 157 of the Securities Trading Law".
2. According to the major information items listed in the "Taiwan Stock Exchange Co., Ltd. Verification and Public Handling Procedures for Major Information of Listed Securities Companies".
3. The "Article 36 of the Securities Exchange Law" authorizes the competent authority to formulate matters that should be announced or declared by the relevant sub-laws.



Article 5 Settlement period of internal major news

When the personnel who are regulated in Article 3 of this operating procedure actually know the internal material news mentioned in the first paragraph of Article 4 of the Company, after the information is clear, before the disclosure or within 18 hours after the disclosure, the company shall not Stocks or other marketable securities with equity and non-equity corporate bonds are bought or sold on their own or in the name of others.

Article 5-1 Transaction Control Measures Before Announcement of Financial Report

The company's chairman's office will notify the directors of the expected announcement date of the annual or quarterly financial report, reminding the directors not to trade the company's stocks during the closed period of 30 days before the announcement of the annual financial report and 15 days before the announcement of the quarterly financial report. If there is any change in the date, the directors will also be notified.

The so-called announcement date in the preceding paragraph includes the date when the financial report is submitted to the board of directors or the date when the major information is released by the resolution of the board of directors (Article 4, Item 1, Article 31 Subsection), the date of uploading the e-book of the financial report, and the date of the declaration of the extensible business report language file format.

Article 6 Responsible unit for handling internal major information

The company's special unit for handling internal major information is composed of the chairman's office and the corporate speaker.

The office and the accounting office are composed of the following functions and powers:

CEO office:

1. Responsible for preparing and revising the draft of the operating procedures.
2. Responsible for all documents, files and electronic records related to this operation procedure preservation.
3. Provide the latest laws and advocacy information to directors and managers, and provide legal publicity information on the company's internal website.
4. Responsible for accepting, deliberating and providing advice on major internal information processing operations and consultations related to the operating procedures.
5. Responsible for public announcement and declaration business and review of materials.



6. Establish and maintain information files of insiders and shareholders holding more than 10% of the shares.

Corporate speaker:

1. Responsible for the verification of the declared materials.
2. Public speaking.

Accounting Office:

1. Responsible for accepting inquiries related to internal major information processing operations and related to this operating procedure

Inquire, review and provide suggestions.

2. Responsible for the announcement and reporting business and the review of the materials.
3. Establish and maintain information files of insiders and shareholders holding more than 10% of the shares.
4. Provide legal information on the company's internal website.

Article 7 Assessment and Approval Procedures

When the company releases important information, it should be handled in accordance with relevant laws, orders, "Taiwan Stock Exchange Co., Ltd.'s verification and public handling procedures for material information of listed companies with securities", related question and answer sets, and this operating procedure to ensure timely information. correctness, correctness and completeness.

Major decisions made by the company or major events occur in line with the provisions of "Taiwan Stock Exchange Co., Ltd.'s verification and public handling procedures for major information of listed companies with securities". After being signed by the supervisor of the unit, the application form for uploading data will be sent to the company's major information department for review and review, and then sent to the company's spokesperson for review (but the clarification of the media needs to be approved by the executive director), and it must be released before the time limit stipulated by the law. Make big announcements.

Article 8 Confidential firewall operations-management of personnel

The directors, managers and employees of the company should pay attention and loyalty to the kind managers

Obligations, the principle of good faith to perform business, managers and employees should sign "Sunplus Affiliate Enterprise Confidentiality Agreement ", for the company 's undisclosed internal

For employees of Big Information, the company may additionally request to sign a confidentiality agreement; another director



A confidentiality agreement should also be signed when taking office.
Directors, managers and employees who are aware of material information within the company shall not disclose
The internally significant information known to others.

The directors, managers and employees of the company shall not be
The information person inquires or collects the company's undisclosed internal material information that is not related to the individual's position.
For non-disclosure of material internal information that is not known to the company due to the execution of the business
People leaked.

Article 9 Confidential firewall operations-management of documents and information

The company's internal major information archives and documents should be properly protected when they are delivered in writing. Electricity
When sending e-mails or other electronic means, appropriate encryption or electronic signatures and other security technologies must be used.
The archives and documents of important information within the company should be backed up and kept in a safe place.

Article 10 Operation of the confidential firewall

The company shall ensure the establishment of the firewall specified in the previous two articles and take the following measures:

1. Adopting proper firewall management and control measures and regularly testing.
2. Strengthen the storage and confidentiality measures of the company's undisclosed internal major information archives.

Article 11 Confidential operations by external agencies or personnel

Organizations or personnel outside the company should sign confidentiality agreements because they participate in the company's mergers and acquisitions, important memoranda, strategic alliances, other business cooperation plans or important contracts, and must not disclose known major information within the company to others.

Article 12 Principles for the disclosure of internal material information

The company shall uphold the following principles when exposing internal material information to the outside world:



1. The disclosure of information should be correct, complete and immediate.
2. The disclosure of information should be based.
3. Information should be disclosed fairly.

Article 13 Implementation of the spokesperson system

Unless otherwise stipulated by laws or decrees, the disclosure of material information within the company

The spokesperson of the company or the spokesperson of the agent, and the order of agents should be confirmed; if necessary, this

The person in charge of the company is directly responsible for processing.

The content of the spokespersons and spokespersons of our company shall be limited to the scope authorized by our company

, And in addition to the person in charge of the company, spokesperson and agent spokesperson, the company's personnel, non-economic

The authorization shall not disclose major internal information to the outside world.

Article 14 Records of internal material disclosure

The company's external information disclosure shall retain the following records:

Except for important information of the company that can be reported electronically due to emergencies, non-official hours or home office, the "Application Form for Online Application for Public Information Information Upload" should be recorded in writing and submitted to the spokesperson for decision (except for media clarifications need to be approved by the CEO), if the evaluation or review is done electronically, it should be archived in written documents afterwards, and the previous evaluation records, review documents and related information should be kept for at least five years.

The company shall keep the following records when releasing important information:

1. Evaluation content.
2. Signature or seal and date of the evaluation, review and decision personnel.
3. The content of the major information released and the applicable legal basis.
4. Other relevant information.

Article 15 Response to false media reports

If the content reported by the media is inconsistent with the content disclosed by the company, the company should

Open an information observatory to clarify and request corrections from the media if necessary.

Article 16 Report of abnormal situation



If the directors, managers and employees of the company are aware of the leakage of material internal information

The situation should be reported to the responsible unit and the internal audit department as soon as possible.

After accepting the report in the preceding paragraph, the responsible unit shall formulate the countermeasures and, if necessary, may invite

Ministry of Internal Audit and other departments to discuss the processing, and make the processing results into records for future reference, internal audit also

It should be checked based on responsibilities.

Article 17 Handling of violations

In case of any of the following, the company shall hold the relevant personnel accountable and take appropriate legal measures

Shi:

1. The personnel of the company unauthorized disclosure of internal major information or violation of this operating procedure or

He is prescribed by law.

2. The content of the spokesperson or the spokesperson of the company's spokesperson exceeds the authorized scope of the company

Those who encircle or violate this operation procedure or other laws and regulations.

If someone outside the company leaks material information inside the company, it will cause damage to the company.

The company's property or interests, the company should pursue its legal responsibilities through relevant channels.

Article 18 Internal control mechanism

This operating procedure should be incorporated into the company 's internal control system, and internal auditors should

The results of the risk assessment determine whether to be included in the annual audit plan. If included in the annual audit plan,

Should understand its compliance and make an audit report to implement internal major information processing and prevention

Execution of the operation procedures of Fan's internal transaction management.

Article 19 Declaration

The company's internal major information special unit should always pay attention to the requirements of relevant laws and regulations, and



The information is posted on the company 's internal website at any time and provides information to directors, managers and

The hiring staff knows that the directors and managers will also be emailed separately

Notice.

Provide relevant legal information to new directors and managers in a timely manner.

Article 20 This operating procedure shall be implemented after approval by the board of directors, and shall be the same when amended.

Article 21 This operating procedure was approved by the board of directors on August 21, 1998, and was first revised on February 16, 2011, and the second revised on July 29, 2015; November 10, 2022.