

 直得科技股份有限公司 CHIEFTEK PRECISION CO., LTD.	Document Title	Insider Trading Prevention Procedures	Rev. No.	5
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Article 1 Purpose :

To prevent the Company or its insiders from inadvertently or intentionally violating insider trading regulations due to unfamiliarity with applicable laws and regulations, thereby causing legal disputes or reputational damage to the Company or its insiders, these Procedures are hereby established to prevent insider trading, protect investors, and safeguard the Company's interests.

Article 2 Scope :

The Company's management and control of insider trading prevention shall comply with these Procedures; however, where other laws provide otherwise, such laws shall prevail.

Article 3 Responsibilities :

1. The Internal Audit Office of the Company shall be responsible for the formulation and maintenance of these Procedures.
2. The Company's Spokesperson or Acting Spokesperson shall be responsible for externally releasing the Company's material information.
3. The Stock Affairs Unit shall be responsible for organizing insider trading prevention training or providing awareness information.

Article 4 Definitions :

一、Insiders : According to the Securities and Exchange Act, insiders include the Company's directors, supervisors, managers, and shareholders holding more than ten percent of the total shares. Related parties of insiders include:

1. The insider's spouse, minor children, and persons holding shares in the name of others.
2. Representatives of institutional directors (or supervisors), their spouses, minor children, and nominees; all of the above are deemed insiders of the Company.

二、Persons Subject to Insider Trading Regulations : In addition to the aforementioned insiders, this also includes persons who obtain information due to professional or control relationships, as well as recipients of information from insiders.

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Article 5 Operating Procedures :

一、 Pursuant to Article 157-1, Paragraph 1 of the Securities and Exchange Act, the following persons are subject to insider trading prohibitions, including:

1. The Company's directors, supervisors, managers, and natural persons designated to exercise duties pursuant to Article 27, Paragraph 1 of the Company Act.
2. Shareholders holding more than ten percent of the Company's shares.
3. Persons who obtain information due to professional or control relationships.
4. Persons who have lost the identities specified in the preceding three subparagraphs within the past six months.
5. Persons who receive information from those listed in the preceding four subparagraphs.

Their shareholdings shall include those held by their spouses, minor children, and nominees.

二、 To protect shareholders' rights and ensure equal treatment, insiders who become aware of the Company's financial reports or related operating results shall comply with stock trading control measures, including but not limited to the prohibition for directors from trading shares during the closed period of thirty days before the annual financial report announcement and fifteen days before each quarterly financial report announcement.

三、 Insider Trading :

Pursuant to Article 157-1, Paragraph 1 of the Securities and Exchange Act, persons subject to insider trading regulations who become aware of material information that may significantly affect the Company's stock price shall not, before the information is publicly disclosed or within eighteen hours after disclosure, purchase or sell the Company's listed or OTC shares or other equity securities, either in their own name or in the name of others. Any violation of this provision constitutes insider trading.

四、 Material information that significantly affects the Company's stock price includes :

1. Information concerning the Company's financial or business matters that has a significant impact on stock prices or investors' decisions.
2. Information concerning the market supply and demand or tender offers for the securities that significantly affects stock prices or investment decisions.

五、 When there is any change in shareholdings of insiders, including directors, supervisors, managers, shareholders holding more than ten percent of shares, and their related parties (including spouses, minor children, and nominees), such changes shall be reported within two days after the occurrence through the "Insider Appointment/Dismissal Real-Time Reporting System."

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Directors, supervisors, and managers shall sign a declaration acknowledging their understanding of insider-related regulations within five days of assuming office, and such declaration shall be retained by the Company for record.

Copies of the declarations of directors and supervisors shall be submitted to the OTC market within ten days from the date of appointment for recordation.

六、The method of public disclosure for material information affecting stock prices shall be handled in accordance with the “Regulations Governing the Scope of Material Information and the Means of Its Public Disclosure under Article 157-1, Paragraphs 5 and 6 of the Securities and Exchange Act.”

七、Handling of Material Information :

1. The Company shall handle the processing and disclosure of internal material information in accordance with relevant laws, regulations, and the rules of the Taiwan Stock Exchange or the Taipei Exchange.

2. The Company’s directors, supervisors, managers, and employees shall perform their duties with the care of a prudent administrator and the duty of loyalty, in accordance with the principle of good faith, and shall sign confidentiality agreements.

Directors, supervisors, managers, and employees who become aware of the Company’s internal material information shall not disclose such information to others.

They shall not inquire about or collect undisclosed internal material information unrelated to their duties from persons who possess such information.

They shall also not disclose any undisclosed internal material information obtained other than through the performance of their duties.

3. When internal material information documents are transmitted in written or electronic form, they shall be properly marked with “confidential” or similar designations for protection. Such documents shall be backed up and stored in secure locations.

4. External institutions or personnel participating in the Company’s mergers and acquisitions, important memoranda, strategic alliances, other business cooperation projects, or significant contracts shall sign confidentiality agreements and shall not disclose the Company’s internal material information to others.

5. The Company shall adhere to the following principles when externally disclosing internal material information :

(1) Information shall be accurate, complete, and timely.

(2) Information shall be supported by proper basis.

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(3) Information shall be disclosed fairly.

6. Unless otherwise provided by law or regulation, the disclosure of the Company's internal material information shall be handled by the Company's Spokesperson or Acting Spokesperson, and the order of delegation shall be confirmed. When necessary, the responsible person of the Company may handle the disclosure directly. Statements made by the Spokesperson or Acting Spokesperson shall be limited to the scope authorized by the Company. Except for the responsible person, the Spokesperson, and the Acting Spokesperson, no personnel of the Company may disclose internal material information without authorization.
7. The Company shall retain the following records regarding external information disclosures :
 - (1) The person, date, and time of disclosure.
 - (2) The method of disclosure.
 - (3) The content of the disclosed information.
 - (4) The contents of written materials provided.
 - (5) Other relevant information.
8. If media reports are inconsistent with the Company's disclosures, the Company shall immediately clarify the matter on the Market Observation Post System and request corrections from the media.
9. If directors, supervisors, managers, or employees become aware of any leakage of internal material information, they shall promptly report it to the responsible unit and the Internal Audit Department.

Upon receiving such report, the responsible unit shall formulate response measures, and when necessary, convene the Internal Audit and other departments for discussion, and record the handling results for reference.

The Internal Audit Department shall also conduct reviews in accordance with its responsibilities.
10. If any of the following circumstances occur, the Company shall pursue the responsibilities of the relevant personnel and take appropriate legal actions :
 - (1) Company personnel disclose internal material information without authorization or violate these Procedures or other regulations.
 - (2) The Spokesperson or Acting Spokesperson makes statements beyond the authorized scope or in violation of these Procedures or other regulations.

If any external party leaks the Company's internal material information and causes damage to

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the Company's property or interests, the Company shall pursue legal liability through appropriate channels.

Article 6 : The Company shall conduct insider trading prevention training or provide awareness information at least once annually.

Article 7 : The Company shall establish and maintain files of insiders and report to the competent authority within the prescribed timeframe and manner.

Article 8 : These Procedures shall be implemented upon approval by the Board of Directors, and the same shall apply to any amendments.