

Sinyi Realty Inc.
Procedures for Handling Material Inside Information

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Article 1

The Procedures are specially adopted to establish sound mechanisms for the handling and disclosure of material inside information by the Company, in order to prevent improper information disclosures and to ensure the consistency and accuracy of information released by the Company to the public.

Article 2

The Company shall implement its handling and disclosure of material inside information and management of the prevention of insider trading in accordance with applicable laws and regulations, the rules and regulations of the Taiwan Stock Exchange Corporation ("TWSE"), and the Procedures.

Article 3

The Procedures shall apply to all directors, managerial officers, and employees of the Company.

The Company shall ensure that any other person who acquires knowledge of the Company's material inside information due to their position, profession, or relationship of control shall comply with the applicable provisions of the Procedures.

Article 4

For the purposes of the Procedures, the term "material inside information" refers to information that, with reference to the Securities and Exchange Act, other applicable laws and regulations, and the applicable rules and regulations of the TWSE.

Article 5

According to the Article 157-1 of the Securities and Exchange Act, after the information is precise, and prior to the public disclosure of such information or within 18 hours after its public disclosure, the following persons who have gotten the material inside information defined in the Article 4 of the Procedures shall not purchase or sell, in the person's own name or in the name of another, shares of the company that are listed on an exchange market, or any other equity-type security of the Company:

1. A director, managerial officer of the company, and/or a natural person designated to exercise powers as representative pursuant to Article 27, paragraph 1 of the Company Act.

2. Shareholders holding more than ten percent of the shares of the company.
3. Any person who has learned the information by reason of occupational or controlling relationship.
4. A person who, though no longer among those listed in one of the preceding three subparagraphs, has only lost such status within the last six months.
5. Any person who has learned the information from any of the persons named in the preceding four subparagraphs.

Article 6

The finance division of the Company is charged with handling material inside information. The division shall have the following functions and authorities:

1. Responsibility for formulating the drafts of the Procedures and any amendments to them.
2. Responsibility for receiving relevant internal major information processing operations and consulting, reviewing and providing suggestions related to this Procedure.

The term "handling of material inside information" refers to the assessment, drafting, review, and announcement of material inside information.

The Company shall disclose material information in accordance with relevant laws, orders, and Taiwan Stock Exchange Corporation Procedures for Verification and Disclosure of Material Information of Companies with Listed Securities, related FAQs, and the Procedures, to ensure the timeliness, accuracy, and completeness of the information. The Company's spokesperson, deputy spokesperson, head of the finance division, and assessing material information officer should keep communication channels open. Based on the confidentiality premise, they should discuss and exchange views thoroughly and promptly to clarify whether specific events fall within the scope of material information. If needed, they should actively consult experts such as accountants or the securities regulatory authority.

Once major decisions made by the Company or material events happens, the Company shall fill in the "Material Information Assessment Checklist" to comply with Taiwan Stock Exchange Corporation Procedures for Verification and Disclosure of Material Information of Companies with Listed Securities. After being approved by the supervisor, the checklist shall be reviewed by the Company's spokesperson or deputy spokesperson and the material information will be released to the public before the legal deadline.

3. Responsibility for receiving reports on unauthorized disclosures of material inside information and formulation of corresponding measures.
4. Responsibility for designing a system for preserving all documents, files, electronic records, and other materials related to the Procedures.
5. Responsibility for establish and maintain the file of the Company's directors, managerial officers and the stakeholders who own more than 10% of the Company's shares and his/her spouse, minor children, and the directors and managerial officers whose shares held in the name of other persons.
6. Other activities related to the Procedures.

Article 7

The Company's directors, managerial officers, and employees shall exercise the due care and fiduciary duty of a good administrator and act in good faith when performing their duties, and shall sign confidentiality agreements.

No director, managerial officer, or employee with knowledge of material inside information of the Company may divulge the information to others.

No director, managerial officer, or employee of the Company may inquire about or collect any non-public material inside information of the Company not related to their individual duties from a person with knowledge of such information, nor may they disclose to others any non-public material inside information of the Company of which they become aware for reasons other than the performance of their duties.

Article 8

Proper protection of confidentiality shall be given to files and documents containing the Company's material inside information when transmitted in written form. When transmitted by e-mail or other electronic means, such files and documents must be processed with appropriate security technology such as encryption or electronic signatures.

Files and documents containing the Company's material inside information shall be backed up and stored in a secure location.

Article 9

The Company shall ensure that the firewalls specified in the preceding two articles are established, and take the following additional steps:

1. Adopt adequate control measures for the firewalls and perform periodic testing.

2. Enhance measures for custody and maintaining the secrecy of files and documents containing non-public material inside information of the Company.

Article 10

Any organization or person outside of the Company that is involved in any corporate action of the Company relating to a merger or acquisition, major memorandum of understanding, strategic alliance, other business partnership plans, or the signing of a major contract shall be required to sign a confidentiality agreement, and may not disclose to another party any material inside information of the Company's thus acquired.

Article 11

The Company shall comply with the following principles when making external disclosures of material inside information:

1. The information disclosed shall be accurate, complete, and timely.
2. There shall be a well-founded basis for the information disclosure.
3. The information shall be disclosed fairly.

Article 12

Any disclosure of the Company's material inside information, except as otherwise provided by law or regulation, shall be made by the Company's spokesperson, or by a deputy spokesperson acting in such capacity in a confirmed sequential order. When necessary, the disclosure may be made directly by a responsible person of the Company.

The Company's spokesperson or deputy spokesperson shall communicate to outside parties only information within the scope authorized by the Company, and no personnel of the Company other than those serving as the Company's responsible person, spokesperson, or deputy spokesperson may disclose any material inside information of the Company to outside parties without authorization.

Article 13

Except in emergency situations or during non-business hours, the "Material Information Assessment Checklist" shall be filled in and reviewed in written form. If the assessment or reviews are done electronically, it shall be archived in written documents afterwards, and the above records, documents and related information should be kept for at least five years. The Company shall keep records of the following in respect of any disclosure of information to outside parties:

1. The person who assesses, reviews and decides whether the information shall be disclosed, the date, and the time.
2. How the information is disclosed.
3. The assessment and what information is disclosed. If the information is material, the applicable law shall be recorded.
4. What written material is delivered.
5. Any other relevant details.

Article 14

If a media agency releases information that is in any respect inconsistent with material information disclosed by the Company, the Company shall promptly issue a clarification on the Market Observation Post System (MOPS) and request the media agency to correct the information.

Article 15

Any director, managerial officer, or employee of the Company that becomes aware of any unauthorized disclosure of the Company's material inside information shall report to the responsible unit and the internal audit department of the Company as soon as practicable.

Upon receipt of a report made pursuant to the preceding paragraph, the responsible unit shall formulate corresponding measures. When necessary, it may invite members from the internal audit and other departments to meet for discussion of the measures, and shall keep a record of the results of the measures for future reference. The internal auditors shall also perform such audits as their duties may require.

Article 16

The Company shall take measures to discover those responsible and take appropriate legal action against any personnel under either of the following circumstances:

1. Personnel of the Company disclose material inside information without authorization to any outside party, or otherwise violate the Procedures or any other applicable law or regulation.
2. A spokesperson or deputy spokesperson of the Company communicates to any outside party any information beyond the scope authorized by the Company, or otherwise violates the Procedures or any other applicable law or regulation.

If any person outside the Company divulges any material inside information of the Company, thereby causing damage to any property or interest of the Company, the Company shall pursue appropriate measures to hold the person divulging the information legally liable.

Article 17

The Procedures shall be incorporated into the Company's internal control system. The internal auditors shall keep themselves regularly informed of the status of compliance with the Procedures and shall prepare related audit reports, so as to ensure full implementation of the procedures for handling material inside information.

Article 18

At least once per year, the Company shall conduct educational campaigns to promote awareness among all directors, managerial officers, and employees with respect to the Procedures and related laws and regulations.

The Company shall also provide educational campaigns to new directors, managerial officers, and employees in a timely manner.

Assessing material information Officers should be familiar with operating material information system and required to attend, at least once a year, a training program conducted by the competent authorities of securities laws and regulations.

Article 19

The Procedures, and any amendments to them, shall be implemented upon approval by the board of directors.