

Procedures for Handling Material Inside Information of Oriental Union Chemical Corporation

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Chapter 1 General Provisions

Article 1 (Purpose of these Procedures)

Procedures for Handling Material Inside Information (hereinafter referred to as these “Procedures”) of Oriental Union Chemical Corporation (hereinafter referred to as the “Company”) 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 (Material inside information shall be handled in accordance with applicable laws and regulations and these Procedures)

The Company shall implement its handling and disclosure of material inside information in accordance with applicable laws and regulations, the rules and regulations of the Taiwan Stock Exchange Corporation, and these Procedures.

Article 3 (Scope of application)

These 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 identity, occupation, or control relationship shall comply with the applicable provisions of these Procedures.

Article 4 (Scope of material inside information)

For the purposes of these Procedures, the term “material inside information” refers to information that is defined by the Securities and Exchange Act, other applicable laws and regulations, and the applicable rules and regulations of the Taiwan Stock Exchange Corporation.

Article 5 (Responsible Unit in charge of the handling of material inside information)

The unit charged with handling material inside information of the Company is composed of the President, Executive Vice Presidents, and Finance, Accounting and Audit Department heads, and Corporate Governance Officer, whose functions and authorities include:

- 1) Responsible for formulating and revising these Procedures.
- 2) Responsible for receiving consultation, review, and recommendations relating to the handling of the material inside information and these Procedures.
- 3) Responsible for receiving reports on unauthorized disclosures of material inside information and formulation of countermeasures.
- 4) Responsible for the preservation system of all documents, files, electronic records related to these Procedures.
- 5) Other business related to these Procedures.

Chapter 2 Confidentiality Procedures of Material Inside Information

Article 6 (Confidentiality firewall operations – personnel)

The Finance Department of the Company shall establish and maintain the data files reported by insiders as required by the Securities and Exchange Act.

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.

No Director, managerial officer, or employee with knowledge of material inside information of the Company may divulge the information to others, nor may they purchase or sell the shares, other equity-type securities of the Company or sell the non-equity-type corporate bonds of the Company, prior to the public disclosure of such material inside information or within a certain period after its legally public disclosure. No stock trading is allowed 30 days prior to the publish of annual financial statements, or 15 days prior to the publish of quarterly financial statements for Directors.

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 7 (Confidentiality firewall operations – documents and information)

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 stored in secure location.

Article 8 (Operation of confidentiality firewalls)

The Company shall ensure that the firewalls specified in the previous two articles are established, and take the following measures:

- 1) Adopt adequate control measures for the firewalls and perform regular testing.
- 2) Enhance the storage and confidentiality measures of the undisclosed material inside information archives and documents of the Company.

Article 9 (Confidentiality obligations of outside organizations or personnel)

Any organization or personnel 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 learned material inside information of the Company.

Chapter 3 Disclosure Procedure of Material Inside Information

Article 10 (Principles of disclosure of material inside information)

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

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

Article 10-1 (Procedures of evaluation and approval of material information)

The Finance Department of the Company is the dedicated unit for material inside information, responsible for operations of its evaluation, inspection, verification and disclosure.

In the event of the Company's determined major policies or the occurrence of major events, which are in line with the provisions of "Taiwan Stock Exchange Corporation Procedures for Verification and Disclosure of Material Information of Companies with Listed Securities," or through further evaluation of the materiality of the policies of events thereof, which will have significant impact on the status of the Company's finances, business, shareholders' equity or securities prices, in that case, the Company's competent unit shall fill in "the Request for Approval Letter for the Disclosure of Material Inside Information" right on the date of the occurrence of that fact and submit such letter to the unit's supervisor for approval, and then the Finance Department shall fill in and submit the "Evaluation and Verification Table of Material Inside Information," along with the letter aforesaid, to the Company's spokesperson and the President for further review and approval, and then promptly disclose the Material Inside Information before the time limit set by applicable laws and regulations.

Article 11 (Implementation of the Company's Spokesperson system)

Implementation of the Company's material inside information, except as otherwise provided by law or regulation, generally be made by the Company's spokesperson, or by a deputy spokesperson acting in a confirmed sequential order. When necessary, the disclosure may be made directly by the Chairman or President of the Company.

The content delivered by the Company's spokesperson or deputy spokesperson shall be limited to the scope authorized by the Company, and other personnel of the Company except Chairman, President, spokesperson, or deputy spokesperson will need to be authorized prior to disclosure of such information.

Article 12 (The preservation of verification and approval records of material inside information)

The Company shall keep records of the following in respect of any disclosure of information to outside parties:

- 1) The content of the evaluation of the disclosure of material inside information.
- 2) The personnel who involved in the evaluation, verification and approval procedures of the disclosures of the material inside information, and the date such procedures have been conducted.
- 3) The content of the disclosed materials inside information and the applicable laws and regulations.
- 4) Other relevant information.

The Company's "Request for Approval Letter for the Disclosure of Material Inside Information" and "Evaluation and Verification Table of Material Inside Information" shall be recorded in writing. If the procedures of evaluation, verification and approval are operated in electronic form, they shall be recorded and filed in writing form afterwards. The records, documents and all relating information to the evaluation, verification and approval of the disclosure of the material inside information shall be preserved for at least five(5) years.

Article 13 (Response to false media coverage)

If any media releases information that is in any respect inconsistent with material information disclosed by the Company, the Company's Finance Department may depend on circumstances to promptly issue a clarification on the Market Observation Post System (MOPS) or request information correction from the media.

Chapter 4 Measures of Unusual Events

Article 14 (Reporting of unusual events)

Should any Director, managerial officer, or employee of the Company be aware of any unauthorized disclosure of the Company's material inside information shall report to the Responsible Unit and the 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 countermeasures. When necessary, relevant departments may be invited for discussion of the measures, and a record of the countermeasures results shall be kept for future reference. The Audit Department of the Company shall also perform such audit as their duties require.

Article 15 (Disciplinary measures)

If the personnel of the Company disclose material inside information without authorization to any outside party, or violate these Procedures or any other applicable law or regulation, the Company shall hold the relevant personnel accountable and take appropriate legal measures.

Personnel outside of the Company divulge material inside information of the Company, or violate these Procedures or any other applicable law or regulation, thereby causing damage to any property or interest of the Company, the Company shall pursue its legal responsibility through relevant channels.

Chapter 5 Internal Controls and Publicity

Article 16 (Internal controls)

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

Article 17 (Publicity)

The Company's Finance Department shall deliver these Procedures to the Directors, managerial officers, and employees of the Company in written or otherwise, and make them acquainted with these Procedures.

Chapter 6 Supplementary Provisions

Article 18 These Procedures herein take effect after approval at the Director's meeting. The same applies for any amendments.

** In case of any discrepancy between this English translation and the Chinese text of this document, the Chinese text shall prevail.*