

**Alpha Networks Inc.**  
**Procedures for Handling Material Inside Information**  
**and Preventing Insider Trading**

**Chapter 1 General Provisions**

**Article 1**

These Procedures are specifically established to provide a reference for building sound mechanisms for handling and disclosing material information for the Company to prevent improper information leakage, ensure the consistency and accuracy of information released by the Company, and prevent insider trading.

**Article 2**

The Company shall handle and disclose material information with respect to the related laws, executive orders, regulations, the rules and regulations of the competent authorities, and these Procedures.

**Article 3**

These Procedures shall apply to all directors, managers and employees of the Company. The Company shall also urge all parties learning the Company's material information due to their position, profession, or relationship of control to comply with the relevant provisions in these Procedures

**Article 4**

The term " Material Inside Information " as used in these Procedures means the material information meets the conditions of Article 2, 3, 4 of "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", Article 7 of "Securities and Exchange Act Enforcement Rules" and "Taiwan Stock Exchange Corporation Procedures for Verification and Disclosure of Material Information of Companies with Listed Securities".

## **Article 5**

The Finance Division (the “Responsible Unit”) is the unit responsible for handling material information of the Company, and its duties are as follows:

1. Responsibility for formulating the drafts of these Procedures and any amendments to them.
2. Responsibility for assessment, review, approval and disclosure procedure of material information
3. Responsibility for receiving inquiries in connection with the methods of handling material inside information, and for consultation, review, and recommendations relating to these Procedures.
4. Responsibility for receiving reports on unauthorized disclosures of material inside information and formulation of corresponding measures.
5. Responsibility for designing a system for preserving all documents, files, electronic records, and other materials related to these Procedures.
6. Other activities related to these Procedures.

## **Chapter 2 Procedures for Keeping Material Information Confidential**

### **Article 6**

The Company’s directors, managers, and employees shall exercise the due care and fiduciary duty of a good administrator and act in good faith to perform their duties and sign the non-disclosure agreement (“the NDA”).

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

No director, supervisor, 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**

Appropriate protection shall be arranged for transferring files and documents containing the Company’s material information in writing. 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.

Backup copies of files and documents containing the Company’s material information shall be made and stored in a secure location.

## **Article 8**

The Company shall ensure the establishment of the firewalls specified in the preceding two articles and adopt the following measures:

- I. Adopting appropriate firewall control measures.
- II. Strengthening the measures for custody and maintaining the secrecy of files and documents containing undisclosed material information of the Company

## **Article 9**

Organizations or individuals outside of the Company involved in mergers and acquisitions, memoranda of understanding, strategic alliances, other cooperation projects, or signing important contracts with the Company shall sign the NDA and may not disclose the Company's material information learned to others.

## **Chapter 3 Procedures for Disclosing Material Information**

### **Article 10**

When disclosing material information to the public, the Company shall uphold the following principles:

- I. Information shall be disclosed in an accurate, complete and timely manner.
- II. Information shall be disclosed based on facts.
- III. Information shall be disclosed fairly.

### **Article 10-1**

Material information published by the Company shall comply with the relative laws, orders, "Taiwan Stock Exchange Corporation Procedures for Verification and Disclosure of Material Information of Companies with Listed Securities", frequently asked question (FAQ) and these Procedures to ensure immediacy, accuracy and completeness of information.

Any major policy resolution or occurrence of material event of the Company meet the regulations of the "Taiwan Stock Exchange Corporation Procedures for Verification and Disclosure of Material Information of Companies with Listed Securities" or after further assessment of materiality, the policy or event has a material effect on financial operations, the shareholders' equity or securities prices. The Company shall publish or release material information within deadline set by laws and regulations in accordance with the regulations of the preceding paragraph.

## **Article 11**

Except as otherwise required by law or other regulations, material information shall be disclosed by the Company's spokesperson or deputy spokespersons. The priority of deputies shall be defined.

Where necessary, the chairperson or president of the Company may directly handle the disclosure.

The spokesperson or deputy spokespersons shall disclose information within their authority. Except for the chairperson or president, spokesperson, and deputy spokesperson, no employee may disclose the Company's material information without authorization.

## **Article 12**

Record of disclosure of proprietary/strictly confidential information Finance is the designated unit in charge of material information, and is responsible for the approval and issuance of material information disclosure. All evaluations, approvals, and related records should be stored for at least five years.

Alpha's material information disclosure records should contain these items:

- I. Content of evaluation.
- II. Records and time stamp of evaluation and approval.
- III. The legal basis and content of material information disclosed.
- IV. Other related information.

## **Article 13**

If the information reported by the media is inconsistent with the information disclosed, the Company shall make a clarification on the Market Observation Post System (MOPS) and request the media to make corrections as necessary.

## **Chapter 4 Handling Anomalies**

### **Article 14**

After detecting leakage of material information, directors, managers, or employees of the Company shall report to the responsible unit and the internal audit department as early as possible.

Upon receipt of the report defined in the preceding paragraph, the responsible unit shall formulate countermeasures and discuss with the internal audit department as necessary. The responsible unit shall maintain a record of the handling results for reference, and the internal auditors shall also perform audits based on their duties.

## **Article 15**

Personnel of the Company violating these Procedures and other laws and regulations shall be punished in accordance with the related personnel regulations, and related legal action shall also be taken.

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 external person of the Company discloses any material inside information of the Company, thereby causing damage to any property or interest of the Company, the Department of Legal Affairs of the Company shall pursue appropriate measures to hold the person disclosing the information legally liable.

## **Chapter 5 Prevention of Insider Trading**

### **Article 16**

After learning of the establishment of material information, the financial department shall notify personnel as stated in Article 157-1, paragraph 1 of the Securities and Exchange Act (the "Insiders") in a timely manner to prevent insider trading.

### **Article 17**

Whether or not having learned the substantial contents of the Company's material information, insiders may not trade the Company's stocks or other share-based marketable securities after the establishment and during the specific period after disclosure of material information

#### **Article 17-1**

Insiders of the Company are prohibited from using undisclosed information in the market to buy and sell the Company's securities

The regulation of preceding paragraph is the Company's insiders, who receive non-public information in the market, shall not be allowed to trade their shares of the Company during the lock-up period 30 days before the announcement of the annual financial report and 15 days before the announcement of the quarterly financial report.

## **Article 18**

After learning facts sufficient for establishing material information, personnel related to decision-making shall immediately report to the financial department to determine the need to notify insiders according to these Procedures as quickly as possible.

## **Chapter 6 Internal Control and Internal Awareness Education**

### **Article 19**

These Procedures shall be incorporated into the Company's internal control system. Internal auditors shall keep track of the compliance with these Procedures and produce a report on any anomalies found to ensure the implementation of the Procedures for Handling Material Information and Preventing Insider Trading.

### **Article 20**

The Company promote and arrange education of these Procedures and related laws and regulations for directors, managers, and employees at appropriate times.

## **Chapter 7 Supplementary Provisions**

### **Article 21**

These Procedures shall be implemented upon the approval of the Board. The same shall apply to amendments thereto.

### **Article 22**

These Procedures were established on November 9, 2020

The 1st amendment was made on April 29, 2022

The 2nd amendment was made on October 27, 2022