



Phihong Technology Co.,Ltd.

PROCEDURES FOR HANDLING SIGNIFICANT INTERNAL INFORMATION

Chapter 1: General Provisions

Article 1 (Purpose of these Procedures) To establish a sound mechanism for handling and disclosing significant internal information, prevent improper information leakage, and ensure the consistency and accuracy of the company's external information disclosure, these procedures are formulated for compliance.

Article 2 (Handling of Significant Internal Information in Accordance with Laws and Procedures) The company shall handle and disclose significant internal information in accordance with relevant laws, orders, the regulations of the Taiwan Stock Exchange, and these procedures.

Article 3 (Applicable Subjects) These procedures apply to the company's directors, managers, and employees. Other individuals who become aware of the company's significant internal information due to their identity, occupation, or control relationship shall also be urged to comply with the relevant provisions of these procedures.

Article 4 (Scope of Significant Internal Information) The significant internal information referred to in these procedures shall be formulated by the unit responsible for handling significant internal information and approved by the board of directors. The formulation shall consider the Securities and Exchange Act, relevant laws, orders, and the regulations of the Taiwan Stock Exchange.

Article 5 (Unit Responsible for Handling Significant Internal Information) The company shall establish a unit responsible for handling significant internal information, composed of suitable and adequate members according to the company's scale, business situation, and management needs, and approved by the board of directors. Its responsibilities are as follows:

1. Drafting and revising these procedures.
2. Handling inquiries, reviews, and providing suggestions related to the handling of significant internal information and these procedures.
3. Handling reports of significant internal information leakage and formulating countermeasures.
4. Formulating a preservation system for all documents, files, and electronic records related to these procedures.
5. Other matters related to these procedures.

Chapter 2: Procedures for Keeping Significant Internal Information Confidential

Article 6 (Confidentiality Firewall - Personnel) Directors, managers, and employees of the company shall perform their duties with the care of a good administrator and the duty of loyalty, adhering to the principles of honesty and good faith. Directors, managers, and employees who become aware of significant internal information shall not disclose such information to others. They shall not inquire about or collect unpublished significant internal information unrelated to their duties from those who are aware of such information, nor disclose such information to others if it is not related to their duties.

Article 7 (Confidentiality Firewall - Documents) When transmitting significant internal information files by written, email, or other electronic means, appropriate protection shall be applied. Significant internal information files shall be backed up and stored in a secure location.

Article 8 (Operation of the Confidentiality Firewall) The company shall ensure the establishment of the firewalls specified in the previous two articles and take the following measures:

1. Implement appropriate firewall control measures and conduct regular tests.
2. Strengthen the storage and confidentiality measures for unpublished significant internal information files.

Article 9 (Confidentiality Procedures for External Institutions or Personnel) External institutions or personnel participating in the company's mergers, important memorandums, strategic alliances, other business cooperation plans, or important contract signings shall sign confidentiality agreements and shall not disclose the company's significant internal information to others.

Chapter 3: Procedures for Disclosing Significant Internal Information

Article 10 (Principles for Disclosing Significant Internal Information) The company shall adhere to the following principles when disclosing significant internal information:

1. The information disclosed shall be accurate, complete, and timely.
2. The information disclosed shall have a basis.
3. The information shall be disclosed fairly.

Article 11 (Implementation of the Spokesperson System) The disclosure of significant internal information shall be handled by the company's spokesperson or deputy spokesperson, except as otherwise provided by laws or regulations, and the order of succession shall be confirmed. If necessary, the company's responsible person may directly handle the disclosure. The

spokesperson and deputy spokesperson shall only disclose information within the scope authorized by the company. No other personnel, except the responsible person, spokesperson, and deputy spokesperson, shall disclose significant internal information without authorization.

Article 12 (Records of Disclosing Significant Internal Information) The company shall keep records of the following when disclosing information externally:

1. Personnel, date, and time of disclosure.
2. Method of disclosure.
3. Content of the disclosed information.
4. Content of the written materials provided.
5. Other relevant information.

Article 13 (Response to Inaccurate Media Reports) If the content reported by the media does not match the information disclosed by the company, the company shall clarify on the Market Observation Post System and request the media to make corrections.

Chapter 4: Handling of Abnormal Situations

Article 14 (Reporting of Abnormal Situations) If directors, managers, or employees become aware of any leakage of significant internal information, they shall promptly report to the responsible unit and the internal audit department. Upon receiving such reports, the responsible unit shall formulate countermeasures and, if necessary, convene discussions with the internal audit department and other relevant departments. The handling results shall be recorded for reference, and the internal audit department shall conduct audits based on its duties.

Article 15 (Handling of Violations) If any of the following situations occur, the company shall hold the relevant personnel accountable and take appropriate legal measures:

1. Unauthorized disclosure of significant internal information by company personnel or violation of these procedures or other laws and regulations.
2. The spokesperson or deputy spokesperson discloses information beyond the scope authorized by the company or violates these procedures or other laws and regulations. If external personnel leak the company's significant internal information, causing damage to the company's property or interests, the company shall pursue legal responsibility through relevant channels.

Chapter 5: Internal Control Operations and Internal Education and Advocacy

Article 16 (Internal Control Mechanism) These procedures shall be incorporated into the company's internal control system. Internal audit personnel shall regularly understand the

compliance status and prepare audit reports to ensure the implementation of the procedures for handling significant internal information.

Article 17 (Education and Advocacy) The company shall conduct education and advocacy on these procedures and related laws and regulations for internal personnel at least once a year. New directors and managers shall receive timely education and advocacy.

Article 18 (Evaluation Procedures for Significant Information)

1. Evaluation Principles The company shall release significant information in accordance with relevant laws, orders, the verification and public disclosure procedures for significant information of listed companies on the Taiwan Stock Exchange, related Q&A, and these procedures to ensure the timeliness, accuracy, and completeness of the information.
2. Evaluation Content If the company's major decisions or significant events meet the verification and public disclosure procedures for significant information of listed companies on the Taiwan Stock Exchange, or if further evaluation of significance shows that the decisions or events have a significant impact on the company's finances, business, shareholders' rights, or securities prices, the significant information shall be released as soon as possible within the time limits prescribed by law.

Article 19 (Preservation of Approval Records) The unit responsible for handling significant information shall be responsible for the evaluation, review, approval, and release of significant information. The evaluation and review shall be recorded in writing or electronically and approved by the highest financial officer. Relevant evaluation records, approval documents, and materials shall be preserved for at least five years. The company shall keep records of the following when releasing significant information:

1. Evaluation content.
2. Signatures or seals, dates, and times of the evaluation, review, and approval personnel.
3. Content of the released significant information and the applicable legal basis.
4. Other relevant information.

Chapter 6: Supplementary Provisions

Article 20 These procedures shall be implemented after approval by the board of directors, and the same applies to amendments. These procedures were established on April 24, 2009. First revision on August 7, 2020. Second revision on November 3, 2022. Third revision on May 8, 2024.