

# Eris Technology Corporation

## Implement insider trading situations

### Internal Regulations

#### **Procedures for Insider Trading Prevention Management**

These procedures expressly stipulate that insiders, quasi-insiders, and recipients of major internal information are prohibited by law from trading the Company's listed shares, shares traded on over-the-counter securities markets, or other equity-linked securities, or selling the Company's listed non-equity corporate bonds or those traded on over-the-counter securities markets, when they have actual knowledge of major internal information, and within the period from the time the major internal information becomes definite until its public disclosure, or within eighteen hours after its public disclosure. This is to prevent individuals who have obtained major internal information from inadvertently violating insider trading regulations due to unfamiliarity with the law.

The operating procedures include:

1. Directors, managers, and natural persons designated to exercise duties on behalf of a corporate shareholder under Article 27, Paragraph 1 of the Company Act, shall not trade the Company's shares during the blackout period of thirty days prior to the announcement of the annual financial report and fifteen days prior to the announcement of each quarterly financial report.
2. The Company's Chairperson's Office shall, after scheduling the Board of Directors' meetings for the next fiscal year, clearly inform the regulated persons of the blackout periods during which share trading is prohibited, in accordance with the preceding paragraph.
3. The Company's Sustainability Office shall be responsible for supervising compliance by the regulated persons mentioned in Paragraph 1 when they report their monthly shareholdings for the preceding month.

#### **Operating Procedures for the Handling of Major Internal Information**

These procedures establish sound mechanisms for the handling and disclosure of the Company's major internal information to prevent improper information leakage and to ensure the consistency and accuracy of information released by the Company to the public. They stipulate that directors, supervisors, managers, and employees shall not disclose any major internal information of which they have knowledge to others, nor shall they inquire about or collect undisclosed major internal information of the Company from those who possess such information, if it is irrelevant to their personal duties. Furthermore, they have a confidentiality obligation not to disclose any undisclosed major internal information of the Company obtained incidentally to the performance of their duties to others.

## Implementation Status

- ✓ The Company conducts education and awareness programs on the "Procedures for Insider Trading Prevention Management," "Operating Procedures for the Handling of Major internal Information," and related laws and regulations at least once a year for current directors, managers, and employees as needed or deemed necessary. New directors and managers receive such education within three months of assuming office, and new employees receive it concurrently during new hire training.
- ✓ "Insider Trading Prevention" and "Integrity Management" Education and Awareness  
In October 2024, the Company conducted online education and awareness sessions of 3 to 6 hours for all 11 directors and managers. The content included "Insider Trading Prevention," "Employee Codes of Conduct," and "Codes of Ethical Management." The Company also conducted 6-hour education sessions for 120 person-times of employees as needed or deemed necessary during the year 2024.
- ✓ "Insider Trading Prevention" course content includes the constituent elements of insider trading, methods and timing of major internal information disclosure, penalties, judicial practical opinions, and regulations on changes in insider shareholdings.
- ✓ "Employee Codes of Conduct" and "Integrity Management" course content includes trade secret protection, fair trade, anti-bribery and anti-corruption, prevention of conflicts of interest, and compliance with laws and regulations.
- ✓ Relevant course materials are available on the internal employee system for reference.
- ✓ On January 25, 2024, the Company notified directors via email of the dates for the 5 Board of Directors' meetings in 2024 where quarterly financial reports would be resolved, as well as the blackout periods for the announcement of each quarterly financial report (directors are prohibited from trading the Company's shares during the blackout period of thirty days prior to the announcement of the annual financial report and fifteen days prior to the announcement of each quarterly financial report), to ensure the implementation of corporate governance best practices.