

111 年度落實禁止內線交易之具體情形

為避免本公司或內部人因未諳法規規範誤觸或有意觸犯內線交易相關規定，造成公司或內部人訟案纏身，損及聲譽之情事，本公司已訂定「防範內線交易管理作業程序」，防範內線交易，保障投資人及維護本公司權益。

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- 本公司每年蒐集即時法規訊息並不定期向內部人（包含董事及經理人）宣導相關法規函令，加強內部人法令遵循，以免其受罰。

日期	宣導方式	宣導內容
16/02/2023	電子郵件	通知各內部人注意財務報告公告之禁止交易期間 ✚ 本公司 111 年度財務報告公告日為 112 年 3 月 21 日董事會通過日期，故本公司於公告之 30 日前即 112 年 2 月 16 日以電子郵件方式通知各內部人注意財務報告公告之禁止交易期間，並遵守相關規定。
23/12/2022	電子郵件	內部人股權宣導 ✚ 禁止董事或員工等內部人利用市場上未公開資訊買賣有價證券之內部規範，內容包括(但不限於)董事不得於年度財務報告公告前三十日，和每季財務報告公告前十五日之封閉期間交易其股票。
29/11/2022	電子郵件	"內部人"簡述版 ppt & 櫃買 112 年全年度開(休)市日期表

- 若適逢有董事改選、新任董事就職之情事，則公司治理單位會特別印製與內線交易之法令規範相關的手冊提供給新任董事以利其閱覽並了解相關法條(最近一次之董事改選為 2022 年 6 月 29 日，新任董事皆有簽收相關宣導手冊以及相關內部人注意事項說明)。相關內線交易之法令規範相關的手冊，如下：

No	文件名稱
1	董監事法規宣導手冊
2	上(興)櫃公司新任內部人應注意事項說明

更多資料可至網站 <http://www.tpex.org.tw/> -> 內部人股權專區 -> 宣導資料，下載相關檔案電子檔。

- 本公司每年提供董事持續進修課程或相關法規宣導座談會之資訊，以協助董事遵循法令規範，並會適時提醒所有董事們應及時完成年度進修的時數要求。

The situation of implementing the prevention of insider trading in 2022.

To prevent the company or insiders from erroneously or intentionally violating the relevant regulations on insider trading because of ignorance of laws and regulations, causing the company or insiders to lose lawsuits and damage their reputation, the company has planned "Procedures for Preventing Insider Trading Management" to protect investors and safeguard the rights and interests of the company.

The situation of implementing the prevention of insider trading in 2022.

- The company collects information on regulations every year and occasionally publicizes relevant laws and regulations to insiders (including directors and managers) to strengthen insiders' compliance with laws and regulations.

Date	Way	Content
16/02/2023	Email	Inform all insiders to pay attention to the prohibited trading period of the announcement for the financial report. <ul style="list-style-type: none"> ✚ The company's 2022 annual financial report announcement date is March 21, 2023, when the board of directors passed the date, so the company notified all insiders by email on February 16, 2023, 30 days before the announcement, to pay attention to the prohibited trading period of the financial report announcement and abide by relevant regulations.
23/12/2022	Email	Insider Equity Advocacy <ul style="list-style-type: none"> ✚ Internal regulations prohibiting insiders such as directors or employees from using unpublished information in the market to buy and sell securities, including (but not limited to) directors not being allowed 30 days before the announcement of the annual financial report and 15 days before the announcement of the quarterly financial report. Trading its shares during the closed period.
29/11/2022	Email	Brief version of "Insider" ppt & open (closed) market date table in 2023.

- If there is a re-election of directors or the appointment of new directors, the corporate governance unit will especially print a manual related to insider trading laws and regulations for new directors (The latest re-election of directors is on June 29, 2022, and all new directors have signed the relevant brochures and relevant insider notices).

No	File Name
1	Laws and Regulations Publicity Manual for Directors and Supervisors

2	Notes for new insiders of Shanghai (Xing) Cabinet Company
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For more information, please go to the website <http://www.tpex.org.tw/> -> Insider Equity Zone -> Publicity Materials, and download relevant electronic files.

- Every year, the company will also provide continuing education courses for directors or related laws and regulations to assist directors in complying with laws and regulations., and will remind all directors to complete the annual training hour requirements in a timely manner.