

Document	Insider Trading Prevention Management Policy			Date of Adoption	May 13, 2010
Document No.	FHt-TS-00	Version	B	Date of Revision	August 17, 2022

Article 1 (Purpose)

This Policy is adopted to prevent the Company's Insiders from violating applicable Insider Trading laws and regulations, to establish a sound framework for the handling and disclosure of the Company's Material Non-Public Information, to prevent the improper disclosure or unauthorized dissemination of such information, and to ensure the accuracy and consistency of information publicly disclosed by the Company. This Policy is hereby adopted as the governing standard for compliance by the Company and its relevant personnel.

Article 2 (Scope)

The Company's administration and management of Insider Trading prevention shall be governed by this Policy. Where any applicable law or regulation contains provisions inconsistent with this Policy, such law or regulation shall govern.

Article 3 (Definitions)

I. Insiders: For purposes of this Policy, Insiders shall mean the Company's Directors, Officers, and shareholders holding more than ten percent of the Company's total issued shares.

II. Related Parties of Insiders:

The Related Parties of the Company's Insiders shall include:

- (I) an Insider's spouse, minor children, and persons whose shares are held under the names of others but are beneficially owned or controlled by such Insider; and
- (II) where the Insider is a juristic-person Director, the representative designated by such juristic-person Director, together with such representative's spouse, minor children, and persons whose shares are held under the names of others but are beneficially owned or controlled by such representative.

All Related Parties of the Company's Insiders shall likewise be deemed Insiders of the Company for purposes of this Policy.

Article 4 (Responsibilities)

The Finance Department shall be responsible for the drafting, implementation, administration, and periodic maintenance of this Policy.

Article 5 (Operating Procedures)

I. The following persons shall be subject to the restrictions and requirements set forth under the Insider Trading laws and this Policy:

- 1. the Company's Directors, Officers, employees, and any natural person designated to exercise the duties of a juristic-person Director pursuant to Paragraph 1 of Article 27 of the Company Act;
- 2. shareholders holding more than ten percent of the Company's total issued shares;

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3. persons who become aware of Material Non-Public Information by virtue of their profession, employment, or controlling relationship;
4. persons who have ceased to hold any of the capacities described in the preceding three subparagraphs, for a period of less than six months following the loss of such status;
5. persons who obtain Material Non-Public Information from any person described in the preceding four subparagraphs; and
6. the spouses, minor children, and persons whose shares are held under the names of others but are beneficially owned or controlled by an Insider, for a period of less than six months following the loss of such Insider status.

II. Insider Trading

Any person subject to the Insider Trading restrictions who is in actual possession of Material Non-Public Information concerning the Company that is reasonably expected to have a material effect on the market price of the Company's securities shall not, after such information has become sufficiently specific and before it has been publicly disclosed, or during the eighteen hour period following such public disclosure, directly or indirectly purchase or sell, whether in such person's own name or through the name of another person, any listed or over-the-counter securities of the Company, or any other securities having an equity nature or equity-linked characteristics. Any such transaction in violation of the foregoing restrictions shall constitute Insider Trading.

- III. For purposes of the preceding paragraph, Material Non-Public Information that is reasonably expected to have a material effect on the price of the Company's securities means information relating to the Company's financial condition, business operations, market supply and demand, or tender offers that is reasonably expected to materially affect the market price of the Company's securities or to significantly influence the investment decisions of a reasonable investor.

IV. Determination of Material Information, Means of Public Disclosure, and Time of Public Disclosure

(I) Time Material Information Arises

For Material Information relating to the Company's financial condition, business operations, or the market supply and demand for its securities, the time at which such information is deemed to arise shall be the earliest of the following: the occurrence of the relevant event, execution of an agreement, execution of a contract, payment, engagement or authorization, completion of a transaction, transfer of ownership, adoption of a resolution by the Audit Committee or the Board of Directors, or any other date on which the relevant matter becomes sufficiently ascertainable, with the earliest such date controlling.

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(II) Means of Public Disclosure

1. Material Information relating to the Company's financial condition, business operations, or market supply and demand shall be deemed publicly disclosed upon the Company's filing or posting of such information through the Market Observation Post System.
2. Material Information relating to the market supply and demand for the Company's securities shall be deemed publicly disclosed upon dissemination through any one of the following channels:
 - (1) filing or posting by the Company through the Market Observation Post System;
 - (2) publication on the Taiwan Stock Exchange Basic Market Information Reporting Website;
 - (3) publication on the Taipei Exchange Basic Market Information Reporting Website; or
 - (4) publication in at least two nationally circulated daily newspapers (excluding local editions), broadcast through a nationwide television news program, or publication through an electronic news service operated by any of the foregoing media.

(III) Time of Public Disclosure

1. Where disclosure is made through the Market Observation Post System or a Basic Market Information Reporting Website, the official public disclosure time shall be the time stamp recorded by the applicable system.
2. Where disclosure is made through newspapers, television news broadcasts, or electronic news services, the public disclosure time shall be calculated from the latest to occur of the first newspaper publication, the first television broadcast, or the first posting to the applicable electronic news service.
3. For purposes of determining the public disclosure time of newspaper publications, morning editions shall be deemed published at 6:00 a.m., and evening editions shall be deemed published at 3:00 p.m.

V. Procedures for the Handling of Material Non-Public Information

(I) Compliance with Applicable Laws and This Policy

The handling and public disclosure of the Company's Material Non-Public Information shall be conducted in accordance with the Securities and Exchange Act, other applicable laws and regulations, the applicable rules and regulations of the Taiwan Stock Exchange Corporation or the Taipei Exchange, and this Policy.

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(II) Persons Subject to These Procedures

These procedures shall apply to all Directors, Officers, and employees of the Company.

Any other person who gains access to or becomes aware of the Company's Material Non-Public Information by virtue of such person's position, profession, contractual relationship, or controlling relationship shall likewise be required by the Company to comply with the applicable provisions of this Policy.

(III) Scope of Material Non-Public Information

For purposes of these procedures, the scope of Material Non-Public Information shall be formulated by the Company's designated Material Non-Public Information Compliance Unit and submitted to the Board of Directors for approval. In establishing the scope of MNPI, due consideration shall be given to the Securities and Exchange Act, other applicable laws and regulations, and the relevant rules and regulations promulgated by the Taiwan Stock Exchange Corporation and the Taipei Exchange.

(IV) Material Non-Public Information Compliance Unit

The Company shall establish a Material Non-Public Information Compliance Unit responsible for administering matters relating to the handling of Material Non-Public Information. The Compliance Unit shall consist of an appropriate number of qualified personnel commensurate with the Company's size, business operations, and management requirements, and its establishment shall be approved by the Board of Directors. The Compliance Unit shall have the following duties and responsibilities:

1. To prepare, review, and propose this Policy and any amendments thereto.
2. To receive and respond to inquiries regarding the handling of Material Non-Public Information, conduct legal or compliance reviews as appropriate, and provide recommendations.
3. To receive reports of any actual or suspected unauthorized disclosure of Material Non-Public Information and develop appropriate corrective or remedial measures.
4. To establish and maintain document retention policies governing all documents, files, records, and electronic data relating to these procedures.
5. To perform such other duties relating to the implementation and administration of this Policy as may be assigned.

(V) Information Barrier Procedures – Personnel

The Company's Directors, Officers, and employees shall discharge their duties with the care of a prudent administrator, perform their fiduciary duties of loyalty, and act in accordance with the principles of honesty and good faith. Each such person shall execute and comply with a confidentiality agreement.

No Director, Officer, or employee who is aware of the Company's Material Non-Public Information shall disclose such information to any unauthorized person.

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Directors, Officers, and employees shall not seek, request, or obtain access to undisclosed Material Non-Public Information from any person possessing such information unless required for the performance of their official duties. Likewise, no Director, Officer, or employee shall disclose to any other person any undisclosed Material Non-Public Information obtained other than as necessary in the ordinary course of performing such person's official duties.

(VI) Information Barrier Procedures - Documents and Information Assets

Documents and records containing Material Non-Public Information shall be appropriately safeguarded during physical transmission. Where such information is transmitted by e-mail or other electronic means, appropriate information security measures, including encryption, digital signatures, or other comparable security technologies, shall be utilized. All documents, files, records, and electronic data containing Material Non-Public Information shall be appropriately backed up and securely stored.

(VII) Implementation of Information Barriers

The Company shall establish and maintain the information barriers described in the preceding two subsections and shall implement the following control measures:

1. Establish, maintain, and periodically test appropriate information barrier controls.
2. Strengthen the custody, access controls, and confidentiality protections applicable to documents, records, and files containing undisclosed Material Non-Public Information.

(VIII) Confidentiality Obligations of External Parties

Any external organization or individual participating in the Company's mergers and acquisitions, execution of material memoranda of understanding, strategic alliances, other business collaboration projects, or negotiation or execution of material contracts shall execute a confidentiality agreement prior to obtaining access to the Company's Material Non-Public Information and shall not disclose such information to any unauthorized third party.

(IX) Principles Governing Public Disclosure of Material Non-Public Information

The Company shall observe the following principles in publicly disclosing Material Non-Public Information:

1. All disclosures shall be accurate, complete, and timely.
2. All disclosures shall be supported by adequate factual and legal authority.
3. Material information shall be disclosed in a fair, consistent, and non-selective manner.

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(X) Authorized Corporate Spokespersons

Unless otherwise required by applicable law or regulation, all public disclosure of the Company's Material Non-Public Information shall be made solely by the Company's designated Spokesperson or Acting Spokesperson, and a clear order of succession for the Acting Spokesperson shall be established. Where circumstances so require, such disclosure may be made directly by the Company's Chairperson or other duly authorized representative.

The Spokesperson and Acting Spokesperson shall make public statements only within the scope of authority expressly delegated by the Company. Except for the Company's authorized representative, Spokesperson, or Acting Spokesperson, no Director, Officer, employee, or other personnel shall disclose Material Non-Public Information to any external party without prior authorization.

(XI) Records of Public Disclosure

The Company shall maintain complete records of all public disclosures of information, including:

1. the identity of the person making the disclosure and the date and time of such disclosure;
2. the means of disclosure;
3. the information disclosed;
4. copies or contents of any written materials distributed; and
5. any other relevant supporting information.

(XII) Response to Inaccurate Media Reports

If any media report contains information inconsistent with or materially different from the information publicly disclosed by the Company, the Company shall promptly issue a clarification through the Market Observation Post System and request that the applicable media organization publish an appropriate correction.

(XIII) Reporting and Investigation of Information Leakage

Any Director, Officer, or employee who becomes aware of any actual or suspected unauthorized disclosure of Material Non-Public Information shall promptly report the matter to the Material Non-Public Information Compliance Unit and the Internal Audit Department.

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Upon receipt of such report, the Compliance Unit shall promptly investigate the matter and formulate appropriate corrective actions. Where appropriate, the Compliance Unit may coordinate with the Internal Audit Department and other relevant departments to determine appropriate remedial measures. The investigation process and its results shall be fully documented and retained for recordkeeping purposes. The Internal Audit Department shall perform such review or audit procedures as are required within the scope of its responsibilities.

(XIV) Violations and Disciplinary Measures

Where any of the following circumstances occurs, the Company shall investigate the matter, hold the responsible individual accountable, and take such disciplinary or legal action as may be appropriate:

1. Any Director, Officer, employee, or other Company personnel who makes any unauthorized disclosure of Material Non-Public Information or otherwise violates this Policy or any applicable law or regulation.
2. The Company's Spokesperson or Acting Spokesperson makes any public statement beyond the scope of the authority delegated by the Company or otherwise violates this Policy or any applicable law or regulation.

If any person outside the Company improperly discloses the Company's Material Non-Public Information, thereby causing damage to the Company's property, business, or other lawful interests, the Company shall pursue all available legal remedies against such person in accordance with applicable law.

Article 5-1 (Shareholders' Right to Know and Insider Trading Prevention)

- I. The Company recognizes and respects the shareholders' right to timely and transparent information. Accordingly, the Company shall comply with all applicable disclosure requirements and shall regularly and promptly disclose information regarding the Company's financial condition, business operations, Insider shareholdings, and corporate governance through the Market Observation Post System and/or the Company's official website.
- II. To promote the equitable treatment of shareholders, the categories of information described in the preceding paragraph should, where practicable, be disclosed simultaneously in both Chinese and English.
- III. To safeguard shareholders' interests and ensure the equitable treatment of all shareholders, no Company Insider shall purchase or sell the Company's securities while in possession of Material Non-Public Information that has not been publicly disclosed.
- IV. The Company shall maintain trading controls applicable to Company Insiders upon their becoming aware of the Company's financial statements or other financial results. Such controls shall include, without limitation, a prohibition against trading the Company's securities during the thirty day blackout period preceding the public release of the Company's

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annual financial statements and the fifteen day blackout period preceding the public release of each quarterly financial statements.

- V. The Finance Department shall, at least seven days before the commencement of each applicable blackout period, provide written notice to all Company Insiders reminding them that trading in the Company's securities is prohibited during the applicable blackout period, thereby reducing the risk of inadvertent violations of applicable Insider Trading laws and this Policy.

Article 5-2 (Insider Reporting Requirements and Filing Deadlines)

Upon the appointment or removal of any Insider, the Company shall complete the required filing through the Insider Appointment/Removal Real-Time Reporting System within two days following the effective date of such appointment or removal. Each Director, Supervisor, and Officer shall, within five days after assuming office, execute a written acknowledgment confirming that such individual has read and understands the laws and regulations applicable to Company Insiders. The Company shall retain the original acknowledgment for its records. A copy of each acknowledgment executed by a Director or Supervisor shall be submitted to the Taipei Exchange within ten days after the Director's or Supervisor's assumption of office for recordation. If a legitimate reason exists and prior approval is obtained from the Taipei Exchange, the filing deadline may be extended to no later than fifteen days after the assumption of office.

Article 5-3 (Audit Procedures for the Transfer of Treasury Shares to Employees)

Where the Company transfers treasury shares to employees, the Internal Audit Department shall conduct audit procedures to verify that the purpose of the share repurchase, the transfer date, the transfer price, employee eligibility, receipt in full of the share purchase price, and other relevant matters comply with applicable laws and regulations and the Company's treasury share transfer policy.

Article 6 (Training and Compliance Awareness)

The Company shall conduct training and compliance awareness programs regarding this Policy and applicable Insider Trading laws and regulations for its Directors, Officers, and employees at least annually.

Appropriate orientation and compliance training shall also be provided to newly appointed Directors, Officers, and employees on a timely basis following their appointment.

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Article 7 (Internal Control System)

This Policy shall form an integral part of the Company's Internal Control System. The Internal Audit Department shall periodically evaluate compliance with this Policy and issue audit reports to verify the effective implementation of the Company's procedures governing the handling and disclosure of Material Non-Public Information.

Article 8 (Effective Date)

This Policy shall become effective upon approval by the Board of Directors and shall remain in effect unless and until amended or repealed by a resolution of the Board of Directors. Any amendment to this Policy shall likewise require the approval of the Board of Directors.

Article 9 This Policy was originally adopted on December 21, 2009.

First Amendment adopted on October 25, 2010.

Second Amendment adopted on August 7, 2019.

Third Amendment adopted on May 12, 2021.

Fourth Amendment adopted on March 16, 2022.

Fifth Amendment adopted on November 9, 2022.