

Skytech Inc.

Management Procedures for Material Inside Information and Preventing of Insider Trading

Article 1

(Purpose of the Procedures)

These Procedures are specially adopted to establish sound mechanisms for the handling and disclosure of material inside information by this Corporation, in order to prevent improper information disclosures and to ensure the consistency and accuracy , and to prevent the company or insiders from erroneously or intentionally violating the relevant regulations of insider trading due to ignorance of laws and regulations of information released by this corporation to the public.

Article 2

(Material inside information shall be handled in accordance with applicable laws and regulations and these Procedures)

This Corporation shall implement its handling and disclosure of material inside information in accordance with applicable laws and regulations, the rules and regulations of the Taiwan Stock Exchange Corporation or the GreTai Securities Market, and these Procedures.

Article 3

(Legal Definition of Insider Trading)

Individuals subject to the Securities Exchange Act, upon obtaining material nonpublic information that could significantly impact the stock price of an issuing company, are prohibited from personally or on behalf of others, purchasing or selling the company's listed stock or other equity securities within eighteen hours before or after the public disclosure of such information.

Article 4

(Scope of application)

The Procedures shall apply to: :

1. All directors, managerial officers, and natural persons designated to exercise powers as representative pursuant to Article 27, paragraph 1 of the Company Act.
2. Any shareholder holding more than ten (10) percent of the shares of the Company.
3. Any other person who acquires knowledge of the Company's information due to their position, profession, or relationship of control.
4. A person who has only lost such status within the last six months though no longer among those listed in one of the preceding three subparagraphs.
5. Any person who has learned the information from any of the persons named in the preceding four subparagraphs.

Any person set out in subparagraph 1 or 2 of the preceding paragraph includes his/her spouse, minor child and nominee holder.

Article 5

(Scope of material inside information)

For the purposes of these Procedures, the term "material inside information" refers to information that, with reference to the Securities and Exchange Act, other applicable laws and regulations, and the applicable rules and regulations of the Taiwan Stock Exchange Corporation or the GreTai Securities Market, is defined as material inside information by the responsible unit in charge of handling of such information and is further approved by a resolution of the board of directors.

Article 6

(Responsible unit in charge of the handling of material inside information)

This Corporation shall establish a unit charged with handling material inside information. The responsible unit shall be composed of an adequate number of competent members within this company consists of the following members: the Chairman of the Board, the CEO, the Spokesperson, the Chief Financial Officer, the Chief Accountant, and the Head of Audit. The unit shall have the following functions and authorities:

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

Article 7

(Confidentiality firewall operations - Personnel)

1. This Corporation's directors, supervisors, managerial officers, and employees shall exercise the due care and fiduciary duty of a good administrator and act in good faith when performing their duties, and shall sign confidentiality agreements.
2. No director, supervisor, managerial officer, or employee with knowledge of material inside information of this Corporation may divulge the information to others.
3. No director, supervisor, managerial officer, or employee of this Corporation may inquire about or collect any non-public material inside information of this Corporation 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 this Corporation of which they become aware for reasons other than the performance of their duties.
4. The individuals subject to the provisions of this article are prohibited from trading securities using undisclosed market information. The aforementioned prohibition includes company insiders who, from the date of receiving the company's financial reports or related performance information, are restricted from trading in publicly listed stocks of the company or other securities with equity characteristics traded at securities firms' business premises during specified closed periods. These closed periods include the thirty days prior to the announcement of the annual financial report and the fifteen days prior to the

announcement of each quarterly financial report. Furthermore, if the aforementioned content pertains to information that significantly affects the prices of the aforementioned securities already issued by the company, company insiders must adhere to the provisions of Article 157-1 of the Securities Trading Act concerning the cooling-off period for information. This means that after the information becomes explicit, they must refrain from personally or on behalf of others engaging in the purchase or sale of stocks or other securities with equity characteristics traded in the company's publicly listed stocks or at securities firms' business premises for a period of eighteen hours before or after the information is made public.

Article 8

(Confidentiality firewall operations - Documents and information)

Proper protection of confidentiality shall be given to files and documents containing this Corporation's material inside information when transmitted in written form. 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.

Files and documents containing this Corporation's material inside information shall be backed up and stored in a secure location.

Article 9

(Operation of confidentiality firewalls)

This Corporation shall ensure that the firewalls specified in the preceding two articles are established, and take the following additional steps:

1. Adopt adequate control measures for the firewalls and perform periodic testing.
2. Enhance measures for custody and maintaining the secrecy of files and documents containing non-public material inside information of this Corporation.

Article 10

(Confidentiality obligations of outside organizations and persons)

Any organization or person outside of this Corporation that is involved in any corporate action of this Corporation relating to a merger or acquisition, major memorandum of understanding, strategic alliance, other business partnership plans, or the signing of a major contract shall be required to sign a confidentiality agreement, and may not disclose to another party any material inside information of this Corporation's thus acquired.

Article 11

(Principles of disclosure of material inside information)

This Corporation shall comply with the following principles when making external disclosures of material inside information:

1. The information disclosed shall be accurate, complete, and timely.
2. There shall be a well-founded basis for the information disclosure.
3. The information shall be disclosed fairly.

Article 12

(Implementation of the spokesperson system)

1. Any disclosure of this Corporation's material inside information, except as otherwise provided by law or regulation, shall be made by this Corporation's spokesperson, or by a deputy spokesperson acting in such capacity in a confirmed sequential order. When necessary, the disclosure may be made directly by a responsible person of this Corporation.
2. This Corporation's spokesperson or deputy spokesperson shall communicate to outside parties only information within the scope authorized by this Corporation, and no personnel of this Corporation other than those serving as this Corporation's responsible person, spokesperson, or deputy spokesperson may disclose any material inside information of this Corporation to outside parties without authorization.

Article 13

(Record of disclosure of material inside information)

This Corporation shall keep records of the following in respect of any disclosure of information to outside parties:

1. The person who discloses the information, the date, and the time.
2. How the information is disclosed.
3. What information is disclosed.
4. What written material is delivered.
5. Any other relevant details.

Article 13-1

(Evaluation and Decision-Making Process for Internal Significant Information Disclosure)

Decisions made by the company or significant events occurring, as determined by the Taiwan Stock Exchange Corporation Procedures for Verification and Disclosure of Material Information of Companies with Listed Securities, shall follow the assessment and approval procedures. The responsible units are required to submit the "Application Form for Significant Information Disclosure" and the "Checklist for Evaluation of Significant Information" signed by the unit supervisor on the day of the occurrence. These documents are then submitted to the specialized unit within the company for review and verification. Subsequently, they are forwarded to the company's spokesperson for further review. The release of significant information is subject to the approval of the General Manager or an equivalent authority before being published within the legally prescribed time limit.

Decisions made by the company or significant events occurring, as determined by the Taiwan Stock Exchange Corporation Procedures for Verification and Disclosure of Material Information of Companies with Listed Securities, or after further assessment of significance, if the decision or event has a significant impact on the company's finances, business, shareholder equity, or securities prices, the significant information shall be promptly disclosed within the prescribed legal time limit in accordance with the aforementioned provisions.

Article 14

(Response to false media coverage)

If a media agency releases information that is in any respect inconsistent with material information disclosed by this Corporation, this Corporation shall promptly issue a clarification on the Market Observation Post System (MOPS) and request the media agency to correct the information.

Article 15

(Reporting of unusual events)

Any director, supervisor, managerial officer, or employee of this Corporation that becomes aware of any unauthorized disclosure of this Corporation's material inside information shall report to the responsible unit and the internal audit department of this Corporation as soon as practicable.

Upon receipt of a report made pursuant to the preceding paragraph, the responsible unit shall formulate corresponding measures. When necessary, it may invite members from the internal audit and other departments to meet for discussion of the measures, and shall keep a record of the results of the measures for future reference. The internal auditors shall also perform such audits as their duties may require.

Article 16

(Disciplinary measures)

This Corporation shall take measures to discover those responsible and take appropriate legal action against any personnel under either of the following circumstances:

1. Personnel of this Corporation disclose material inside information without authorization to any outside party, or otherwise violate these Procedures or any other applicable law or regulation.
2. A spokesperson or deputy spokesperson of this Corporation communicates to any outside party any information beyond the scope authorized by this Corporation, or otherwise violates these Procedures or any other applicable law or regulation.

If any person outside this Corporation divulges any material inside information of this Corporation, thereby causing damage to any property or interest of this Corporation, this Corporation shall pursue appropriate measures to hold the person divulging the information legally liable.

Article 17

(Internal controls)

These Procedures shall be incorporated into this Corporation's internal control system. The internal auditors shall keep themselves regularly informed of the status of compliance with these Procedures and shall prepare related audit reports, so as to ensure full implementation of the procedures for handling material inside information.

Article 18

(Awareness campaigns)

At least once per year, this Corporation shall conduct educational campaigns to promote awareness among all directors, supervisors, managerial officers, and employees with respect to these Procedures and related laws and regulations.

This Corporation shall also provide educational campaigns to new directors, supervisors, managerial officers, and employees in a timely manner.

Article 19

These Procedures, and any amendments to them, shall be implemented upon approval by the board of directors. Unless approved by more than half of the members of the Audit Committee, it can be carried out with the consent of more than two-thirds of all directors and the resolution of the Audit Committee should be recorded in the minutes of the board meeting.

These regulations were established on November 24, 2022.

The first amendment was made on July 21, 2023.

The second amendment was made on November 9, 2023.