### **Applied BioCode Corporation**

### 內部重大資訊處理暨防範內線交易管理作 業程序

Operational Procedures for Handling Material Inside Information and Preventing

Effective	11/10/2022			
Revision	4.0			
Approved by Board of Directors				
Approval Date	11/10/2022			

第一條	本作業程序之目的 Purpose of these Operational Procedures
Article 1	為建立本公司良好之內部重大資訊處理及揭露機制,以避免資訊不當洩漏及確保本公司對外界發表資訊之一致性與正確性,並強化內線交易之防範,特制定本作業程序,以資遵循。
	These Operational Procedures are adopted specifically to establish well-defined mechanisms of the Corporation for handling and disclosing material inside information, by which to prevent improper information disclosure and to ensure the consistency and accuracy of information released by the Corporation to outside parties, and to strengthen the prevention of insider trading.
	可能會對公司正常營運造成重大影響,甚至觸及違法行為,造成公司權益受損。 The Company may suffer the loss or penalties without a proper insider trading management procedure
第二條	法令之遵守 Legal Compliance
Article 2	本公司辦理內部重大資訊處理、揭露及防範內線交易之管理,應依有關法律、命令及臺灣證券交易所之規定及本作業程序辦理。
	The Corporation shall implement management practices with respect to the handling and disclosure of material inside information and the prevention of insider trading in accordance with applicable laws and regulations, the rules and regulations of the Taiwan Stock Exchange Corporation, and these Operational Procedures.
第三條	適用對象 Scope of Application
Article 3	本作業程序適用對象包含本公司之董事、監察人、經理人及受僱人。 其他因身分、職業或控制關係獲悉本公司內部重大資訊之人,本公司應促 其遵守本作業程序相關規定。
	These Operational Procedures shall apply to all directors, supervisors, managerial officers, and employees of the Corporation.  The Corporation shall see to it that any other person who acquires knowledge of the Corporation's material inside information due to that person's capacity or position,
	occupation, or controlling relationship shall be bound by and observe the applicable provisions of these Operational Procedures.
第四條 Article 4	本作業程序所稱之內部重大資訊由本公司處理內部重大資訊專責單位擬訂並經 董事會決議通過,擬訂時應考量證券交易法及相關法律、命令暨臺灣證券交易 所或證券櫃檯買賣中心相關規章。
	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 such information and is further approved by a resolution of the board of directors.
第五條	有價證券買賣之限制 Restriction on Trading of Securities
Article 5	本作業程序第 3 條規範之本公司董事、監察人及經理人於實際知悉本作 業程序 第 4 條所稱之內部重大資訊時,在該消息明確後,未公開前或公 開後 18 小時 內,不得對本公司之股票或其他具有股權性質之有價證 券,自行或以他人名義 買入或賣出。本作業程序第 3 條規範之本公司董事、監察人及經理人於實際知

悉有重 大影響本公司支付本息能力之消息時,在該消息明確後,未公開前或 公

開後 18 小時內,不得對本公司之上市或在證券商營業處所買賣之非 股權性質之公司債,自行或以他人名義賣出。本項所稱之重大影響其 支付本息能力之消息,依證券交易法及相關法律、命令暨臺灣證券交 易所相關規章定之。如法令另有修正者,依該法令之規定。

No director, supervisor, or managerial officer of the Corporation within the scope of Article 3 of these Operational Procedures who has actual acquired knowledge of any material inside information within the meaning given in Article 4 hereof may buy or sell, in his own name or in the name of another, stock or other equity securities of the Corporation once the information is precise, and before this information is made public or within 18 hours after it is made public.

No director, supervisor, or managerial officer of the Corporation within the scope of Article 3 of these Operational Procedures who has actual acquired knowledge of any information that will have a material impact on the ability of Corporation to pay principal or interest may sell, in his own name or in the name of another, the non-equity-type corporate bonds of the Corporation that are listed on an exchange market once the information is precise, and before this information is made public or within 18 hours after it is made public. The closer definition of the term "information that will have a material impact on the ability of Corporation to pay principal or interest" as described in this paragraph shall be interpreted through and governed by the Securities and Exchange Act, other applicable law and regulations, and the applicable rules and regulations of the Taiwan Stock Exchange Corporation.

Notwithstanding the foregoing, if there is any legal or regulatory amendment providing otherwise, the amended provision shall govern.

### 第六條 Article 6

處理內部重大資訊及防範內線交易之專責單位 Special Task Force for Handling Material Inside Information and Preventing Insider Trading

本公司所設置處理內部重大資訊及防範內線交之專責單位易,由財務長依公司規模、業務狀況及管理需要指定適當人數之成員組成。該單位職權如下:

- 一、負責擬訂、修訂本作業程序之草案。
- 二、負責受理有關內部重大資訊處理作業及與本作業程序有關之諮詢、審 議及 提供建議。
- 三、負責受理有關洩漏內部重大資訊之報告,並擬訂處理對策。
- 四、負責擬訂與本作業程序有關之所有文件、檔案及電子紀錄等資料之保存制度。

五、負責建立及維護本公司之董事、監察人、經理人及持有本公司股份超過百分之十之股東及其配偶、未成年子女及本公司之董事、監察人、 經理人向本公司申報其利用他人名義持有本公司股票者之資料檔案。

六、其他與本作業程序有關之業務。

The Corporation shall establish a special task force charged with the responsibility for handling material inside information and preventing insider trading, to be composed of an adequate number of members in accordance with the size, business conditions, and management needs jointly appointed by the chief financial officer.

The special task force shall have the following functions and authorities:

- 1. Be responsible for formulating the drafts of these Operational Procedures and any amendments hereto.
- 2. Be responsible for receiving and processing any inquiries with respect to the handling operations for material inside information as well as these Operational Procedures, and for review and deliberation and giving of recommendations in connection therewith.

- 3. Be responsible for receiving any report submitted to inform of any unauthorized disclosure of material inside information, and for formulating corresponding measures to be taken.
- 4. Be responsible for designing a system for preserving all documents, files, electronic records, and other material related to these Operational Procedures.
- 5. Be responsible for establishing and maintaining data files recording the information on the Corporation's directors, supervisors, managerial officers, any shareholders holding more than ten percent of the shares of the Corporation, any spouse or minor children thereof, and any holding of the Corporation's shares through nominees as reported to the Corporation by the directors, supervisors, and managerial officers concerned.

Other activities related to these Operational Procedures.

### 第七條 Article 7

保密防火牆作業-人員的管理 Confidentiality Firewall Operations – Management of Personnel

本公司董事、監察人、經理人及受僱人應以善良管理人之注意及忠實義務,本誠實信用原則執行業務,並簽署保密協定。 知悉本公司內部重大資訊之董事、監察人、經理人及受僱人不得洩露所知悉之內部重大資訊予他人。 本公司之董事、監察人、經理人及受僱人不得向知悉本公司內部重大資訊 之人探詢或蒐集與個人職務不相關之公司未公開內部重大資訊,對於非因執行業務得知本公司未公開之內部重大資訊亦不得向其他人洩露。

The Corporation's directors, supervisors, managerial officers, and employees shall exercise the duty of care and fiduciary duty of a good administrator and act in good faith when performing their duties, and shall sign a confidentiality agreement.

No director, supervisor, managerial officer, or employee having knowledge of any material inside information of the Corporation may divulge the information to others. No director, supervisor, managerial officer, or employee of the Corporation may seek to obtain any material inside information of the Corporation from a person having knowledge of such information, nor may they gather or collect, any non-public material inside information of the Corporation not within the scope of their office functions. They also may not divulge to others any non-public material inside information of the Corporation coming to their knowledge not as a result of performing their duties.

### 第八條 Article 8

保密防火牆作業-文件及資訊的管理 Confidentiality Firewall Operations – Management of Documents and Information

本公司內部重大資訊檔案文件以書面或電子方式傳遞時,應有標示機密 (confidential)等文字之適當保護。公司內部重大資訊之檔案文件,應備份並保存於安全之處所。

Files and documents containing the Corporation's material inside information, when transmitted in writing or by electronic means, shall be marked "confidential" or other similar designation for proper protection of confidentiality.

Files and documents containing the Corporation's material inside information shall be backed up and stored in safe places.

### 第九條 Article 9

保密防火牆之運作 Operation of Confidentiality

本公司應確保前二條所訂防火牆之建立,並採取下列措施:

- 一、採行適當防火牆管控措施並定期測試。
- 二、加強公司未公開之內部重大資訊檔案文件之保管、保密措施。

The Corporation shall ensure the establishment of the firewalls specified in the preceding two articles, and also take the following steps:

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

#### 第十條 Article 10

外部機構或人員保密作業 Confidentiality Obligations of Outside Organizations and Persons

本公司以外之機構或人員因參與本公司併購、重要備忘錄、策略聯盟、其他業務 合作計畫或重要契約之簽訂,應簽署保密協定,並不得洩露所知悉之本公司內部 重大資訊予他人。

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

### 第十一條 Article 11

內部重大資訊揭露之原則 Principles of Disclosure of Material Inside Information 本公司對外揭露內部重大資訊應秉持下列原則:

- 一、資訊之揭露應正確、完整且即時。
- 二、資訊之揭露應有依據。
- 三、資訊應公平揭露。

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

- 1. The information shall be disclosed on an accurate, complete, and timely basis.
- 2. The information shall be disclosed on a well-foundedbasis.

The information shall be disclosed on a fair basis.

### 第十二條 Article 12

發言人制度之落實 Implementation of Spokesperson

本公司內部重大資訊之揭露,除法律或法令另有規定外,應由本公司發言人或代理發言人處理,並應確認代理順序;必要時,得由本公司負責人直接負責處理。本公司發言人及代理發言人之發言內容應以本公司授權之範圍為限,且除本公司負責人、發言人及代理發言人外,本公司人員,非經授權不得對外揭露內部重大資訊。

Any disclosure of the Corporation's material inside information shall, except as otherwise provided by law or regulation, be made by the Corporation's spokesperson, or, as the case may be, by any person duly acting as a deputy spokesperson following an established sequential order for acting in such capacity; when necessary, the disclosure may be made directly by a responsible person of the Corporation.

The Corporation's spokesperson or deputy spokesperson shall communicate to outside parties only information within the scope authorized by the Corporation, and no personnel of the Corporation other than those serving as the Corporation's responsible person, spokesperson, or deputy spokesperson may disclose any material inside information of the Corporation to outside parties without authorization.

### 第十三條 Article 13

重大訊息之評估及核決程序 Evaluation and Approval Procedure of Material Information

本公司決議之重大決策或發生重要事件符合臺灣證券交易所對有價證券上市公司 重大訊息之查證暨公開處理程序規定,本公司重大訊息專責單位應於事實發生日 填報「重大訊息發布申請書」,並送請專責單位主管審核,並於法令規定發布時 限前經財務長簽核決行後發布重大訊息。

Special task force of the Corporation shall file the "Material information announcement application" when resolving great decision or occurring critical event corresponds with the Taiwan Stock Exchange Corporation Procedures for Verification and Disclosure of Material Information of Companies with Listed Securities. In addition, the "Material information announcement application" shall be reviewed by manager of special task force and the material information shall be announced in time after receiving approval from chief financial officer.

本公司決議之重大決策或發生重要事件符合臺灣證券交易所對有價證券上市公司 重大訊息之查證暨公開處理程序規定,或經進一步評估重大性後,決策或事件對 本公司財務、業務、股東權益或證券價格具重大影響者,應於法令規定時限內依 前項規定儘速發布重大訊息。

Material information shall be announced in time, if the great decision which resolved by the Corporation or critical event occurred corresponds with the Taiwan Stock Exchange Corporation Procedures for Verification and Disclosure of Material Information of Companies with Listed Securities, or after further materiality evaluation, if the decision or event has significant impact on the Corporation's finance, business, shareholders' equity, or stock price.

### 第十四條 Article 14

內部重大資訊揭露之紀錄 Record of Disclosure of Material Inside Information 公司對外之資訊揭露應留存下列紀錄:

- 一、資訊揭露之人員、日期與時間。
- 二、資訊揭露之方式。
- 三、揭露之資訊內容及適用之法規依據。
- 四、交付之書面資料內容。
- 五、其他相關資訊。

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

- 1. Who discloses the information, on what date, and at what time.
- 2. How the information is disclosed.
- 3. What information is disclosed and corresponding regulation.
- 4. What written material is delivered.

#### Any other relevant details.

### 第十五條 Article 15

對媒體不實報導之回應 Response to False Media Coverage

媒體報導之內容,如與本公司揭露之重大資訊內容有不符時,本公司得依 其內容之性質,於公開資訊觀測站澄清或向該媒體要求更正。If a media agency releases information that in any respect is inconsistent with material information disclosed by the Corporation, the Corporation may, having regard to the nature of the information, elect either to make a clarification announcement on the Market Observation Post System (MOPS) or to request the media agency to correct the information.

### 第十六條 Article 16

異常情形之報告 Reporting of Unusual Events

本公司董事、監察人、經理人及受僱人如知悉內部重大資訊有洩漏情事,應儘速向專責單位及法務部門報告。專責單位於接受前項報告後,應擬定處理對策,必要時並得邀集法務等部門商討處理,並將處理結果做成紀錄備查,內部稽核亦應本於職責進行查核。

Any director, supervisor, managerial officer, or employee of the Corporation shall report to the special task force and the legal division of the Corporation as soon as practicable if becoming aware of any unauthorized disclosure of the Corporation's material inside information.

Upon receipt of a report under the preceding paragraph, the special task force shall formulate corresponding measures to be taken, and when necessary may invite members from the legal and other divisions to meet for discussion of such measures, and shall document the results of the measures so taken for future reference. The internal auditors shall also perform such audits as their duties may require.

### 第十七條 Article 17

違規處理 Disciplinary Measures

有下列情事之一者,本公司應追究相關人員責任並採取適當法律措施:

- 一、本公司人員擅自對外揭露內部重大資訊或違反本作業程序或其他法 令規定者。
- 二、本公司發言人或代理發言人對外發言之內容超過本公司授權範圍或 違反本 作業程序或其他法令規定者。

本公司以外之人如有洩漏本公司內部重大資訊之情形,致生損害於本公司 財產或利益者,本公司應循相關途徑追究其法律責任。

The Corporation shall pursue disciplinary action and take appropriate legal measures against any personnel to whom either of the following applies:

- 1. Any personnel of the Corporation without authorization discloses material inside information to any outside party or otherwise violates these Operational Procedures or any other applicable law or regulation.
- 2. The spokesperson or deputy spokesperson of the Corporation communicates to any outside party any information beyond the scope authorized by the Corporation or otherwise violates these Operational Procedures or any other applicable law or regulation.

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

#### 第十八條

內控機制 Internal Controls

#### Article 18

本作業程序應納入本公司內部控制制度,內部稽核人員應定期了解其遵循 情形並做成稽核報告以落實內部重大資訊處理暨防範內線交易管理作業 程序之執行。

These Operational Procedures shall be incorporated into the Corporation's internal control system. The internal auditors shall keep themselves regularly informed of the compliance status with regard to these Operational Procedures and shall prepare audit reports accordingly, so as to enforce the implementation of operational procedures for handling material inside information and for preventing insider trading.

### 第十九條 Article 19

教育宣導 Awareness Campaigns

本公司每年至少一次對董事、監察人、經理人及受僱人辦理本作業程序及 相關法令之教育宣導。 對新任董事、監察人、經理人及受僱人應亦適時提供教育宣導相關法令訊息。

The Corporation shall, at least once per year, conduct informational campaigns to promote awareness among all directors, supervisors, managerial officers, and employees with respect to these Operational Procedures and applicable laws and regulations.

The Corporation shall also provide informational training to new directors, supervisors, managerial officers, and employees in a timely manner so that they may become aware of the provisions of applicable laws and regulations.

#### 第二十條

本作業程序經董事會通過後實施,修正時亦同。

#### Article 20

These Operational Procedures, and any amendment hereto, shall be implemented upon approval by the board of directors.