



Sino-American Silicon Products Inc.

Policies and Procedures for Financial Derivatives Transactions

Article 1

Scope of application

The Company shall follow the Policies and Procedures when doing financial derivatives transactions. Any other matters not set forth in the Procedures shall be dealt with in accordance with the applicable laws, rules and regulations.

Article 2

Definition (1)

The term "derivatives" in these Procedures means products such as Forward contracts, options contracts, futures contracts, leverage contracts, or swap contracts, whose value is derived from a specified interest rate, financial instrument price, commodity price, foreign exchange rate, index of prices or rates, credit rating or credit index, or other variable; or hybrid contracts combining the above contracts; or hybrid contracts or structured products containing embedded derivatives.

Article 3

Definition (2)

The term "forward contracts" does not include insurance contracts, performance contracts, after-sales service contracts, long-term leasing contracts, or long-term purchase (sales) contracts.

Article 4

The types of derivatives that may be traded

Derivative products that the Company can buy or sell are limited to derivative products as defined in Article two and three of this procedure.

Article 5

Transaction principle and guideline

The profit of the Company shall be derived from operation. The Company engages in hedge-oriented transaction of the above derivatives transactions should be on safeguarding the company's operational profit and mitigating risks such as exchange rate, interest rate, or asset-liability price fluctuations through hedging transactions, which means the purpose of holding or issuing derivatives commodity is not to earn through price differences of a commodity. The Company does not allow opportunism transaction. The instruments shall meet the Company's actual hedging needs.

Article 6

The loss ceiling on total trading and for individual

Loss limit of "Hedge-oriented transactions" is 20% of the contract amount. The term applies in any



individual contract or for all contracts in aggregate.

If contract losses exceed the specified limit, the Finance Department must promptly report to the Chairperson and take necessary actions, followed by presenting a special report to the latest Board for review and recordation. If there are offsetting gains or losses from hedging positions on assets or liabilities, equal to the contract loss amount, they will not be subject to the above limit on loss amounts.

Article 7

Ceiling of total amount of derivatives contracts

The total contract amount from foreign exchange hedging operation underwritten from daily operation, shall not exceed the total foreign currency position of accounts receivable and accounts payable (including funds lending among companies in the consolidated financial statements) and deposit, and shall be reported to the latest BOD meeting after transaction. Apart from daily operation, any currency hedging should adopt the assets (liability) which are held or anticipated to trade as ceiling. For example (including but not limited to), overseas acquisition adopts acquisition price as ceiling, fund lending adopts loan balance as ceiling, overseas equity, bonds or other financial instruments adopts total amount of outstanding balance as ceiling and could only be executed after BOD approval. However, if BOD approval could not be obtained in advance due to interest of time, Chairperson could be authorized to approve transactions based on evaluation report submitted by finance department, and such transaction shall be reported to the latest BOD meeting after execution.

Article 8

Division of authority and duties

- (1) Finance Department is responsible for building hedging strategy and negotiation, as well as setting up quarterly case-specific hedging ceiling in accordance with the Procedures based on revenue, export/import quantity and other relevant indicators and data and balance position for risk control.
- (2) Finance Department shall pay attention to foreign currency positions, fund levels, and other relevant indicators and data at all times, submit hedging strategy according to actual needs for President's approval. Any deviation can only be executed upon receiving President's approval.

Article 9

Authorization

- (1) The amount within US\$500 thousand or equivalent foreign currency on each transaction shall be approved by President.
- (2) The amount exceed US\$500 thousand or equivalent foreign currency on each transaction shall be approved by Chairperson.

Article 10

Finance Department shall evaluate the financial institution with better condition and engage in hedging transactions within the agreement after getting the approval of President and Chairperson.

Article 11



Public Disclosure of Information

- (1) The Company shall submit derivatives transactions as of last month of the Company and its overseas public subsidiaries to the information disclosure website designated by the Securities and Futures Commission on a monthly basis by the 10th of every month.
- (2) When losses from derivatives trading reaching the limits on aggregate losses or losses on individual contracts set out in the procedures adopted, the Company shall publicly announce and report the relevant information on the FSC's designated website in the appropriate format as prescribed by regulations within 2 days counting inclusively from the date of occurrence of the event.

Article 12

Finance Department shall make trading slip and details regarding hedging transaction in accordance with transaction voucher and submit to the manager in charge for review. Finance department personnel shall confirm transaction contents with banks are in accordance with the aforementioned trading slips and details and submit to President for approval.

Article 13

The balance from the hedging transactions shall be settled by the Finance Department immediately.

Article 14

The accounting handling towards the Company's derivative transactions will be conducted in accordance with the requirements of the General Acceptable Accounting Principles and the relevant Financial Accounting Principle Statement. The accounting of derivatives transactions entered into by the Company shall be processed pursuant to the Statements of Financial Accounting Standards No. 14 "Accounting for Financial Instruments".

Article 15

1. Internal Control of Operational Processes

- (1) Derivative commodity trading personnel and personnel involved in confirmation, delivery, and other operations shall not hold dual positions. Related risk measurement, monitoring, and control personnel shall be assigned to a different department than the personnel in the preceding subparagraph and shall report to the Board of Directors or senior management personnel with no responsibility for trading or position decision-making.
- (2) Trading personnel shall submit trading slip to confirmation personnel for record.
- (3) Bookkeeping personnel shall at regular intervals reconcile accounts or records with the trading counterparty.
- (4) Trading personnel shall check total transaction amounts on an ongoing basis to see whether they conform to the ceilings set under these Procedures.

2. Risk Management

(1) Credit risk

Credit risk is controlled by restricting the counterparties that the Company deals with to those who either have banking relationship with the Company or professional brokerage house to



avoid default risk.

(2) Market Risk

Market/Price risk arising from the fluctuations of interest rates and foreign exchange rates or from other factors shall be closely monitored and controlled.

(3) Liquidity Risk

Liquidity risk should be controlled by restricting counterparties to those who have adequate facility, sufficient information, and sizable trading capacity and capability to enter into transactions in any markets around the world.

(4) Operation Risk

The Company shall comply with the authorized trading amount and the rules of operating process in order to avoid the operating risk.

(5) Legal Risk

Any legal documents with banks in respect of financial derivative transactions shall first be reviewed by in-house and/or outside legal counsel before being executed to control legal risk.

(6) Cash flow Risk

Source found for derivative transaction shall come from the Company's own funds. Operational fund for next three months should be taken into consideration when deciding transaction amount.

3. Periodic evaluation

(1) The Finance Department shall assess market prices and evaluate hedging performance.

"Hedge-oriented" amount shall be evaluated at least twice a month; reports should be delivered to managers with BOD authorization.

(2) The designated personnel appointed by the Board of Directors to monitor and control derivatives trading risks on an ongoing basis shall also at regular intervals evaluate whether trading performance accords with established operational strategies, and whether risks assumed are within a tolerable range. They shall at regular intervals evaluate whether the risk management procedures currently in use are appropriate and scrupulously conducted in accordance with these Procedures.

(3) Senior management personnel authorized by the Board of Directors shall monitor the trading and profit and loss situation. When any irregularity is discovered, senior management personnel authorized by the Board of Directors shall report to the Board of Directors. The Board of Directors shall have the independent Director(s) attend and express an opinion.

(4) The Company engaging in derivatives trading shall establish a logbook in which details of the types and amounts of derivatives trading engaged in, Board of Directors approval dates, and the matters required to be carefully evaluated under subparagraph 1, 2 of this Article shall be recorded in detail in the logbook at least 5 years.

Article 16

Internal audit and penalties

An internal audit personnel shall periodically make a determination of the suitability of internal controls



on derivatives and conduct a monthly audit of how faithfully derivatives trading by the trading department adheres to the procedures for engaging in derivatives trading, and prepare an audit report. If any material violation is discovered, the audit committee shall be notified in writing.

Manager and dealers shall follow the procedures when doing derivative transactions, if any violation to the procedure or relevant regulations, he/she shall be punished in accordance with Personnel Evaluation Committee regulations.

Article 17

Implementation and amendment

After the procedures have been approved by more than half of all Audit Committee members, this shall be submitted to the board of directors for a resolution and be implemented after approved by a shareholders' meeting; the same applies when the procedures are amended. If any director expresses dissent and it is contained in the minutes or a written statement, the Company shall submit his/her dissenting opinion to shareholders' meeting for discussion.

If approval of more than half of all Audit Committee members as required in the preceding paragraph is not obtained, the procedures may be implemented if approved by more than two-thirds of all directors, and the resolution of the Audit Committee shall be recorded in the minutes of the Board of Directors meeting.

The terms "all Audit Committee members" and "all directors" shall be counted as the actual number of persons currently holding those positions.

Article 18

Enforcement and history

The Procedure was enacted on March 19, 1999.

The 1st amendment was made on June 13, 2003.

The 2nd amendment was made on June 8, 2006.

The 3rd amendment was made on June 25, 2013.

The 4th amendment was made on June 27, 2017.

The 5th amendment was made on June 26, 2018.

The 6th amendment was made on June 27, 2019.

The 7th amendment was made on August 26, 2021.

The 8th amendment was made on June 20, 2024.