

Article 1.0 Purpose and basis of these procedures

Article 1.1 These procedures are specially adopted to establish sound prevention of insider trade and avoid improper information disclosure by D-Link Corporation ("The Company"), in accordance with Regulations Governing Establishment of Internal Control Systems by Public Companies and Article 157-1 of Securities and Exchange Act for safeguarding the rights of investors and the Company.

Article 1.2 Internal procedures of the Company:

1. Procedures for managing of financial and non-financial information.
2. Procedures for filing of Public Information

Article 2.0 Scope of application

The Company should handle the procedure and disclosure of material inside information and prevention of insider trade in accordance with relevant laws, orders and the regulations of the competent authority of the Taiwan Stock Exchange and these procedures.

Article 3.0 Subject of application

The following persons are subject to the prohibition on insider trading in accordance with article 157-1, paragraph 1 of the Securities and Exchange Act.

Article 3.1 A director and/or managerial officer of the Company, and/or a natural person designated to exercise powers as representative by juristic-person pursuant to Article 27, paragraph 1 of the Company Act.

Article 3.2 Shareholders holding more than ten percent of the shares of the Company.

Article 3.3 All employees of the Company

Article 3.4 Any person who has learned the undisclosed material information by reason of occupational or controlling relationship.

Article 3.5 A person who, though no longer among those listed in [one of] the preceding four subparagraphs, has only lost such status within the last six months.

Article 3.6 Any person who has learned the information from any of the persons named in the preceding five subparagraphs.

In accordance with article 22-2 of the Securities and Exchange Act, the directors, representative by juristic-person director, managerial officers, or shareholders holding more than ten percent of the total shares, including shares held by their spouses and minor children and those held under the names of other parties.

Article 4.0 Insider trading

Article 4.1 In accordance with article 157-1, paragraph 1 of the Securities and Exchange Act, the persons who are subject to the prohibition on insider trading, knowing of any

information that will have a material impact on the price of the securities of the Company, after the information is prior to the public disclosure of such information or within 18 hours after its public disclosure, should not purchase or sell, in the person's own name or in the name of another, shares of the Company that are listed on an exchange or an over-the-counter market, or any other equity-type security of the Company. If the aforementioned person violates the regulations, it constitutes insider trading.

Article 4.2 In accordance with article 157-1, paragraph 2 of the Securities and Exchange Act, the persons who are subject to the prohibition on insider trading, knowing of any information that will have a material impact on the ability of the Company to pay principal or interest, after the information is precise, and prior to the public disclosure of such information or within 18 hours after its public disclosure, should not sell, in the person's own name or in the name of another, the equity-type corporate bonds of such company that are listed on an exchange or an over-the-counter market. If the aforementioned person violates the regulations, it constitutes insider trading.

Article 5.0 In accordance with article 157-1, paragraph 2 of the Securities and Exchange Act, information that have a material impact on the price of the securities of the Company includes:

Article 5.1 The information relating to the finances or businesses of the Company and the specific content of which will have a material impact on the price of the securities, or will have a material impact on the investment decision of a reasonably prudent investor.

Article 5.2 The information relating to the supply and demand of such securities on the market, or tender offer of such securities, and the specific content of which will have a material impact on the price of the securities, or will have a material impact on the investment decision of a reasonably prudent investor.

Article 6.0 The information that has a material impact on the price of the securities and the ability of the Company to pay principal discloses by the following means:

Article 6.1 Regulations governing the scope of information and the means of its disclosure pursuant to article 157-1, paragraph 5 and paragraph 6 of the Securities and Exchange Act, it is stipulated that

(1) The information relating to the finances or businesses of the Company would be disclosed by entering into the Market Observation Post System.

(2) The information relating to the supply and demand on the market would be disclosed by entering into the Market Observation Post System.

(3) The time of announcement is calculated after entering into the Market

Observation Post System and the announcement is confirmed.

Article 6.2 The means for disclosure of information relating to the supply and demand on the market refer that the company enters such information into the Market Observation Post System, publicly announces, coverage of the information by two or more daily national newspapers on non-local news pages and national television news or electronic newspapers issued by any the aforesaid media.

Article 7.0 Procedures of handling of material inside information

Article 7.1 The date of existence of the information described in these procedures should be the date of the fact, agreement, contract signature, payment, request, execution of transaction, transfer of title, resolution of the board of directors, or other precise date based on concrete evidence, whichever comes first and the Company handles the procedure and disclosure of material inside information in accordance with relevant laws, orders and the regulations of the Taiwan Stock Exchange.

Article 7.2 Confidentiality agreements

(1) The Company's directors, representatives by juristic-person director, managerial officers, and employees should exercise the due care and fiduciary duty of a good administrator and act in good faith when performing their duties, and should sign confidentiality agreements.

(2) No director, representative by juristic-person director, managerial officer, or employee with knowledge of material inside information of the Company may divulge the information to others.

(3) No director, representative by juristic-person director, managerial officer, or employee of the Company may inquire about or collect any non-public material inside information of the Company 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 the Company of which they become aware for reasons other than the performance of their duties.

Article 7.3 (1) Proper protection of confidentiality should be given to files and documents containing the Company'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.

(2) Files and documents containing the Company's material inside information should be backed up and stored in a secure location.

Article 7.4 Any organization or person outside of the Company that is involved in any

corporate action of the Company relating to a merger or acquisition, major memorandum of understanding, strategic alliance, other business partnership plans, or the signing of a major contract should be required to sign a confidentiality agreement in written form, and may not disclose to another party any material inside information of the Company's thus acquired.

Article 7.5 The Company should comply with the following principles when making external disclosures of material inside information:

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

Article 7.6 (1) Any disclosure of the Company's material inside information, except as otherwise provided by law or regulation, should be made by the Company's spokesperson, when necessary, the disclosure may be made directly by a responsible person of the Company.

(2) The Company's spokesperson should communicate to outside parties only information within the scope authorized by the Company, and no personnel of the Company other than those serving as the Company's responsible person, spokesperson may disclose any material inside information of the Company to outside parties without authorization.

Article 7.7 The Company should 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 7.8 If a media agency releases information that is in any respect inconsistent with material information disclosed by the Company, the Company should promptly issue a clarification on the Market Observation Post System (MOPS) and request the media agency to correct the information.

Article 7.9 (1) Any director, representative by juristic-person director, managerial officer, or employee of the Company that becomes aware of any unauthorized disclosure of the Company's material inside information should report to the responsible unit and the internal audit department of the Company as soon as practicable.

(2) Upon receipt of a report made pursuant to the preceding paragraph, the responsible unit should formulate corresponding measures. When necessary, it

may invite members from the internal audit and other departments to meet for discussion of the measures, and should keep a record of the results of the measures for future reference. The internal auditors should also perform such audits as their duties may require.

Article 7.10 The Company should take measures to discover those responsible and take appropriate legal action against any personnel under either of the following circumstances:

(1) Personnel of the Company 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 of the Company communicates to any outside party any information beyond the scope authorized by the Company, or otherwise violates these procedures or any other applicable law or regulation.

(3) If any person outside the Company divulges any material inside information of the Company, thereby causing damage to any property or interest of the Company, the Company will pursue appropriate measures to hold the person divulging the information legally liable. In response to violations of laws related to insider trading, the Company will fully cooperate with the relevant competent authorities in the investigation.

Article 8.0 Responsible unit

The Company has corporate finance division as the responsible unit for handling material inside information, the following are functions and authorities:

Article 8.1 Responsibility for formulating the procedures and any amendment.

Article 8.2 Responsibility for receiving inquiries in connection with the methods of handling material information, and for consultation, review, and recommendations relating to these procedures.

Article 8.3 Responsibility for receiving reports on unauthorized disclosures of material inside information and formulation of corresponding measures.

Article 8.4 Responsibility for designing a system for preserving all documents, files, electronic records, and other materials related to these procedures.

Article 8.5 Responsibility for establishing and maintaining data files of insiders and shareholders holding more than 10% of the shares.

Article 8.6 Other activities related to these procedures.

Article 9.0 Internal controls

These procedures should be incorporated into the Company's internal control system. The internal auditors should keep themselves regularly informed of the

status of compliance with these procedures and should prepare related audit reports.

Article 10.0 Awareness campaigns

Depending on the actual situation, the Company conducts educational campaigns among the applicable subject of Article 3.0 of these procedures from time to time. The Company should also provide educational campaigns to new directors, representative by juristic-person director, managerial officers, and employees in a timely manner.

Article 11.0 Implement and amendment

These procedures, and any amendments to them, should be implemented upon approval by the board of directors. Matters not covered by these procedures should be handled in accordance with the Securities and Exchange Act and relevant laws, orders and regulations of the competent authorities.

Article 12.0 Supplementary Provisions

These procedures were constituted on March 3, 2010.

Amendment for 1st instance: March 17, 2021.