

## PharmaEngine, Inc.

### Implementation of Insider Trading Prevention Measures

Date: January 16, 2024

- 1 The Company has published the complete content of internal rules, such as the “Measures for Prevention of Insider Trading” and the “Procedures for Handling Material Inside Information,” in the dedicated section (Corporate Governance section) on the Company’s website.
- 2 Specific Implementation of Insider Trading Prevention Measures
  - 2.1 The Company conducts educational training at least once a year for current directors, managerial officers, and employees on the “Measures for Prevention of Insider Trading,” “Procedures for Handling Material Inside Information,” and relevant laws and regulations. Newly appointed directors and managerial officers receive educational training on these topics within three months of assuming their positions. Newly hired employees receive educational training on these topics during their orientation training, organized by the Human Resources Department. In the fiscal year 2023, a total of 5 newly hired employees in the Company received at least a one-hour educational training session on the “Measures for Prevention of Insider Trading,” “Procedures for Handling Material Inside Information,” and relevant laws and regulations.
  - 2.2 In the fiscal year 2022, the Company approved the amendment of the “Measures for Prevention of Insider Trading” during the board meeting held on July 26. The Company has announced company stock trading control measures for insiders including directors, managers, and others that have knowledge regarding the upcoming financial statements or business information. Measures include, without limitation, those prohibiting directors and managers from trading its shares during the closed period of 30 days prior to the publication of the annual financial reports and 15 days prior to the publication of the quarterly financial reports. The announcement was made four times in 2023. On October 2, 2023, the Company conducted one hour of “Measures for Prevention of Insider Trading” training to 22 personnel including managers and employees.
  - 2.3 The content of the educational training session on insider trading prevention may include: confidentiality of material inside information, as well as the reasons for insider trading, the process of identifying and confirming insider trading, examples of trading instances, internal scope of material inside information, confidentiality procedures, disclosure procedures, and handling violations.
  - 2.4 After the completion of the insider trading prevention educational training session, the presentation slides and audio/video files are uploaded to the internal employee system for reference. Additionally, the materials will be provided via e-mail to those employees who were unable to attend the session on that day.