

## Advanced Analog Technology, Inc.

### Procedures for Handling Material Inside Information

#### Chapter 1 General Provisions

##### Article 1 Purpose of These Procedures

These procedures are established to create a sound mechanism for handling and disclosing the Company's internal material information, prevent improper information leakage, and ensure the consistency and accuracy of information released to the public.

##### Article 2 Handling of Internal Material Information in Compliance with Laws and These Procedures

The Company shall handle and disclose internal material information in accordance with applicable laws, regulations, the rules of the Taipei Exchange, and these procedures.

##### Article 3 Applicable Subjects

These procedures apply to the Company's directors, independent directors, managers, and employees. Other persons who become aware of the Company's internal material information due to their status, profession, or control relationship shall also be required by the Company to comply with the relevant provisions of these procedures.

##### Article 4 Scope of Internal Material Information

The internal material information referred to in these procedures shall be drafted by the Company's Office of the General Manager and the Chief Financial Officer, and approved by the Board of Directors. In drafting, consideration shall be given to the Securities and Exchange Act, related laws and regulations, and the rules of the Taipei Exchange.

The scope of the Company's internal material information includes:

1. Matters specified in Article 7 of the Enforcement Rules of the Securities and Exchange Act.
2. The "Regulations Governing the Scope and Disclosure Methods of Material Information under Article 157-1, Paragraphs 5 and 6 of the Securities and Exchange Act."

3. The “Verification and Public Disclosure Procedures for Material Information of Listed Companies” issued by the Taipei Exchange.

#### Article 5

#### Designated Unit for Handling Internal Material Information

Based on the Company’s scale, business operations, and management needs, a designated unit for handling internal material information shall be formed by the Office of the General Manager and the Chief Financial Officer, and approved by the Board of Directors. Its authorities and responsibilities are as follows:

1. Responsible for drafting and revising these procedures.
2. Responsible for handling matters related to internal material information, including consultations, reviews, and providing recommendations concerning these procedures.
3. Responsible for receiving reports of internal material information leaks and formulating appropriate countermeasures.
4. Responsible for establishing systems for preserving all documents, files, and electronic records related to these procedures.
5. Responsible for other duties related to the implementation of these procedures.

#### Chapter 2

#### Internal Material Information Confidentiality Procedures

#### Article 6

#### Confidentiality “Firewall” Procedures – Personnel

The Company’s directors, independent directors, managers, and employees shall perform their duties with the care of a prudent manager and in good faith, and shall sign confidentiality agreements.

Directors, independent directors, managers, and employees who are aware of the Company’s internal material information shall not disclose such information to others.

Furthermore, directors, independent directors, managers, and employees shall not inquire about or collect non-public internal material information unrelated to their duties from those who have access to it, nor shall they disclose any non-public internal material information learned outside the scope of their job responsibilities.

#### Article 7

#### Confidentiality “Firewall” Procedures – Information

When the Company’s internal material information is transmitted in written

form, it shall be properly protected. When transmitted via email or other electronic means, appropriate security measures such as encryption or electronic signatures must be applied.

All files and documents containing internal material information shall be backed up and stored in a secure location.

Article 8                      Operation of the Confidentiality “Firewall”

The Company shall ensure the establishment of the firewalls described in the preceding two articles and implement the following measures:

1. Adopt appropriate firewall control measures and conduct regular testing.
2. Strengthen the custody and confidentiality measures for the Company’s non-public internal material information files and documents.

Article 9                      Confidentiality Procedures for External Institutions or Personnel

External institutions or personnel involved in the Company’s mergers and acquisitions, important memoranda, strategic alliances, other business cooperation plans, or the signing of significant contracts shall sign confidentiality agreements and shall not disclose any internal material information of the Company they become aware of to others.

Chapter 3                      Procedures for the Disclosure of Internal Material Information

Article 10                      Principles, Evaluation Procedures, and Approval for Disclosure of Internal Material Information

The Company shall adhere to the following principles when disclosing internal material information externally:

1. Information must be disclosed accurately, completely, and promptly.
2. Information disclosure must be based on verifiable facts.
3. Information must be disclosed fairly.

For major decisions or significant events that meet the “Verification and Public Disclosure Procedures for Material Information of Listed Companies” issued by the Taipei Exchange, or that, upon further assessment, are determined to have a material impact on the Company’s finances, operations, shareholders’ equity, or securities price, the Office of the General Manager or the Chief Financial Officer shall, on the date the facts occur, submit a “Material Information Disclosure Application Form” with relevant documents for review

by the Company Spokesperson and approval by the Chairman. The material information shall then be disclosed within the legally prescribed timeframe.

#### Article 11

##### Implementation of the Spokesperson System

Except as otherwise required by law or regulation, the disclosure of the Company's internal material information shall be handled by the Company's Spokesperson or an authorized deputy, with the order of delegation confirmed. When necessary, the Company's responsible officer may directly handle the disclosure.

The statements made by the Spokesperson or deputy spokesperson shall be limited to the scope of authority granted by the Company. Except for the Company's responsible officer, the Spokesperson, or the deputy spokesperson, no other personnel shall disclose internal material information externally without authorization.

#### Article 12

##### Records and Preservation of Internal Material Information Disclosures

The Company shall retain the following records for external information disclosures:

1. Personnel responsible for the disclosure, date, and time.
2. Method of disclosure.
3. Content of the disclosed information.
4. Content of any submitted written materials.
5. Other relevant information.

The disclosure of material information may be evaluated, approved, and preserved in electronic or written form. The evaluation records, approval documents, and related materials shall be retained for at least five years.

For the release of material information, the Company shall retain records of:

1. Evaluation content.
2. Signatures, dates, and times of the approving and executing supervisors.
3. Content of the disclosed material information and applicable legal basis.
4. Other relevant information.

#### Article 13

##### Response to Inaccurate Media Reports

If the content reported by the media is inconsistent with the information disclosed by the Company, the Company shall promptly issue a clarification on

the Market Observation Post System and request the media to make a correction.

Chapter 4 Handling of Abnormal Situations

Article 14 Reporting of Abnormal Situations

If any director, supervisor, manager, or employee becomes aware of a leak of internal material information, they shall promptly report it to the dedicated unit and the Internal Audit Department.

Upon receiving such a report, the dedicated unit shall formulate appropriate countermeasures and, if necessary, convene relevant departments such as Internal Audit to discuss the handling. The handling results shall be documented and retained for reference, and the Internal Audit Department shall perform audits in accordance with its responsibilities.

Article 15 Handling of Violations

The Company shall hold responsible and take appropriate legal measures against any personnel under the following circumstances:

1. If Company personnel disclose internal material information externally without authorization, or violate this operating procedure or other applicable laws and regulations.
2. If the Company spokesperson or deputy spokesperson makes statements beyond the authorized scope or violates this operating procedure or other applicable laws and regulations.

For any external party who leaks the Company's internal material information, resulting in damage to the Company's property or interests, the Company shall pursue legal responsibility through relevant channels.

Chapter 5 Internal Control Operations and Internal Education & Awareness

Article 16 Internal Control Mechanism

This operating procedure is incorporated into the Company's internal control system. Internal audit personnel shall monitor compliance and prepare audit reports to ensure proper implementation of the internal material information handling procedures.

Article 17 Education and Awareness

The Company shall provide education and awareness programs on this operating procedure and related laws and regulations to its directors,

independent directors, managers, and employees.

For newly appointed directors, independent directors, managers, and employees, the Company shall provide timely education and awareness sessions.

## Chapter 6

### Supplementary Provisions

#### Article 18

This operating procedure shall be implemented after approval by the Board of Directors, and the same applies to any amendments.

The first amendment was made on November 17, 2011. (Original procedure: Insider Trading Prevention Management Procedure)

The second amendment was made on November 9, 2022.