

CTCI Corporation

Insiders' Shareholding Policy

1. Insiders definition
 - (1) The directors, managerial officers, or a shareholder holding more than 10 percent of the total issued shares of the Company, and any spouse, minor child, or nominee holder thereof.
 - (2) The elected board director who is representative designated by a government agency or a juristic person, and any spouse, minor child or nominee holder thereof.

2. The Company has a minimum shareholding requirement for directors and managerial officers. As of March 2018, all insiders achieve compliance with above-mentioned requirement. Please refer to 2017 Annual Report, 3.2.1 Directors (page 10 to 11) and 3.2.2 Management Team (page15 to 23).

3. Insiders related specifications
 - (1) Report to the Competent Authority before share transfer
 - A. The insider shall not transfer shares within 6 months following being the insider.
 - B. Insiders, who transfer totaling more than 10,000 shares per exchange day, shall report to the Competent Authority in advance.
 - C. Insiders can transfer shares on a centralized exchange market after at least three days following reporting to the Competent Authority.
(It is necessary to report the reasons if insiders failed to transfer shares within the scheduled transfer period.)
 - D. Insider, who transfers shares to a designated person, should complete transfer within 3 days following reporting to the Competent Authority.

- (2) Report to the Competent Authority after share transfer
 - A. Insiders shall file a report with the Company of the changes in the number of shares they held during the preceding month by the 5th day of each month.
 - B. Insiders shall make immediate notification within 5 days to the Company after the shares they held are pledged.
- (3) Others
 - A. During the period of buying back treasury stocks, insiders shall not sell their shares.
 - B. Insider who acquires, either individually or jointly with other persons, more than 10 percent of the total issued shares of the Company shall file a statement with the Company and Competent Authority after such acquisition.
 - C. Insiders are not permitted to conduct the contrary transaction when they acquire or sell the Company' s shares within 6 months. If they have aforementioned behaviors and gain a profit, the Company shall claim for the disgorgement of any profit realized.
 - D. Insiders shall not buy or sell the shares when the material information of the Company is precise, and prior to the public disclosure of such information or within 18 hours after its public disclosure.