Gamania Digital Entertainment Co., Ltd.

Procedures for Prevention of Insider Trading

Article 1

These Procedures are established in accordance with Paragraph 2, Article 8 of the *Regulations Governing the Establishment of Internal Control Systems by Public Companies*, aiming to avoid and prevent individuals within the scope of information access from unintentionally violating insider trading regulations due to unfamiliarity with laws and regulations.

Article 2

Stock administration personnel shall establish and maintain data files of insiders and shareholders holding more than 10% of total shares. The scope is as follows:

1. Directors, supervisors, managerial officers of the Company, and natural persons designated to exercise duties on behalf of government or corporate entities.
2. Shareholders holding more than 10% of the Company's shares.

Article 3

The scope of material internal information and trading prohibition rules of the Company shall be handled in accordance with the *Regulations Governing the Scope of Material Information and the Means of its Public Disclosure Under Article 157-1, Paragraphs 5 and 6 of the Securities and Exchange Act* and Article 7 of the *Enforcement Rules of the Securities and Exchange Act*. Any person or employee who learns of material internal information shall not, after the information becomes precise and prior to its public disclosure or within 18 hours after its public disclosure, purchase or sell, on their own account or in the name of another, shares or other equity-type securities of the Company.

Article 4

Filing and disclosure of the Company's material internal information shall be processed in accordance with relevant operational procedures such as "CC-111 Controls for Public Information Filings and Disclosures" and "CM-109 Management of Financial and Non-Financial Information."

Article 5

Unless otherwise provided by laws or regulations, disclosures of the Company's material internal information shall be handled by the Company's spokesperson; when necessary, they may be handled directly by the person in charge of the Company.

Article 6

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

1. Personnel, date, and time of information disclosure.
2. Method of information disclosure.
3. Content of disclosed information.
4. Content of written materials delivered.
5. Other relevant information.

Article 7

If the content of media reports is inconsistent with the information disclosed by the Company, the Company shall immediately clarify on the Market Observation Post System (MOPS) and request corrections from the media concerned.

Article 8

For the transmission of important Company information, appropriate protective measures shall be provided, and participating members shall not forward, copy, or leak such information to others to know or master.

Article 9

When material internal information documents of the Company are transmitted in paper form, appropriate protection must be provided. If transmitted by email or other electronic means, appropriate security technologies such as encryption or digital signatures must be used. File documents containing material internal information shall be backed up and stored in a secure location. Electronic records shall be assigned access and control permissions; unauthorized use or reading is prohibited without permission from the responsible supervisor.

Article 10

Institutions or personnel outside the Company participating in mergers and acquisitions, major memorandums, strategic alliances, other business cooperation plans, or the signing of major contracts may be required not to disclose material internal information learned about the Company to others, and depending on circumstances, may be required to sign confidentiality agreements.

Article 11

The Company shall conduct educational training and publicity at least once a year for insiders and employees handling business related to material information.

Article 12

Employees of the Company who violate these Procedures or other laws and regulations shall be handled in accordance with the "Reward and Discipline Measures" under the personnel management regulations. If persons outside the Company leak the Company's material internal information resulting in damage to the Company's property or interests, legal liability shall be pursued through relevant legal channels.

Article 13

For any matters not specified in these Procedures, they shall be handled in accordance with relevant laws and regulations.

Article 14

These Procedures shall take effect upon approval by the Board of Directors; the same shall apply to any amendments.

Article 15

These Procedures were enacted on October 27, 2009.