The Code of Ethical Conduct

Article 1 (Purpose of and basis for adoption)
Lucky Cement Corporation (the "Company") establishes the code of ethical conduct (the "Code") with reference to the "Guidelines for the Adoption of Codes of Ethical Conduct for TWSE/TPEx Listed Companies". The Code is adopted for the purpose of encouraging directors and managerial officers of the Company to act in line with ethical standards, and to help interested parties better understand the ethical standards of the Company.

Article 2 (Applicable to the Code)
The Code applies to the directors and managerial officers of the Company including general managers or their equivalents, assistant general managers or their equivalents, deputy assistant general managers or their equivalents, chief financial and chief accounting officers, and other persons authorized to manage affairs and sign documents on behalf of the Company.

Article 3 (Principle of honesty and good faith)
Directors and managerial officers of the Company shall uphold their duties in a proactive, conscientious and responsible manner, abandon selfish departmentalism, focus on team spirit, and heed the principle of honesty and good faith.

Article 4 (Prevention of conflicts of interest)
Directors and managerial officers of the Company shall perform their duties in an objective and efficient manner and shall not obtain improper benefits for themselves or their spouse, or relatives within the second degree of kinship when a person in such a position takes advantage of their position in the Company.

Directors and managerial officers shall voluntarily explain whether there is any potential conflict between them and the Company when the Company provides loans for or provides guarantees, and major asset transactions or the purchase (or sale) of goods involving the affiliated enterprise at which a director and managerial officer works.

Article 5 (Must not pursue personal gain)
The directors and managerial officers of the Company shall not:

1. Intend or gain personal gain by using company property or information or taking advantage of their positions.
2. Competing with the Company.

When the Company has an opportunity for profit, it is the responsibility of the directors and managerial officers to maximize the reasonable and proper benefits that can obtained by the Company.

Article 6 (Confidentiality)
The directors and managerial officers of the Company shall be bound by the obligation to maintain the confidentiality of any information regarding the Company itself or its suppliers and customers, except when authorized or required by law to disclose such information. Confidential information includes any undisclosed information that, if exploited by a competitor or disclosed, could result in damage to the Company or the suppliers and customers.

Article 7 (Fair trade)
Directors and managerial officers shall treat all suppliers and customers, competitors, and employees fairly, and may not obtain improper benefits through manipulation, nondisclosure, or misuse of the information learned by virtue of their positions, or through misrepresentation of important matters, or through other unfair trading practices.
Directors and managerial officers of the Company shall not, in the performance of their duties, require, contract, deliver or receive any form of gift, entertainment, rebate, bribery or other improper interest in the interest of an individual, the Company or third party. Except that gifts or entertainments are permitted by social etiquette practices or the company regulations.

Article 8 (Proper protection and use of company assets)
All directors and managerial officers of the Company have the responsibility to safeguard company assets and to ensure that they can be effectively and lawfully used for official business purposes.

Article 9 (Legal compliance)
Directors and managerial officers of the Company shall indeed abide by the related laws, regulations and policies of the Company Act and the Securities and Exchange Act which are governing the activities of the company.

Article 10 (Encouraging reporting on illegal or unethical activities)
The Company shall raise awareness of ethics internally and encourage employees to report to the audit committee, managerial officer, chief internal auditor, or other appropriate individual upon suspicion or discovery of any activity in violation of a law or regulation or the code of ethical conduct and to provide sufficient information to enable the company to properly handle follow-up matters. To encourage employees to report illegal conduct, the Company shall establish a concrete whistle-blowing system and make employees aware that the Company will use its best efforts to ensure the safety of informants and protect them from reprisals.

Article 11 (Punishment and remedy)
When a director or managerial officer of the Company violates the code of ethical conduct, the company shall handle the matter in accordance with the disciplinary measures prescribed in the code, and shall without delay disclose on the Market

Observation Post System (MOPS) the date of the violation by the violator, reasons for the violation, the provisions of the code violated, and the disciplinary actions taken.
Violators may file a complaint in accordance with relevant regulations when they are punished for violating the provisions of this Code.

Article 12 (Procedures for exemption)
The code of ethical conduct adopted by the Company must require that any exemption for directors or managerial officers from compliance with the code be adopted by a resolution of the board of directors, and that information on the date on which the board of directors adopted the resolution for exemption, objections or reservations of independent directors, and the period of, reasons for, and principles behind the application of the exemption be disclosed without delay on the MOPS, in order that the shareholders may evaluate the appropriateness of the board resolution to forestall any arbitrary or dubious exemption from the code, and to safeguard the interests of the company by ensuring appropriate mechanisms for controlling any circumstance under which such an exemption occurs.

Article 13 (Method of disclosure)
The Company shall disclose the code of ethical conduct it has adopted, and any amendments to it, on its company website, in its annual reports and prospectuses and on the MOPS.

Article 14 (Method of disclosure)
The code of ethical conduct, and any amendments to it, shall enter into force after it has been adopted by the board of directors and submitted to a shareholders meeting.
The code is concluded on November 7th, 2014.
First amendment was approved on March 24th, 2015.
Second amendment was approved on January 29th, 2019.
Third amendment was approved on August 11th, 2020.