HSING TA CEMENT CO., LTD.

Category	Code of Ethical Conduct	Formulated by	Board of Directors	Document No.	HOAC010
Procedures		Date of Issuance	107.06.21	Page	1／3

Version	Revision			Description of Revision	Drafted by	Reviewed by	Approved by	Date
	Revision No.	Page	Article(s)					
A				Newly enacted	Regulation Formulation Taskforce	Yang, Te-Hsiung	Board of Directors	102.03.29
A	1	All	Article 1 | Article 12	Revised wording in accordance with the Financial Supervisory Commission (FSC) Letter No. 1030051379; amended relevant terms pursuant to the FSC Order No. 10200531121 to establish the Audit Committee in replacement of supervisors' functions.	Regulation Formulation Taskforce	Yang, Chih-Hsiung	Board of Directors	107.03.30

Chapter 1 General Provisions

Article 1：(Purpose and Basis)

To establish a shared understanding of the standards of ethical conduct for the Company's directors and managerial officers, and to enable stakeholders to better understand the Company's ethical standards, this Code is formulated in accordance with the *"Sample Template for the Code of Ethical Conduct for TWSE/TPEx Listed Companies"* promulgated by the Taiwan Stock Exchange Corporation, for compliance accordingly.

Chapter 2 Ethical Standards

Article 2：(Prevention of Conflicts of Interest)

The Company's directors and managerial officers shall handle official duties in an objective and efficient manner, and shall avoid any personal interest that interferes or may interfere with the overall interests of the Company, or attempts to seek improper benefits for themselves, their spouses, parents, children, or relatives within the third degree of kinship.

Any lending of funds, provision of guarantees, material asset transactions, or purchase/sale transactions between the Company and the aforementioned persons or affiliated enterprises shall be conducted in accordance with the Company's *"Procedures for Lending of Funds to Others," "Procedures for Endorsements and Guarantees," "Procedures for Acquisition or Disposal of Assets,"* and other relevant operational procedures for purchase and sale transactions. The relevant person shall proactively disclose to the Company whether any potential conflict of interest exists.

Article 3：(Avoidance of Personal Gain Opportunities)

When profit opportunities arise, the Company's directors and managerial officers have the responsibility to maximize the lawful and legitimate interests obtainable by the Company and shall avoid:

1. Seeking personal gain by using the Company's property, information, or their position.
2. Using the Company's property, information, or position to obtain private benefits.
3. Competing with the Company.

Article 4：(Confidentiality Obligation)

The Company's directors and managerial officers shall maintain the confidentiality of information relating to the Company, its clients, or suppliers, except where disclosure is authorized or required by law. Confidential information includes any non-public information that may be exploited by competitors or, if disclosed, would cause harm to the Company, its clients, or suppliers.

Article 5：(Fair Dealing)

The Company's directors and managerial officers shall treat the Company, clients, suppliers, competitors, and employees fairly, and shall not obtain improper benefits through manipulation, concealment, misuse of information acquired in the course of duties, misrepresentation of material facts, or other unfair dealing practices.

Article 6：(Protection and Proper Use of Company Assets)

The Company’s directors and managerial officers are responsible for safeguarding the Company’s assets and ensuring that such assets are used effectively and lawfully for business purposes. They shall prevent theft, negligence, or waste that may impair the Company’s profitability.

Article 7：(Compliance with Laws and Regulations)

The Company’s directors and managerial officers shall comply with the Company Act, the Securities and Exchange Act, other applicable government laws and regulations, and all internal rules and policies of the Company.

Article 8：(Encouragement to Report Unlawful or Unethical Conduct)

The Company shall strengthen internal promotion of ethical awareness and encourage employees to report any violation of laws, regulations, or this Code of Ethical Conduct to the Audit Committee, managerial officers, the head of Internal Audit, or other appropriate personnel.

The Company shall handle all reports in a confidential manner and ensure that the informant understands that the Company will make every effort to protect the safety of those who report in good faith.

Chapter 3 Supplementary Provisions

Article 9：(Disciplinary Measures for Violation of the Code)

If any director or managerial officer of the Company violates this Code, and the internal investigation confirms that the violation is material, the Company shall take immediate action in accordance with relevant regulations and disclose, via the Market Observation Post System (MOPS), the name of the violator, date of violation, cause of violation, violated provision, and handling status.

Any person who violates this Code may also file an appeal with the Company.

Article 10：(Procedures for Granting Exemptions)

If any director or managerial officer of the Company requires exemption from compliance with this Code, such exemption shall be approved by a resolution of the Board of Directors. Upon approval, the Company shall immediately disclose on the Market Observation Post System (MOPS) the dissenting or qualified opinions of independent directors, the date of board approval, the duration and reason for the exemption, and the specific provisions exempted.

Article 11：(Disclosure Method)

The Company shall disclose this Code on its official website, in the annual report, prospectus, and via the Market Observation Post System (MOPS). The same shall apply to any amendments hereto.

Article 12：(Enforcement)

This Code shall be implemented upon approval by the Board of Directors and shall be submitted to the shareholders’ meeting. The same procedure shall apply to any amendments.