

Fair Trade and Antitrust Compliance Guidelines

Established in May 2023

Taiwan Cement Corporation (the “**Company**”) hereby establishes the following guidelines (the “**Guidelines**”) for compliance with the fair trade and antitrust laws and regulations.

I. Purpose and Objectives

The purpose of these Guidelines is to ensure the compliance with the legal requirements of all countries in which the Company operates and conducts business, including fair trade laws, antitrust laws, competition laws, antimonopoly laws and other laws established to promote fair competition and maintain market order (collectively, “**Competition Laws**”), in order to safeguard a fair and competitive marketplace.

All members of the Company, including all employees and management (collectively, “**Personnel**”), are expected to strictly follow these Guidelines in order to ensure a fair and competitive marketplace and to reduce the legal risks and negative impact that violations of the law may have on the Company’s business.

II. Prohibited Acts

1. Concerted Actions

“Concerted action” refers to any collective action among industry players that causes or is intended to cause a disruption or restriction of fair competition, such as price fixing, output limitation, bid-rigging, customer allocation and territory/market division, in order to increase company profits by reducing competition. Such unlawful conduct needs not be explicit or in writing and may include a “tacit” understanding, and may be done formally or informally, verbally or in writing, explicitly or implicitly.

2. Abuse of Monopolistic or Dominant Position

A monopolistic or dominant position is not illegal *per se*, but the abuse of such monopolistic or dominant position resulting in the foreclosure of competitors is illegal. If a company has a high market share or is reasonably expected to achieve a high market share that gives it a monopolistic or dominant position in a market, it is subject to the Competition laws and may not abuse its dominant position by price fixing, implementing unreasonable exclusivity terms, refusal to deal, tying or boycotting, etc.

3. Other Unfair Competition Practices

- (1) Imposing Restrictions on Resale: Avoid unduly restricting resale prices without proper

justification, and refrain from forcing resellers to maintain resale prices by means of coercion, enticement, delay or cancellation of supply.

- (2) It is prohibited to engage in any improper conduct that impedes competition, such as improperly taking away trading opportunities, improperly obtaining secrets of other enterprises' production and marketing, or restricting other people's business activities.
- (3) It is prohibited to engage in any dishonest competitive practices, such as counterfeiting, false labeling and advertisements, impeding business reputation, and multi-level marketing.

III. Procedures

1. Compliance with the Competition Laws

The Company's Legal Affairs Office oversees the Personnel's compliance with the Competition Laws and the procedures thereunder. The Personnel should contact the Legal Affairs Office if they have any questions regarding the Competition Laws.

2. Education and Training

The Company's management, all Personnel who may have contact with competitors and who are involved in pricing and product marketing shall receive compliance training; the Legal Affairs Office will be responsible for arranging the Company's competition law education and training.

3. Handling Process

- (1) If any Personnel is under investigation by the relevant competent authorities for issues relating to the compliance with the Competition Laws, he/she shall immediately report to the following persons: the direct and highest supervisor of his/her unit, and the Legal Affairs Office (E-mail address of Headquarters Legal: legal@taiwancement.com).
- (2) The Legal Affairs Office shall investigate the specific situation and the applicable provisions under the Competition Laws, and if it believes that there is a risk of violating the Competition Laws, it shall report to the management and seek assistance from external legal counsel to take prompt measures in response.
- (3) If the Company's suppliers, distributors or vendors violate or are suspected to have violated the Competition Laws, each relevant unit shall notify the Legal Affairs Office and request the supplier/distributor/vendor to cease the illegal conduct and cooperate with the government authority's investigation.

IV. Miscellaneous

1. These Guidelines, as well as any and all amendments thereto, shall take effect upon approval by the Chairman of the Board of Directors.
2. The Chairman of the Board of Directors shall authorize the General Manager to establish

the regulations for matters not covered under these Guidelines.