

LCY Chemical Corp.

Anti-Bribery Policy

approved by the board

on August 8, 2023

I. Purpose and Scope

This company is committed to preventing bribery and adopting a zero-tolerance attitude towards bribery. This policy is formulated as the basis for committing to and implementing various anti-bribery measures.

This policy applies to this company's subsidiaries, foundations that directly or indirectly receive donations accounting for more than 50% of the total, and other organizations or legal entities that have substantial control. However, the aforementioned group companies and organizations, if they have established their anti-bribery policy or if the laws of their operating location provide otherwise, shall comply with their respective regulations.

II. Applicable Parties

This policy applies to the directors, managers, employees, appointees, or those with substantial control (hereinafter referred to as "controlling parties") of this company. The aforementioned applicable parties are hereinafter referred to as "company personnel".

III. Objectives of Anti-Bribery Policy

The company's objectives for implementing the anti-bribery management system are as follows:

- Zero incidents of bribery;
- Continuous improvement;
- Establishing an anti-bribery culture;
- Implementing whistleblower protection;
- Strict punishment for dishonest behavior.

IV. Prohibition of Bribery

This company prohibits bribery. The term "bribery" as used in this policy refers to any improper benefit provided, accepted, promised, or demanded directly or indirectly by company personnel during the execution of business, for the purpose of achieving a transaction or for the benefit of oneself or others, or engaging in other dishonest,

illegal, or breach of trust behaviors.

V. Compliance with Anti-Bribery Laws

This policy stipulates adherence to all relevant anti-bribery laws and regulations, serving as the basis for the behaviors of company personnel in all operating jurisdictions.

VI. The Company's Response to Bribery

When the company discovers or receives reports of bribery involving company personnel, it should investigate the facts. If it is confirmed that there is a violation of relevant laws or the company's anti-bribery policy and regulations, the company should immediately request the person involved to stop the relevant actions, and punish them according to the company's rules, and protect the company's rights and reputation through legal means if necessary.

If the company discovers or receives reports of dishonest behavior towards the company by others, if the behavior involves illegal activities, it should report the facts to the judiciary and investigation authorities, and protect the company's rights through legal means if necessary.

VII. Whistleblowing Mailbox

The company's reporting mailbox for violations of ethical business practices, improper behavior, and bribery is gm@lcygroup.com. Alternatively, written reports can be sent to: 3rd Floor, No.85, Section 4, Bade Road, Songshan District, Taipei City, Lee Chang Yung Chemical Whistleblowing Mailbox. Whistleblowers should provide specific evidence and can make reports anonymously or not. The identity of the whistleblower and the content of the report should be kept confidential. The company encourages reporting based on good faith, or trust that is reasonable, and will ensure that whistleblowers are not improperly treated due to the report.

VIII. The Company's Commitment to and Execution of Anti-Bribery

The company should require directors and managers to issue declarations of compliance with the anti-bribery management policy and faithfully implement it in internal management and external business activities. And in the terms of employment, employees are required to abide by the anti-bribery management policy and related management systems.

IX. Implementation

This policy shall be implemented after being approved by the board of directors, and

the same applies to amendments.