

Alexander Marine Co., Ltd.

Insider Trading Prevention Management Procedure

Document No.: CRM-018

- Article 1: This Procedure is established in accordance with the second paragraph, Article 8 of the Regulations Governing Establishment of Internal Control Systems by Public Companies for the purpose of avoiding and preventing unintentional insider trading by persons having access to information due to lack of understanding of the law.
- Article 2: The constitution of insider trading is not conditional upon profit. In accordance with the express stipulation of Article 157-1 of the Securities and Exchange Act, the conditions include the following:
1. Governed entity;
 2. Material information actually learned;
 3. After material information is confirmed and before it is rendered public, or within 18 hours from the time of publication;
 4. Trading of the Company's shares or other equity securities listed in the stock exchange or over-the-counter market in one's own name or in the name of any other person.
- Article 3: The governed entity referred to under subparagraph 1, Article 2 of this Procedure, i.e., the scope of application for prohibited insider trading, includes the following:
1. Directors, supervisors, managers, 10% or more shareholders and natural persons designated as representatives to perform duties in accordance with the first paragraph, Article 27 of the Company Act.
 2. Related parties to the persons under the previous subparagraph (i.e., spouse, minor child or nominee shareholder).
 3. Any person who has learned about the information due to professional or controlling relationship.
 4. Less than 6 months have lapsed since the person loses the status under the previous three subparagraphs.
 5. Any person who has learned about the information from any person listed under the previous four subparagraphs.
- Article 4: Shares or other equity securities traded in a stock exchange or over-the-counter market referred to under subparagraph 4, Article 2 of this Procedure:
1. Shares mean shares or other equity securities of the Company listed in the stock exchange, over-the-counter market or emerging market.
 2. Other equity securities mean convertible corporate bonds, corporate bonds with

warrants, stop options, call (put) options, proof of share price payment, new share subscription certificate, new share certificate, convertible bond certificate and other equity securities.

Article 5: Material information referred to under subparagraph 2, Article 2 of this Procedure means:

1. Information relating to the Company's finance or business and having a material impact on the share price of the Company or having a significant impact on a normal investor's investment decisions, including:
 - (1) Matters listed under Article 7 of the Securities and Exchange Act Enforcement Rules.
 - (2) Significant issuance or private place of equity securities, capital reduction, merger, acquisition, split, share swap, conversion or assignment, direct or indirect investment plan by the Company or any material change to the above.
 - (3) Reorganization, bankruptcy, dissolution or application by the Company for terminating the listing or trading of its shares in a stock exchange or over-the-counter market, or any material change to the above.
 - (4) Any director of the Company is subject to a ruling of provisional disposition to suspend the exercise of his duties, and as a result, the board of directors is unable to exercise its duties, or all independent directors of the Company have been dismissed.
 - (5) Occurrence of disaster, demonstration, strike, environmental pollution or other material event, resulting in serious damage to the Company, or order of work suspension, business suspension, business closure or cancellation or revocation of relevant permit by relevant authority.
 - (6) Any related party or main creditor of the Company or its guarantor has any event of note rejection, petition for bankruptcy, reorganization or other similar material event, or the main debtor for whom the Company has provided endorsement or guarantee is unable to pay any note, loan or other indebtedness due.
 - (7) Material cheating under internal control, non-arms-length transaction or asset withdrawal within the Company.
 - (8) Suspension of all or part of business transactions with main clients or suppliers of the Company.
 - (9) The financial reports of the Company have any of the below events:
 - i. Failure to make public filing in accordance with Article 36 of the Securities and Exchange Act.
 - ii. Error or omission in the preparation of financial reports, which requires correction or revision in accordance with Article 6 of the Securities and

Exchange Act Enforcement Rules.

- iii. The accountant issues an audit or review report other than a clean report or revised clean report, except accountant review or audit report with reservations about cross-year amortization of losses in accordance with the law, or the inclusion of statements of subsidiaries that have not been audited or reviewed by an accountant in the calculation of long-term equity investment amount or the profit and loss thereof in the first-quarter, third-quarter or semi-annual financial reports.
- (10) Published financial forecast significantly deviates from the actual figures or the updated (corrected) financial forecast significantly deviates from the original forecast figures.
 - (11) The Company buys back its shares.
 - (12) Public purchase or suspension of such purchase of securities issued by a public company.
 - (13) Acquisition or disposal of major asset by the Company.
 - (14) If the Company issues overseas securities, occurrence of material event subject to timely public announcement or filing in accordance with the government regulations of the place of listing and the regulations of the securities trading market.
 - (15) Other event related to the finance or business of the Company that has a material impact on the share price of the Company or a significant impact on the normal investor's investment decisions.
2. Information related to the market supply and demand and public purchase of the Company's securities that has a material impact on the share price of the Company or a significant impact on the normal investor's investment decisions:
 - (1) Public purchase or suspension of public purchase of securities traded in a stock exchange or over-the-counter market.
 - (2) Material change in the equity of the Company or any subsidiary under its control.
 - (3) Any circumstance or event of tender, auction, material breach in closing, change of original trading method, trading suspension, limited trading or termination of trading for securities traded in a stock exchange or over-the-counter market.
 - (4) Other events related to the market supply and demand of the securities that has a material impact on the share price of the Company or a significant impact on the normal investor's investment decisions

Article 6: The timing of the material information referred to under subparagraph 2, Article 2 of this Procedure is the date of occurrence, date of agreement, contract signature date, date of payment, date of mandate, closing date, date of transfer registration, date of

resolution by the audit committee or the board of directors or other determinable date, whichever is earliest.

Article 7:

1. The Company shall disclose public information 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 established by the Financial Supervisory Commission, Executive Yuan:
 - (1) Material information under subparagraph 1, Article 5 of this Procedure shall be published by the Company's input into the Market Observation Post System.
 - (2) Material information under subparagraph 2, Article 5 of this Procedure shall be published by the Company's input into the Market Observation Post System, basic market reporting website of the Taiwan Stock Exchange Corporation or the non-local pages of two or more national daily newspapers, national TV news or electronic news issued by the above media.
2. If information is published through the "non-local pages of two or more national daily newspapers, national TV news or electronic news issued by the above media" under subparagraph 2 of the previous paragraph, the 18 hours under the third paragraph, Article 2 of this Procedure shall start from the time of distribution of the newspaper, the first broadcasting of the TV news or the input onto the electronic website, whichever is the latest.
3. The newspaper distribution time under the previous paragraph starts at 6 a.m. for morning papers and 3 p.m. for evening papers.

Article 8: Upon actual learning of material information about the Company having an impact on its share price, the person defined under Article 3 of this Procedure shall not, after the information is confirmed, before it is rendered public or within 18 hours after the publication of the information, purchase or sell any shares or other equity securities of the Company listed on the stock exchange or over-the-counter market in its own name or in the name of any other person. Upon actual learning of material information about the Company's ability to pay principal and interest, the person defined under Article 3 of this Procedure shall not, after the information is confirmed, before it is rendered public or within 18 hours after the publication of the information, purchase or sell any non-equity corporate bonds listed on the stock exchange or over-the-counter market in its own name or in the name of any other person.

Article 9: The shareholder services staff of the Company shall timely establish and regularly maintain information of the governed entities under Article 3 of this Procedure and shall provide the governed entities with the regulations related to insider trading.

Article 10: If any member of the Company breaches this Procedure, a proposal for evaluation shall be submitted in accordance with the Employee Reward and Sanction Rules of the

Company, and penalties shall be imposed based on the situation.

Article 11: Any matter that is not stipulated in this Procedure shall be governed by applicable laws.

Article 12: This Procedure, including any amendment hereto, shall be published and implemented after approval by the board of directors.