

## **Code of Ethics Implementation Guidelines**

The company establishes employee practice guidelines to implement ethical management and sets standards for the ethical behavior of the company and its employees and executives.

The company, its employees, and executives must strictly adhere to these employee practice guidelines as directives that guide their decision-making and actions in the course of their duties.

### **1. Selection of Business Partners and Fair Trade**

**The company must select business partners based on fair and transparent principles, ensuring their selection is reasonable. If restrictions or adjustments are needed regarding transaction terms, they must be carried out based on clear and valid reasons and through transparent procedures. Transactions with business partners must strictly comply with laws concerning fair trade and subcontracting, and there should be no use of superior bargaining power to engage in unequal or unfair treatment or uncooperative transaction practices.**

**Acts Contrary to the Transparent Selection of Partner Companies and Fair and Just Transactions Are as Follows:**

#### **○ Selection of Partner Companies**

- Actions by employees in positions to have a decisive influence on the selection and evaluation of business partners, exerting or attempting to exert influence to grant favor to a specific company or, conversely, discriminate against it.
- Refusal to participate in transactions or deprivation of opportunities without legitimate reasons.
- Imposing exclusive transaction terms, establishing trade territories, or limiting trading counterparts without justifiable grounds.
- Discriminatory application of transaction terms (e.g., price, performance period), collective discrimination through collusion, or granting preferential treatment to specific companies.
- No transaction will be conducted with employees who were dismissed, resigned, or retired due to work-related corruption or intentional misconduct to harm the company during their employment, or with companies that have significant business ties to such individuals (if the employee or their family members are registered as the representative, executives, or major shareholders, or they are actual owners or equity investors in the company).

#### **○ Transactions with Partner Companies**

- Acts of establishing a one-sided transactional relationship solely for the company's benefit or intentionally causing harm to a specific company by disadvantaging it.
- Unilateral adjustment of delivery quantities, unfair low-price purchases, unilateral changes to contract terms, intentional delays in payment, and unilateral termination of transactions for unfair reasons.

- Receiving improper support from partner companies, whether in the form of financial resources, human resources, or assets.
- Improper use of partner companies' technology, improper hiring of their personnel, interference with their transactions with the company's competitors, and other disruptions to business activities.
- Acts of leaking various information obtained from partner companies to external parties.
- **Equity Investment**
  - Prohibition on acquiring shares in non-listed companies or spin-off companies that have a business relationship with the company or seek to establish one, either in one's own name or through another person's name. However, an exception applies if, in the case of a spin-off, a fair opportunity is provided to all its employees through a stock offering.

## 2. Acceptance of Gifts or Entertainment

**Any form of rewards, including gift, entertainment, or convenience, provided by interested parties, regardless of the reason, must not be accepted. If it is unavoidable to accept such a reward, it must be reported to the company.**

### **Acts of Accepting Gifts, Entertainment, or Hospitality Provided by Interested Parties Include the Following:**

- **Valuables**
  - Accepting cash, checks, gift certificates, various cards, and other negotiable securities.
  - Accepting memberships, vouchers, tickets, discount vouchers, articles, and other gifts.
  - Accepting congratulatory or condolence money, and congratulatory gifts (such as standing wreaths, rings, etc.)
  - ※ In particular, employees must not inform external stakeholders, such as partner companies, of personal or colleagues' celebratory or condolence events. Employee notifications of such events should be made via the dedicated event board on the company portal and should not be sent to a broad unspecified group of employees or executives through company-wide emails.
  - Repayment of debts such as credit card payments, accounts payable, and loans.
  - Payment of expenses related to company gatherings, and other personal expenses.
  - Unauthorized receipt of goods without payment at stores, etc.
- **Entertainment and hospitality**
  - Unsavory establishments such as hostess bars, bars, nightclubs, massage parlors, illicit barbershops, and illicit saunas.
  - Casinos, gambling, and illicit horse racing.
  - Entertainment such as golf, screen golf, fishing, and sightseeing.
- **Provision of conveniences**

- Provision of transportation, accommodation, or food during business trips.
- Provision of transportation, accommodation, or food for personal vacations.
- Abnormal discounts on products at stores, and receiving goods and paying later, etc.
- Event sponsorship, donation of goods, and provision of supplies.
- Employment, job placement, and transaction (contract) guarantees.
- Asset transactions, such as low-price purchases and high-price sales.
- Receiving loan guarantees, etc.
- Monetary lending, asset leasing, and collateral provision.
- ※ Receiving such conveniences through family, relatives, or acquaintances is considered the individual's actions.
- ※ However, gifts such as congratulatory or condolence money, commemorative items, and promotional articles, which are of small value, generally provided to a large, unspecified group, and fall within socially acceptable norms, are excluded, only if refusal to accept them would cause disruption to the business.

### 3. Prohibition of Improper Solicitation and Offering of Bribes, etc.

**Employees and executives must not engage in actions that tarnish the company's image by making improper solicitations or offering bribes to public officials.**

#### **Actions that Constitute Improper Solicitation or Offering of Bribes to Public Officials Are as Follows:**

- **Acts of Improper Solicitation**
  - Processing of approvals, permits, licenses, etc.
  - Reduction or exemption of various administrative or criminal sanctions.
  - Interference in the hiring or promotion of public officials, etc.
  - Interference in the selection or removal of specific individuals from decision-making positions in public institutions.
  - Interference in the selection or exclusion of specific individuals from awards or honors organized by public institutions.
  - Disclosure of confidential information related to bids, auctions, etc.
  - Interference in the selection or exclusion of specific individuals for contracts.
  - Intervention in the allocation or provision of subsidies, investments, etc.
  - Abnormal transactions of goods and services produced or supplied by public institutions.
  - Manipulation of school admissions, grades, etc.
  - Handling of military service-related matters.
  - Intervention in various evaluations and assessments conducted by public institutions.

- Manipulation of results in administrative guidance or inspections and acquiescing illegal activities.
- Intervention in investigations, trials, hearings, judicial decisions, mediation, arbitration, etc.
  - ※ Public officials: Employees of national and local governments, heads and staff of public institutions and organizations affiliated with public institutions, principals and staff of educational institutions at all levels, employees of educational corporations, as well as representatives and employees of media companies, among others.
  - ※ Exceptions: Actions not in violation of social norms (7 specific reasons)
    - ① Request for specific actions according to procedures or methods defined by laws or standards.
    - ② Publicly requesting specific actions.
    - ③ Elected officials, etc., conveying third-party complaints, or suggesting or recommending improvements to laws or standards for public interest.
    - ④ Requesting tasks to be processed within statutory deadlines or inquiring about progress.
    - ⑤ Application or request for confirmation or certification regarding work duties or legal relationships.
    - ⑥ Requests for explanation and interpretation of laws, regulations, and systems through inquiries and consultations.
    - ⑦ Other acts not violating social norms (acts acceptable by social conventions).

○ **Provision of Valuables, etc.**

- Money, securities, real estate, goods, accommodation vouchers, membership cards, tickets, discount coupons, invitations, admission tickets, rights to use real property, or any other form of property benefit.
- Offering entertainment or hospitality, such as food, alcohol, golf, or providing conveniences such as transportation and accommodation.
- Forgiving debt, offering employment, granting benefits, or other tangible or intangible economic advantages.
  - ※ Regardless of whether related to duties, offering valuables by a single individual exceeding KRW 1 million in a single instance or KRW 3 million in a fiscal year is prohibited. If related to duties, offering valuables by a single individual, even if not exceeding KRW 1 million in a single instance or KRW 3 million in a fiscal year, is also prohibited, regardless of whether there is any quid pro quo.
  - ※ Exceptions:
    - ① Valuables, etc., permitted under social norms (8 items)
      - Valuables provided by senior managers to public officials or others within the organization for consolation, encouragement, or rewards.
      - Valuables provided to facilitate official duties, social interactions, or as part of formality, condolences or congratulations. When providing food, the value must not exceed KRW 30,000; gifts must exceed KRW 50,000; and condolence or celebratory money must not exceed KRW 100,000.
      - Valuables provided under legitimate entitlement.
      - Valuables provided by relatives of public officials, etc.

- Valuables provided to a member by organizations such as funeral associations, in accordance with standard practice, or to public officials in difficult circumstances with whom the employee has had long-term or continuous personal relationships.
  - Valuables provided uniformly within the usual range at official events related to the duties of public officials.
  - Souvenirs, promotional items, or prizes received through competitions or drawings that are distributed to an unspecified large number of people.
  - Other valuables permitted by applicable legal standards or social norms.
- ② Permissible Fees for External Lectures or Contributions, etc.
- Public officials: Ministerial level or higher (KRW 500,000), Vice-ministerial level (KRW 400,000), Grade 4 or higher (KRW 300,000), and Grade 5 or lower (KRW 200,000).
  - Employees and executives of public institutions and organizations affiliated with public institutions: Institution heads (KRW 400,000), executives (KRW 300,000), and others (KRW 200,000).
  - Executives and employees of private schools, educational corporations, journalists, etc.: Regardless of rank, up to KRW 1,000,000 per hour for lectures and per contribution. For duty-related lectures as part of participation as a member of public institution committees, the limit is KRW 1,000,000 per session.

※ Acts of soliciting or offering valuables through family members, relatives, or acquaintances are considered the actions of the individuals themselves.

#### 4. Use of Company Assets

**The company's tangible and intangible assets, confidential information, and company funds are critical resources for the company's sound business operations. They must be used solely for approved purposes and in compliance with company standards. Employees and executives are also responsible for preventing the loss, misuse, or theft of such assets.**

**Acts That Constitute Improper Use of the Company's Tangible and Intangible Assets, Leakage of Material Information, Causes of Personnel Attrition, and Embezzlement of Company Funds Are as Follows:**

##### ○ Misuse of Company Assets

- Using fixed tangible assets such as land, buildings, facilities, and equipment for purposes other than business operation, or for unauthorized use or personal profit.
- Unauthorized removal or use of business assets such as company vehicles, PCs, high-value consumables, or office supplies, or provision thereof to family members or acquaintances, thereby transferring maintenance costs to the company.
- Misusing company-provided information networks, PCs, or storage media for inappropriate or commercial purposes.

- Using information obtained through one's position or duties for personal profit, or utilizing the company's non-public information for investments in real estate, stocks, etc.

○ **Leakage of Information and Personnel Attrition**

- Any acts of unauthorized disclosure of information obtained in the course of performing one's duties, such as trade secrets, sales data, business information, technology development information, or personal details of customers, employees, or executives, and any acts of providing such information to competitors.
- Facilitating the recruitment of the company's personnel by competitors, arranging meetings for such purposes, or disclosing internal organizational and personnel information to competitors or headhunters without authorization, thereby causing a loss of personnel.

○ **Embezzlement and Misuse of Company Funds**

- Unauthorized withdrawals of company funds, personal use of such funds, misappropriation through falsification of accounting records, or gifting funds to interested parties.
- Illegitimate use of corporate credit cards, processing expenses using false receipts, unjustified claims for travel expenses or overtime allowances, or misallocation of personal entertainment or unaccountable hospitality expenses to unrelated accounts.
- Any other expenditures that violate the company's expense policies.

## 5. Document and Accounting Manipulation and False Reporting

**All records and reports of information must be made accurately and honestly.**

### Acts that Constitute Manipulation of Documents and Accounting Records and False Reporting Are as Follows:

○ **Manipulation and Falsification of Documents and Accounts**

- Acts of intentionally or negligently creating documents that are false, or manipulating or falsifying accounts.
- Acts of manipulating or falsifying documents or accounts that cloud decision-making or judgments of superiors or relevant departments or lead to incorrect judgments.
- Instances where a superior directs the manipulation of documents or accounts, or where a subordinate knowingly acquiesces such instructions despite being aware that they are clearly improper.

○ **False Reporting**

- Making dishonest and false reports to superiors, including management, within the company is strictly prohibited as this constitutes improper conduct.
- Making false or misleading statements to customers.
- In addition to direct false reporting, acts of manipulating information with the intent to mislead the recipient of the information are prohibited.

## 6. Other Basic Ethics for Employees and Executives

**Employees and executives must take the initiative to maintain a healthy organizational culture.**

**Basic Ethics for Employees and Executives to Uphold a Healthy Organizational Culture Are as Follows.**

### ○ **Prohibition of Sexual Harassment in the Workplace**

- Use of inappropriate sexual remarks between employees at the company.
- Forcing others to serve at company gatherings or using language, actions, or physical contact that causes sexual humiliation or discomfort.
- Prohibition of making sexual innuendos about a coworker's body or engaging in language or actions that emphasize fixed gender roles.
- Prohibition of any words or behavior that is recognized as causing sexual humiliation or disgust under social norms.
  - ※ Discomfort caused by sexual harassment should be clearly expressed, and the other party's expression must be taken seriously.

### ○ **Prohibition of Monetary Transactions and Gift Exchanges Between Employees**

- Monetary transactions between employees can lead to financial losses and foster distrust among colleagues, which negatively impacts the workplace sentiment.
- In principle, gift exchanges between employees are prohibited, except for socially accepted meaningful gifts, such as those for anniversaries, birthdays, or farewells.
  - ※ However, employees should not be forced to contribute towards gifts or should not have expenses arbitrarily allocated to them. Voluntary participation is allowed as long as it stays within socially acceptable limits.
- Personal gifts with the intent to solicit favors from superiors are prohibited.

※ Financial transactions and gift exchanges through family, relatives, or acquaintances are also considered the actions of the individual.

### ○ **Guidelines for Appropriate Use of Social Media**

- Employees must not mention any internal confidential information, non-public company events, information, or rumors.
- Employees must not slander customers, shareholders, partners, competitors, or colleagues, and must refrain from engaging in disputes or confrontations on social media regarding company-related matters.
- Employees must not post content that could damage the reputation of the company or others, including profanity, racist or sexist remarks, grotesque material, or obscene content.
- Employees must clearly state that personal opinions are their own to avoid any misunderstanding that they represent the company.
- Employees must not use the company's name, logo, trademark images, or others' intellectual property without permission.

- Employees must report significant customer feedback or media inquiries obtained through social media to the PR team in accordance with established procedures.

○ **Guidelines for Healthy Workplace Conduct**

- Employees must refrain from engaging in behavior or speech that could harm the reputation of the company or its employees.
- Illegal gambling is strictly prohibited, regardless of the counterpart, and employees must avoid engaging in depraved or illegal activities such as illegal drug use or drunk driving, which could lead to social condemnation.
- Activities like multi-level marketing and insurance sales that could interfere with work or negatively impact colleagues, superiors, or stakeholders are prohibited.
- Employees are prohibited from engaging in any secondary or side jobs that may harm the company or interfere with their work without prior approval of the company. If an employee receives a fee for external lectures, written contributions, or similar activities, they must, in principle, report it to the company and remit the payment to the company.
- Employees must refrain from engaging in any activities unrelated to their work during working hours.
- Actions that undermine workplace discipline, such as personal outings, unauthorized leave, early departures, tardy arrivals, or failure to adhere to meal or rest breaks, are strictly prohibited.
- The use of illegal software is prohibited, and employees must follow proper procedures through the relevant department if the use of such software is necessary.
- Employees must not abuse their position or relationships to request or coerce others into performing private tasks or engaging in unfair practices, or cause physical or mental harm, or create a degrading work environment.
- Employees must not engage in any acts of violence that harm their own dignity and that of others.
- Employees must not form private groups that create division or discomfort among colleagues.
- Employees must refrain from any actions that could damage their dignity or disrupt a healthy work environment.