

Anti-Bribery Global Guideline

All employees and third parties acting on the company's behalf must not pay, offer, authorize, or promise a bribe, kickback, or any other form of corrupt payment in the course of carrying out the company business.

Not only does U.S. Foreign Corrupt Practices Act apply as our company is listed on the NYSE, but also all anti-bribery laws of the locality where the business is operating ("Anti-bribery law") apply. If the applicable Anti-bribery law is violated, the individual who violated the law may be subject to criminal sanctions, and it may also cause severe financial losses and loss of profit to the company. Therefore, please familiarize yourself with the terms of this guideline and ensure that you abide by the guideline at all times in connection with your work.

01 Violation of Anti-bribery law

It is strictly prohibited to **corruptly or improperly** offer, pay, promise to pay, or authorize the payment of money or **anything of value** to a **Government Official** in order to obtain or retain business or a business advantage. In fact, even if not actually paid, **offering to pay, promising or authorizing to pay** with corrupt intent can be considered as violation.

02 Who is Government Official?

Government official ("Government Official") is broadly defined under the Anti-bribery law.

- Government Officer
- Politician, candidate for political office, member of a political party, royal family, family member of a politically influential person
- Employee of a state-owned/ state-controlled enterprise or public institution operating under national management and/or under policy with substantial control of the government
- Management and employees of Public International Organization

This guideline also applies to family-relations or any agents acting on behalf of the Government Official defined above. Moreover, you should be particularly aware of interactions with Government Officials who may be in a position to provide some benefit to the company, such as a business opportunity, licenses or permits, import/export matters, or any other advantage that can benefit the company.

03 What Types of Payments are Prohibited?

Improper payment/ offering payment of anything of value, directly or indirectly, in any form to a Government Official is strictly prohibited. This guideline strictly prohibits the improper payment/ offering payment of anything of value in any form - this includes not only cash or cash equivalents, but also anything with tangible or intangible value, including the following:

Examples of “Anything of Value”

- Gift
- Stock, gift card, voucher, real estate, ticket
- Rebates, kickbacks
- Political/charitable donations/contributions/sponsorships, expenditure for congratulations and condolences, scholarship
- Meals and entertainment expenses
- Travel, expenses for accommodation
- Payment of certain amount agreed with the Government Official in exchange for the benefit of winning a business contract/ maintaining the business
- Business opportunities
- Job or internship opportunities
- Favorable discount for products or services, not offered to the general public
- Soft dollar practices



It is permissible to make legitimate charitable donations, contributions or sponsorships to credible institutions and organizations. However, there must be no improper advantage or undue influence, and all must be made according to the internal process.

04 Acts Subject to Anti-Bribery Laws (Corrupt Intent)

‘Corrupt intent’ refers to **an intent to induce a Government Official to use his/her official position to secure business opportunities or to obtain any improper business benefit**, and if anything of value was provided in exchange, such thing shall be considered a ‘bribe’.

05 Guide to Conducts when Contacting Government Officials

There are certain exceptions when payment of expenses related to Government Official is **permitted** under the Anti-bribery law. However, the expenses should be **reasonable and directly related to the work**. It should be made in **compliance with the local laws**, and **must not be offered improperly or repeatedly directed to a certain Government Official**.

- ✓ Expenses incurred in the process up to contract execution (e.g. meal expenses, travel expenses related to site inspection)
- ✓ Work-related expenses such as expenses incurred to the Government Official for advertisement, exhibition, or explanation of company products or services (e.g. travel and accommodation expenses) are exceptionally permitted.

06 Transactions with a Third-party agent

Company shall be responsible for not only directly offering bribe, but also by **indirectly offering bribe through a third party** (Organization and Individuals representing or conducting work on behalf of our company for government and government officer-related work). Therefore, below guidelines should be complied when conducting work related to the government by authorizing the work to a third-party agent.



Types of Third-party agents

- Consulting company
- Agency
- Professional advisory services (accounting firm, law firm)
- Freight forwarder, Logistics company
- Services business (construction services, fire-fighting services, and etc.)
- Sales agent
- Organization and individuals conducting work on behalf of our company for government-related work based on authorization contracts or due to share ownership relations, such as JV partner or subsidiary

07 Liabilities and Sanctions for Violation

Countries around the world strictly regulate and impose severe penalties for violations of anti-bribery laws. If the company becomes involved in a bribery case or is subject to such allegations, it may suffer serious reputational damage and incur substantial losses due to **criminal and/or civil sanctions**. Moreover, you should be aware that **individuals** involved in a bribery case would be sentenced to **imprisonment or fines** and must therefore take great caution. Especially, employees who violate this guideline during their work, or who refuse to cooperate with an investigation related to such violations, will be subject to disciplinary procedures in accordance with internal regulations. Third parties found to be in violation of this guideline may also be subject to actions including, but not limited to, termination of contract with the company.

08 Violation Handling Procedures

If any employee becomes aware of an actual, suspected, or potential violation of applicable anti-bribery laws or this guideline, they shall immediately **report to their department head or the Compliance team**. Upon receiving such a report, the department head shall promptly notify the Compliance team without any delay. All reported matters shall be investigated and addressed expeditiously in accordance with the company's internal procedures. Throughout the entire process—from initial investigation to final resolution—the company shall give the highest priority to protecting the identity and rights of the whistleblower.

09 Anti-Bribery Compliance Training and Risk Assessment

Anti-bribery compliance training is provided either **in-person or online** in accordance with company policy. All employees are required to fully attend the anti-bribery compliance training sessions conducted by the company. The company also identifies **anti-bribery-related risks** and conducts **company-wide voluntary compliance assessments** through the Compliance Portal. For any inquiries regarding training or risk assessments, please contact the Compliance Team.

10 Conclusion

This guideline has been approved by the responsible executive. If you have questions regarding the requirements or the scope of the guideline, or if there is any doubt as to whether a particular payment is permissible, **please consult with the Compliance team**. In addition, if you become **aware of any violation** of this guideline, **please report immediately to your department head or the Compliance Team**.

※ This guideline has been revised with the approval by the Compliance Executive.