

# **DOOSAN CODE OF CONDUCT**

## A Message from the Chairman

The Doosan Credo encompasses our philosophy about people and business which we have developed for over a hundred years. By putting the Credo into action, we now prepare for the next hundred years to come.

As global economic environments and social paradigms are changing at a rapid pace, it is ever more important to emphasize corporate integrity, transparency, respect for our customers, fair business practices with our partners, and commitment to the development of our communities. The Doosan Code of Conduct is firmly anchored in the Doosan Credo and is designed to serve as the guiding principles for all of us at Doosan Corporation and its subsidiaries worldwide. All of us should keep the values in the Code of Conduct close to our hearts and follow the Code at all times. In today's world, even one person's misconduct can have a significant negative impact on the reputation and credibility of our company, which many have built over the course of our long history. In this regard, it is essential that all of us understand and comply with our Code of Conduct. In addition, if you are aware of a violation of the Code of Conduct or applicable laws, it is your obligation to speak up or, where allowed under applicable laws, make a report through our whistleblowing systems. It is everyone's duty to protect Doosan's integrity, which is indispensable to realizing our vision for the future as well as carrying out our social responsibility.

Thank you for embracing the Code of Conduct and making it a part of your life at Doosan. With our commitment to thinking about and doing what is

right, I have no doubt that we will be successful in building a proud Doosan which will enhance the quality and value of our world for many generations to come.

Jeongwon Park  
Chairman & CEO  
Doosan Group

## Doosan Code of Conduct

Doosan is committed to improving competitiveness and fulfilling its corporate social responsibility through *Inhwa*, customer-focused business philosophy, transparent business operations and innovation, thereby fostering Doosan's continuous growth. To this end, we adopt and implement the Doosan Code of Conduct as our guiding principles.

The Doosan Code of Conduct (the "Code") applies to all directors, officers, and employees ("employees") of Doosan Corporation and its subsidiaries and affiliates (collectively, "Doosan" and individually, the "Company"). Third parties working with Doosan are also encouraged to comply with the Code.

This Code is intended to provide a broad ethical framework for guiding employees' conduct. It is not meant to encompass all possible situations we may encounter. Thus, each Company will provide supplementary policies aimed at providing guidance in specific areas, which can be found on the Company's intranet or obtained from the Company's Legal Department.

All employees are responsible for understanding and complying with the Code and applicable supplementary policies. They are also expected to comply with all applicable laws. To the extent any provision of this Code or supplementary policies conflict with applicable laws, the latter shall take precedence.

Doosan takes seriously any violations of the Code, supplementary policies and applicable laws. If you believe that such violations have occurred, you should report them in accordance with the procedure established by the Company. The Company will take every reasonable precaution to protect your anonymity if you choose to remain anonymous. Any form of retaliation against employees for their reporting such violations in good faith is strictly prohibited.

## Inhwa

- ❖ *Respect, Teamwork and Openness: Our people are at the heart of our growth and success. We recognize individual differences and treat each other with respect. We understand “Inhwa” as teamwork in the truest sense, based on fairness, openness and camaraderie.*
  - ◆ We are unreservedly committed to the principle of non-discrimination with respect to race, color, gender, age, disability, religion, ideology, political opinion, nationality, ethnicity, health, physical appearance, sexual orientation, education and social, family or marital status.
  - ◆ Words and conduct detrimental to *Inhwa*, including offensive remarks, verbal and physical abuse, and sexual harassment, have no place at our workplace.
  - ◆ Fairness, transparent criteria and sound principles guide how we hire, evaluate, develop, and promote our people.
  - ◆ We create and foster an environment of open communication where everyone is encouraged to share reasoned ideas and good-faith opinions.
  - ◆ We pursue solid teamwork based on fairness and warmth. We treat one another in accordance with fair and equitable standards and principles.

## Integrity and Transparency

- ❖ ***Integrity and Transparency :*** *Integrity and transparency must be applied to every aspect of Doosan's organization and business.*
- ◆ We must not, directly or indirectly, offer, give, promise to give, receive, agree to receive, or request improper financial or other advantage (including gifts, meals, and entertainment) in our dealings with public officials and individuals in the private sector.
- ◆ We must ensure the integrity and accuracy of our business and financial records, consistent with applicable laws, accounting principles and our supplementary policies.
- ◆ We must provide material information to our investors in a truthful, reliable and timely manner consistent with applicable laws.
- ◆ We must not act in any manner that creates, or appears to create, a conflict between Doosan's interests and our personal interests. We must not engage in any activities, including activities outside of our employment, which may undermine Doosan's interests and reputation.
- ◆ We must not use, or provide to someone else, inside, non-public information of Doosan for personal or someone else's benefit. We must not trade, or facilitate another person's trade, in Doosan's, or any other company's, securities based on any inside, non-public information.
- ◆ We must safeguard Doosan's assets from loss, damage, theft, misuse and abuse.
- ◆ Doosan observes the laws, regulations, and internationally applicable standards related to the prevention of corruption and bribery.
- ◆ Doosan's assets may be used only for proper business purposes and for the benefit of the Company.
- ◆ We must protect Doosan's confidential or proprietary information and must not share it with any third party without the Company's permission.
- ◆ We must safeguard the security and confidentiality of personal information in Doosan's possession in accordance with applicable laws.

❖ *Doosan competes fairly. Doosan is committed to complying with relevant antitrust and competition laws and regulations where it conducts business.*

- ◆ We value our suppliers, contractors and distributors as our business partners, and strive to build trusting relationships with them for mutual growth.
- ◆ Doosan is committed to conducting business in ways that do not restrict fair and free competition. We must not unfairly restrict competition by agreeing with, or exchanging information or opinions with, our competitors regarding prices, types and standards of the products and services, supply levels, markets and territories, customers, suppliers, distributors, terms and conditions of transactions, and bidding conditions and methods.
- ◆ We must not use Doosan's dominant market position to exert undue influence on those who deal with us.

## Focus on Our Customers, Innovation, Growth

❖ ***Customer-Focused*** : *Our customers are the reason we exist. Our business decisions and activities are thoroughly customer-focused.*

- ◆ We are driven to offer our customers the best value by understanding and satisfying their needs. We will listen to our customers and treat them fairly and respectfully.
- ◆ We will provide our customers with truthful information about our products and services.

❖ ***Innovation & Growth*** : *We pursue sustainable growth through continuous innovation.*

- ◆ We are committed to continuously improving our technologies, products, services, processes and systems. To this end, we will actively pursue new and diverse technologies, knowledge, ideas, and information.
- ◆ We will constantly set new and challenging goals, thereby improving our individual capabilities and sustaining Doosan's growth.



## Community Development, Safety and Environment

- ❖ ***Community Development, Safety and Environment:*** *We are committed to building Doosan as a trusted company that grows with our community. As responsible members of our communities, it is our duty to safeguard the life and safety of everyone in our communities and protect the environment.*
- ◆ Doosan takes corporate social responsibility seriously. We will contribute to the development of our community through carrying out our corporate activities and actively fulfilling our corporate social responsibilities while being transparent with our efforts.
  - ◆ Doosan is dedicated to maintaining safe working environments and complying with all applicable environmental, health, and safety standards and regulations.
  - ◆ We are committed to the health and safety of our people, our customers, and the members of our communities in all aspects of our business, including product development, manufacturing and sales activities.
  - ◆ We are committed to achieving environment-friendly growth by actively improving our technology and pursuing innovation.

## **Integrity Policy**

### ***Article 1. Purpose***

The purpose of this Policy is to set forth specific rules to promote honest and transparent business operations as required by the Company's Code of Conduct.

### ***Article 2. Definitions***

The terms used in this Policy shall have the meanings set forth below:

1. "Interested Persons" means individuals and entities who may be affected by work done and decisions made by the Company, which includes the following:
  - (1) Any individual or entity that may be, directly or indirectly, advantaged or disadvantaged by the Company's business operations and decisions.
  - (2) Any individual or entity that is doing or seeking to do or has potential of doing business with the Company.
2. "Interested Employees" means the Company's employees who receive work orders from other employees or who may be, directly or indirectly, advantaged or disadvantaged by their actions or decisions.
3. "Gifts" means money, services, goods, stocks, bonds, lodgings, memberships, event tickets or anything of value which is given or offered for free or at a discount.
4. "Entertainment" includes meals, travel, lodging, hospitality, golf outings, and other financial favors or services.
5. "Code of Conduct Department" means the department designated by the Company to be in charge of the implementation of the Code of Conduct, including responding to inquiries and providing employee education. Representative Director shall designate the Code of Conduct Department and announce by appropriate means so that the Code of Conduct Department can be easily known to the employees.

### ***Article 3. Scope***

This Policy applies to all domestic and overseas directors, officers, and employees of the Company. Third parties working with the Company are also encouraged to comply with this Policy.

***Article 4. Prohibition on Improper Use of One's Position and Making Improper Requests***

1. Employees should never use their Company position or authority to obtain any improper benefit, whether for themselves or for any other person.
2. Employees should not make improper requests which may interfere with other employees' fair work performance, whether for themselves or for any other person.

***Article 5. Conflict of Interest***

1. In each of the following situations, an employee should consult with and seek guidance from his or her supervisor or the head of the department:
  - (1) When the employee's work is directly related to the financial interests of the employee, his or her family, and/or close relatives.
  - (2) When the Interested Person is a family member or a close relative.
  - (3) When the Interested Person is the employee's former employer or former CEO.
  - (4) In all other situations where the relationship between the employee and the Interested Person may affect the employee's proper job performance.
2. When the supervisor or the head of the department receives a consultation request pursuant to Article 5-1, he or she should take appropriate measures to ensure proper job performance.
3. Executive officers and team leaders should submit an annual report listing the names of the individuals and entities covered under Article 5-1 ("Conflict of Interest Report").

***Article 6. Prohibition on Making Improper Requests for Favorable Treatment in Personnel Matters***

1. Employees may not, directly or indirectly, request line managers or HR managers to make improper favorable decisions on their personnel matters, including promotion, relocation, evaluation, and compensation.

2. Employees may not use their positions to improperly interfere with personnel matters of other employees, including their promotion, relocation, evaluation, and compensation.

### ***Article 7. Prohibition on Gifts and/or Entertainment***

1. Employees should not receive Gifts and/or Entertainment from Interested Persons. However, this prohibition does not apply, if such Valuables are:
  - (1) Provided in connection with the lawful rights of the employees (for example, money given to repay an existing debt obligation toward such employees);
  - (2) Meals, lodging and transportation which are reasonable and uniformly provided to every participant of a business-related event;
  - (3) Souvenirs or promotional gifts distributed to the general public; or
  - (4) Commensurate with legitimate and generally accepted local customs.
2. Employees should never receive Gifts and/or Entertainment from Interested Employees. However, this prohibition does not apply, if such Gifts and/or Entertainment are:
  - (1) Allowed under Article 7-1; or
  - (2) Modest and customary gifts of nominal value.
3. The prohibitions of Articles 7-1 and 7-2 also apply to employees' family and close relatives.
4. If employees have any inquiries regarding whether they may attend a certain event or receive certain Gifts and/or Entertainment, they should consult the Code of Conduct Department through their supervisors. If employees receive unsolicited Gifts and/or Entertainment which are prohibited under this Policy, they should submit a written report to the Code of Conduct Department through their supervisors and discuss how to handle such Gifts and/or Entertainment.

### ***Article 8. Prohibition on Giving Gifts and/or Entertainment***

Employees may not offer or give Gifts and/or Entertainment to other employees, their families, or close relatives who are prohibited from receiving such Gifts and/or Entertainment under Articles 7-2 and 7-3.

### ***Article 9. Prohibition on Loans***

Employees may not borrow money or receive loan guarantees from Interested Persons or Interested Employees.

#### ***Article 10. Special Personal Events***

1. Employees may not inform Interested Persons of Special Personal Events. Special Personal Events” is defined as events of personal significance, such as marriage, the death of a family member, or the birth of a child.
2. Employees may not receive monetary gifts for their Special Personal Events from Interested Persons.
3. Employees may not receive gifts from any other employee where such gifts may be deemed excessive by social standards.
4. Employees must report to their supervisor and discuss with the Code of Conduct Department, (i) when they receive monetary gifts for the Special Personal Events from Interested Persons or (ii) when they receive monetary gifts for the Special Personal Events from other employees where such gifts may be deemed excessive by social standards.
5. Employees shall not give return gifts to other employees, unless they are uniformly distributed to every guest at the Special Personal Events and do not exceed customary and reasonable limits.

#### ***Article 11. Employee’s Duty and Responsibility to Comply with Policy***

1. Employees are required to understand and comply with this Policy. An employee in violation of this Policy may be subject to Company’s disciplinary actions and other necessary sanctions.
2. Employees who are aware of a violation of this Policy shall report it to the Company; where allowed, they may report the violation through the Company’s whistleblowing system.

#### ***Article 12. Questions***

Employees should consult with the Code of Conduct Department for any questions regarding this Policy and whether a specific act may be allowed or prohibited.

## **Anti-Bribery Policy**

### ***Article 1. Purpose***

The Code of Conduct prohibits bribery, and this Anti-Bribery Policy (“Policy”) is intended to set forth specific anti-bribery rules.

### ***Article 2. Definition of Public Official***

In this Policy, the term “public official” includes the following:

1. Anyone who is an officer or employee of the government or is appointed to exercise a public function;
2. A member of the National Assembly or a local legislative assembly;
3. An executive officer of a government-related enterprise;
4. A candidate for public office; and
5. Anyone who is considered as a “public official” or performs official functions for or on behalf of the government under relevant laws.

### ***Article 3. Definition of Foreign Public Official***

In this Policy, the term “foreign public official” means the following:

1. Any person holding legislative, administrative, or judicial office in a foreign government (including governments at all levels, from central to local), whether appointed or elected.
2. Any person exercising a public function for a foreign country and falling under any of the following:
  - (1) Any person carrying out public affairs delegated by a foreign government;
  - (2) Any person holding office in a public organization or public agency established by any Act and subordinate statutes to carry out specific public affairs; or
  - (3) Any executive or employee of an enterprise in which a foreign government has invested in excess of 50 percent of its paid-in capital or over which a foreign government has de facto control with respect to all aspects of its management, such as decision-making on important business operations and the appointment and removal of executives;

however, excluded herefrom is any enterprise engaging in a business in competition at arm's length with general private business entities without any privilege conferred thereon, such as discriminative subsidies.

3. Any person acting for a public international organization.

#### ***Article 4. Definition of Bribe***

1. In this Policy, the term “bribe” includes money, goods, pecuniary advantages, and any tangible or intangible benefits. And also includes any transactions, regardless of the form or type, that have the character of bribery and all activities that are against the laws and regulations related to political funding.
2. Examples of bribes include, but are not limited to, the following:
  - (1) Money, gift certificates, stocks, and bonds;
  - (2) Trips, meals and drinks, sports (including golf), and entertainment (including deliberate losses at gambling games);
  - (3) Travel and accommodation assistance;
  - (4) Job placement assistance; and
  - (5) Investment opportunities, including conferring an unfair advantage to obtain a newly built apartment unit whose value is expected to increase in the future.

#### ***Article 5. Prohibition on Bribery***

1. Employees may not offer, give, or promise to give a bribe to public officials or foreign public officials in relation to any business operations (which include but are not limited to retaining or obtaining business opportunities, requesting favors, and relieving/evading disadvantageous measures).
2. When dealing with foreign public officials, employees must understand and follow this Policy, relevant national laws, and relevant local anti-corruption laws.

#### ***Article 6. Prohibition on Bribery through Agents***

1. Employees may not promise, give, offer, or express their intent to give a bribe to a public official or a foreign public official in relation to any business operations through agents or consultants.

2. Employees may not appoint or hire an agent or consultant if employees suspect that such agent or consultant are highly likely to give a bribe to a public official or a foreign public official.

***Article 7. Employee's Duty and Responsibility to Comply with this Policy***

1. Employees are required to understand and comply with this Policy. An employee in violation of this Policy may be subject to Company's disciplinary actions as well as other necessary sanctions.
2. Employees who are aware of a violation of this Policy shall report it to the Company; they may report the violation through the Company's whistleblowing system.

***Article 8. Questions***

1. Employees should consult with the Code of Conduct Department for any questions regarding this Policy and questions about whether a specific act may be allowed or prohibited.
2. "Code of Conduct Department" means the department designated by the Company to be in charge of the implementation of the Code of Conduct, including responding to inquiries and providing employee education. Representative Director shall designate the Code of Conduct Department and announce by appropriate means so that the Code of Conduct Department can be easily known to the employees.



## **Corporate Culture Policy**

### ***Article 1. Purpose***

The Code of Conduct prohibits improper words and conduct, including discrimination, sexual harassment, and offensive remarks, and this Corporate Culture Policy (the “Policy”) is intended to set forth specific standards and guidelines.

### ***Article 2. Scope***

1. This Policy applies to the interactions between the Company’s employees. It also applies to the interactions between the Company’s employees and the employees of the Company’s business partners, including subcontractors and suppliers, with whom the employees may come into contact in the course of employment.
2. This Policy applies to all work-related activities and situations considered to be work-related.
3. This Policy applies to behavior at any event directly or indirectly related to Company, such as social events hosted or sponsored by the Company.
4. It is recommended that employees explain this Policy to the Company’s business partners, including subcontractors, and encourage their compliance with this Policy.

### ***Article 3. Prohibition of Sexual Harassment***

1. Employees must not (i) make another person feel humiliation or antipathy by verbal or physical behavior of a sexual nature or (ii) put another person at a disadvantage in any employment matters (including but not limited to employment, promotion, evaluation and compensation) on the grounds of not submitting to verbal or physical behaviors or demands of a sexual nature (“Sexual Harassment”).
2. The determination as to whether a particular behavior constitutes Sexual Harassment will take account of the surrounding circumstances as a whole, including the following:
  - (1) The victim’s subjective impressions;
  - (2) The expected feelings and perspectives of a reasonable, objective person in response to the behavior at issue; and

- (3) Whether the behavior at issue may create a hostile and threatening work environment, thereby decreasing work efficiency and productivity.

#### ***Article 4. Other Types of Prohibited Harassment***

1. Employees must not engage in harassment or any other behavior that could be mistaken as such, including the following behaviors (“Harassment”):
  - (1) Any discrimination on an improper basis, including sex, religion, disability, age, social status, place of origin, nationality, ethnicity, physical condition, marital status, pregnancy, parental status, family status, race, color, ideology, political affiliation, sexual orientation, education or health status.
  - (2) Abusive or offensive words and behaviors which may violate another person’s dignity; or
  - (3) Repeated and consistent ostracizing of an individual from normal work interactions or bullying of an individual or a small group of employees.
2. Constructive criticism as well as legitimate supervisory or coaching actions made in response to employees’ performance deficiencies or other workplace issues do not constitute Harassment.

#### ***Article 5. Reporting of Harassment***

1. Employees who are aware of a violation of Articles 3 or 4 of this Policy shall report it to the Company; they may report the violation through the Company’s whistleblowing system.
2. The Company may investigate and take appropriate action (including disciplinary action) in accordance with the relevant Company’s regulation or policy when it becomes aware of incidents of Harassment, even if no formal report has been filed.

#### ***Article 6. Questions***

1. Employees should consult with the Code of Conduct Department for any questions regarding this Policy and questions about whether a specific act may be allowed or prohibited.
2. “Code of Conduct Department” means the department designated by the Company to be in charge of the implementation of the Code of Conduct, including responding to inquiries and providing employee education.

Representative Director shall designate the Code of Conduct Department and announce by appropriate means so that the Code of Conduct Department can be easily known to the employees.

## **Conflicts of Interest Policy**

### ***Article 1. Purpose***

The Code of Conduct prohibits employees from improperly using the Company's nonpublic information or engaging in any activity where an employee's interests may conflict with those of the Company, including taking outside employment and competing with the Company. This Conflicts of Interest Policy ("Policy") is intended to set forth specific standards which employees should follow.

### ***Article 2. Scope***

This Policy applies to all domestic and overseas officers and employees ("employees") of the Company. Third parties doing business with the Company are also encouraged to comply with this Policy.

### ***Article 3. Non-Compete***

Employees shall not engage in the following activities:

1. Establishing and managing, directly or indirectly, a company or other entity; receiving wages or other pecuniary benefits from an entity or individual; or competing against the Company for personal or third party's benefit.
2. Allowing the use of the employee's name or position at the Company for sales and marketing activities of any outside company or entity covered under Article 3-1.

### ***Article 4. Use of Corporate Opportunity***

Employees shall not take advantage of any Corporate Opportunity for their personal or a third party's benefit where such opportunity may be beneficial to the Company at the moment or in the future. Corporate Opportunity includes the following:

1. A business offer which employees receive because of their work or positions at the Company;

2. A business offer from the Company's business partners or competitors;
3. A business opportunity which the employees become aware of while working at the Company or using the Company's information; and
4. A business opportunity which is closely related to the Company's current or future business.

#### ***Article 5. Selection of Business Partners***

1. Selection of business partners as well as decisions on whether to enter into a contract should be based on rational and objective business criteria, such as quality, price, and reliability. Such decisions shall not be based on employees' personal financial interests or personal relationships (such as nepotism and cronyism).
2. Employees shall not engage in any investment activities, such as trading securities or real estate, which may adversely influence their business decision, including selecting business partners, on behalf of the Company.

#### ***Article 6. Prohibition on the Use of Nonpublic Information***

1. Employees may not use or disclose the Company's Nonpublic Information (information which (i) a reasonable investor would consider material in making his or her investment decisions and (ii) has not been disseminated to the public ) for personal or someone else's benefit. The use of the Company's Nonpublic Information includes (i) trading securities or real estate based on such information and (ii) engaging in other activities to obtain pecuniary advantage.
2. The Company's Nonpublic Information includes not only information relating to the Company's business but also information relating to other companies which the employees obtain in connection with the employees' work at the Company, including information related to affiliate companies (including subsidiaries), suppliers, subcontractors, and other business partners.
3. The Company's Nonpublic Information does not include publicly available information disclosed through reporting to the Financial Authorities or through newspapers and television, as recognized under the applicable laws.

#### ***Article 7. Limitations on Outside Speaking Engagements and Publications***

1. Employees shall report to and discuss with their department managers or supervisors prior to giving speeches, presentations, or lectures; participating in decision-making; providing advisory support; or participating in debates in outside seminars, forums, presentations, trainings, and meetings (“Outside Speaking Engagements”). When reporting the Outside Speaking Engagements, the following information should be provided to the Company: the name of the person who requested such engagement, the reason for the engagement, location, time, and whether the employee will receive compensation.
2. Where department managers determine that the Outside Speaking Engagements may cause leakage of the Company’s trade secrets and other confidential and proprietary information, undermine the Company’s reputation, or interfere with work performance, department managers may impose restrictions on employees’ Outside Speaking Engagements.
3. The amount of the compensation an employee may receive from the Outside Speaking Engagements may not exceed the amount socially acceptable and customarily paid by the sponsor of such speaking engagements.
4. If employees wish to publish a book or an article relating to their professional knowledge which they gained through their work at the Company, they shall first discuss with their department managers regarding the content and publication timing of such a book or article. Employees shall make good faith efforts to respond to the manager’s feedback, including postponing the publication and making revisions to the content thereof.

#### ***Article 8. Employee Responsibility to Comply with this Policy***

1. Each employee shall understand and comply with this Policy. Any employee in violation of this Policy may be subject to Company disciplinary action and other necessary sanctions.
2. Employees who are aware of a violation of this Policy shall report it to the Company; they may report the violation through the Company’s whistleblowing system.

#### ***Article 9. Questions***

1. Employees should consult with the Company’s Code of Conduct Department for any questions regarding this Policy and questions about whether a specific act may be allowed or prohibited.

2. “Code of Conduct Department” means the department designated by the Company to be in charge of the implementation of the Code of Conduct, including responding to inquiries and providing employee education.

## **Fair Competition Policy**

### ***Article 1. Purpose***

The purpose of this Fair Competition Policy (the “Policy”) is to establish standards employees must follow to promote fair competition as required by the Company’s Code of Conduct.

### ***Article 2. Definitions***

The terms used in this Policy will have the meanings set forth below:

1. Code of Conduct Department: The department designated by the Company to be in charge of the implementation of the Code of Conduct, including responding to inquiries and providing employee education.
2. Fair Trade Compliance Officer: An executive officer in charge of monitoring, supervising, and training to ensure the Company’s compliance with the applicable fair trade laws.
3. Company’s Fair Trade Department: The department that supports the duties of the Fair Trade Compliance Officer.

### ***Article 3. Scope***

This Policy applies to all Company employees, and is recommended that business partners and other third parties doing business with the Company comply with this Policy.

### ***Article 4. Contact with Competitors’ Employees***

1. Employees shall refrain from any contact with the employees of competitors, including through private gatherings, emails, phone calls, and mails. In the event such contact cannot be avoided due to personal relationships, employees shall not exchange information or opinions on prices, conditions of transactions, future product development plans, marketing plans, and other sales policies.
2. In the event employees plan to attend formal events such as business association meetings where the employees of competitors will be present, employees shall obtain prior approval from Company’s Code of Conduct



Department.

3. The Code of Conduct Department shall consult with the Company's Fair Trade Compliance Officer or the Company's Fair Trade Department, and refer to their opinion when making decisions on whether to approve.

#### ***Article 5. Sales and Marketing Activities***

When performing sales and marketing activities, employees shall comply with the following:

1. Employees shall not give or offer to give illegal rebates to customers purchasing goods or services.
2. Employees shall not make unsupported and damaging statements about competitors to attract customers. Nor shall employees provide customers with false information about competitors, including their business situation, product functions, and technology.
3. Employees shall not force employees of the Company, its affiliates, or business partners to purchase or use goods and services of the Company or its affiliates.

#### ***Article 6. Employee Responsibility to Comply with this Policy***

1. Each employee is required to understand and comply with this Policy. Any employee in violation of this Policy may be subject to disciplinary actions and other necessary sanctions.
2. Employees who are aware of a violation of this Policy shall report it to the Company; they may report the violation through the Company's whistleblowing system.

#### ***Article 7. Questions***

1. Employees should consult with the Company's Code of Conduct Department for any questions regarding this Policy and whether a specific act may be allowed or prohibited.
2. The Code of Conduct Department may consult with the Company's Fair Trade Compliance Officer or the Company's Fair Trade Department, and refer to their opinion when replying to inquiries.

## **Safeguarding Company Assets Policy**

### ***Article 1. Purpose***

The purpose of the Safeguarding Company Assets Policy (“Policy”) is to establish the specific standards to safeguard the Company’s assets as required by the Code of Conduct.

### ***Article 2. Scope***

This Policy applies to all domestic and overseas employees of the Company.

### ***Article 3. Basic Principles***

1. Employees shall protect the Company’s assets and use them only as determined and only for the Company’s business purposes.
2. Employees shall not use the Company’s assets for their own benefit nor for the benefit of third parties.

### ***Article 4. Proper Use of Company Funds***

1. Employees shall use Company funds for Company business purposes only and shall refrain from misappropriating funds, for example, by embezzling or submitting false documentation.
2. Employees shall use corporate credit cards only to the extent necessary to carry out their professional duties. Employees shall not use Company credit cards for the following purposes:
  - (a) Unauthorized withdrawals of cash;
  - (b) Misuse through questionable merchants; and
  - (c) Personal expenses.

### ***Article 5. Protection of Tangible Assets***

1. Employees shall comply with safety and environmental standards to prevent harm to persons and problems such as soil contamination and factory and building depreciation. In addition, employees shall follow relevant user

manuals to ensure the safety of employees and proper working condition of machines and equipment.

2. Employees may use computers, printers, fax machines and other office equipment only to the extent necessary and only for purposes related to their job duties. Employees may not install, use, or store software programs, copyrighted works or other materials protected under intellectual property laws, without obtaining proper licenses or complying with applicable license terms. In addition, employees shall not engage in any conduct that may negatively affect the Company's data system.
3. Employees shall use office supplies and goods only for the purpose of carrying out their professional duties and shall not take them for personal use without permission.

#### ***Article 6. Protection of Intangible Assets and Informational Assets***

1. Employees shall not improperly disclose the Company's informational assets, including trade secrets, to third parties. In addition, employees shall not use the Company's informational assets for personal benefit.
2. Employees shall comply with the Company's standards relating to the protection of informational assets and shall prevent the improper disclosure of them.

#### ***Article 7. Employee Responsibility to Comply with This Policy***

1. Each employee is required to understand and comply with this Policy. Any employee in violation of this Policy may be subject to Company disciplinary action and other necessary sanctions.
2. Employees who are aware of a violation of this Policy shall report it to the Company; they may report through the Company's whistleblowing system.

#### ***Article 8. Questions***

1. Employees should consult with the Company's Code of Conduct Department for any questions regarding this Policy and questions about whether a specific act may be allowed or prohibited.
2. "Code of Conduct Department" means the department designated by the Company to be in charge of the implementation of the Code of Conduct, including responding to inquiries and providing employee education.

## **Internet Use Policy**

### ***Article 1. Purpose***

Under the Code of Conduct, protection of corporate assets is the responsibility of all employees. The purpose of the Internet Use Policy (“Policy”) is to provide guidelines for the appropriate use of the Internet by employees.

### ***Article 2. Definition***

The terms used in this Policy shall have the meanings set forth below:

1. “Company’s Information System” includes hardware, software, and networks which are used to collect, produce, process, preserve, search, and communicate information and data, thereby supporting the Company’s business.
2. “Company Equipment” means laptops, desktop computers, mobile devices, removable storage devices, and other electronic devices using the Company’s Information System which employees use for business purposes.
3. “Code of Conduct Department” means the department designated by the Company to be in charge of the implementation of the Code of Conduct, including responding to inquiries and providing employee education.

### ***Article 3. Scope***

This Policy applies to all domestic and overseas employees of the Company.

### ***Article 4. Basic Principles***

1. When using the Company’s Information System or the Company Equipment, employees may use the Internet only to the extent necessary and only for business purposes.
2. Nevertheless, brief Internet use as well as drafting and sending personal emails are allowed, so long as such activities (i) are deemed reasonable and not excessive by social standards, (ii) do not interfere with employee job performance, (iii) do not adversely affect the Company, and (iv) are not prohibited under Article 5, Company policies or applicable laws.

### ***Article 5. Prohibited Acts***

When using the Internet, employees shall not engage in the following activities:

1. Disclosing the Company's confidential information, including trade secrets;
2. Accessing or attempting to access informational assets of the Company or third parties without authorization;
3. Posting or sending statements or materials that may damage the Company's reputation or image;
4. Engaging in activities which may be false or may defame another person;
5. Engaging in activities which may infringe upon another person's privacy or personal data protection rights;
6. Searching or accessing illegal or inappropriate websites which contain obscenities, violence, terrorism, unlawful activities, or discrimination based on race, gender or age, while using the Company's Information System or the Company Equipment;
7. Downloading, installing, using, uploading or transmitting software programs, copyrighted content, or other content protected under intellectual property laws, while using the Company's Information System or the Company Equipment, without obtaining proper licenses or complying with applicable license terms;
8. Engaging in any other activities which are unlawful or considered inappropriate by society.

### ***Article 6. Security***

1. Employees shall exercise due care and diligence in ensuring security and confidentiality when using the Company's Information System and the Company Equipment.
2. Employees shall take appropriate protective measures to prevent malware (such as viruses, worms and spyware) from infecting the Company's Information System and the Company Equipment.
3. Employees should only use the Company's Information System and the Company Equipment in compliance with the Company's policies. In addition, employees must comply with the Company's security standards, including protecting their passwords.

***Article 7. Employee Responsibility to Comply with This Policy***

1. Employees shall understand and comply with this Policy. Any employee in violation of this Policy may be subject to disciplinary action and other necessary sanctions in accordance with the Company Policy.
2. Employees who are aware of a violation of this Policy shall report it to the Company; where allowed, they may report through the Company's whistleblowing system.

***Article 8. Questions***

Employees should consult with the Company's Code of Conduct Department for any questions regarding this Policy and questions about whether a specific act may be allowed or prohibited.