

<b>윤리규범 실천기준</b> <b>(Code of Ethics)</b>			
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<b>Managed by</b>	<b>Business Ethics Risk Management Office</b>		
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## I. CEO Message

In 2003, POSCO FUTURE M declared our pledge for Business Ethics. Since then, we have embraced ethical business practices by making multiple revisions to our Code of Ethics.

Recently, we've made another improvement to the Code of Ethics to affirm ethical principles as our highest value in corporate governance, and to induce our employees to conduct responsibly and to lead by example. Integrity, fairness, and trust that stands on these two values have been the greatest asset that made POSCO FUTURE M what it is today. They will remain the backbone of the company as we embark on our journey to shape the future.

Despite dire circumstances in and out of the country, we are expanding our business areas overseas. We have set a vision to become a global leader in the field of chemical and energy materials. The highest level of ethical standard is required for a global leader.

POSCO FUTURE M will place the highest priority on ethics in our management practices based on the vision 'Motivate Future Movement for a Better World'. To that end, I will focus my attention on Business Ethics and spend ample resources as needed.

Keeping in mind the management philosophy of POSCO FUTURE M to choose ethical values over profit when these two values collide, we will put ethics at the forefront of our decision making process and conduct. We will strictly adhere to the zero tolerance policy which prohibits four major areas of unethical behaviors: bribery, embezzlement, manipulation of information fabrication of information and sexual misconduct violation of sexual ethics.

Fellow employees!, We must firmly establish an ethical corporate culture to be a partner of choice for key customers, a company that shareholders prefer to invest in, and a workplace our employees feel happy to work at. In this way, we can build a company that grows together with all stakeholders. Let's make every effort to establish a clean management system founded on ethics.

2024. 05.

POSCO FUTURE M CEO

## II. Code of Ethics

### 1. Preamble

This code of ethics establishes the ethical values and behavioral standards that must be preserved and developed by all POSCO Group employees by inheriting the foundational spirit of patriotism in steelmaking based on sacrifice and service while reflecting the new spirit of the times

It is our unchanging value to establish a corporate image that can be trusted by all stakeholders with the highly prioritized value criteria of integrity, fairness, and honesty. As a result, POSCO enacted the code of ethics in 2003 that must be adhered to by all employees, and explicitly included UN Human Rights that proclaims support and respect for human life and dignity in 2014. At this time, we have amended the code of ethics with tighter ethical standards according to the intent of management innovation that places the highest value on ethics in management

This code of ethics consists of the preamble, followed by the Principles of Ethics that reflect compliance and responsibilities of employees regarding the code of ethics, and the Practice Guidelines that set the standard for ethical decision-making.

All employees of POSCO Group must strictly comply with the Principles of Ethics and uphold the Practice Guidelines set forth by this code of ethics in all aspects of business

### 2. Principles of Ethics

#### 2.1 Duty of Compliance with the Code of Ethics

- 1) We must comply with related rules and regulations in all areas of the world where POSCO FUTURE M is conducting business operations
- 2) We must retain our dignity as POSCO FUTURE M employees and make efforts to maintain the company's reputation

- 3) We must preserve integrity, fairness, and trust throughout all jobs and business relations
- 4) We must not become engaged in activities in which there are conflicts of interests between the company and individuals
- 5) We must not irrationally discriminate against other employees or stakeholders based on race, nationality, gender, age, educational background, religion, region, disability, marital status, and sexual orientation, and must respect the dignity and diversity of each individual
- 6) We must make efforts to create a safe workplace and protect the environment.
- 7) We must be devoted to establishing an ethical culture by taking responsibility and upholding ethical conduct.

## **2.2 Roles and Responsibilities of Employees**

Every officer/employee, as a member of a global company, shall fully understand and implement this Code of Ethics and comply with domestic/foreign anti-corruption laws.

### **1) Understanding and Complying with the Code of Ethics**

- (1) We must fully understand and faithfully comply with all aspects of the code of ethics
- (2) Regarding situations in which there are conflicts concerning the code of ethics, decisions must be made after consulting with the department head or Corporate Audit Office
- (3) We must take responsibility for unethical conduct.

### **2) Reporting and Consulting Unethical Conduct**

- (1) If we find out that our own or others' behavior conflicts with the code of ethics, we must immediately report to and consult with the department head or the Corporate Audit Office
- (2) We must be aware of various methods to report or consult on cases in which there are conflicts over the code of ethics

### **3) Roles and responsibilities of leaders**

**The leader must perform a key role in ensuring the competitiveness of the company by preventing and eradicating unethical conduct through ethical compliance.**

#### **(1) Decision making**

The leader has the obligation to make decisions with ethics being the top priority whenever the company's benefits conflict with ethics

#### **(2) Operational accountability**

The leader possesses unlimited liability in unethical conduct, and must take supervisory

responsibility in cases of unethical conduct by his or her subordinates.

**(3) Job performance**

The leader strictly abides by the law and company regulations, and does not pursue private interests, is devoted to creating corporate values, and does not deal with corrupt stakeholders.

**(4) Elimination of favors and solicitations**

The leader aims to eliminate all forms of favors and solicitations, and to eliminate business influence in relation to outsiders.

**(5) Respect for humans**

The leader strives to eliminate conduct that negatively impacts respect for fellow humans, such as sexual harassment and verbal abuse in the organization.

**(6) Preventing Conflicts of Interest**

The leader prevents conflicts of interest with any private interested party who is working for a trading partner and make an effort to eradicate unfair business practices of providing business favors for my private interests

**(7) Practical activities**

The leader makes his or her utmost effort to play a role in raising the level of ethical practice to the highest level in the world by fulfilling the above roles and responsibilities.

**The leader must prevent unethical conduct among members of the team and take the following measures in case of such conduct.**

**(1) Training and counseling on ethics**

- The leader must provide training and counseling on ethics for relevant staff.
- The leader must have relevant staff understand the importance of compliance with the code of conduct and practice of ethical conduct.

**(2) Precautions for unethical conduct**

- In cases where unethical conduct occurs habitually, the leader must isolate the cause, improve the process, and fundamentally take preventive measures.
- The leader must report to or consult with the Corporate Audit Office immediately after receiving a report that a member has violated the code of ethics.

### **2.3 Penalty for Violation of the Code of Ethics**

Employees violating the code of ethics may receive certain penalties, including dismissal according to related regulations. In particular, the zero tolerance policy is applied to unethical conduct such as accepting bribes, embezzlement, fabrication of information, and violation of sexual ethics

#### **1) Conduct Subject to Penalty**

- (1) If one has violated the code of ethics or demanded others to do so
- (2) If one has not immediately reported a violation of the code of ethics that he or she is aware of or is skeptical about
- (3) If one does not cooperate with the investigation of the Corporate Audit Office regarding matters that may have violated the code of ethics
- (4) If one takes retaliatory action against other employees who reported an issue regarding ethical management

## **III. Ethical Practice Standards**

### **1. Purpose**

Practice Guidelines lay down the scope of acceptable conduct and practice standards in relations to business execution of employees for efficient application of the Code of Ethics.

### **2. Scope of application**

The Company practices the Code of Ethics according to these standards.

### **3. Definition of terms**

These standards define the terms as follows.

#### **3.1 Stakeholders**

Individuals such as executives and employees who may benefit directly and indirectly by the duties they perform; customers, clients, partners, public officers in Korea and abroad, and other related organizations.

### **3.2 General standards**

A universally reasonable standards that other employees and the general public can understand based on sound sense of judgement. A degree of something that the beneficiary can handle fairly without feeling pressured.

## **4. Responsibility and authority**

### **4.1 Responsibilities of executives and heads of department**

- 1) An executive or a head of a department must provide training or consultation constantly so that their team members can fully understand these standards.
- 2) An executive or a head of a department must take appropriate precautions to prevent their team members from violating these standards.

## **5. Business procedures**

### **5.1 Ethical Practice and Compliance**

As a global company, the Company establishes an ethical corporate culture by complying with the laws and ethics through management activities that strictly follow the basis and the principle.

#### **1) Money and valuables**

- (1) Money and valuables refer to money (cash, gift cards, vouchers) and goods that can bring economic benefit.
- (2) You must not provide or accept money or valuables to/from stakeholders for any reason. However, exceptions are made in the following cases.
  - Gifts for promotional purposes that cost 50,000 won or less. However, agricultural and fishery products and processed products (including flowers) that cost up to 100,000 won are allowed.
  - Gifts displaying a stakeholder's company logo that do not exceed 50,000 won, and gifts given to all attendees in general at events organized by stakeholders are allowed. (Stakeholders: Individuals such as executives and employees who may benefit directly and indirectly by the duties you perform; customers, clients, partners, public officers in Korea and abroad, and other related organizations.)
  - You must not request or receive gifts from overseas offices when traveling abroad for business purposes.

- (3) If you have received money or valuables without being aware of this, you must return them, and if it is difficult to do so, you must report the matter to the Corporate Audit Office.
- (4) If you earn income (such as instructor fees) by using the company's business knowledge, position, etc. to teach outside of the company, they must donate 50% of the income.

## **2) Entertainment**

- (1) Entertainment means various activities for the purpose of business meetings and exchanges such as meals, drinking, golf rounds, enjoying a performance, and amusement.
- (2) You must not provide or accept entertainment to/from stakeholders that exceeds 100,000 won per person. In case you must do so, you need to seek approval from the department head in advance. If the expense exceeds 100,000 won per person due to inevitable circumstances, it must be reported to the Corporate Audit Office. For those subject to the Anti-graft Act, such as public officers, journalists, and school personnel, you may provide meals that don't exceed 30,000 won per person only for legitimate purposes that are recognized as they are for the smooth progress of a given task, social reasons or the formality. You are prohibited from offering entertainment in bars that offer hostess or host services.

## **3) Hospitality**

- (1) Hospitality means offering or accepting services including transportation, accommodation, tourism, and event support.
- (2) You must not provide or receive hospitality services including transportation and accommodation that exceed general standards. However, hospitality services generally provided to all participants in events are excluded.
- (3) If the expense exceeds the permitted amount due to inevitable circumstances, it must be reported to the Corporate Audit Office.

## **4) Congratulations and condolences allowance**

- (1) (1) You must not notify stakeholders of your own or your colleague's congratulatory and condolatory events; notifying them of these events through a third party is also considered as being a notification from you..
- (2) You must use a company forum to provide any notification of congratulatory or condolatory events; you must not inform them of these events by using your company mail or sending an invitation card (wedding invitations and obituaries). When providing information about congratulatory or condolatory events, the scope of relatives are limited to your immediate family: your parents and parents-in-law, grand parents and grand parents-in-law, and your children..
- (3) A general standard of 50,000 won is recommended for expenditure for congratulations or condolences. No more than 100,000 won can be provided to stakeholders as a

congratulations or condolences allowance, which includes the price of standing sprays and flowers..

- (4) You must never receive congratulations or condolences allowance from stakeholders outside the company under any circumstance. If you have inevitably received a congratulations or condolences allowance from stakeholders outside the company, you must return the money or deposit the money to the Corporate Audit Office.
- (5) When requested by the Corporate Audit Office, executives and employees must submit relevant materials such as a record of returned allowances received from stakeholders..
- (6) You must not accept congratulations or condolence flowers from stakeholders. If you have accepted them due to unavoidable circumstances, you must not display them..
- (7) Executives and employees must not hold extravagant weddings in luxury hotels, etc.

#### **5) Solicitation/Recommendation**

- (1) Do not make solicitation or recommendation related to the following through an acquaintance within the company or an outsider. If you receive such solicitation or recommendation, you must register the case on the Company's Clean POSCO FUTURE M System.
  - Any requests for preferential treatment for the purchase of equipment and materials, and for diverse contracts.
  - Any requests for preferential treatment for personal matters including employment, promotions, rewards and penalties, and transfers.
  - Any requests for preferential treatment for excessive preferential treatment that goes beyond normal practices.
  - Any requests to neglect management and supervision tasks, such as inspections and examinations.
- (2) You must not make any illicit solicitation directly or through a third-party regarding tasks subject to the Anti-graft Act.

#### **6) Pecuniary transactions**

- (1) You must not be involved in pecuniary transactions with stakeholders, such as lending money, offering loan guarantees, and leasing real estate.
- (2) If you engage in pecuniary transactions with a stakeholder due to unavoidable reasons, you must report the case to the Corporate Audit Office.

#### **7) Event contributions**

- (1) You must not accept event contributions or donations from stakeholders in events sponsored by the Company, such as department events or club activities.
- (2) If you use a vehicle / venue / service provided from a stakeholder for your convenience, you are deemed as having accepted donations or contributions.



- (3) If you get these donations or contributions in inevitable circumstances, you must report it to the Corporate Audit Office.

#### **8) Unfair use of company budget**

- (1) You must not use the Company budget, such as budget allocated to meetings and project implementation, for personal purposes.
- (2) For business expenses, you must use a corporate card; the card must be used only to serve the purpose, pursuant to relevant laws.

#### **9) Protection of information and properties**

- (1) You must strictly safeguard confidential information or other important information.
- (2) If you find out important information, you must inform a person in charge of it.
- (3) You must not manipulate information or disseminate false information.
- (4) You must not use Company's equipment or facility for purposes that are not directly related to work.

#### **10) Fair Trade**

- (1) You must comply with international standards, laws and regulations related to fair trade in order to not engage in unfair trade practices, including collusion related to production, price, bidding and market sharing, etc.; you must compete in the market in a fair manner.
- (2) You must not take advantage of a superior position to demand any form of rewards or other unreasonable gains from customers or companies you are trading with.
- (3) You must respect the rights and properties of others, including intellectual properties, and not violate them to win in a trade or gain profit from it.
- (4) Corporate information including that of competitors must be acquired and used by fair means.

#### **11) Prevention of conflicts of interest**

- (1) Conflict of interest refers to situations when executives and employees of a company you are trading with have personal interests with you, which puts a negative impact on the performance of duties by POSCO executives and employees.
- (2) You must completely exclude inappropriate requests from executives and employees of companies you are trading with, if they have private interests with you. The same applies to retired POSCO executives and employees.
- (3) Do not make unofficial contact with executives and employees of companies you are trading with, if they have private interests with you. In case you have contacted them unintentionally, report it to the senior officer in your department or the Ethics Officer at the Corporate Audit

Office.

- (4) Do not attend meetings of retired POSCO executives and employees that are not approved by the Company.
- (5) Do not join a group for retired POSCO executives and employees before you retire. If you are already a member, report to a senior officer in your department and leave the group.
- (6) If you have private interests with executives and employees of companies you are trading with, consult your senior or the Ethics Officer, and follow the actions to be taken, such as job reassignment.
- (7) Do not engage in unfair trade, including signing of an unfair trade contract, purchasing products at a higher price, favoring certain companies in biddings, and leaking of trade information in advance by giving preference to a specific individual or a company for reasons of private interest.
- (8) Prevent conflicts of interest with POSCO and the POSCO Group even after retirement.

## **12) Accounting Process**

- (1) Financial statements must not be prepared by violating accounting standards.
- (2) If an employee engages in accounting irregularities or becomes aware of such conduct, they must report it to the Corporate Audit Office.

## **5.2 Work-life balance**

The Company seeks the development of both individuals and the Company through work-life balance. The Company creates a happy workplace by establishing a corporate culture of respect towards one another.

### **1) Pursuit of work-life balance**

- (1) We promote improved quality of life by offering welfare benefits that help stabilize the living conditions of employees.
- (2) We support employees by helping them to achieve their goals and assist them to work flexibly in terms of time, place, and means.

### **2) Provision of opportunities for education and growth**

- (1) We create a work environment and systems that promote creative thinking.
- (2) We support employees with training programs to improve their capabilities and foster self-development.

### **3) Fair assessment and compensation**

- (1) the Company conducts fair assessment based on the capabilities and performance of each employee and reflect them systematically to ensure the provision of appropriate compensation.

### **4) Creation of Healthy Organizational Culture**

- (1) Executives and employees will work towards open corporate culture through open communication.
- (2) Executives and employees will remove barriers between departments, and pursue a cooperative atmosphere.

## **5.3 Creating customer value and securing trust**

Recognizing that customer trust and success is our future, we respect customer opinions at all times, understand customers, and create value that promotes their development.

### **1) The realization of customer satisfaction**

- (1) We listen carefully to the voice of the customers and conduct our duties in a customer-centric fashion.
- (2) We readily accept legitimate customer requests and reasonable suggestions.

### **2) The creation of customer values**

- (1) We meet customer needs by providing the best products through continuous technological development.
- (2) Our employees understand the market trend in Korea and abroad and develop a service mindset that respects the customer's culture and customs.

### **3) Securing customer trust**

- (1) We certainly consider customer safety and health, and don't provide products or services that threaten them.
- (2) We protect each customer's information and comply with the laws and regulations regarding information protection.
- (3) We provide accurate information to customers in a timely manner.

#### **5.4 Duty of good faith to investors**

We maximize investor value by making profit on the basis of transparent decision making and efficient management activities.

##### **1) Pursuit of increased shareholder values**

- (1) We make profit on the basis of transparent decision making and efficient management activities and enhance both corporate value and shareholder value.

##### **2) Fair provision of investor information**

- (1) We do not provide information that may affect the investment decisions of shareholders to only some shareholders, or offer select information.
- (2) We do not directly trade stocks and securities using inside information acquired at work, or solicit trade to others.

##### **3) Calculation and provision of transparent financial information**

- (1) Financial information must be calculated using an appropriate process or control based on precise trade facts.
- (2) Financial reports must be made according to generally recognized accounting standards.
- (3) A sufficient amount of correct management information must be provided to help investors to make investment decisions based on free will and responsibility.

#### **5.5 Building mutually beneficial relations with business partners**

We must establish a fair business order based on mutual trust and build a corporate ecosystem where we coexist and develop with our stakeholders.

##### **1) Building mutual trust**

- (1) We must ensure that we do business fairly on an equivalent relationship with partners on the basis of mutual respect.
- (2) We protect information acquired from doing business with our partners according to the related laws, regulations, and provisions in contracts.
- (3) We support our business partners to observe fair trade laws and regulations.

##### **2) Co-prosperity with our business partners**

- (1) We share accomplishments with our business partners and seek mutual prosperity.
- (2) We support our business partners to provide high-quality products and services through smooth communication and cooperation with them.

- (3) We offer equal opportunities and ensure reasonable business requirements for our business partners to develop relationships into companionships.

### **3) Supporting the continued development of business partners**

- (1) We offer technical and financial support to our business partners to help them build a stable supply chain.
- (2) We expand the scope of our growth partners for the comprehensive prosperity of the entire business ecosystem.

## **5.6 Contribution to the country and the society**

We fulfil our responsibility and duty as a global society member to contribute to national and social development.

### **1) The role and attitude for national and society**

- (1) We strive to achieve mutual development with local communities and respect their respecting local laws, regulations, culture and customs.
- (2) We strive to communicate with stakeholders by involving them in our management activities that are related with the local society.
- (3) We strive to support our business partners to participate in the activities aimed at the development of the local society.

### **2) Commitment to the country and the society**

- (1) The Company fulfils its duty in the local community by creating and maintaining jobs and by faithfully paying taxes.
- (2) The Company participates in charities including volunteer activities and disaster relief, and engage in pro bono activities in different areas, such as culture, art, sports, and academia.
- (3) The Company assists local residents to improve their quality of life.

## **5.7 Preservation of the environment and the ecosystem**

We build a sustainable management system, strengthen our capabilities to respond to risks and implement sustainable management through open communication.

### **1) Building a sustainable management system**

- (1) We operate a sustainable management system efficiently to evaluate the impact and risk of our activities, manage and analyze our sustainable management performance systemically, in order to, ultimately, reach our sustainability goals.

- (2) We share accomplishments and issues with various stakeholders and engage in sustainability activities together.
- (3) We form a consensus with partners regarding environment protection as a social obligation, and support them to comply with environment laws and regulations.
- (4) We assist our business partners to safeguard public health and safety when producing products or services. At the same time, we help them minimize any negative impact on local environments and natural resources.

## **2) Compliance with environment laws and improvement in environmental impact**

- (1) We abide by environment laws and try to improve the impact on the environment in all processes, including development, production, and use of products.
- (2) We minimize emissions of harmful substances by introducing environmentally friendly process and applying the optimum technology that prevents environmental pollution.

## **3) Response to climate change**

- (1) We strive to reduce greenhouse gas emissions by using fewer fossil fuels or raw fossil materials and improving energy efficiency.
- (2) We strengthen our competitiveness by developing innovative low-carbon technology.

## **4) Protection of the environment and the ecosystem**

- (1) Through the efficient use of natural resources and by-products, we work to restore the natural ecosystem and preserve biodiversity.

## **5.8 Protection and respect for human rights**

We uphold human rights, endorse international human rights standards, and establish human dignity of all stakeholders through enhancement of the quality of life.

### **1) Respect for international human rights standards**

- (1) We respect and support the internationally accepted human rights standards, such as the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the UN Global Compact, and the OECD Guidelines for Multinational Enterprises.
- (2) We have established clear human rights policies and systems and strive not to violate human rights in the course of our management activities.
- (3) We support our business partners to observe human rights laws as required by international human rights standards. We help them protect the human rights of their employees and treat them fairly.

- (4) We respect the International Labour Organization (ILO) conventions and conventions ratified by the Republic of Korea, especially the convention on the prohibition of child labor and forced labor, and the convention on the abolition of forced labor.

## **2) Obligation to perform due diligence to respect human rights**

- (1) We may conduct due diligence as needed for management activities that violate human rights or cause complaints.
- (2) We seek reasonable solutions if, as a result of due diligence, the Company is considered to have violated human rights during the course of management activities.
- (3) We communicate with stakeholders regarding the result of human rights-related activities.

## **3) Protecting executives and employees**

- (1) Company executives and employees do not engage in verbal, physical, or visual behavior that is offensive to others, including sexual harassment, which infringes on human rights of an individual.
- (2) We respect privacy of our individual employees. We do not slander others nor leak personal data.
- (3) We prevent people from working involuntarily due to mental or physical coercion.
- (4) We observe the labor law of each country we operate in and international standards for employment standards and the minimum age of employment for minors.
- (5) We strictly follow safety rules and take appropriate measures for all risks identified.

## **4) Respect and equality**

- (1) We do not discriminate or harass people on the basis of race, nationality, gender, age, academic background, religion, region, disabilities, marriage status, gender identity or any other reasons.
- (2) We provide equal employment opportunities to people who meet job qualifications.
- (3) We maintain the work environment by respecting various cultural differences.

## **5) Guarantee of legal and humane employment requirements**

- (1) We take prompt action on human rights issues raised by our employees through our complaints support system.
- (2) We guarantee employment requirements, including appropriate working hours so our employees can live a life of dignity and a life that is worthy of a human being.

## **6) Efforts to respect human rights in the community**

- (1) In case a human rights violation in the community is committed in the course of the Company's management activities, we gather opinions and take measures to resolve the human rights issues.

## **6. [Supplementary rules] Management and operation of the Code of Ethics**

### **6.1 Compliance with the Code of Ethics**

- 1) We must abide by the Code of Ethics as a standard for our behavior and judgement of values.
- 2) Corporate Audit Office is responsible for general management of the Code of Ethics, while management departments of respective areas take responsibility of detailed operation of the Code of Ethics. (Management departments for different areas: Departments responsible for risk management, reporting, and evaluation in eight different areas when practicing the Code of Ethics.)
- 3) We can set a separate set of standards for efficient operation of the Code of Ethics.

### **6.2 Responsibilities of executives and heads of department**

- 1) An executive or a head of a department must provide training or consultation constantly so that their team members can fully understand these standards.
- 2) An executive or a head of a department must take appropriate precautions to prevent their team members from violating these standards.

### **6.3 Obligation to report and confidentiality**

- 1) If you find out about a violation of the Code of Ethics, you must report the case to the Corporate Audit Office in the fastest and the most convenient way possible.
- 2) Upon receiving a report that an employee in your team or department has violated the Code of Ethics, you must immediately report the case to the Corporate Audit Office.
- 3) Corporate Audit Office may verify the facts as needed about the reported case, and all employees involved must cooperate readily with the verification.
- 4) Executives and employees must not put the person who reported the case or an informant at a disadvantage or disclose his/her identity.



- 5) In case there is a risk that the reporter or an informant may become subject to adverse personnel actions, personnel measures may be taken, such as position change at his/her desire.
- 6) In the case that an executive or an employee finds out about the report, he/she must keep it confidential. He/she may become subject to disciplinary action when revealing it.
- 7) Standards for reporting of unethical behavior, such as receiving bribes from stakeholders, and rewards for reporting such behavior, will be set separately.
- 8) Ensure confidentiality, anonymity and protection of informants, except to the extent prohibited by law. There must be a communication process in place for employees to raise concerns without fear of retaliation.

#### **6.4 Rewards and penalties**

- 1) The Company can provide reward or appropriate compensation to executives and employees who have contributed in achieving the goal of the Code of Ethics according to relevant regulations.
- 2) The Company strictly reprimands executives and employees who have violated the Code of Ethics according to relevant regulations.
- 3) The Company may restrict access or trade by executives and employees who have retired by violating the Code of Ethics.

#### **6.5 Interpretation**

- 1) If a family member, a relative or a personal acquaintance of an executive or employee has violated the Code of Ethics using his/her name, this is also considered to be an action taken by the executive or the employee.
- 2) For things that have not been specified in the Code of Ethics or things that cause dispute over its interpretation, consult the Corporate Audit Office and follow their interpretation of the case.

#### **6.6 Revisions**

- 1) Corporate Audit Office, when necessary, may revise the Code of Ethics. For cases that Corporate Audit Office deems important, the revision must be made after getting an approval from the CEO.

### 7. Records and management

Form number	Records and attachments	Retention period	Department that stores the standards
	Report on the implementation of the obligation to report the Ethical Practice Standards	Permanent	Corporate Audit Office

### 8. Document

- 8.1 Guidelines for Reporting Rewards and Exemption for Unethical Behavior.
- 8.2 Criteria for Reporting Rewards and Exemption
- 8.3 Operation of Reporting Reward and Exemption Review Committee