

Compliance Management Charter

July 1, 2021

- Code of Conduct, setting forth the basic procedures and general matters of compliance

SeAH Group

Preamble

All officers and employees of SeAH Group (hereinafter the “**Company**”) shall pursue fair and transparent competition through management that adheres to fundamental and basic principles, and shall promote sound economic and social development by complying with applicable laws and the Company’s regulations and by-laws.

We hereby announce and shall abide by the provisions specified in this compliance charter.

1. Purpose

The purpose of this compliance charter (hereinafter the “**Charter**”) is to establish a compliance system for the Company and its officers and employees (hereinafter the “**Officers and Employees**”) by providing them with compliance-based standards to guide their respective decision-making processes during the course of their work and employment at the Company.

2. Scope of Application

- (1) This Charter shall apply to all Officers and Employees who provide services under an agreement signed with the Company, including its subsidiaries and affiliates, domestic and international. The Company may, as necessary, request that all stakeholders who engage in business with the Company to comply with this Charter.
- (2) All Officers and Employees of the Company subject to this Charter shall perform their respective duties in accordance with the laws and regulations of applicable jurisdictions and this Charter.
- (3) If the Charter conflicts with the laws and regulations of any jurisdiction, the laws and regulations of the applicable jurisdiction shall prevail, and the Charter may be revised to reflect the nuances of the laws and regulations and the relevant industry practice of the applicable jurisdiction.

Compliance Charter

1. Principles of Conduct for Officers and Employees

- (1) As an honest, enthusiastic, and capable member of the Company, every Officer and Employee shall prioritize his/her compliance with the Charter when making decisions concerning the business and shall use best efforts to advance the Company's continued development.
- (2) Officers and Employees shall fully understand the Company's compliance principles and shall comply with all applicable laws and regulations in addition to the Company's regulations and guidelines whilst executing their duties in order to help achieve the goals of the Company.
- (3) Officers and Employees shall recognize that fair competition is the driving force for mutual development, and shall not engage in any act that undermines the order of the market economy.
- (4) Officers and Employees shall maximize work efficiency by actively cooperating and engaging in direct communication with other colleagues and departments.
- (5) Officers and Employees shall use their respective best efforts to create a clean and safe workplace and shall be leaders in protecting the local community environment.
- (6) Officers and Employees shall protect shareholders' rights and interests by promoting transparent and efficient business activities and contributing to the development of the country and society by fulfilling their social responsibilities as community members.

2. Obligation and Responsibility of Officers and Employees

- (1) Officers and Employees shall strictly differentiate public and private matters and shall not, regardless of the purpose and reason, provide or receive any economic benefits, including intermediation, solicitation, preferential treatment, and valuables including, but not limited to, money, entertainment or convenience, to or from stakeholders that may undermine the impartiality in executing their duties.
- (2) Officers and Employees shall recognize the importance of the Company's intellectual property. Officers and Employees shall not disclose the Company's information assets, trade secrets, information requiring security protection, or other intellectual property acquired while performing their duties, to a third-party or external party without prior approval and shall strictly comply with the Company's security regulations.
- (3) Officers and Employees shall obtain information on the Company's competitors in a lawful and legitimate manner, and shall not use any superior bargaining position or other manner to steal or use any business partner's technology.
- (4) Officers and Employees shall not harass other Officers and Employees by using insulting speech or behavior or by slandering others. Officers and Employees shall

comply with applicable laws and regulations and shall not engage in any verbal or physical conduct that may constitute sexual humiliation.

- (5) In the event of a conflict of interest between the Company and an individual Officer or Employee, such Officer or Employee shall prioritize the interests of the stakeholders, including the Company and the shareholders.
- (6) Officers and Employees shall not use the Company's assets for personal gain and shall commit to protect the Company's assets.
- (7) Officers and Employees shall make their best efforts to comply with instructions legitimately made by their superiors but shall unequivocally refuse any inappropriate instructions that are not directly or indirectly related to the Company's business, even if such instructions are made by their respective superiors imposing their superior status.
- (8) Officers and Employees shall have the responsibility and duty to prevent any risks to the environment and safety of the Company and strictly comply with applicable laws and regulations as well as standards relating to environment and safety.

3. Obligation and Responsibility of the Company

- (1) The Company shall create a working environment in which the Officers and Employees shall feel a sense of autonomy to perform their respective duties without undue external pressure or coercion, and efficiently invest in the education of its Officers and Employees to promote their respective continuous growth and development.
- (2) The Company shall provide all Officers and Employees with materials and training related to its compliance system and shall create an organizational culture and working environment in which its Officers and Employees can implement the Company's compliance system.
- (3) To encourage Officers and Employees to perform their duties in a legitimate and transparent manner, the Company shall provide compliance training to ensure Officers and Employees fully understand the applicable laws and regulations and the Company's regulations and guidelines.
- (4) The Company shall establish a management system to ensure Officers and Employees can appropriately monitor their respective compliance with applicable laws and regulations and the Company's regulations and guidelines and regularly manage and supervise whether the system has been properly implemented.
- (5) The Company shall protect any Officer and Employee who reports any violation or suspected violation of applicable laws and regulations and the Company's regulations and guidelines, and shall ensure that the whistleblower is not subject to detriment.
- (6) If the Company becomes aware of any violation by an Officer and Employee of applicable laws and regulations or the Company's regulations and guidelines, the

Company shall take reasonable measures against the applicable Officer and Employee pursuant to the Company's regulations and guidelines.

- (7) With respect to education, promotion, treatment and more, of its Officers and Employees, the Company shall provide equal opportunities based on their abilities and qualifications and shall impartially evaluate and reward them based on their respective performance and achievements. The Company shall not discriminate on the basis of gender, sexual identity, sexual orientation, academic background, age, religion, race, ethnicity, place of origin, physical disability, and more.
- (8) The Company shall establish safety rules and standards to protect Officers and Employees from any threat to their respective safety, health or environment that may arise during their performance of duties and shall notify them of the above safety rules and standards. The Company shall take steps to ensure that all persons visiting its places of business shall act in accordance with the Company's principles and standards.