Employee Code of Conduct

I. Purpose:

Our purpose in establishing this Code of Conduct is to promote ethics, integrity and professionalism within our company and among our employees. We are a disciplined organization and believe that the actions of each employee affect the entire organization and how our company is perceived by the outside world. All employees have a duty to work to increase the profits of the company within the limits of the law and are responsible for preventing damage and loss to the company. In order to maintain society's trust and ensure the sustainable growth and development of the company, we expect all employees to adhere to this Code when performing their duties.

II. Scope:

All employees (including executives and directors)

III. Contents:

- 1. Business ethics and integrity
 - 1-1. This guideline has been introduced to outline the legal requirements and company policies expected of the company and all employees. Employees with questions regarding business ethics or legal matters are encouraged to consult and seek guidance from their department manager or the Company's Legal Department.
 - 1-2. Corporate ethics standards are not limited to compliance with laws and regulations. Each employee has a duty to conduct all business ethically and to avoid any activities that may create a conflict of interest.
 - 1-3. The principles governing business ethics and integrity consist of the following:
- 1-3-1. We will carry out all business operations honestly and keep records of all transaction processes.
 - 1-3-2. When carrying out our duties, we will ensure the appropriate confidentiality of all business information, maintain complete business activity and records, and respect the assets and intellectual property of the company, customers, and strategic partners.
 - 1-3-3. All accounting ledgers, invoices, records, accounting entries, capital and assets of the company must be accurately organized and securely protected to ensure that all of the company's transactions and business dealings are fairly and accurately reflected. It is strictly prohibited to fabricate, falsify or create misleading claims, and to fabricate, falsify, create or record accounting entries, records, financial reports or other related documents, or intentionally conceal the trading condition of the Company. You are also prohibited from opening, maintaining or accessing any

- unauthorized accounts at any bank or third party institution that handles Company related accounts.
- 1-3-4. It is prohibited to destroy, alter, or falsify any relevant records that may be relevant to an investigation, litigation, or legal settlement.
- 1-3-5. All employees are obligated to report any incident involving suspected unethical conduct or violation of this rule to the company's management.

2. Respect for individuals and customers:

- 2-1. We maintain strict standards of privacy and confidentiality of personal data. The processing of business data relating to customers and individuals is also subject to this confidentiality principle.
- 2-2.All employees are expected to deal fairly with the company's customers, suppliers, competitors, and other employees. No employee may take an unfair advantage over another through manipulation, concealment or misuse of confidential information, misrepresentation of material facts or any other unfair trading practice.
- 2-3. The company will create an open work environment where all employees can participate in the company's operations and express their opinions to superiors at all levels.

3. Avoiding conflicts of interest:

- 3-1. All employees must not engage in any business, investment or related activities that may create a conflict of interest between their personal and professional relationships.
- 3-2. All employees must avoid any situation that could be considered a conflict of interest. All employees are prohibited from (a) seizing personal opportunities discovered through the use of Company property, information or position; (b) using Company property, information or position for personal gain; or (c) competing with the Company.
- 3-3. All employees are prohibited from openly providing or disclosing confidential information of the company without proper authorization from the company. Trading in confidential or insider information for personal gain, or for the benefit of others, or to jeopardize the interests of the company, is strictly prohibited.
- 3-4. All employees are prohibited from engaging in any of the aforementioned activities through agents, partners, or representatives in order to circumvent this guideline.
- 3-5. All employees who participate in the evaluation and selection of business partners must avoid situations in which preconceived ideas or prejudices may influence their fair decisions.
- 3-6. All employees must protect the company's assets and ensure their efficient use. Company assets, whether tangible or intangible, may be used solely by employees authorized by the Company and solely for legitimate Company business purposes.

3-7. All employees shall comply with the company regulations regarding confidential information management when disclosing the company's confidential information to a third party (including, but not limited to, the company's customers, suppliers, agents or partners).

4. Honours and Gifts:

- 4-1. All employees are prohibited from accepting or giving kickbacks or other forms of illegal benefits to customers, suppliers or others.
- 4-2. It is strictly prohibited to accept gifts from suppliers that exceed socially acceptable standards.
- 4-3. All employees are prohibited from accepting excessive entertainment that exceeds socially acceptable standards.
- 4-4. When accepting or arranging business entertainment, we will observe common business courtesies and will not incur excessively lavish, excessive or unnecessary expenses.
- 5. Full, Fair, Accurate, Timely and Understandable Disclosure:
 - 5-1. It is important that all of the Company's accounting books, financial statements and records fully, fairly, accurately and timely reflect the underlying transactions and dispositions of its assets.
 - 5-2. It is critical that the financial statements and related disclosures are free from material error. All employees are prohibited from knowingly making, or causing others to make, any materially misleading, incomplete or false statements to auditing or regulatory authorities, accountants or attorneys.
- 6. Safeguards Related to Enforcing the Code of Conduct and Reporting Misconduct:
 - 6-1. All employees must comply with applicable government laws, rules and regulations, as well as company regulations and procedures.
 - 6-2. If employees, suppliers, customers or other relevant stakeholders discover any illegal acts or serious misconduct by other employees or staff, they may report it through the means taken by the company.
 - 6-3. Who can report violations of the Code of Conduct?
 - The Company will take measures to protect reporters from unfair retaliation or treatment.
 - 6-4. Anyone found to be violating the Code of Conduct will be subject to appropriate corrective measures from the Company depending on the severity of the incident. It is the responsibility of every employee to carefully read, understand and comply with this Code of Conduct and to seek clarification on any point if necessary. If you have any doubts or queries you may contact the Company's management.
- 7. Changes to the Code of Conduct:

Any changes to this Code of Conduct will be promptly disclosed.

8. Other

Matters not stipulated in this Code of Conduct will be subject to various regulations, including our work regulations.