BUSINESS ETHICS GUIDELINES

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Chapter 1. General Provisions

1. Objective

The objective of the Business Ethics Guidelines (hereinafter referred to as the "Guidelines") is to fulfill the Company's management ideas and establish business ethics by suggesting criteria for determining activities and criteria for handling duties related to business ethics, in order to ensure that all Employees of the Company can correctly understand and put into practice the Company's business ethics policies including its Charter of Ethics and Code of Conduct.

2. Definitions of Terms

The definitions of terms used in the guidelines shall be as follows:

(1) "**Employees**" shall refer to any and all officers or employees who receive wages in consideration of providing services to the Company; where an officer or employee enters into an agreement to vicariously perform the Company's duties in whole or in part with the Company, the officer or employee may be also deemed to be the Company's officer or employee as the case may require.

(2) "**Family Member(s)**" shall refer to an officer's or an employee's spouse, the lineal ascendants of the officer or employee and its spouses, and persons in kinship relations of less than 4 Chon.

(3) "**Duties**" shall refer to works given with roles and responsibilities in terms of positions or titles, including cases where a particular decision-making is likely to cause profits or losses to interested parties.

(4) "**Interested Parties**" shall refer to those parties including but not limited to subsidiaries, customers, business partners like suppliers and/or outsourcing partners of the Company, and any organization outside the Company who mutually affect the decision-making by the Company or its officers or employees directly or indirectly relating to the Company's performance of duties.

(5) "**Monies and Valuables**" shall include any and all monetary benefits, including not only cash, checks, gift certificates, securities, but also debt redemptions, guarantees, payment of interests accrued on loans, provision of personal or real properties free of charge at a low price.

(6) "**Gifts**" shall refer to goods, membership, lodging tickets, entrance tickets, and other similar objects provided without consideration.

(7) "**Souvenirs**" shall refer to goods to be uniformly provided to participants by hosts in official events or to be distributed to many and unspecified persons, or goods marked with the Company's logos, including giveaways, awards.

(8) "**Entertainments**" shall refer to paying or causing a third party to pay costs incurred to meals, drinking, sports (golf, etc.), speculative entertainments, unhealthy businesses, etc.

(9) "**Accommodations**" shall refer to assistances other than money and valuables or treatments and entertainments including provision of transportation means and lodgings, tourism information and events, booking assistance.

(10) "**Money and Valuables for Congratulations and Condolences**" shall refer to money and valuables provided for congratulations and condolences, and similar goods of rings, wreaths, etc.

(11) "**Ordinary Level**" shall refer to the level at which an ordinary person can understand for determination with a sound common sense, meaning the extent that beneficiaries can handle duties without burdens.

(12) "**Conflicts of Interest**" shall refer to a situation where an officer's or employee's ability to perform the Company's duties effectively and fairly is potentially or actually restricted by appointments, relations, activities, etc. with third parties.

(13) "**Superiority**" shall refer to an authority or ability to make the other party in a relative concept and a "Superior Position" shall refer to taking an advantageous position compared to the other party in the transaction relations by using a superiority, which may be affected by asymmetric decision-making authority.

(14) "**Undisclosed Important Information**" shall refer to any and all information that a reasonable investor finds to be significant in making a series of transaction, including purchasing, holding, selling securities.

3. Coverage

The guidelines shall apply to all Employees of the Company and the officers or employees of its business partners.

Chapter 2. Preparation and Management of Important Information

1. Basic Principle

(1) All Employees shall recognize that intentional or reckless manipulation of documents or calculations may make mistakes in the Company's decision making, and shall record and report all information accurately.

(2) All Employees shall accurately prepare financial and accounting documents under the International Financial Reporting Standards (IFRS), and shall properly disclose the documents to interested parties, such as shareholders.

(3) All Employees shall not use the information they have acquired with respect to their duties for personal purposes.

2. Details of Practice Guidelines

(1) All Employees shall accurately and honestly prepare all documents and calculations to prevent serious mistakes.

(2) In the event that the Employees of the Company have made an error in the documents or calculations because of their recklessness, they shall immediately notify their superior manager thereof and correct the mistake.

(3) It shall be an unethical activity for a superior manager to direct manipulation of documents or calculations, and his or her inferior shall report relevant facts to Internal Auditing Team. If there is no such a report, not only related parties but also the officer or employee who has known such facts shall be subject to disciplinary action.

(4) In the event that there is a mistake in the financial or accounting materials, appropriate measures shall be taken under relevant laws, such as correction on public disclosure(amendment).

(5) All Employees shall not sell or purchase securities issued by the Company relating to the Company or relevant information by taking advantage of the information they have acquired while performing their duties.

(6) All Employees shall not sell or purchase securities at their cost by using undisclosed important information regardless of the title, and in violation thereof, they shall be punished regardless of whether they have obtained economic profits.

(7) All Employees shall not disclose undisclosed important information to a third party regardless of whether it is disclosed inside or outside until the information is disclosed according to legitimate procedures.

Chapter 3. Transparent Transactions with Business Partners

1. Basic Principle

(1) All Employees shall provide all eligible companies with equal opportunities for fair business transactions, and select business partners through fair competition and selection criteria and transparent evaluation procedures.

(2) All Employees shall not pursue their private interest in direct or indirect means from business partners or their officers or employees regarding performance of duties.

(3) A business partner shall be sufficiently familiar with the Company's business ethics policies and actively participate in the Company's ethical management activities.

2. Details of Practice Guidelines

(1) All Employees shall not unequally or unreasonably treat business partners by abusing the Company's market position.

(2) All Employees shall not request interested parties to guarantee employment after their retirement, solicit jobs, enter into transactions, etc. nor shall they accept proposals made by interested parties in this respect.

(3) All Employees shall not pursue joint interests by acquiring a share of interested business partners or making investments jointly with business partners, etc., and shall not have the dual positions as an officer or employee of a business partner without approval by the Company.

(4) Business partners shall be sufficiently aware of and agree to comply with the Company's business ethics policies and rules, and in the event that the Company provides education related to the business ethics, they shall complete relevant educational programs.

(5) The Company shall operate a grievance system to establish a practical cooperation system with business partners relating to its business ethics.

(6) The Company and its Employees shall take the following measures if it is necessary to establish transparent transactions:

- Where the Employees of the Company receive from interested parties the proposals in Section (2) or (3), they shall report to Internal Auditing Team;
- Where the Employees of the Company have engaged in unreasonable activities related to Section (2) or (3) without approval by the Company, they shall suspend making transactions with relevant business partners for three (3) years from the date when such activities have been turned out to be true, which shall be equally applicable also where a relevant business partner's officers and employees have retired from their office; and
- Where the Employees of the Company have engaged in unfair activities in Section (2) or (3) without approval by the Company, they shall be subject to disciplinary action of the Company.

Chapter 4. Establishment of Fair and Justified Transaction Practices

1. Basic Principle

(1) All Employees shall be aware that making all transactions fairly and reasonably may strengthen sound relationships between the Company and relevant transacting parties, thereby ultimately contributing to the Company's interests.

(2) The Company and its Employees shall comply with relevant laws including the laws related to fair transactions, the laws related to protection of small and medium companies, and oppose any unfair and unreasonable transactions.

(3) The Company and its Employees shall make efforts to prevent conflicts of interest with interested parties, and if there is an interested party, they shall report it by following the provision of "Reporting Conflicts of Interest."

2. Details of Practice Guidelines

(1) Agreement on Business

- All Employees shall not cause damages to the company by entering into agreements that violate the money collection terms permitted by the Company.

(2) All Employees shall clearly define the procedures for changes in agreements, including a change of the scope of agreement, a change of the scope of construction, an adjustment of the construction period, and shall not make arbitrary decisions different from the procedures under the agreement. Purchase and Construction Order Transactions

- All Employees shall give all companies equal opportunities to participate pursuant to the fair and objective criteria for review.
- All Employees in principle shall place orders based on the competitive bidding process, and may adopt the method of private agreements, etc. through reasonable procedures according to the Company's need and rules.
- All Employees shall not enter into agreements with a payment condition that has conspicuously violated the Company's criteria for payment.

(3) Transactions with Internal and Outside Business Partners

- All Employees shall not unreasonably provide assistance for personnel or equipment or intentionally delay providing equipment.
- All Employees shall cause business partners to obtain unreasonable profits by intentionally accepting a delivery of products with the quality lower than that in a purchase order.
- All Employees shall not allot a specific company job with the especially low or high level of difficulty.
- All Employees shall not accept additional Man-Hour for business partners exceeding the criteria or without foundation.
- All Employees shall not unreasonably and discriminately give tools or equipment, etc. necessary for jobs.

(4) Transactions with the companies owned or operated by family members

- All Employees shall not compel business partners to select companies operated by their family members by abusing their market positions or tacitly exercise influence.
- In particular, all Employees shall make transparent and arm's length transactions with the companies owned or operated by their family members.

(5) Reporting Conflicts of Interest

- When there is or is likely to be a conflict of interest between employees of the company and another company (including subsidiaries of EHI) in relation to the performance of official duties, the employees must immediately notify the Company's Lawyer.
- The cases from the previous paragraph "when there is a conflict of interest between employees of the company and another company" should refer to each of the following examples:
  - A. Where the Employees of the Company or their family members directly or indirectly own the whole or partial shares of companies in transaction relationships with the Company (internal or external business partners, service companies, etc.) (However, an exception shall be made where they own a share of listed companies for simple investment purposes);
  - B. Where the family members of the Employees of the Company with the position level of the management or a manager (or higher) are employed at companies transacting with the Company;
  - C. Where the above companies in Item A or B are expected to have a business transaction relationship with the Company in the near future; or
  - D. Where conflicts of interest are likely to occur for any other reasons.
- Reporting conflicts of interest shall be given regularly or on a very frequent basis, and the reported content shall be handled pursuant to the 'the Guidelines for Reporting and Handling Conflicts of Interest' separately specified.
- Notwithstanding the occurrence of conflicts of interest, where the Company's officer or employee fails to or falsely report it, the relevant officer or employee shall be subject to disciplinary action. The Company shall take disciplinary action against its relevant Employee according to the criteria set forth in the separate Guidelines in the above Section, taking into consideration the relevant Employee's intention, the number of violations, monetary significance, the degree of involvement in the decision-making, the scale of losses, etc.
- All Employees shall establish a compliance system to prevent conflicts of interest by implementing the Reporting Conflicts of Interest system not only for their Employees but also for business partners.

Chapter 5. Integral Performance of Duties

1. Basic Principle

(1) All Employees shall maintain their dignity and keep their reputations by performing their duties integrally.

(2) All Employees shall not pursue any form of economic or non-economic profits from interested parties, such as business partners, by abusing their market positions.

(3) All employees shall not offer, promise, authorize or provide Economic Benefits to existing or future transaction counterparties, including Domestic or Foreign Government Employees directly or through a third party, for the Purpose of Obtaining Illicit or Improper Personal or Business Gains. All Employees of the Company shall obtain the full understanding of, and also comply with, Guidelines for Compliance with Anti-Corruption Laws.

2. Details of Practice Guidelines

(1) With respect to their duties, all Employees shall not request to, receive from, or promise interested parties such as business partners, or grant or request the interest parties to grant to a third party any and all monetary or non-monetary benefits.

- All Employees shall not request the provision of, or give or take, money and valuables, such as cash, checks, gift vouchers, securities
- All Employees shall not engage in any and all transactions, such as making transactions for personal or real properties, or providing or being provided with guarantees for loans or lending or borrowing of money, which are conspicuously unfavorable or favorable to one transacting party.
- All Employees shall be prohibited from engaging in any and all monetary or non-monetary acquisitions that may undermine fairness in performance of their duties, such as having a dual position of an officer or employee with, acquiring a share of, receiving guarantee of employment of, making investments jointly with a business partner.
- Where the Employees of the Company have received monetary benefits for unavoidable reasons, they shall immediately return the benefits. Where it is impossible to return the benefits, they shall entrust Internal Auditing Team to do so by reporting it within three (3) work days.
- In case of a report in previous Section, Internal Auditing Team shall return the relevant money and valuables to the sender and send the business partner's CEO or interested parties a letter that contains the reasons of return and the requests of preventing reoccurrence thereof.

(2) All Employees shall not receive gifts of goods, membership, lodging vouchers, tickets, etc. from interested parties, such as business partners. Where they have received gifts for unavoidable reasons, it shall be handled according to the following procedures.

- All Employees shall return the relevant gifts to the sender, and if it is impossible to return the gifts, they shall be donated to social welfare entities.
- Where it is not convenient to return or donate gifts, all Employees shall entrust Internal Auditing Team or the Administration Department (General Affairs Department) to handle the gifts.
- Internal Auditing Team or the Business Support Department entrusted to handle the gifts shall return the gifts to the sender, and if it is impossible to return the gifts, they shall be submitted to social welfare entities.
- Where the Internal Auditing Team returns gifts to the sender, it shall send a letter that contains the reasons of return and the requests of preventing the reoccurrence there of.

(3) Where the Employees of the Company have received from interested parties, such as business partners, the souvenirs distributed to official events or marked with the company's logos, it shall be handled according to the following procedures:

- In case of a souvenir of less than 70 EUR distributed to many and unspecified people, it may be personally held through their reporting it to a superior manager with the position level of the relevant department's head or higher;
- Where the Employees of the Company have received souvenirs other than those in previous Section, they shall entrust Internal Auditing Team to handle them by reporting it within three (3) work days.

(4) All Employees shall not receive from interested parties, such as business partners, any entertainment or receptions including meals or amusements.

- In case of meals on business, All Employees may receive meals at an ordinary level where there is an official event and their attendance has been previously approved by an authorized officer (in case of an officer, his or her superior officer).

- All Employees shall not engage in sports activities, such as golfing with interested parties, including business partners, etc; provided, however, that they may attend at sports activities, such as golfing, where there is an official event and their attendance has been previously or after-the-fact approved by an authorized officer (in case of an officer, his or her superior officer).
- All Employees shall be prohibited from receiving or engaging in any reception at unhealthy business places, speculative entertainments (Go-stop game, casino games, golfing for money bet, card games, mahjong games, etc.), regardless of the amounts.

(5) All Employees shall not request to or receive from interested parties, such as business partners, any conveniences including the provision of means of transportation and lodgings, the assistance for events, etc.

- All Employees shall not request the provision of conveniences of transportations, lodgings, etc. for public duties of business trips, etc. Where they have received conveniences for the efficiency of their performance of duties, it shall be reported to Internal Auditing Team within three (3) work days and relevant costs shall be calculated and returned after-the-fact; provided, however, that an inland transportation means may be provided after being reported to their superior manager with the position level of the relevant department's head or higher.
- At the time of a company meal or event, all Employees shall not call and cause interested parties such as business partners to pay costs. When the Employees of the Company have met an interested party such as a business partner by accident and the interested party has voluntarily paid costs, it shall be reported to Internal Auditing Team within three (3) work days and the costs shall be returned at the Company's or personal expense.
- All Employees shall not share event costs or request sponsorship, or intentionally give a prior notice thereof for the purposes except where it is an official joint event for business purposes.
- All Employees shall not request interested parties to reserve facilities by abusing their market positions or receive it.
- Where there is a report in firs Section, Internal Auditing Team shall send a business partner's CEO a letter that contains its thankful intention and requests him/her to prevent reoccurrence thereof, and ask for his/her cooperation.

(6) All Employees shall not receive from interested parties such as business partners any monies or any articles for congratulations or condolences (a first-birthday rings, etc.) nor shall they notify interested parties thereof to receive any monies or any articles for congratulations or condolences (a first-birthday rings, etc.).

- Where the Employees of the Company unavoidably have received any monies or any articles for congratulations or condolences, they shall return them within three (3) work days, and if it is impossible to return them, they shall entrust Internal Auditing Team to do so by reporting it within three (3) work days.
- Where there is a report in previous Section, Internal Auditing Team shall return the relevant monies or articles for congratulations or condolences to the sender and send the business partner's CEO or interested parties a letter that contains the reasons of return and the requests of preventing reoccurrence thereof.

(7) The Company shall determine the intention, number, and level of violations by reviewing the content reported to Internal Auditing Team, and then may restrict transactions with business partners or interested parties.

(8) All Employees may receive gifts or any monies for congratulations or condolences with one another to the extent permitted under the social norms.

- All Employees shall be prohibited from receiving any monies and valuables with one another by means of personnel or economic benefits; provided, however, that where any monies for congratulations or condolences are permitted under the social norms, they may be received to the extent that they shall not exceed 70 EUR.
- Any gifts among superiors, inferiors, or fellows may be received to the extent that they shall not exceed 35 EUR each time and 70 EUR per year.

(9) If the Employees of the Company have received gifts, souvenirs, any monies or articles for congratulations or condolences, etc., but it is difficult to determine a converted price thereof because any attached content has not been specified, they shall handle it by having a prior consultation with Internal Auditing Team.

(10) All Employees shall not be encouraged to share credits and gains or losses with one another, such as lending or borrowing of money, providing or being provided with a payment guarantee for a loan, making investments jointly, etc., and their sharing of credits and gains or losses in excess of 15 000 EUR per case or 35 000 EUR in total shall be reported to Internal Auditing Team.

Chapter 6. Justified Use of Company's Assets

1. Basic Principle

(1) The Company's tangible assets and intangible assets of information, technologies, know-how, etc. shall be used only for the approved business purposes, and all Employees shall be responsible for unreasonable misappropriation, disclosure, etc. of these assets.

(2) All Employees shall pay expenses of the Company not for their personal purposes but for the official duties of the Company.

2. Details of Practice Guidelines

(1) All Employees shall not use the Company's tangible and intangible assets without permission or bring them out to outside without legitimate procedures.

(2) All Employees shall not use lands, buildings, facilities or raw or subsidiary materials for the purposes other than performing their duties, and shall be prohibited from bring out to outside articles other than those approved through legitimate procedures.

(3) All Employees shall not use for personal purposes, or bring out or misappropriate without legitimate procedures, any vehicles, computes, office supplies, etc.

(4) The Company shall designate an authorized person to manage important assets that need confidentiality, such as drawings, trade secrets, business information, and shall impose strict responsibilities as personnel or civil matters for damages or disclosure of important assets that arise by gross negligence of the Employees of the Company.

(5) All Employees shall use corporate credit cards only for performing their duties, and shall not use them for extraordinary transactions, such as illegal discount of credit cards.

(6) All Employees shall be prohibited from using illegal software, and the Company shall regularly check any use of illegal software.

(7) In the event that the Employees have become aware that they or a third party have unreasonably used the Company's assets, they shall immediately report it to Internal Auditing Team. If the Employees have intentionally connived at or aided and abetted such unreasonable use, they shall be subject to disciplinary action.

Chapter 7. Other Practice Ethics

1. Basic Principle

(1) All Employees shall sincerely perform their duties assigned under relevant positions and titles, and shall not cause losses to the Company or undermine the Company's reputations.

(2) All Employees shall not have side or dual jobs that may cause a difficulty in performing their duties.

2. Details of Practice Guidelines

(1) Ethical Management for all Employees

- All Employees shall not conceal or connive at irregularities of their superiors, inferiors, or fellows.
- All Employees shall not misuse the signatures of their superiors, inferiors, or fellows, or forge documents.
- All Employees shall not perform duties by making different use of documentary evidence or by changing account items at will.
- All Employees shall not treat their superiors, inferiors, or fellows in unreasonably discriminatory ways on grounds of age, gender, academic background, the place of origin, etc.
- All Employees shall not engage in any activity that may arouse sexual humiliation to third parties.
- All Employees shall not give the disabled, the pregnant, the underage, etc. any unreasonable work directions against labor related laws.

(2) Side or Dual Jobs

- All Employees shall not have any side or dual job required to use the information they have acquired relating to their duties, without approval by the Company.
- If the Employees of the Company are engaged in a not-for-profit(public) institution for academic or educational purpose with a designated period of engagement, they shall obtain approval from the Company.
- All Employees shall not lease to or solicit business partners or interested parties for their or a third party's buildings or equipment by abusing their market positions.

Chapter 8. Observance of Code of Conduct, etc.

1. Basic Principle

(1) All Employees shall sincerely comply with the Code of Conduct by considering them the criteria for actions and value judgments.

(2) In the event that the Employees of the Company have become aware that a third party's activity has violated the Code of Conduct, they shall report it to Internal Auditing Team.

(3) The company shall take disciplinary action against its Employees who have violated the Code of Conduct, but take into consideration their voluntary reporting thereof.

(4) The Company shall ensure that informants or opinion staters for violations of business ethics are not given any form of disadvantages.

2. Details of Practice Guidelines

(1) Observance of Code of Conduct, etc.

- All Employees shall be sufficiently familiar with Code of Conduct and this Guidelines and pledge to comply with therewith. In addition, persons performing purchasing, financial or accounting, personnel duties, etc. shall have the obligation to enter into a separate practice written pledge required to perform specific duties.
- If the Code of Conduct or this Business Ethics Guidelines is unclear, or if there are conflicting interpretations, Internal Auditing Team shall be consulted. Internal Auditing Team's interpretation and decision on unclear and/or conflicting interpretations shall be final to be followed by all Employees.
- All Employees shall complete educational courses for business ethics conducted by the company in order to enhance and put into practice their awareness of business ethics.

(2) Obligation of Reporting

- In the event that the Employees of the Company have become aware that they or a third party has violated the Code of Conduct or these guidelines, they shall immediately report it to Internal Auditing Team.
- In addition to the "Reporting Conflicts of Interest" regularly conducted by the Company, in the event that conflicts of interest occurred or are likely to occur, it shall be reported.

(3) Disciplinary Action against Violations

- In the event that the Employees of the Company have violated the Code of Conduct or these guidelines, or connived or aided and abetted a third party' violations, they shall be subject to disciplinary action.
- In the event that the Employees of the Company having violated the Code of Conduct or these guidelines have voluntarily reported it, the Company may reduce the degree of disciplinary action by taking the mitigating circumstances into consideration.
- Disciplinary action shall be implemented according to the criteria separately specified.

(4) Protection of Informants

- In principle, the identity of informants of violations of the business ethics or of information related reference staters shall be prohibited from being disclosed.
- The identity of all Employees having been aware of the identities of informants or information related reference staters shall be kept in secret, and informants or information related reference staters shall not be given any disadvantages.
- Informants or information related reference staters having been given disadvantages of the disclosure of their identity, discriminatory treatments, etc. may request Internal Auditing Team to take protective actions or remedial measures, and Internal Auditing Team shall take appropriate measures that it finds necessary for the informants or information related reference staters.
- In the event that the identity of informants has been disclosed, Internal Auditing Team shall investigate the course of disclosure of identity. All Employees that have intentionally or negligently disclosed the identity of an informant shall be subject to disciplinary action.

(5) Reward for Reporting

- Where the Company finds it necessary for business ethics related informants and information related reference staters, it may give a reward pursuant to the criteria separately specified.
- The Company may take disciplinary action against or give disadvantages to informants of false information or information related reference staters with impure intentions according to the Company's regulations.

- Each of the following cases shall be excluded from the subjects of reward:
  A. Where the report is not true or it is impossible to verify the facts;
  B. Where the report has been recognized by Internal Auditing Team or has been disclosed too outside;
  C. Where the report was given under an anonymity or assumed name;
  D. Where the report was given by a business ethics promotion related person, such as the business ethics related department; or
  E. Where it is found inappropriate to give a reward as a result of the review for reward.

Chapter 9. Additional Provisions

1. Effective Date

This Business ethics guidelines is enacted and effective from 01.01.2019.
The first amendment to this Special Code of Conduct for Financial and Accounting Positions has been in effect as of 08.09.2021.