

SPECIAL CODE OF CONDUCT

FOR

FINANCIAL AND ACCOUNTING POSITIONS

II/0	08.09.2021	Company name change	A. Hristov	E. Gotsich	E. Kuyumdjian
I/0	01.01.2019	New	A. Hristov	L. Alexandrova	Je Chol Jang
Issue	Date	Description	Prepared	Checked	Approved

Table of Contents

Chapter 1. General Provisions	3
1. Objective.....	3
2. Coverage	3
3. The Operations of this Special Code of Conduct for Financial and Accounting Positions	3
Chapter 2. Preparation and Management of Documents.....	3
1. General Principles	3
2. Principles of Preparation	4
Chapter 3. Conflicts of Interest and Insider Trading	4
1. Conflicts of Interest	4
2. Prevention of Insider Trading	4
Chapter 4. Handling Violations of Company Regulations	4
1. Reporting of Violations	4
2. Handling Violations and Taking Disciplinary Action	5
Chapter 5. Additional Provisions.....	5
1. Effective Date	5

Chapter 1. General Provisions

1. Objective

The financial and accounting duty performers shall have the social responsibility to fairly provide reliable management information not only to investor for the Company but also many interested parties. The importance of such responsibility is growing larger as time goes by because of an increase in the complexity of interests.

Therefore, it is necessary to allow the financial and accounting duty performers to lead the Company's business ethics by imposing higher duty professionalism and ethical obligations to the financial and accounting duty performers. Accordingly, this Special Code of Conduct for Financial and Accounting Positions is imposed additionally.

The objective of this Special Code of Conduct for Financial and Accounting Positions is to secure reliability of investors and put into practice transparent management by securing transparency and objectivity in preparing financial and accounting documents, observing domestic and foreign securities related laws, and preventing insider trading and conflicts of interest.

2. Coverage

This Special Code of Conduct for Financial and Accounting Positions shall apply to persons performing the following duties (hereinafter referred to as the "Duty Performers") or their superior managers:

- All Employees responsible for preparing financial and accounting documents of the Company;
- All Employees responsible for operating and procuring the Company's financial resources
- All Employees responsible for producing, conveying, or publishing the Company's important information subjected to disclosure requirements; and
- All Employees responsible for producing, accumulating, or using the Company's other undisclosed important information.

If the Company regulations conflict with this Special Code of Conduct for Financial and Accounting Positions, the Company regulations shall be revised to meet the standards of this Special Code of Conduct for Financial and Accounting Positions.

3. The Operations of this Special Code of Conduct for Financial and Accounting Positions

If this Special Code of Conduct for Financial and Accounting Positions or the Business Ethics Guidelines are 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 the Duty Performers shall confirm that they understand this Special Code of Conduct for Financial and Accounting Positions and submit a written pledge to comply with this Special Code of Conduct for Financial and Accounting Positions.

Chapter 2. Preparation and Management of Documents

1. General Principles

All accounting records shall be maintained to comply with not only healthy commercial practices but also relevant laws and contractual requirements, and shall reflect all transactions in an accurate and fair way.

The duty performers shall be familiar and comply with relevant laws, and their superior managers shall manage and supervise compliance with laws by the duty performers.

2. Principles of Preparation

The accounting materials and documents shall accurately reflect the Company's financial conditions and transaction details according to the International Financial Reporting Standards (IFRS), and shall be made to prevent material mistakes related to disclosure requirements in this respect.

The duty performers shall not intentionally omit accounting records and distort accounting documents for unethical purposes, and shall make it possible to conduct transparent auditing by providing accurate information to the accountants.

Chapter 3. Conflicts of Interest and Insider Trading

1. Conflicts of Interest

In the event that it is difficult for the duty performers to perform their duties fairly and efficiently because there are conflicts between the Company's and their personal interest, they shall report it to Internal Auditing Team and their superior manager.

If there is a report by the duty performers or a superior manager finds that conflicts of interest are likely to occur, the manager shall exchange the authorized person or take all measures for supervising duties.

2. Prevention of Insider Trading

The duty performers shall be prohibited from selling or purchasing the securities issued by the Company by using the information they have acquired in performing their duties, or the securities issued by the Company regarding the information.

The duty performers shall not reveal undisclosed important information to an outside third party before the information is disclosed under the legitimate procedures.

In the event that a duty performer has become aware of some of undisclosed important information with respect to the undisclosed important information held by the Company, he or she shall not sell or purchase related securities.

"Undisclosed Important Information" shall refer to any and all information that a reasonable investor finds to be important in making series of transactions, such purchasing, holding, selling securities. The duty performers shall be prohibited from selling or purchasing securities at their account in whatever names by taking advantage of the information, in violation of which they shall be punishable regardless of whether economic profits have been realized.

The Company shall comply with the disclosure requirements and find out methods to treat all investors and interested parties fairly according to appropriate procedures.

Chapter 4. Handling Violations of Company Regulations

1. Reporting of Violations

The duty performers shall comply with this Special Code of Conduct for Financial and Accounting Positions, and shall report to Internal Auditing Team any matter that is or is likely to violate this Special Code of Conduct for Financial and Accounting Positions.

The Company ensures that all the matters on handling reports and the identities of reporters shall be kept in strict secret, and that any disadvantages shall not be given as a result of reporting; provided, however, that even if there is a fault on the part of a duty performer, where he or she has voluntarily reported it, the mitigating circumstances shall be taken into consideration.

2. Handling Violations and Taking Disciplinary Action

Internal Auditing Team shall conduct investigation for violations reported and received, and report the results thereof to the CEO.

In the event that a duty performer has violated this Special Code of Conduct for Financial and Accounting Positions, he or she shall be subject to disciplinary action pursuant to the Company regulations.

Chapter 5. Additional Provisions

1. Effective Date

This Special Code of Conduct for Financial and Accounting Positions 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.