

Code of Conduct

KISWIRE GROUP

[KISWIRE Code of Conduct]

■ Introduction

This Code of Conduct ("Code") regulates the ethical relationship between the Company's customers, stakeholders, competitors, suppliers and society.

■ Aim

To become reliable and respectable company by conducting co-prosperity management through the employee's rational and effective operation as well as satisfying the customer's requirements.

■ Scope

This Code applies to all employees of the Company. Also, all third parties that are contracted with the company are to be advised to understand and to comply with the Code.

■ Responsibility and Authority

[Employees]

If one's job is in ethically conflicting situation, he/she must judge and act based on the Code.

[Operation of the Code of Conduct]

Responsibility of Code of Conduct operation is on 'Audit Office', and their job is to guide, to control, and to supervise employees to comply with the Code.

[Management of the Code of Conduct]

Responsibility of Code of Conduct operation is on 'HR Team', and their job is to enact and to revise the Code including making separate standard if necessary for efficient operation, and they shall encourage employees to comply with the Code through active education and promotion.

■ Key Factors of the Operation

1. Principle of Ethics

- 1) We must comply with related rules and regulations, and compete freely and fairly in all countries and areas that KISWIRE is operating business.
- 2) We must preserve integrity, fairness and trust throughout all jobs and business relations.
- 3) We must not irrationally discriminate based on race, nationality, gender, religion, regional and academic background, age, disability, marriage, and gender identity against all stakeholders* including customers and employees, and must respect individual dignity, diversity and human rights.
- 4) We must not be involved in activities that conflict interests between the company and individuals.
- 5) We must protect information on individuals and all stakeholders.
- 6) We must pursue environment friendly management, and must value the health and safety of human beings.
- 7) We must be devoted to establishing an ethical culture by taking responsibility and practicing ethical conduct, and must take the responsibility as a global corporate citizen.
- 8) We must maintain a healthy and clean organization culture, and must maintain our dignity and the company's reputation as KISWIRE employees.

* **Stakeholders** : Employees, customers, business partners, subsidiaries, outsourcing partners, public institutions and organizations (including their employees) that can give or take direct or indirect influences on rights or interest in line with business operation

2. Customer Ethics

1) Respect customers

- (1) We shall perceive customers as the foundation of the company's existence and driving source, and will perform customer-oriented work by listening to and respecting the voice of customers.
- (2) We shall comprehend the domestic and overseas market situation and develop service mind that respects customer's culture and practices.
- (3) We will respect the customer's right to choose products rationally by refraining from exaggerated advertisements or coercive sales techniques.

2) Customer's trust

- (1) We will actively accommodate customer's legitimate demand and reasonable suggestions, and will satisfy customer's demands and suggestions by providing the best products and services through continuous technology development.
- (2) We will provide clear and accurate information of products and services such as safe usage and operation on a timely basis, and must keep the promises with the customers.
- (3) We shall not provide any product or service that may threaten customer's health and safety, and will promptly deal with the discovery of any fault in a product, which could pose a threat to the safety of customers.

3. Shareholder(Investor) Ethics

1) Protection of shareholders and investors

- (1) We will maximize the profit of shareholders and investors by delivering healthy profit through efficient management and transparent decision making, and by rational investment.
- (2) We will timely and sincerely provide management information that is required by shareholders and investors in order to help their investment decisions.

2) Equal treatment of shareholders

- (1) We will fairly and equally treat all shareholders including minority shareholders, and will endeavor to apply legitimate requests and proposals to the management activities.
- (2) We will make rational decisions in order not to unfairly infringe the profit and rights of minority shareholders.

3) Consolidation of internal control and transparent financial information

- (1) We shall eliminate corruption and irrationality through continuous internal control activities.
- (2) We will record and manage financial information based on accurate transactions records implementing appropriate process and internal control, and will prepare financial report in compliance with international standards, local accounting and the company regulations, and will be subject to accounting audits by external parties at regular basis.
- (3) We will make every effort to refrain from entering into a business relationship with customers of uncertain identity, and will not participate nor cooperate with illegal, false, or irregular transactions.
- (4) We will not directly trade stocks or securities nor recommend trading to others using insider information obtained while working for the company.

4. Competitors and Suppliers Ethics

1) Fair competition

- (1) We will compete freely and justifiably by complying with relevant international standards and local regulations, and by respecting the market economic orders.
- (2) We will not enter into price fixing, bid/market collusion, or production reduction agreements with competitors, and will not discuss with competitors prices, bids, customers, sales territories and conditions for the intention of collusion or price-fixing.
- (3) We shall not illegally obtain or use competitor's trade secrets or confidential information, and all corporate information should be obtained by justifiable means, and should be used for business practices.

2) Fair transaction with business partners

- (1) We will provide fair opportunities and reasonable transaction terms to business partners in order to build co-prosperity relationship through mutual respect and trust, and will pursue mutual benefits by sharing fruitful outcome with business partners.
- (2) We shall not exploit the superiority to exert influence or to coerce business partners for any kind of unjust action using dominant market position, and will co-operate and have open

communication with business partners such that business partners may provide high quality product and services.

- (3) Under the “Supplier Code of Conduct”, all business partners are required to comply with international standards and local laws related to human rights, child & forced labor, working hours, discrimination and environment.
- (4) We will be devoted to expand the range of business partners with co-prosperity relationship for overall mutual-development of corporate ecosystem.
- (5) We will strictly protect information received from transactions with business partners in accordance with the terms of the relevant contract and laws.

5. Social Ethics

1) Respect for human rights and Due Diligence

- (1) We will support and respect internationally recognized standards on human rights, such as Universal Declaration of Human Rights, Guiding Principles on Business and Human Rights, UN Global Compact, and OECD Guidelines for Multinational Enterprises, and endeavor not to violate human rights in our management activities.
- (2) We may conduct due diligence on management activities that might violate human rights or cause complaints at our discretion, and if the conclusion shows that any of the company’s management activities violated human rights or incurred discontents, we will endeavor to find reasonable and radical resolutions.
- (3) We will endeavor to listen to the opinions of the community and resolve issues of violation of human rights caused by the company’s management activities in the community.
- (4) We will share and communicate with the relevant stakeholders regarding the issues on human rights related activities and results thereof.

2) Prevention of Child and Forced Labor

- (1) We will comply with local labor laws and international standards with respect to the age and labor conditions of minors, and all of the company’s subsidiaries and business partners must comply with the strict employment process and age verification.
- (2) Regarding the child labor policy, the company operates under the “zero tolerance” principle, meaning that child labor at any stage of our business is unacceptable and intolerable.
- (3) We strongly support the right of voluntary labor, and will not compel works through mental or physical coercion. We strictly prohibit forced labor and protect voluntary labor within the company as well as in all of its business partners.

3) Anti-Corruption

- (1) We shall comply with local and international laws and regulations on anti-corruption as a member of a nation and a community.
- (2) We shall operate business sites around the world by respecting social regulations and values of relevant areas.

- (3) We shall not accept money, goods, entertainment and/or share offers of stock from business partners or any other external stakeholders, nor allow any improper activities that violate laws and fair trade principles.
- (4) Employees shall not illegally benefit nor provide, suggest, approve any illegal benefits, directly or indirectly, in requital for money and other valuables or any other personal benefits.
- (5) We will comply with the local laws that apply to government-associated activities, and will not inappropriately influence government officials and other related stakeholders.
- (6) When competing for government entity government-owned business biddings, we will operate ethically, transparently, honestly and accurately in compliance with all relevant laws and regulations.

4) Contribution to Community

- (1) We will respect the laws and the regulations of the local laws and regulations as well as local culture and tradition, and endeavor for mutual development with the country and society, and employees, wherever they are located, are expected to carry out their duties and responsibilities as a member of the local community.
- (2) Through continuous innovation and research & development, we will create new values that are helpful to the community.
- (3) We will faithfully fulfill our basic obligations in the community by creating and maintaining stable jobs and paying taxes in time. We will also actively participate in social service activities, such as volunteer works and disaster relief work, and will initiate nonprofit activities in various fields including culture, arts, sports and education.
- (4) We will help to enhance the quality of life for the local citizens and the communities in which we operate and invested.
- (5) Through foreign investment activities, we will contribute to the development of the talent in local communities by creating employment opportunities and providing employee training opportunities, which will result in greater long-term impact to the local communities.

5) Environmental Management System

- (1) As a global company, the company puts equal efforts into our environmental protection activities at both domestic and international facilities. We established and comply with the [Environmental Management Regulation] for environmental issues that are related to the company, and use this policy to instruct our activities on site and overseas locations, at business partner's facilities, and in local communities.
- (2) We will comply with local environmental laws in the countries that we operate, and will endeavor to improve impacts on the environment in all of the processes including development, manufacturing and product usage, and will minimize discharge of pollutants by applying technologies optimized for prevention of pollution.
- (3) We will endeavor to reduce consumption of fossil fuels or materials, and to minimize discharge of greenhouse gas by improving energy efficiency, and will enhance competitiveness by developing innovative low-carbon technology. Also, we will endeavor to restore the eco-system and preserve biological diversity through effective use of natural resources and by-products.

- (4) By effectively implementing environmental management system, we will not only evaluate impacts and risk of business activities on environment, but also analyze and manage the results of environmental management. We will also share benefits and issues with various interested parties, and jointly carry out environmental protection activities.
- (5) We will develop a bond of sympathy with our business partners that protection of environment is fundamental social responsibility of a company, and will support business partners to comply with laws and regulations related to environmental protection. We will also support business partners to manufacture products and provide services while protecting the public health and minimizing adverse effects on the environment and the natural resources of the community.

6) Conflict Mineral* Management

- (1) We will endeavor not to use conflict minerals (3TG : tungsten, tantalum, tin, gold) that are produced in conflict areas such as Democratic Republic of the Congo and its surrounding countries in Central Africa.
- (2) In order to fundamentally prevent use of conflict minerals, we will continuously monitor the origin and supplier of conflict minerals that are necessary for production, and will manage conflict mineral supply chains based on "OECD Due Diligence Guidance for Responsible Mineral Supply Chains".
- (3) We will strictly prohibit use of conflict minerals through responsible supply chain management, thus products that contains ethically mined minerals can be provided to our valued customers.

* **Conflict Minerals** : Minerals that are extracted in areas of conflict in Central Africa such as Democratic Republic of Congo, Rwanda, Uganda, Zambia etc.. Mines in these areas of conflict are under control of armed rebel forces who not only utilize the profits from the mines as their financial resources, but also infringe human rights through activities against humanity such as child labor, sexual assault, murder and so on. Such activities is considered as an international issue that the use of conflict minerals is regulated and is required to publically report in the US and EU.

6. Company & Employees Ethics

1) Basic Attitudes and Standards as Member of Organization

- (1) All employees shall act morally and ethically for the honor of the company and the individuals.
- (2) All employees shall share the company's management philosophy, empathize with the objectives and values that the company pursues, faithfully perform individually assigned missions in compliance with the company's working policy, and strive to correspond with the company's management philosophy through continuous self-development.
- (3) All employees shall perform their duties fairly and legally in compliance with the company's regulations. If the regulations do not clearly specify, they shall carry out their duties transparently and rationally.
- (4) All employees shall protect personal information, and the information of customers and other corporations acquired for the work will be strictly used for business purpose only.
- (5) All employees shall not be involved in the management or investment in a firm that is directly or indirectly in competition with the company.

2) Sound Corporate Culture and Work Environment

- (1) We will respect and comprehend cultural diversity, and seek for corporate culture with mutual trust through open communication.
- (2) We will not engage in any harassment or offensive behaviors that may disrupt or interfere with works of employees by offending and/or infringing other's human rights with verbal, physical or demonstrative acts such as sexual harassment.
- (3) We will create working environment and necessary policies in that employees may freely suggest or recommend against any difficulties they may have.
- (4) In compliance with international standards, local laws and regulations, we will determine conditions of salaries including minimum wage and overtime allowance, and will carry out all other obligations such as social insurance and vacations.
- (5) We will try to improve the quality of life of the executives and employees by providing benefits helpful for maintaining stable life, and will support them to achieve their individual visions by allowing flexibility in terms of the working time, places and methods.
- (6) We will support the executives and employees with education and self-development programs such that they can fully develop their potentials to excel as talented professionals.

3) Protection and Management of Assets

- (1) We respect and comply with the laws and/or regulations that govern both the rights to, and protection of intellectual property, and all employees are urged to protect the company's intellectual property and trade secrets.
- (2) The company's assets and premises, including physical, financial, intellectual and human resource assets; communication systems; equipment; corporate credit cards; and other supplies, shall be used for the sole purpose of conducting business as authorized by management. And we do not allow theft, damage or unauthorized use of the company's assets and premises, and also prohibit improper use of the company's assets and premises by external parties such as friends or family.
- (3) It is paramount that all employees follow the safeguards for managing and protecting proprietary information*, and we will use and disclose sensitive information when deemed necessary (need-to-know basis). We take cautionary measures against inadvertent or intentional disclosure of proprietary information, and employees must continue to maintain confidentiality on information gained during his/her employment even if he/she ceases to work for the company for any reason.
- (4) We should respect the rights and property of others including intellectual property rights, and should not try to enter into transaction or make profits by infringing upon such rights.
- (5) If a critical issue that may threaten the asset of the company occurs or such possibility is discovered, it should immediately reported to the head of the department, and appropriate measures shall be taken.
- (6) Company expenditure shall be carried out in accordance with the purpose of the budget and the guidelines prescribed by law.
- (7) We protect our customers, employees and the company from illegal software, and employees shall refrain from actions that may violate IT security or make their device more susceptible to viruses when using the Internet.

* **Proprietary Information** : Includes - earnings and other financial data, business plans and projections, information about current and future products and services, software in object or source code form, personnel information including executive and organizational changes etc.

4) Fair Treatment Based on the Capabilities and Achievements

- (1) We will not discriminate on the basis of gender, skin color, race, ethnicity, nationality, religion, age, marital status, sexual preference, sexual identity, social status, disability, pregnancy, military status, protected genetic information, or political affiliation in all processes such as work, promotion, compensation and disciplinary measures.
- (2) Also, we will provide equal employment opportunity to those who possess necessary qualification and capability.
- (3) We will avoid any unnecessary competitions among the executives and employees, and create fair competition corporate environment reflecting appropriate compensation through impartial evaluation of the executives and employees based on their individual competencies and performances.

5) Responsibility on Health and Safety

- (1) The highest priority is to ensure the health and safety of employees and communities, and we will endeavor to provide a safe working environment for all employees.
- (2) We strictly comply with international standards and related laws on enhancing the safety, health and security of employees as well as safety rules including maintenance of clean work places, and will immediately take appropriate actions upon discovery of risk factors.
- (3) We implement regular safety trainings in order to contribute to the compliance of safety rules and regulation as well as the settlement of such culture.
- (4) In compliance with [Safety Management Regulations], we design a safe working environment, establish working procedures, provide personal protection equipment, and conduct regular safety training to prevent workers from being exposed to potential risks (electric shock, fire, fall etc.). And we will thoroughly evaluate and understand potential emergencies and accidents such as fire, bad weather, and leakage of hazardous material, and will prepare with and manage adequate response procedures.

7. Management and Operation of Code of Conduct

1) Organization responsible for Code of Conduct

- (1) Code of Conduct management responsible department (HR Team) may enact and revise the Code if necessary for efficient operation, and they shall encourage employees to comply with the Code through active education and promotion.
- (2) Code of Conduct operation responsible department (Audit Office) shall guide, control, and supervise employees to comply with the Code.

2) Code of Conduct Operation Policy

- (1) The company and its employees shall refer and faithfully comply with the Code to their actions and decision-making, and if one violates the Code, he/she will be subject to a disciplinary action in accordance with [Reward and Punishment Management Regulations].

- (2) Violation of the Code by the company and/or employees should be reported to the Code of Conduct operation department in the most expeditious and convenient manner, and they may verify the relevant facts with respect to the violation of the Code at its discretion, and the relevant executives and employees should fully cooperate therewith.
- (3) If violation or application of the Code on one's job is ambiguous, he/she shall enquire Code of Conduct operation/management departments of the matter, and shall act and treat accordingly.
- (4) Once executives and employees become aware of a whistle-blowing case due to his/her job or inadvertently, they must treat it with strict confidentiality. If he/she divulges the confidentiality, he/she will be disciplined for such action.
- (5) If it is apprehended that the whistleblower would be penalized for his/her action, the whistleblower can be transferred or assigned to a different position at will.
- (6) In accordance with relevant regulations, executives and employees who made significant contribution to accomplish the objectives of the Code may be offered with appropriate rewards or compensations. On the contrary, executives and employees may be severely disciplined in accordance with relevant regulations for violating the Code, and those who were terminated from the company therefor may be restricted for access to the company.

3) Risk Management

- (1) In such an uncertain business environment, we will evaluate various factors that may become a risk to the company, and will establish appropriate countermeasures to manage risks effectively.
- (2) Executives and employees should be aware of various and inevitable risks in such a rapidly changing global community, and should respond promptly and appropriately according to their job and responsibilities. Also, they must be well-informed of and comply with the relevant Code to their jobs in order to prevent and to minimize the corporate risks.
- (3) In order for all executives, employees, and in-/external stakeholders to be well-informed of "KISWIRE Code of Conduct", the Code should be continuously promoted by placing the Code at locations with better accessibilities such as internet website and notice boards of each business sites.

8. Relevant Company Regulations

- 1) Business Planning Management Regulations
- 2) Performance Management Regulations
- 3) PR Management Regulations
- 4) Company Rules Management Regulations
- 5) Audit Regulations
- 6) Office Regulations
- 7) Employment Regulations
- 8) Education Management Regulations
- 9) Promotion Evaluation Regulations
- 10) Reward and Punishment Management Regulations
- 11) Internal Accounting Regulations

12) Safety Management Regulations

13) Health Care Regulations

14) Environment Control Regulations