

COMPLIANCE GUIDELINES FOR ANTI-CORRUPTION LAWS

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COMPLIANCE GUIDELINES FOR ANTI-CORRUPTION LAWS

1. Purpose

- 1.1 HD Hyundai Marine Solution and all its directly or indirectly owned or controlled entities either in South Korea or abroad (collectively, the “**Company**”) has in place the Charter of Ethics (“윤리헌장”), the Code of Ethics (“윤리규범”), the Practical Guidelines to Professional Ethics (“직무윤리실천지침”), and the Code of Ethics for Vendors (“협력회사 윤리규범”) (collectively, the “**Ethics Regulations**”) and requires all directors, officers, employees, agents, representatives, and other associated persons of the Company (which may include consultants, advisors and temporary employees) (collectively, “**Company Personnel**”) and partners carrying out business for the Company at home and abroad to strictly adhere to anti-corruption laws of domestic and foreign jurisdictions and international conventions on anti-corruption, including but not limited to (i) the Republic of Korea Act on the Prevention of Corruption and the Establishment and Management of the Anti-Corruption and Civil Rights Commission, (ii) the Criminal Act of the Republic of Korea, the Republic of Korea Code of Conduct for Public Officials, (iii) the Republic of Korea Act on Combating Bribery of Foreign Public Officials in International Business Transactions, (iv) the Improper Solicitation and Graft Act of the Republic of Korea, (v) the U.S. Foreign Corrupt Practices Act of 1977, (vi) the United Kingdom Bribery Act of 2010, (vii) anti-bribery legislation promulgated by the European Union and implemented by its member states, and (viii) legislation adopted in furtherance of the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, and all other applicable laws relating to bribery or corruption in each jurisdiction in which Company Personnel do business (collectively, the “**Anti-corruption Laws**”).
- 1.2 The purpose of these Compliance Guidelines for Anti-corruption Laws (the “**Policy**”) is to lay out detailed criteria to evaluate conduct and ensure compliance with the Company’s Ethics Regulations and the Anti-corruption Laws.
- 1.3 In summary, the Company will not tolerate bribery, kickbacks, or corruption of any kind, directly or through third parties, whether or not explicitly prohibited by this Policy or by law. Company Personnel are not permitted to give or offer anything of value (including gifts, hospitality, or entertainment) to anyone for the purpose of improperly obtaining or retaining a business advantage. Similarly, Company Personnel may not solicit or accept such improper payments.
- 1.4 This Policy’s objective is to prevent violation of Anti-corruption Laws and enable the Company to respond promptly and effectively to any related misconduct. Company Personnel found in violation of this Policy may be subject to disciplinary action, up to and including termination.
- 1.5 While the Policy provides a general guide to anti-corruption compliance it should not be considered comprehensive. Therefore, if you who have any questions concerning the requirements of this Policy, please consult with Legal Affairs Team(Compliance).

2. Applicable Scope

- 2.1 This Policy applies to the Company and Company Personnel.
- 2.2 Company Personnel shall share this Policy with third parties that engage in transactions with the Company for its business, including entities and individuals providing goods and services to the Company (e.g., partners, consultants, agents, distributors, etc.), the Company's joint venture partners, and consortium members, as well as their respective officers and employees (such third parties, however described, will be hereinafter referred to as "**Stakeholders**"), and shall require Stakeholders to comply with the Anti-corruption Laws in accordance with this Policy.

3. Fundamental Principle

- 3.1 Company Personnel are prohibited from giving or offering Economic Benefits¹ to a third party, including any Public Officials² for the purpose of improperly obtaining or retaining a business advantage.
- 3.2 Please note that provision of Economic Benefits for an improper purpose to Public Officials may be punishable by criminal sanctions under Anti-corruption Laws.
- 3.3 Company Personnel are also prohibited from making "facilitation payments," those relatively insubstantial payments made to facilitate or expedite routine governmental action. Simply put, bribes, kickbacks or similar payments are never permitted, whether made to Public Officials or to customers, investors, clients, or other private parties. Similarly, Company Personnel may not solicit or accept such payments. Company Personnel are required to exercise common sense and judgment in assessing whether any arrangement could be perceived as corrupt or otherwise inappropriate.
- 3.4 If confronted with a request or demand for an improper payment or other violation of this Policy, the request or demand must be immediately rejected and reported to the Company's Legal Affairs Team(Compliance). Similarly, if any Company Personnel or agent knows or believes that an improper payment has been or will be made, offered or received, Company Personnel or Stakeholders must also report such payment to the Company's Legal Affairs Team(Compliance). A failure to report an improper payment

¹ "Economic Benefits" means all tangible and intangible benefits provided in a variety of forms including money and other valuables, gifts, souvenirs, provision of entertainment, invitation to events, congratulatory/condolence money, promotional offers, travel expenses, donations, discounts, political donations or contributions, assumption/repayment of debts, commissions on contracts, jobs, etc.. Company Personnel may only provide Economic Benefits in accordance with paragraph 4 of this Policy.

² "Public Officials" shall include (i) officers and employees of a central or federal government (department, agency, or instrumentality), officers and employees of a local government, and official representatives of any government; (ii) officers and employees of any state-owned enterprise, public enterprise, public institution, or government-invested company; (iii) officers and employees of any public international organization (e.g., the International Monetary Fund, the World Bank, the World Trade Organization, the Organization for Economic Cooperation and Development); (iv) politicians, employees of political parties, and candidates for political office; (v) persons entrusted with public duties and persons who engage in public duties as defined in Items 2 (b) through 2 (d) of Article 2 of the Improper Solicitation and Graft Act (i.e., "Kim Young-ran Act"), including an executive or employee of a public service-related organization or public institution, an executive or employee of an educational institution including a kindergarten, school, or school foundation (as defined under Korean law) and any person who serves on a government committee or who "performs a public function" as defined under Korean law, at home or abroad.

is considered a violation of this Policy. The Company will not take adverse action against any Company Personnel in retaliation for, honestly and in good faith, reporting a violation or suspected violation of Anti-Corruption Laws or this Policy.

- 3.5 Company Personnel shall not make improper solicitations (including types of improper solicitations set forth in Article 5 (1)³ of the Improper Solicitation and Graft Act) to any Public Official performing his or her duties directly or through a third party.

4. Provision of Economic Benefits for Legitimate Business Purpose

- 4.1 Company Personnel shall comply with the following guidelines when providing Economic Benefits for legitimate business purposes to the extent permitted by the Anti-corruption Laws, cultural and social norms.

Money and other valuables

- 4.2 Provision of money and other valuables is not permitted in principle. However, provision of congratulatory and / or condolatory money under 600,000 won is permissible, provided such provision complies with local laws, cultural and social norms and cannot be mistaken for any unjust purpose.

- (a) The congratulatory and / or condolatory money must be presented openly with complete transparency; and
- (b) The congratulatory and / or condolatory money must be properly recorded in the Company's books and records.

- 4.3 Money and other valuables shall include cash or cash equivalents (all Economic Benefits that can be easily cashed, such as bills, bonds, gift certificates, securities, etc.) as well as any and all monetary benefits, such as debt repayments, guarantees, surrogate payments of loan interest, or provision of movables or real estates at no or low prices.

Gifts and souvenirs

- 4.4 Gifts refer to items provided free of charge, memberships, hotel vouchers, entrance passes, and equivalents and do not include money and other valuables.
- 4.5 Souvenirs mean items provided uniformly by the organizer of an official event to attendees or distributed to many and unspecified persons, or items with the Company's logo, including giveaways and prizes.
- 4.6 Provision of gifts or souvenirs require advance consultation and approval by Legal Affairs Team(Compliance).
- 4.7 Note that the provision of gifts and souvenirs, as well as the reporting requirements, in this Policy, apply even if Company Personnel are not seeking reimbursement for the expenses (i.e. Company Personnel paying these expenses out of their own pocket are still required to comply with this Policy).

³ Please refer to Attachment 5 for a list of improper solicitations.

- 4.8 Company Personnel, including any member of his or her immediate family, **must report as soon as possible** any gifts, souvenirs, gratuities, or other favors from any customer, supplier, or other person doing or seeking to do business with the Company to Legal Affairs Team(Compliance), who will evaluate the purpose and value of the gift and conclude (in accordance with the Anti-corruption Laws and the Policy, including the monetary limits set out therein) whether the gift should be accepted, rejected or charitably disposed.
- 4.9 All provision of money, gifts, and souvenirs to Public Officials must be pre-approved by Legal Affairs Team(Compliance).
- 4.10 Provision of gifts and souvenirs is permitted for items of small value provided to promote the Company's products and services, strengthen ties and permitted under the Anti-corruption Laws, culture, and social norms of each country, when all of the following requirements are met.
- (a) Gifts and souvenirs must not be provided to a person who is in a position to make a decision capable of directly benefiting or hurting the Company when such a decision is imminent to eliminate the possibility of the provision of such gifts and souvenirs being mistaken by an objective third party as an attempt to exercise undue influence over said decision;
 - (b) The recipient of gifts or souvenirs must not have received gifts, souvenirs, etc. from the Company excessively or repeatedly;
 - (c) Gifts provided as samples must not be provided in excess of the required quantity;
 - (d) The value of gifts or souvenirs must not be excessive in light of the laws and regulations, culture, and social norms of the relevant country as well as the job title of the recipient;
 - (e) Gifts and souvenirs must not be provided to third parties other than counterparties and other individuals concerned with the business, such as their spouse and family members;
 - (f) The recipient of a gift or souvenir must not be prohibited from receiving such a gift or souvenir under the internal regulations of the organization to which he or she belongs and the laws and regulations of the country where he or she is located;
 - (g) The gift or souvenir is presented openly with complete transparency; and
 - (h) The gift or souvenir is properly recorded in the Company's books and records.

5. Provision of entertainment

- 5.1 Provision of entertainment refers to an act of bearing expenses incurred from meals, drinking, entertainment, sports (including golf), etc.
- 5.2 For all such expenses, the reimbursement request must identify the total number of all attendees and their names, employer, and titles. All expense reimbursements must be

supported by receipts, and expenses and approvals must be accurately and completely recorded in the Company's records. In all instances, Company Personnel must ensure that the recording of the expenditure associated with meals, lodging, travel, or entertainment clearly reflects the true purpose of the expenditure.

- 5.3 Note that the provision of entertainment and the reporting requirements, in this Policy, apply even if Company Personnel are not seeking reimbursement for the expenses (i.e. paying these expenses out of their own pocket does not avoid these requirements).
- 5.4 When possible entertainment should only be made directly by the Company to the provider of the service, and should not be paid directly as a reimbursement. Per diem cash allowances must not be paid to Public Officials. Any other individuals (in the private sector) may be paid per diem cash allowances subject to section 5.7 below so long as such individuals do not have the power to decide or influence the Company's commercial activities for any reason.
- 5.5 Any entertainment expense provided to Public Officials must be pre-approved by Legal Affairs Team(Compliance).
- 5.6 Please note that in addition to traditional gifts, meals, entertainment, and travel that are provided to business relationships where Company Personnel are not in attendance shall be considered gifts, and subject to the rules and requirements for gifts specified in this Policy.
- 5.7 Provision of entertainment to strengthen ties and cultivate friendship, etc. is permitted only when they are provided at a fair and reasonable level, meeting all of the following requirements:
 - (a) Entertainment must not be provided to a person who is in a position to make a decision capable of directly benefiting or hurting the Company when such a decision is imminent to eliminate the possibility of such provision of entertainment being mistaken by an objective third party as an attempt to exercise undue influence over said decision.
 - (b) The recipient of entertainment must not have received entertainment, etc. from the Company excessively or repeatedly.
 - (c) The value of entertainment must not be excessive in light of the Anti-corruption Laws, other relevant laws and regulations, culture, and social norms of the relevant country as well as the job title of the recipient.
 - (d) Entertainment must not be provided to third parties other than counterparties and other individuals concerned with the business, such as their spouse and family members.
 - (e) The recipient of entertainment must not be prohibited from receiving such entertainment under the internal regulations of the organization to which he or she belongs and the laws and regulations of the country where he or she is located.

6. Invitation to events and provision of travel and other expenses

- 6.1 Provision of travel and other related expenses includes provision of support (other than money, valuables or entertainment) with transportation, accommodation, tour guidance and other logistical assistance to attend events (“Logistical Expenses”).
- 6.2 For all Logistical Expenses, the reimbursement request must identify the total number of all attendees and their names, employer, and titles. All expense reimbursements must be supported by receipts, and expenses and approvals must be accurately and completely recorded in the Company’s records. In all instances, Company Personnel must ensure that the recording of the expenditure associated with meals, lodging, travel, or entertainment clearly reflects the true purpose of the expenditure.
- 6.3 Note that the provision of Logistical Expenses and the reporting requirements, in this Policy, apply even if Company Personnel are not seeking reimbursement for the expenses (i.e. paying these expenses out of their own pocket does not avoid these requirements).
- 6.4 When possible payments in relation to the provision of such expenses should be made directly by the Company to the provider of the service, and should not be paid directly as a reimbursement. Per diem cash allowances must not be paid to Public Officials. Any other individuals (in the private sector) may be paid per diem cash allowances subject to section 6.6 below so long as such individuals do not have the power to decide or influence the Company’s commercial activities for any reason.
- 6.5 Any provision of Logistical Expenses to Public Official must be pre-approved by Legal Affairs Team(Compliance).
- 6.6 Provision of Logistical Expenses is permitted only when they are provided at a reasonable level, meeting all of the following requirements:
 - (a) The event must be officially hosted by the Company and must be related to the business purpose in nature.
 - (b) In case of participation of the Public Official, the official event must be relevant to the duties of the Public Official.
 - (c) Invitations to events must not be extended and Logistical Expenses must not be provided to a person who is in a position to make a decision capable of directly benefiting or hurting the Company when such a decision is imminent to eliminate the possibility of such extension of invitations or provision of Logistical Expenses being mistaken by an objective third party as an attempt to exercise undue influence over said decision.
 - (d) Means of transportation, accommodation, meals, etc. provided during the event must not be excessive in light of the laws and regulations, culture, and social norms of the relevant country as well as the job title of the recipient.
 - (e) The recipient of Logistical Expenses must not have received such expenses from the Company excessively or repeatedly.

- (f) Invitations to events must not be extended to third parties other than counterparties and other individuals concerned with the business, such as their spouse and family members.
- (g) The recipient of Logistical Expenses must not be prohibited from attending events or receiving such expenses relating to events under the internal regulations of the organization to which he or she belongs and the laws and regulations of the country where he or she is located.
- (h) Expenses must not be provided for tours, performances, etc. that are irrelevant to the purpose of events, or excessive.
- (i) Travel expenses, etc. incurred by attendees in connection with events must not be provided in the form of money and other valuables such as cash.

7. Opportunities of Employment, Consultation Service and Internship

- 7.1 The Company may not hire, or offer/promise to hire, a Public Official or person related to any Public Official, to obtain or maintain business, seek an improper benefit, or exert improper influence over others.
- 7.2 Prior approval from Company's Legal Affairs Team(Compliance) must be obtained before hiring any person who is, or is related to, a Public Official.

8. Donations

- 8.1 Donations include provision of cash and cash equivalents, gifts, services, promotional support, political campaigns, etc.
- 8.2 Company Personnel, agents or other third parties representing the Company must not offer, promise, or provide donations to politicians or political organizations of the relevant country directly or through a third party.
- 8.3 Donations for pure charitable purposes that are not likely to be mistaken as having the purpose of obtaining unjust profits may be provided only when meeting all of the following requirements:
 - (a) The recipient of the donation must not be an organization of a political nature;
 - (b) The values pursued by the recipient of the donation must be consistent with the corporate values of the Company.
 - (c) The recipient of the donation must not have any business interest in the Company.
- 8.4 Company Personnel may not make political or charitable donations, whether in their own name or in the name of the Company, to obtain or retain business or to gain an improper business advantage. Any charitable contributions by the Company must be permitted under the law, permissible pursuant to the terms of this Policy, made to a *bona fide* charitable organization, and with the prior approval of Legal Affairs Team(Compliance). In certain instances where there is heightened risk of corruption, Legal Affairs Team(Compliance) may require diligence to be conducted. Legal Affairs

Team(Compliance) must be notified if a Government Official solicits a political or charitable contribution in connection with any government action related to the Company or its affiliates. Company Personnel or agents may not make political contributions on behalf of the Company or its affiliates.

- 8.5 Company Personnel may exercise their personal right to make charitable donations from their own resources, providing this does not give rise to any actual or apparent conflict of interest or appearance of impropriety for the Company.

9. Prior consultation and approval

- 9.1 Company Personnel shall determine whether or not they are in compliance with these Guidelines as an objective third party rather than him or herself as an individual, comprehensively taking into account all circumstances including the duties of the person to whom benefits are provided, the personal relationship between the person providing benefits and the person receiving benefits, the value of benefits provided, and the circumstances and timing of the provision and receipt of benefits. Company Personnel shall contact Legal Affairs Team(Compliance) for prior consultation when there is any question about whether or not a provision of certain Economic Benefits pursuant to this Policy is permissible.

- 9.2 When providing Economic Benefits to Public Officials, <Attachment 1: Request Form for Approval of Provision of Economic Benefits > must be completed for prior approval from Legal Affairs Team(Compliance). When it is unclear whether the recipient of Economic Benefits is a Public Official, <Attachment 2: Checklist for Determination of Public Official Status > must be completed for advice from Legal Affairs Team(Compliance).

10. Stakeholders

- 10.1 When carrying out business for the Company through Stakeholders, Company Personnel shall take appropriate measures to ensure that the Stakeholders would not, directly or through a third party, offer, promise, or provide Economic Benefits to existing or future counterparties including Public Officials.

- 10.2 If Company Personnel knew or could have known about violations of Anti-corruption Laws and regulations by the Stakeholders yet fails to report such violations to Legal Affairs Team(Compliance) such individual may assume civil and criminal liability for such violations by the Stakeholder. To reduce such risks, Company Personnel shall adhere to the following rule when selecting Stakeholders or executing agreements with them:

10.3 Selecting Stakeholders (Due Diligence)

- (a) When selecting a Stakeholder in connection with the Company's business, due diligence shall be conducted to verify whether the Stakeholder is an appropriate entity/individual for the Company to engage in transactions with. A Stakeholder shall be examined and evaluated according to <Attachment 3: Checklist for Due Diligence on Stakeholders >, and the results of such evaluation must be submitted to Legal Affairs Team(Compliance).

- (b) Legal Affairs Team(Compliance) shall review evaluation results and make recommendations when necessary. The relevant Company Personnel must comply with such recommendations.
- (c) Information relating to due diligence, particularly, evidence to prove that compensations to be paid to Stakeholders have been set at a reasonable level that corresponds to the scope and nature of their work, shall be documented and preserved.
- (d) An officer or employee of the Company shall seek advice from Legal Affairs Team(Compliance) and take actions accordingly if the interested party is deemed to have violated or could have violated any Anti-corruption Laws as an objective third party in the course of due diligence or transactions with Stakeholders.

10.4 **Agreements with Stakeholders**

Agreements with Stakeholders must reflect anti-corruption provisions in <Attachment 4: Standard Anti-Corruption Provisions> and include the following:

- (a) Affirmation of past and future compliance with Anti-corruption Laws;
- (b) That the Company may conduct relevant investigation in case of violation of the above provision;
- (c) That the Company would be entitled to revoke or terminate the agreement in case of violation of Anti-corruption Laws and regulations or failure to cooperate with an investigation by the Company.

11. **Recording/Management of Accounting Information and Internal Control**

- 11.1 The Company and its officers and employees shall keep a detailed and accurate record of the substance of transactions in accordance with the International Financial Reporting Standards (“IFRS”) and manage and maintain such accounting information in accordance with the Company’s internal regulations.
- 11.2 The Company and Company Personnel shall set up and operate systems for internal control based on checks and balances between organizations for efficient supervision and control of accounting, finance, bookkeeping practices, and other work processes.
- 11.3 The accounting department shall notify Legal Affairs Team(Compliance) of any transaction records suspected to be in violation of Anti-corruption Laws and regulations or this Policy and shall take actions based on recommendations from Legal Affairs Team(Compliance).

12. **Training and Consultation**

- 12.1 The Company will offer periodic anti-corruption compliance training programs to educate Company Personnel about the requirements and obligations of anti-corruption laws and this Policy. All Company Personnel must participate in such training at least once per annum and Legal Affairs Team(Compliance) must retain attendance records establishing compliance with this requirement.

12.2 The training may be carried out in person or online. When there are concerns of violations of this Policy, Company Personnel shall seek advice from Legal Affairs Team(Compliance).

13. Reporting and Processing of Violations

13.1 Company Personnel who violate Anti-corruption Laws or this Policy in the process of performing duties or refuse to cooperate with an investigation by the Company shall be disciplined in accordance with the Company policies and procedures.

13.2 The Company takes its commitment to anti-corruption compliance very seriously and expects all Company Personnel to share this commitment. The Company therefore expects and requires any Company Personnel who have knowledge of, or reason to suspect, any violation of this Policy to contact Legal Affairs Team(Compliance) immediately or using the online reporting form available on <http://ethics.hhigroup.kr/>, email, phone, etc. If any Company Personnel fail to report known or suspected violations, then the relevant Company Personnel may be subject to disciplinary action, up to and including termination.

13.3 A person can choose to make a disclosure anonymously and to remain anonymous over the course of and after any investigation of the disclosure – they may also decide not to answer questions that they feel could reveal their identity at any time, including during follow-up conversations.

13.4 The following persons can make a disclosure under this Policy:

(a) an officer or employee of the Company (including, but not limited to employees who are permanent, part-time, fixed-term or temporary);

(b) an individual who supplies goods or services to the Company (whether paid or unpaid) or an employee of a supplier (which may include, among others, contractors, consultants and service providers); and

(c) an individual who previously held any of the above positions or functions or who is a relative, dependent or spouse of any of one the individuals set out above.

13.5 The Company encourages disclosures of any matter that:

(a) concerns misconduct or an improper state of affairs or circumstances in relation to the Company;

(b) indicates the Company or its officers or employees has engaged in any offence against, or contravention of, any applicable law; and

(c) concerns any breach of any of the Company's policies or any other wrongdoing or improper or unethical conduct.

13.6 It is the Company's policy that, if the report of known or suspected violations is made honestly and in good faith, no adverse employment-related action will be taken against any Company Personnel in retaliation for reporting a violation or suspected violation

of Anti-corruption Laws or this Policy. The Company shall strictly maintain confidentiality of the processing of all reports and the personal information of reporters.

14. Books and Records, Monitoring

- 14.1 This Policy requires that all expenditures made by the Company are accurately reflected in the Company's financial records and that all payments made with Company funds, or on behalf of the Company, have been properly authorized. Company Personnel must follow all applicable standards, principles, laws, and practices for accounting and financial reporting. Company Personnel must be timely and complete when preparing all reports and records required by management.
- 14.2 In particular, Company Personnel should ensure that no part of any payment is to be made for any purpose other than that to be fully and accurately described in the Company's books and records. Company Personnel should use best efforts to ensure that all transactions, dispositions, and payments involving Company funds or assets are properly and accurately recorded in the Company's financial records. No undisclosed or unrecorded accounts are to be established for any purpose. False or artificial entries are not to be made in the Company's books and records for any reason. Finally, personal funds must not be used to accomplish what is otherwise prohibited by this Policy.
- 14.3 Legal Affairs Team(Compliance) is primarily responsible for the oversight and enforcement of this Policy. The Company will conduct periodic audits of its books and records to monitor compliance with this Policy.

15. Cooperation for Implementation of these Guidelines

Legal Affairs Team(Compliance) shall operate the legal support system in consultation with the Group ICT Resources Management Team for approval of provision of Economic Benefits, etc.

Addendum

These Guidelines shall be effective from January 1, 2020.

Addendum

These Guidelines shall be effective from November 26, 2021.

Addendum

These Guidelines shall be effective from September 25, 2024.

[Attachment 1]

Request Form for Approval of Provision of Economic Benefits

- This request form is to be prepared only when a person receiving Economic Benefits is a Public Official.
- Any Company Personnel wishing to provide a Public Official with Economic Benefits (money and other valuables, gifts/souvenirs, entertainment, invitation to events/provision of Logistical Expenses, etc.) for a legitimate business purpose under this Policy must fill out this Request Form for Approval of Provision of Economic Benefits and submit it to Legal Affairs Team(Compliance) for approval.

Name		Date	
Department		Responsible officer	(Signature)

Type	<input type="checkbox"/> Money and other valuables <input type="checkbox"/> Gifts <input type="checkbox"/> Entertainment <input type="checkbox"/> Invitation to events <input type="checkbox"/> Provision of Logistical Expenses <input type="checkbox"/> Donations <input type="checkbox"/> Others		
Recipient		Total number of recipients	
Attendee from the Company		Total number of attendees from the Company	
Relations			
Date, time, and place			
Amount			
Purpose (necessity)			
Evidence (attachment)			

1. Name, organization, and position of the recipient (representative)
2. Name, department, and position of the attendee from the Company (representative)
3. Relations between the Company and the recipient
4. Legitimate purpose and necessity of the provision of Economic Benefits
5. State whether or not there is any evidentiary document supporting the provision of Economic Benefits (event plan, drafting paper, schedule, etc.) and attach relevant documents to the request form.

[Attachment 2]

Checklist for Determination of Public Official Status

- Any Company Personnel wishing to provide a Public Official with Economic Benefits for legitimate business purposes under the Compliance Guidelines for Anti-corruption Laws must fill out <Attachment 1: Request Form for Approval of Provision of Economic Benefits> and submit it to Legal Affairs Team(Compliance) for prior approval. Pursuant to the Compliance Guidelines for Anti-corruption Laws, when it is not clear whether a person receiving Economic Benefits is a Public Official, Company Personnel must complete the checklist below for advice from Legal Affairs Team(Compliance).
- Any Company Personnel conducting due diligence to select Stakeholders pursuant to this Policy must complete <Attachment 3: Checklist for Due Diligence on Stakeholders>. For Item 2-7 of <Attachment 3: Checklist for Due Diligence on Stakeholders>, to determine whether a Stakeholder is a Public Official, Company Personnel must complete the following checklist for submission to Legal Affairs Team(Compliance).

Purpose	Subject Person		
	Name	Affiliation	Position
<input type="checkbox"/> Provision of Economic Benefits			
<input type="checkbox"/> Stakeholder selection			

No.	Checklist	Checkbox	
		True	False
1	The subject person is a Public Official under the laws of the relevant country and the Policy.		
2	The subject person belongs to or is employed by a central or local government at home and abroad.		
3	The subject person belongs to or is employed by an international organization such as the International Monetary Fund, the World Bank, the World Trade Organization, the Organization for Economic Cooperation and Development, etc.		
4	The subject person is representing a central government, a local government, or an international organization.		
5	The government directly or indirectly owns all or more than 50% of the organization to which the subject person belongs.		

6	The government directly or indirectly controls the organization to which the subject person belongs.		
	1) The government has veto power over important matters of the organization to which the subject person belongs.		
	2) The government appoints major directors or officers of the organization to which the subject person belongs.		
	3) The organization to which the subject person belongs has been established based on statutes of the relevant country or state orders/ requests.		
	4) The laws and regulations of the relevant country grant special benefits or impose special obligations on the organization to which the subject person belongs.		
	5) The organization to which the subject person belongs have an exclusive status in the relevant country in connection with the performance of his or her duties.		
	6) The organization to which the subject person belongs is receiving substantial financial support such as subsidies, incentives, tax benefits, loans, etc. from the government of the relevant country.		
	7) The organization to which the subject person belongs is in charge of governmental functions or other public roles.		
7	The subject person is a principal or a teacher at a school of any level or an employee of a school foundation (limited to domestic schools and school foundations).		
8	The subject person is the representative or an officer or employee of a press organization (limited to local press organizations).		

Please state details below for any item ticked “true” above.

No.	Details

Date: _____

Department: _____

Responsible officer: _____ (Signature)

[Attachment 3]

Checklist for Due Diligence on Stakeholders

- Company Personnel when selecting Stakeholders must evaluate Stakeholders based on the following checklist and submit the result of evaluation to Legal Affairs Team(Compliance).
- No Company Personnel may transact with any Stakeholder found “inadequate” by Legal Affairs Team(Compliance).
- All Company Personnel must inform Legal Affairs Team(Compliance) of any changes to the details of due diligence on Stakeholders made after the selection of Stakeholders without delay.

1. Background of the Project	
1-1	Project summary ※ Project target, contract amount, region (country/state), period, etc.
1-2	Why do you need the Stakeholder in this project?
1-3	Who will be responsible for managing Stakeholders during the project period inside the Company?
2. General Information on the Stakeholder	
2-1	Trade name (representative):
2-2	Address:
2-3	Contact information:
2-4	Business registration number/corporate registration number:
2-5	Business-related licenses/permits and qualifications:
2-6	Transaction account information: ※ Name/location of the bank, account holder, etc.
2-7	Is the Stakeholder a Public Official? ※ Fill out and submit <Attachment 2: Checklist to Determine Public Official Status>

3. Details of the Transaction with the Stakeholder	
3-1	Purpose of the contract:
3-2	Contract period:
3-3	Contract amount (compensation):
3-4	Payment method for the contract amount (compensation):
3-5	Basis for calculating the contract amount (compensation):
3-6	Background and basis of the transaction with the Stakeholder:
3-7	Areas where the Stakeholder will provide services to the Company:
4. Other Stakeholder Due Diligence Items	
4-1	<p>If the Stakeholder is a corporation, is an anti-corruption policy in place and in effect?</p> <p>※ If the answer to the above question is “yes,” please state details and attach documents related to the anti-corruption policy.</p>
4-2	<p>If the Stakeholder is a corporation, is there an accounting control/audit system in place?</p> <p>※ If the answer to the above question is “yes,” please state details and attach documents related to the accounting control/audit system.</p>
4-3	<p>Does the Stakeholder consider his or her relationship or influence over Public Officials or counterparties as his or her own ability?</p> <p>※ If the answer to the above question is “yes,” please state details.</p>
4-4	<p>Has the Stakeholder been recommended by a Public Official or a counterparty?</p> <p>※ If the answer to the above question is “yes,” please state details including the job title and name of the person who recommended the Stakeholder.</p>

4-5	<p>Does the Stakeholder or his or her spouse have a first cousin or closer relative who is a Public Official or a counterparty? (applicable to consultants/agents only)</p> <p>※ If the answer to the above question is “yes,” please state details.</p>
4-6	<p>Has the Stakeholder made political donations for the last five years?</p> <p>※ If the answer to the above question is “yes,” please submit details including details on political donations in writing.</p>
4-7	<p>Does the Stakeholder have government contracts or otherwise make government sales for the last five years?</p> <p>※ If the answer to the above question is “yes,” please state details.</p>
4-8	<p>Are there any key points where the Stakeholder interacts with the government acting as a regulator (<i>e.g.</i>, customs and other capital/goods exports, licensing, permissions, permits, real estate transactions)</p> <p>※ If the answer to the above question is “yes,” please state details.</p>
4-9	<p>List of countries that the Stakeholder has major operations or government customers in, or derives material revenue from.</p> <p>※ If the answer to the above question is “yes,” please state details.</p>
4-10	<p>Has the Stakeholder or any of its officers or employees been sanctioned or investigated for any violation of Anti-corruption Laws and regulations, money laundering, fraud, breach of trust, or embezzlement in the last five years?</p> <p>※ If the answer to the above question is “yes,” please state details.</p>

Date: _____

Department: _____

Responsible officer: _____ (Signature)

[Attachment 4]

Standard Anti-Corruption Provisions

Article 00 (Anti-corruption)

(1) The Counterparty warrants that the Counterparty is not, and would not be, any of the following at present or at any time during the term of this Agreement, unless reported by its officers and employees concerned with this Agreement to HD Hyundai Marine Solution Co., Ltd. (“HMS”).

1. Officers and employees of a central or federal government (department, agency, or instrumentality), officers and employees of a local government, and official representatives of any government;
2. Officers and employees of any state-owned enterprise, public enterprise, public institution, or government-invested company;
3. Officers and employees of any public international organization (e.g., the International Monetary Fund, the World Bank, the World Trade Organization, the Organization for Economic Cooperation and Development, etc.);
4. Politicians, employees of political parties, and candidates for political office;
5. Persons entrusted with public duties
6. A head master or a teacher at a school of any level or an employee of a school foundation (limited to domestic schools and school foundations).
7. The representative or an officer or employee of a press organization (limited to local press organizations).

(2) The Counterparty warrants that it has not and will not, directly or through a third party (stakeholders such as consultants, agents, representatives, etc.), offer, promise, or provide any Economic Benefits such as money and other valuables including any of the items set forth in Paragraph (1) above to any of the existing or future counterparties, etc, in connection with the performance of this Agreement or its activities as a representative of HMS.

(3) The Counterparty undertakes to comply with all anti-corruption laws and regulations of the Republic of Korea, international conventions on anti-corruption, and all other anti-corruption laws and regulations applicable to the performance of duties, as well as the Compliance Guidelines for Anti-corruption Laws of HMS (the “**Anti-corruption Laws**”).

(4) The Counterparty shall maintain and manage in reasonable detail all accounting books and records relating to the performance of this Agreement for at least five (5) years from the expiration or termination of this Agreement as well as during the effective period of this Agreement.

(5) HMS may inspect or copy the accounting books, records, etc. of the Counterparty within a reasonable scope during business hours to verify compliance with these terms and the Anti-corruption Laws by the Counterparty.

(6) The Counterparty shall immediately notify HMS of any known or suspected violation of Anti-corruption Laws in connection with the performance of this Agreement or activities as a distributor of HMS.

(7) If HMS becomes aware of any information to reasonably suspect a violation of the Anti-corruption Laws by the Counterparty, HMS may suspend the performance of its obligations including payment obligations for a reasonable period necessary to investigate the existence of any such a violation.

(8) HMS may terminate or cancel this Agreement in any of the following cases:

1. Violation of Anti-corruption Laws by the Counterparty;
2. Rejection of HMS's request for inspection or reproduction of accounting books, records, etc.
3. Any other breach of this Article.

(9) HMS may claim for damages incurred due to breach of this Article by the Counterparty.

Article 00 (Prohibition of Improper Solicitation)

No person shall make any of the following improper solicitations to any Public Official, etc. performing his or her duties, directly or through a third party:

1. Soliciting to process, in violation of statutes, such tasks as authorization, permission, license, patent, approval, inspection, qualification, test, certification, or verification, for which statutes (including Ordinances and Rules; hereinafter the same shall apply) prescribe requirements and which should be processed upon application by a duty-related party;
2. Soliciting to mitigate or remit administrative dispositions or punishments such as cancellation of authorization or permission, and imposition of taxes, charges, administrative fines, penalty surcharges, charges for compelling compliance, penalties, or disciplinary actions, in violation of statutes;
3. Soliciting to intervene or exert influence in the appointment, promotion, assignment or reassignment, or any other personnel matter with respect to any Public Official, etc., in violation of statutes;
4. Soliciting to select or reject a person, in violation of statutes, for a position which intervenes in the decision-making of a public institution, such as a member of various deliberation, decision-making, and arbitration committees, and a member of a committee for a test or screening administered by a public institution;
5. Soliciting to select or reject a specific individual, organization, or juridical person, in violation of statutes, in any award, prize, or selection of outstanding institutions or persons, administered by a public institution;
6. Soliciting to disclose, in violation of statutes, duty-related confidential information on tender, auction, development, examination, patent, military affairs, taxation, etc.;
7. Soliciting to select or reject a specific individual, organization, or juridical person as a party to a contract, in violation of statutes governing contracts;
8. Soliciting to intervene or exert influence so that subsidies, incentives, contributions, investments, grants, funds, etc., are assigned to, provided to, invested in, deposited in, lent to, contributed to, or financed to a specific individual, organization, or juridical person, in violation of statutes;
9. Soliciting to allow a specific individual, organization, or juridical person to buy, exchange, use, benefit from, or possess goods and services that are produced, supplied, or managed by public institutions, at prices different from what is prescribed by statutes, or against normal transaction practices;
10. Soliciting to process or manipulate affairs of schools of each level, such as admission, grades, or performance tests, in violation of statutes;
11. Soliciting to process affairs related to military service, such as physical examination for military service, assignment to a military unit, or appointment to a position, in violation of statutes;
12. Soliciting to conduct various assessments or judgements implemented by public institutions, or manipulate the results thereof, in violation of statutes;
13. Soliciting to make a specific individual, organization, or juridical person subject to or exempt from administrative guidance, enforcement activities, audit, or

investigation; to manipulate the outcome thereof; or to ignore any illegality, in violation of statutes;

14. Soliciting to process investigation of a case, trial, adjudication, decision, mediation, arbitration, reconciliation, or other equivalent affairs, in violation of statutes;
15. Soliciting a Public Official, etc. to act beyond the limits of his or her position and authority granted by statutes, or to take any action for which he or she lacks legitimate authority, regarding any and all affairs that may be the subject-matter of improper solicitation as prescribed by subparagraphs 1 through 14.