

# Regulations on the Operation of the Fair Trade Compliance Program

## Chapter 1 General Provisions

### Article 1 (Purpose)

The purpose of these Regulations is to set forth the basic procedures and standards that officers and employees shall comply with in order to observe competition laws.

### Article 2 (Scope of Application)

All officers and employees of HD Hyundai Marine Solution Co., Ltd. (the "Company") shall comply with these Regulations.

### Article 3 (Definitions)

The terms used in these Regulations shall have the meanings set forth below:

1. "Self-Compliance(자율준수)" means the voluntary satisfaction of requirements prescribed in competition-related laws and regulations applicable to the Company.
2. "Competition Laws(경쟁법)" means the Monopoly Regulation and Fair Trade Act, the Act on the Regulation of Terms and Conditions, the Fair Transactions in Subcontracting Act, the Door-to-Door Sales Act, the Act on Fair Labeling and Advertising, the Installment Transactions Act, the Act on the Consumer Protection in Electronic Commerce, etc., and other laws and regulations enacted for the purpose of promoting competition and maintaining a fair trade order.
3. "Competition Authority(경쟁당국)" means the government agency responsible for enforcing competition laws, namely the Korea Fair Trade Commission.
4. "Compliance Program(자율준수프로그램)" means a program that sets out the specific action items and implementation measures for putting Self-Compliance into practice.
5. "Compliance Officer(자율준수관리자)" means the person who has overall responsibility for operating the Compliance Program.

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## Chapter 2 Organizational Structure and Allocation of Duties

### Section 1 Compliance Officer

#### Article 4 (Appointment and Removal)

1. The Compliance Officer shall be appointed by the Board of Directors.
2. The Compliance Officer shall not be removed without just cause, and sufficient evidence capable of substantiating the grounds for removal shall be presented where removal is to be effected.

3. Where the Compliance Officer is removed, a new Compliance Officer shall promptly be appointed so as to ensure continuity of work.
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#### **Article 5 (Authority)**

The Compliance Officer shall have the following authority:

1. Authority to inspect and investigate the status of Self-Compliance;
  2. Authority to request improvements and corrective measures in relation to violations of competition laws;
  3. Authority to request the submission of materials and information necessary for the performance of his or her duties; and
  4. Such other authority as the Board of Directors deems necessary.
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#### **Article 6 (Obligations)**

The Compliance Officer shall have the following obligations:

1. Obligation to exercise the due care of a good manager; and
  2. Obligation to operate fair trade Self-Compliance in an efficient manner.
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#### **Article 7 (Duties)**

To ensure the effective operation of fair trade Self-Compliance, the Compliance Officer shall perform the following duties:

1. Operation of the Compliance Program;
2. Establishment of plans relating to Self-Compliance;
3. Inspection of the status of Self-Compliance at least once every half-year;
4. Submission of inspection results to the Personnel Committee and request for corrective measures;
5. Request for improvements and corrective measures for other matters in violation of competition laws;
6. Education of officers and employees on Self-Compliance Regulations;
7. Maintenance of records on Self-Compliance activities;
8. Reporting of plans for Self-Compliance activities and the status of such activities to the CEO and the Board of Directors;
9. Cooperation and support with respect to the competition authority and other bodies; and

10. Other matters deemed necessary.

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#### **Article 8 (Prohibition on Personnel Disadvantages)**

In order to secure the objectivity and independence of the Compliance Officer's performance of his or her duties, the Company shall not impose any personnel disadvantages on the Compliance Officer for reasons related to the performance of such duties.

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#### **Article 9 (Support by the Company)**

1. The Company shall actively provide the human and physical resources necessary for the efficient performance of the Compliance Officer's duties.
  2. The Compliance Officer may seek the assistance of experts at the Company's expense.
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#### **Article 10 (Dedicated Department)**

The Company's overall Self-Compliance work shall be supervised by the Legal Team (Compliance), and the Legal Team (Compliance) shall assist the Compliance Officer in performing his or her duties.

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### **Section 2 Compliance Council**

#### **Article 11 (Establishment and Composition)**

1. The Compliance Officer may operate a Compliance Council, composed of relevant department heads, as an advisory body.
  2. The Compliance Officer shall serve as chairperson of the Compliance Council.
  3. Members of the Compliance Council may be designated by the Compliance Officer depending on the matter concerned.
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#### **Article 12 (Roles)**

The Compliance Council shall perform the following roles:

1. Establishment of basic policies on Self-Compliance; and
  2. Deliberation on important matters and provision of recommendations or advice on necessary measures.
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## **Section 3 Officers and Employees**

### **Article 13 (Obligations)**

1. All officers and employees shall comply with competition laws.
  2. Where any member of the Compliance Council, in the course of performing his or her duties, considers that there is a possibility of violation of competition laws, he or she shall seek advice or consultation from the Compliance Officer.
  3. Where any member of the Compliance Council discovers, in the course of performing his or her duties, any violation of competition laws, he or she shall report the matter to the Compliance Officer without delay.
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## **Chapter 3 Operation of the Compliance Program**

### **Article 14 (Compliance Manual)**

1. The Compliance Officer shall prepare and distribute a Compliance Manual containing detailed guidelines for Self-Compliance with competition laws.
  2. The Compliance Manual shall be drafted in a manner suited to the Company's organization and characteristics.
  3. Where there are amendments to applicable laws and regulations or internal regulations, the relevant changes shall promptly be reflected in the Compliance Manual.
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### **Article 15 (Monitoring System)**

The Compliance Officer shall, by means of the following methods, verify at least once every half-year whether the Compliance Program is being complied with, and shall report the results to the Board of Directors:

1. Inspection and investigation of the status of officers' and employees' Self-Compliance;
  2. Review and verification of various checklists prepared by each department at the request of the Compliance Officer; and
  3. Review and verification of reports, notifications and various materials submitted at the request of the Compliance Officer.
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### **Article 16 (Implementation of Training Programs)**

The Compliance Officer shall provide training related to Self-Compliance Regulations to all officers and employees at least once a year and, where necessary, may provide additional training as supplementary training.

1. Officers and employees in areas with a high risk of violating competition laws shall receive at least two hours of training per half-year.
  2. Training content shall consist of matters deemed necessary, such as changes to the main content of the Self-Compliance Regulations or matters which officers and employees must be aware of due to amendments to competition laws.
  3. Detailed matters relating to Self-Compliance training may be separately determined by the Compliance Officer.
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#### **Article 17 (Sanctions against Officers and Employees Who Violate Competition Laws)**

1. Where a violation of competition laws is detected as a result of inspections on compliance with competition laws, the Compliance Officer may request the imposition of sanctions commensurate with the degree of violation, and the type and procedures of sanctions shall be governed by the Company's personnel regulations and rules of employment.
  2. The Compliance Officer may request the officer or employee concerned to take corrective measures in respect of violations of competition laws.
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#### **Article 18 (Awards for Officers and Employees)**

The Compliance Officer may evaluate officers' and employees' performance of Self-Compliance activities and may grant awards to such officers and employees or recommend their promotion.

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#### **Article 19 (Document Management)**

1. Basic documents relating to Self-Compliance shall be classified and stored under the responsibility of the Compliance Officer.
  2. Documents considered legally important shall be prepared and kept in a thorough manner so that they may later be used as supporting evidence.
  3. All documents relating to Self-Compliance activities shall be recorded accurately and contain up-to-date information.
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#### **Article 20 (Evaluation of Operational Performance)**

1. The Compliance Officer shall regularly evaluate whether the Compliance Program is functioning effectively and reflect the evaluation results in the operation of the program.
2. The Compliance Officer shall conduct such evaluations of operational performance and may, where necessary, seek the advice of external experts.

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### **Article 21 (Disclosure)**

The Compliance Officer shall disclose the status of operation of the Compliance Program on the Company's website or in reports.

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### **Article 22 (Relationship with the Competition Authority)**

The Compliance Officer shall maintain a close relationship with the competition authority, the Korea Fair Trade Commission, by ensuring smooth exchange of information and communication.

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### **Article 23 (Delegation)**

For the efficient and smooth operation of these Regulations, the Compliance Officer may separately establish and operate detailed rules.

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### **Addenda**

#### **Article 1 (Effective Date)**

These Regulations shall enter into force on 28 November 2016.

#### **Article 2 (Sanctions)**

Officers and employees who engage in conduct in violation of the Compliance Program shall be subject to disciplinary action.

#### **Article 3 (Consultation)**

Where any question arises in interpreting or implementing competition law-related work, the matter shall be discussed with, and advice shall be obtained from, the Compliance Officer or the Compliance Council.

#### **Article 4 (Relationship with Other Internal Regulations)**

These Self-Compliance Regulations shall take precedence over other regulations within the Company.

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### **Addenda (26 July 2024)**

#### **Article 1 (Effective Date)**

These Regulations shall enter into force on 26 July 2024.

# Detailed Rules on the Operation of the Fair Trade Compliance Program

## Chapter 1 General Provisions

### 1. Scope of Application

These Detailed Rules shall apply to all officers and employees of HD Hyundai Marine Solution Co., Ltd. (the "Company") and to all business activities related to fair trade.

### 2. Purpose

The purpose of these Detailed Rules is to set forth the detailed standards and procedures necessary for the implementation of the Company's Fair Trade Compliance Program Operating Regulations.

### 3. Definitions

For the purposes of these Detailed Rules, the following terms shall have the meanings set forth below:

- (1) "Fair Trade Compliance" (hereinafter "Compliance") means that officers and employees voluntarily satisfy the requirements prescribed in fair trade-related laws and regulations applicable to the Company.
  - (2) "Fair trade-related laws and regulations" means the competition laws referred to in the Fair Trade Compliance Program Operating Regulations, including the Monopoly Regulation and Fair Trade Act (the "Fair Trade Act"), the Act on the Regulation of Terms and Conditions, the Fair Transactions in Subcontracting Act (the "Subcontracting Act"), the Act on Fair Labeling and Advertising, and the Act on the Consumer Protection in Electronic Commerce, etc., as well as other statutes enacted for the purpose of promoting competition and maintaining a fair trade order.
  - (3) "Fair Trade Compliance Program (Compliance Program)" (hereinafter the "CP") means the Company's internal compliance system, including education, supervision and other measures, established to prevent violations of the Fair Trade Act in advance and setting out practical action items and implementation measures for Compliance.
  - (4) "Compliance Officer" means the person having overall responsibility for operating the CP.
  - (5) "CP Dedicated Department" means the department which, under the direction of the Compliance Officer, takes charge of and implements tasks relating to the CP.
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## Chapter 2 Organizational Structure and Allocation of Duties

### 4. Compliance Officer

#### 4.1 Appointment and Removal of the Compliance Officer

- 4.1.1 The Compliance Officer shall be appointed by the Board of Directors and notified to internal and external stakeholders.
- 4.1.2 Where the Compliance Officer is involved in any violation of fair trade-related laws and regulations and is therefore deemed unfit to continue performing his or her duties, the Board of Directors may, by resolution, remove the Compliance Officer, and such removal shall be notified to officers, employees and internal and external stakeholders.
- 4.1.3 Where the Compliance Officer is unable to perform his or her duties due to unavoidable circumstances, or is removed pursuant to paragraph 4.1.2 above, the head of the CP Dedicated Department (or the next most senior officer) shall perform the duties of the Compliance Officer until the Compliance Officer is able to resume his or her duties or a new Compliance Officer is appointed by resolution of the Board of Directors.

#### 4.2 Ensuring the Independence of the Compliance Officer

- 4.2.1 The Company shall ensure that the Compliance Officer is able to perform his or her duties independently.
- 4.2.2 The Compliance Officer shall perform his or her duties with the care of a good manager, maintain independence in the course of performing such duties, and shall not be influenced by stakeholders in relation to the performance of such duties.
- 4.2.3 In order to secure the objectivity and independence of the Compliance Officer's performance of his or her duties, the Company shall not impose any personnel disadvantages on the Compliance Officer for reasons related to the performance of such duties, unless the Compliance Officer has violated paragraph 4.2.2 above.
- 4.2.4 The Company shall actively provide the human and physical resources required for the efficient performance of the Compliance Officer's duties. Officers and employees shall faithfully comply where the Compliance Officer requires the submission of materials or information in the course of performing his or her duties.
- 4.2.5 Where a situation arises in which these Detailed Rules or fair trade-related laws and regulations are violated, the Company shall hear the Compliance Officer's opinion in order to identify the cause of the problem and prevent recurrence, and shall accord such opinion the fullest possible respect.

#### 4.3 Duties of the Compliance Officer

The Compliance Officer shall perform the following duties to ensure the effective operation of Fair Trade Compliance:

- (1) Operation of the Compliance Program;
- (2) Establishment of plans relating to Compliance;
- (3) Inspection of the status of Compliance at least once every half-year;

- (4) Submission of the inspection results to the Personnel Committee and request for corrective measures;
- (5) Request for improvements and corrective measures in respect of other violations of competition laws;
- (6) Education of officers and employees on Compliance Regulations;
- (7) Maintenance of records on Compliance activities;
- (8) Reporting of plans for Compliance activities and the status of such activities to the CEO and the Board of Directors;
- (9) Cooperation and liaison with competition authorities and other related bodies; and
- (10) Other matters deemed necessary.

#### 4.4 Authority of the Compliance Officer

The Compliance Officer shall have the following authority:

- (1) Authority to inspect and investigate the status of Compliance;
- (2) Authority to report to the Board of Directors and to request improvements and corrective measures in relation to violations of competition laws;
- (3) Authority to request the submission of materials and information necessary for performing his or her duties; and
- (4) Such other authority as the Board of Directors deems necessary.

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## 5. CP Dedicated Department

### 5.1 Organizational Structure

- 5.1.1 For the smooth operation of the CP, the Compliance Officer shall organize a CP Dedicated Department under his or her direct supervision.
- 5.1.2 Persons in charge of inspection tasks in the CP Dedicated Department shall, in principle, be appointed from among persons who have the qualifications, knowledge and experience necessary to perform such inspection tasks.
- 5.1.3 In the foregoing case, persons falling under any of the following subparagraphs shall not be appointed as staff of the CP Dedicated Department:
  - (1) Persons who have been subject to disciplinary action and for whom two years have not elapsed since the date thereof;
  - (2) Persons with poor work performance; or
  - (3) Other persons whom the Compliance Officer deems unfit.
- 5.1.4 The appointment and transfer of staff of the CP Dedicated Department shall be made upon the request of the Compliance Officer.
- 5.1.5 Staff of the CP Dedicated Department shall not be subject to any adverse

personnel measures, except where they violate laws and regulations or fail to faithfully perform their duties.

## 5.2 Roles of the Organization

5.2.1 The CP Dedicated Department shall perform the following tasks:

- (1) Assisting the Compliance Officer in performing his or her duties;
- (2) Preparing plans necessary for the implementation of the CP, reporting them to the Compliance Officer and implementing them;
- (3) Handling practical matters relating to the operation of the CP and evaluating the effectiveness of the CP;
- (4) Providing legal support, including legal advice, in relation to internal tasks connected with fair trade-related laws and regulations;
- (5) Collecting and disseminating information on fair trade-related laws and regulations;
- (6) Operating and managing training programs on fair trade-related laws and regulations and Compliance;
- (7) Preparing and distributing the Compliance Manual;
- (8) Conducting fair trade-related monitoring and inspections at least once every half-year; and
- (9) Developing fair trade monitoring processes and systems.

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## 6. Officers and Employees

6.1 Obligations of Officers and Employees

- 6.1.1 All officers and employees shall comply with fair trade-related laws and regulations.
- 6.1.2 Where any officer or employee, in performing his or her duties, considers that there is a possibility of violation of fair trade-related laws and regulations, he or she shall request advice from, or consult with, the Compliance Officer.
- 6.1.3 Where any officer or employee becomes aware of any violation of fair trade-related laws and regulations in the course of performing his or her duties, he or she shall immediately inform the Compliance Officer thereof.

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## 7. CEO

7.1 Role of the CEO

- 7.1.1 To enable the Compliance Officer to operate the Fair Trade Compliance Program effectively, the CEO shall actively provide the human and physical resources of the Company.
- 7.1.2 Where the CEO receives reports of violations of fair trade-related laws

and regulations by officers and employees, the CEO shall direct improvements to business procedures and other measures to prevent recurrence and, if necessary, may order disciplinary measures against the officers and employees concerned.

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## Chapter 3 Operation of the CP

### 8. Declaration of Intention to Comply

The CEO shall declare the Company's intention to comply, in order to foster a culture in which officers and employees comply with fair trade-related laws and regulations and actively implement the CP, and such declaration shall be notified to the Company's stakeholders.

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### 9. Compliance Manual

- 9.1 The Compliance Officer shall prepare and distribute a Compliance Manual that officers and employees can use as a practical handbook in performing their duties.
  - 9.2 Where there are amendments to fair trade-related laws and regulations or the Company's internal regulations, the relevant changes shall promptly be reflected in the Fair Trade Compliance Manual and notified to officers and employees.
  - 9.3 The Fair Trade Compliance Manual shall be drafted in a user-friendly manner for officers and employees, and the Compliance Officer shall conduct periodic reviews (monthly) and revisions (as necessary).
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### 10. Training

- 10.1 The CP Dedicated Department shall establish annual training plans so that officers and employees can understand fair trade-related laws and regulations, and shall operate the following training programs:
  - (1) Training for departments for which there is a high risk of violating fair trade-related laws and regulations;
  - (2) Training for site managers and personnel responsible for public works, construction, management, safety and similar functions;
  - (3) Training for executives, including the CEO;
  - (4) Supplementary training for those who have not completed required training and special training for those who have violated fair trade-related laws and regulations;
  - (5) Other training necessary to enhance employees' mindset to comply with fair trade; and
  - (6) Training delivered through various formats such as face-to-face

sessions, online and video training, postings on business systems and pop-up notices.

- 10.2 The CP Dedicated Department may designate mandatory trainee departments for each training program and notify such designations, and after the training shall inform the relevant department heads of attendance status.
- 10.3 Officers and employees belonging to departments designated as training targets by the CP Dedicated Department shall complete the training without fail. Officers and employees who, without just cause, fail to complete supplementary training or special training and who violate fair trade-related laws and regulations may be subject to aggravated disciplinary measures.
- 10.4 The CP Dedicated Department may conduct evaluations in order to deliver more effective training.
- 10.5 The CP Dedicated Department shall assess the effectiveness of training by identifying trainees' level of understanding and satisfaction, feedback (VOC) and attendance rate after training, and shall reflect the results in subsequent training.
- 10.6 Taking into account the target audience and content of training, the CP Dedicated Department shall select instructors. Professional instructors shall be persons who have at least two years of experience in fair trade-related work in a law firm or specialized institution, or who are qualified attorneys-at-law. General instructors shall be persons who fall under any of the following subparagraphs:
  - (1) Persons with at least two years of experience in fair trade-related work such as construction management, production management or purchasing;
  - (2) Persons with at least one year of experience in CP Dedicated Department work or who hold a Compliance Management Professional (CCP) Level 2 or higher qualification; or
  - (3) Persons who have completed at least one external training course at an outside institution specializing in fair trade.

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## 11. Document Management

- 11.1 All documents generated in the course of performing tasks relating to fair trade-related laws and regulations shall be retained for three years.
- 11.2 Matters not provided for in these Detailed Rules shall be governed by the Company's internal Detailed Rules on Document Management.

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## 12. Risk Assessment

- 12.1 The CP Dedicated Department shall assess, by department, the risk of violating fair trade-related laws and regulations in relation to business operations, and shall minimize the possibility of violations through appropriate controls.

- 12.2 Risk assessments shall be conducted once a year, and risk levels shall be classified into three grades: high, medium and low.
- 12.3 Where a risk is assessed as medium or higher, appropriate control measures shall be devised so that such risk is avoided, mitigated or eliminated.
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### **13. Monitoring and Inspection**

- 13.1 The CP Dedicated Department shall conduct monitoring and inspections in relation to laws and regulations under the jurisdiction of the Korea Fair Trade Commission, such as the Fair Trade Act, the Fair Transactions in Subcontracting Act and the Act on Fair Labeling and Advertising, in order to minimize the possibility of violations of law.
- 13.2 The CP Dedicated Department may perform ongoing fair trade monitoring and inspections in relation to divisions and departments with high risk or poor self-inspection performance.
- 13.3 Departments subject to inspections shall have an obligation to actively cooperate with the monitoring and inspection activities of the CP Dedicated Department.
- 13.4 The CP Dedicated Department shall report the results of monitoring and inspections to the Compliance Officer and then to senior management, and shall take corrective measures with respect to violations of fair trade-related laws and regulations, and may implement system improvements, business procedure improvements and other measures to prevent recurrence.
- 13.5 Persons performing inspections shall have at least two years of experience in fair trade-related work, such as construction management, production management or purchasing.
- 13.6 Staff of the CP Dedicated Department, when conducting monitoring and inspections, shall comply with the following:
- (1) They shall conduct inspections fairly from an independent standpoint;
  - (2) In performing their duties, they shall base their work on objective inspection criteria and on facts and evidence;
  - (3) They shall not, without just cause, disclose or misappropriate the Company's confidential information obtained in the course of their duties;
  - (4) They shall endeavor to minimize the workload of the person or department subject to inspection, and, in principle, shall conduct inspections during working hours unless the inspection subject agrees otherwise;
  - (5) They shall avoid an authoritarian or oppressive attitude during monitoring and inspections, respect the dignity of counterparties, and actively endeavor to identify and disseminate best practices; and
  - (6) They shall provide inspection subjects with a sufficient opportunity to explain themselves.
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## **14. Operation of Whistleblowing System**

- 14.1 The Compliance Officer shall establish a whistleblowing system that allows officers and employees to report actual or potential violations of fair trade-related laws and regulations, and, where necessary, may conduct inspections and investigations into matters reported.
  - 14.2 The whistleblowing system shall allow both identified and anonymous reporting. Anonymous reports shall be kept strictly anonymous.
  - 14.3 The Compliance Officer shall not disclose or divulge a whistleblower's personal information or other identifying details to any third party, and shall take all necessary measures to ensure that the whistleblower suffers no disadvantage as a result of the report.
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## **15. Mediation of Subcontracting Disputes**

- 15.1 The Company shall establish and operate a Dispute Mediation Committee in order to mediate disputes arising in subcontracting transactions, and specific matters shall be decided by the CP Dedicated Department.
  - 15.2 The Dispute Mediation Committee shall conduct mediation procedures in accordance with the following:
    - (1) The Dispute Mediation Committee shall be composed of three or more experts, including the Compliance Officer, who shall serve as chairperson.
    - (2) The Dispute Mediation Committee shall comprehensively review each case through fact-finding and hearing the parties' views and shall notify the parties concerned of its opinion on the dispute, including a proposed mediation recommendation (the "Mediation Recommendation").
    - (3) The department concerned with the dispute shall resolve the dispute through amicable settlement with the claimant in accordance with the Mediation Recommendation and shall share the outcome with the Dispute Mediation Committee and the CP Dedicated Department.
    - (4) Where necessary, the Dispute Mediation Committee shall report the dispute or the Mediation Recommendation to the CEO.
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## **16. Protection of Intellectual Property Rights and Fair Advertising**

- 16.1 Protection of Intellectual Property Rights
  - 16.1.1 The Company shall protect information provided by contractual counterparties and customers.
  - 16.1.2 Where an officer or employee of the Company, after receiving information belonging to the intellectual property rights of contractual counterparties or customers, distributes or discloses such information without authorization and thereby causes substantial damage to such counterparties or customers, the Company shall conduct an investigation and establish measures to prevent recurrence.
- 16.2 Fair Advertising
  - 16.2.1 The Company shall advertise its products and services in compliance with the Act on Fair Labeling and Advertising and, where necessary, shall

request that its partners also comply with such Act.

16.2.2 Where an officer or employee of the Company violates the Act on Fair Labeling and Advertising, the Company shall conduct an investigation and establish measures to prevent recurrence.

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## **17. Disclosure**

The Compliance Officer shall voluntarily disclose the status of operation of the CP internally and externally.

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## **18. Evaluation of Operation**

18.1 The Compliance Officer shall evaluate, at least once a year, whether the CP is functioning effectively, report the results to senior management, and reflect the evaluation results in the operation of the CP.

18.2 The evaluation of operation shall include analysis of the causes of major non-compliance with laws and measures for improvement.

18.3 Evaluators shall be limited to persons engaged in duties in the CP Dedicated Department or persons holding a Compliance Management Professional (CCP) Level 2 or higher qualification, and external experts may be consulted if necessary.

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## **19. Sanctions against Violating Officers and Employees**

19.1 Requests for Disciplinary Measures

19.1.1 Where an officer or employee violates these Detailed Rules or fair trade-related laws and regulations, the head of the department who becomes aware of such violation shall immediately inform the Compliance Officer or the CP Dedicated Department.

19.1.2 Where, in connection with the Company's business, an officer or employee intentionally or by gross negligence violates fair trade-related laws and regulations, the Compliance Officer or the CP Dedicated Department may request that the department in charge of human resources impose disciplinary measures on the violator.

19.2 Principles and Procedures of Disciplinary Measures

19.2.1 Where a violation of fair trade-related laws and regulations is considered minor, the Compliance Officer or the CP Dedicated Department, with the approval of the Compliance Officer, may request that a warning or caution be given to the officer, employee or organization concerned.

19.2.2 Where a violation of fair trade-related laws and regulations is considered serious, the Compliance Officer or the CP Dedicated Department, with the approval of the Compliance Officer, may request that the case be referred to the Personnel Committee, and the Personnel Committee shall notify the Compliance Officer of the results of any disciplinary measures taken in relation to such case.

19.2.3 Details relating to disciplinary measures shall be governed by the Company's Rules of Employment and Personnel Committee Regulations. Where, without just cause, an officer or employee fails to implement corrective measures for violations or fails to comply with requests from the CP Dedicated Department such as special training for violators of laws, the level of disciplinary measures may be increased.

19.2.4 Matters relating to violators of fair trade-related laws and regulations that are not specified in these Detailed Rules shall be governed by the Company's personnel regulations.

### 19.3 Leniency for Self-Reporting and Similar Cases

19.3.1 Disciplinary and corrective measures may be reduced or exempted for persons who fall under any of the following, including current and former officers and employees:

- (1) Persons who voluntarily report the facts of a competition law violation; or
- (2) Persons who cooperate with the Company's investigation and deliberation and resolution (collectively, the "Investigation, etc.") by providing evidence or in other ways.

19.3.2 Where a person described in paragraph 19.3.1 above satisfies all of the following conditions, both disciplinary and corrective measures shall be fully exempted:

- (1) The person is the first to provide, alone, evidence proving the competition law violation;
- (2) At the time of self-reporting or cooperation in the Investigation, etc., the Company has not yet obtained information about the competition law violation or has not yet sufficiently secured evidence proving such violation;
- (3) The person has truthfully stated all facts relating to the competition law violation and submitted relevant materials, and has faithfully cooperated until the Investigation, etc. is completed; and
- (4) The competition law violation has been discontinued.

19.3.3 Reduction or exemption of disciplinary or corrective measures granted under paragraph 19.3.1 above may be cancelled if the person falls under any of the following:

- (1) The person denies in whole or in part, during investigations or legal proceedings by the competition authority, material statements or materials submitted during the Company's Investigation, etc.;
- (2) It is revealed, during investigations or legal proceedings by the competition authority, that statements made or materials submitted during the Company's Investigation, etc. were false;
- (3) Without justifiable reason, the person refuses to testify about the facts of the competition law violation during investigations or legal proceedings by the competition authority;
- (4) Without justifiable reason, the person fails to appear at investigations or legal proceedings conducted by the competition authority; or
- (5) The person files a lawsuit denying the facts self-reported regarding

the competition law violation.

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## 20. Awards to Officers and Employees

20.1 The Compliance Officer may grant awards to the persons falling under any of the following, or recommend to the department in charge of human resources that they be awarded, where they are deemed to have faithfully implemented the CP:

- (1) Departments with excellent CP inspection performance;
- (2) Individuals recognized as excellent performers in the practice of fair trade.

20.2 Criteria for selecting excellent performers in the practice of fair trade shall follow Annex 1 hereto, and the Compliance Officer may apply other criteria at his or her discretion.

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## 21. Miscellaneous

21.1 The Compliance Officer and the CP Dedicated Department shall maintain smooth information exchange and communication with the competition authority, the Korea Fair Trade Commission.

21.2 The Compliance Officer may, in accordance with internal Company procedures, determine detailed matters necessary for implementing the CP.

21.3 These Detailed Rules on the Operation of the Fair Trade Compliance Program may be amended as necessary.

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### Addenda (12 December 2024)

These Detailed Rules shall enter into force on 12 December 2024.

### Addenda (3 February 2025)

These Detailed Rules shall enter into force on 3 February 2025.

### Addenda (19 August 2025)

These Detailed Rules shall enter into force on 19 August 2025.

### Addenda (29 September 2025)

These Detailed Rules shall enter into force on 29 September 2025.

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## [Annex 1] Criteria for Selecting Excellent Fair Trade Practitioners

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Category	Evaluation Factor	Score (points)	Unit	Remarks
Quantitative	Attendance at	20	–	Check

	fair trade training			attendance at various compliance training programs
	Participation in fair trade inspection activities	30	-	Timely and faithful responses to various investigations
	Completion rate of fair trade training by related department (independent unit)	0.3	%	Up to 30 points; verify using departmental training records, etc.
	Prior consultations on fair trade issues	2	Case	Up to 20 points; verify consultation records via legal support system, e-mail, etc.
<b>Qualitative</b>	Where candidates have the same quantitative score, selection shall be made in consideration of the content of the quantitative evaluation, difficulty of work, etc.			final decision by the Compliance Officer
<b>Others</b>	Persons (at department/independent-unit level) who have been subject to sanctions by regulatory authorities for violations of the Fair Trade Act shall be excluded from selection.			-

These Regulations and Detailed Rules, approved by the CEO, take effect on September 25, 2024, in accordance with the Company's Compliance and Ethical Management framework.