



# Code of Conduct



*Everyday Everywhere EcoPro*

## **Preamble**

We at ECOPRO (including our affiliate companies) aim to become an enterprise that creates value for various stakeholders, including customers, shareholders, employees, partners, competitors, our nation, and local communities, based on the management philosophy of “promoting changes and innovation in pursuit of the best”. We, therefore, would like to become a trusted and respected company, that ultimately contributes to the improvement of the quality of human life.

To this end, to establish an ethical corporate culture, by practicing righteous management that thoroughly adheres to the basics and principles, and to promote corporate value through the growth and continuous innovation of management, we enact the following Code of Ethics and commit to practice it as a basis of the behavior and value judgment of all our constituents:

We respect our customers and strive to give them satisfaction and affection.

We faithfully secure profits for our shareholders through transparent and efficient management.

We pursue fair competition and work to establish sound commercial order.

We secure mutual trust and promote common collective development through fair trade with our partners.

We comply with all laws and ethical standards and practice social responsibility through environmental protection and social contribution.

We create an organizational culture of mutual trust and respect and maintain dignity and honor as constituents of ECOPRO.

### **1. Responsibilities and obligations to customers**

We have a clear belief that the mission and purpose of the company is customer satisfaction. We shall always respect customers' opinions, think from their perspectives, and constantly provide them with value by offering only the best products and services, thereby keeping them impressed and satisfied.

#### **1.1. Customer-centered service**

- 1) We shall keep in mind that customers are the source of our company's growth and existence.
- 2) We shall always put our customers first and respect them.
- 3) We shall always think and act from a customer's perspective and seek to collect customers' opinions.

#### **1.2. Fulfilling our promises to customers**

- 1) We shall work to keep our promises to our customers.
- 2) We shall strive for customer satisfaction by actively accepting their opinions and suggestions and addressing their complaints promptly and accurately to minimize losses for our customers.
- 3) We shall constantly seek to earn the customers' trust with sincerity, honesty, and transparency.

### **1.3. Protecting the rights and interests of customers**

- 1) We shall do our utmost to increase the value of assets and protect the rights and interests of our customers by providing excellent products and services.
- 2) We shall actively disclose information that customers need to know.
- 3) If we acquire customer-related information, we shall not disclose it without the consent of the customer.
- 4) We shall not harm the interests of our customers by engaging in immoral acts.

## **2. Responsibilities and obligations to shareholders**

We shall respect the opinions of our shareholders, protect them through rational investment and sound and transparent management activities, maximize corporate value to provide them with stable, long-term profit, and strive to earn their trust.

### **2.1. Responsibility to our shareholders**

- 1) We shall protect the rights of our shareholders and honor their valid requests and suggestions.
- 2) We shall strive to enhance shareholder value by creating sustainable growth and stable profits through rational and sound business activities.

### **2.2. Protecting the interests of shareholders**

- 1) We shall treat all shareholders fairly and strive to ensure that their interests and rights are not unfairly infringed upon by management decision-making.
- 2) We shall strive to protect shareholders' rights and investment value through shareholder-centered management.
- 3) We shall respect the shareholders' right to know, provide necessary information to shareholders in a timely manner, diligently disclose management information to build mutual trust with shareholders and investors, and seek to maximize shareholder profits.
- 4) We shall prepare the company's financial data accurately and transparently according to fair and just standards and publicly disclose it to shareholders and relevant organizations in a timely manner.

### **3. Fair competition and promotion of sound commercial order**

We shall respect the system of the market economy in our business activities, compete fairly with our competitors, build sound commercial order, and pursue mutual development.

#### **3.1. Promotion of fair competition**

1) We shall promote fair and transparent competition according to the principles and order of the market economy, shall not unfairly exploit the weaknesses of our competitors, and shall work to establish fair competition.

2) We shall obtain and use information lawfully according to the laws and common business practices and shall not disclose anything unreasonably to a third party.

3) We shall not slander a competitor or compare our service or product against a competitor without fair grounds while conducting sales activities.

4) We shall not make an improper request to secure business profits or provide money, valuables, entertainment, or convenience to other interested parties beyond the scope permitted by social norms.

### **4. Responsibility and obligations to partner companies**

During transactions with partner companies, we shall comply with the principles of market competition, secure mutual trust through clean and transparent transactions, pursue long-term growth and collective development, and conduct business fairly and rationally.

#### **4.1. Partnership for mutual growth with partner companies**

1) We recognize our partner companies as partners for the generation of collective profits and strive for the establishment of transparent transaction procedures and shared development based on mutual trust.

2) When we engage in transactions with our partner companies, we shall conduct business on equal footing and shall not use our position to force or control a partner company to engage in any unfair act.

3) We shall apply fair standards in selecting a partner company and shall not give preferential treatment to a particular partner company against the interests of the company.

4) During a transaction with a partner company, we shall prepare a contract stating the details of the transaction, contract amount, payment method, schedule, etc., and deliver it to the partner company.

5) We shall not unreasonably refuse or delay the payment of a transaction expense.

6) We shall respect the trade secrets of our partner companies and shall not unfairly infringe on their rights to technologies.

7) We shall require our partner companies to comply with human rights, labor, and environmental laws and international

standards.

#### **4.2. Prohibition of receiving money, valuables, entertainment, and convenience from partner companies and other interested parties**

The specific regulations on receiving money, entertainment, and convenience from an interested party, such as a partner company of an executive officer or employee, as well as the disciplinary measures if the said regulations are breached, shall be according to the Detailed Rules on Enforcing the Code of Conduct.

### **5. Compliance with the law and ethical standards and social responsibility**

We shall comply with all the laws and regulations on corporate activities, faithfully fulfill our obligations, and, as members of the country and local community, practice corporate social responsibility through environmentally friendly management activities and the return of corporate profits to society.

#### **5.1. Compliance with laws in Korea and other countries and social ethics**

- 1) We shall comply with the various laws and regulations in the course of conducting business and shall engage in business reasonably and ethically.
- 2) We shall respect all laws and commercial customs of the countries with whom we engage in business and fulfill our duties as a member of the global community.
- 3) We shall comply with the laws in Korea and other countries related to anti-corruption, anti-money laundering, and prohibition of supporting terrorist groups.

#### **5.2. Social contribution**

- 1) We shall fulfill our responsibilities and obligations as members of society and strive to fulfill the duties and responsibilities set by society.
- 2) We shall encourage active participation in social service or community activities and continue to support them.
- 3) We shall allot a portion of the profits obtained through corporate activities for voluntary social service and social development projects, such as national and local education, culture, welfare, and social projects.

#### **5.3. Environment-friendly management**

- 1) We shall comply with environmental laws and international standards and strive to protect the environment and solve the problem of global warming.

2) We shall continuously engage in environment-friendly management by minimizing emissions of pollutants and greenhouse gases, recycling resources, and using eco-friendly raw materials and renewable energy.

#### **5.4. Building and managing a sustainable supply network**

1) We shall abide by the international standards on the “conflict minerals” and the “responsible minerals” and seek to build a sustainable supply chain.

2) We shall exercise due diligence regarding suppliers to build a reliable mineral supply chain and avoid engaging with risky suppliers that finance conflicts and high-risk areas.

#### **5.5. Prohibition of political involvement**

1) We respect the right to vote, political conscience, and the freedom of expression of our employees and shall not force political views on them.

2) An employee shall not be negligent at work because of their political activities and shall not use the company’s funds, assets, or human resources for political purposes.

### **6. Sound organizational culture and work ethics**

We shall respect all employees, treat them fairly according to their abilities and performance, and create a bright and sound organizational culture by supporting them in fully realizing their creativity.

#### **6.1. Basic work ethics**

1) We shall always perform our duties fairly, honestly, and with pride and self-esteem as constituents of ECOPRO.

2) We shall work amicably with one another based on mutual trust and love and actively work to form a sound, progressive organizational culture.

3) We recognize one another’s dignities and values, do not treat other employees unfairly on the basis of nationality, place of origin, religion, gender, disability, or others, keep courtesy, and respect one another’s personalities.

4) We shall be as tolerant as possible of any error or mistake that might occur in our work despite our best efforts.

5) Without prior approval from the company, we shall not hold a position or engage in work other than the position or the work of the company. We shall not pursue private interests while infringing on the interests of the company.

6) We shall not trade ECOPRO’s stock, etc., directly or through a third party using undisclosed material information.

7) If an employee gives a lecture somewhere other than the premises of the company, contributes writing, or publishes a book in relation to the company’s business, the employee shall obtain prior approval from the company and take measures so as not

to create a conflict of interest with the company.

## **6.2. Sound work environment and creating an organizational culture**

1) To create a bright and healthy work environment and engage in work with mutual trust and a sense of community among employees, we shall refrain from the following acts.

- Language and behavior, such as profanity, that causes discomfort.
- Language and behavior that causes sexual humiliation or disgust.
- Acts of bullying other employees using one's position at the workplace.
- Acts of making unreasonable requests or granting favors to an employee or putting an employee in a disadvantageous position when they do not comply with unreasonable requests, etc.
- Provision or receipt of loans or guaranteeing of loans between employees.
- Acts of drinking on or bringing dangerous objects such as guns, swords, narcotic substances, and explosives into the company premises.

2) We systematically establish and actively support the various systems and policies of talent development necessary to enhance the capabilities of our employees.

3) We grant equal opportunities according to the individual abilities and qualifications of employees. We do not discriminate based on nationality, place of origin, academic affiliation, family relationship, religion, age, gender, status of marriage, disability, political views, social status, etc., and we do not discriminate against employees who are pregnant or giving birth.

4) We formulate reasonable criteria to fairly evaluate the performance of our employees and reward their achievements.

5) We care for the health of our employees and provide them with safe working environments.

6) A senior officer shall not give instructions that violate laws or internal regulations or hinder the fair performance of duties, and a subordinate shall respect their senior officer and actively follow reasonable instructions. A subordinate employee is entitled to reject illegal or unreasonable instructions from their senior officer and shall request the senior officer to withdraw or change illegal or unreasonable instructions. If the senior officer's illegal or unreasonable instructions persist, however, the subordinate employee shall make a report to one or more of the following: a senior officer whose rank is immediately above that of the senior officer who issued the instructions, the department in charge of ethical management, the Audit Department, or the Compliance Committee. The person who receives such a report shall take appropriate measures against the illegal or unreasonable instructions.

7) The specific restrictions on receiving gifts, money, and other valuables among employees and the procedure of report thereof shall be according to the Detailed Rules on Enforcing the Code of Conduct.

### **6.3. Protecting intellectual property, trade secrets, and personal information**

1) An employee shall take special care to properly execute security measures so the company's technology, intellectual property, trade secrets, and other important information are not disclosed to a third party without authorization.

2) An employee shall obtain prior approval from the company if the employee is to disclose confidential information, such as trade secrets, to a third party.

3) An employee shall cooperate with the company's policies and measures to protect trade secrets, etc., during their period of employment. If an employee terminates their employment with the company, the employee shall write a confidentiality agreement and return all objects provided by the company as well as the information the employee possesses and retains related to their work.

4) An employee shall respect the patents, trademarks, copyrights, and other rights of a third party and shall not infringe or use them without permission.

5) An employee shall work to protect the personal information of our customers and other employees. Personal information shall be collected and used only for valid business purposes and shall not be disclosed to a third party without consent.

## **Supplementary Rules**

### **1. Department in charge of the Code of Conduct**

This Code of Conduct shall be administered by the Compliance Department as the department in charge of ethical management, and its final enactment, amendment, and repeal shall be approved by the CEO.

### **2. How to report a breach of the Code of Conduct**

1) An employee is obliged to actively report to the department in charge of ethical management or the Audit Department if the employee commits an act that is potentially unethical or in breach of this Code of Conduct or if the employee becomes aware of another person's violation.

2) To regularly monitor the practice of ethical management, a report system may be operated on the home page and internal portal of the company at all times.

3) Matters related to the operation of the report system shall be according to the Regulations on the Whistleblowing System Operation and Whistleblower Protection.

### **3. Rewards and disciplinary measures**

For employees who comply with the Code of Conduct and contribute to the practice of ethical management, the company shall

consider such compliance in the performance evaluation of employees and reward them, and employees who are in breach of the Code of Conduct shall be subject to disciplinary measures according to the relevant regulations and procedures of the company.

**4. Basis of interpretation**

In relation to the company’s ethical management activities, if the Code of Conduct does not prescribe a specific matter or if there is a dispute in interpretation, the interpretation and decision of the department in charge of ethical management shall be followed.

**5. Pledge**

1) All executive officers and employees shall receive work ethic training at least once a year and write and submit a letter of Commitment to Comply with the Code of Conduct of Employees.

2) The department in charge of ethical management may accommodate in the Compliance Management Commitment document the obligations of the Code of Conduct in relation to the employees’ work ethics. It may permit an employee to submit the Compliance Management Commitment in lieu of the Commitment to Comply with the Code of Conduct of Employees.

**6. Official documents**

The company may request cooperation from partner companies with whom the company engages in continuous transactions and shall send them an official letter at least once a year to request them to practice ethical management.

**7. Record and preservation**

Name of record	Maximum period of preservation
Commitment to Comply with the Code of Conduct	Three years