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| <b>Last revision date</b>   | September 2024                                   |
| <b>Department in charge</b> | Legal Team                                       |
| <b>Approver</b>             | Head of Compliance Department                    |

# Anti-Corruption Policy

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## 1. Responsibility for Preventing Corruption

DAESANG practices ethical management as our top priority in order to actively realize our management philosophy of respect for humanity, customer satisfaction, and social contribution, and manages faithfully to the basics and principles with a responsible attitude towards society and the company through principled management. Accordingly, this policy has been established to form an ethical corporate culture among employees and executives and to serve as a standard for behavior to prevent corruption.

The responsibility for implementing the ethical corporate culture and preventing corruption in this policy applies to all employees and executives of DAESANG. Furthermore, DAESANG may request all stakeholders, including customers, shareholders, employees and executives, partners, and society, who are directly or indirectly related to the business, products, and services, to take measures for establishing an ethical corporate culture. DAESANG intends to implement the spirit of ethical and principled management by establishing the following anti-corruption goals, basic principles, and processes to implement them.

## 2. Achieving Anti-Corruption Goals

DAESANG aims to practice ethical corporate culture, strictly comply with relevant laws and internal regulations, and act in accordance with social ethics. In order to prevent corruption through the practice of ethical management and compliance with principled management, all employees and executives sign a pledge of practice that clearly states the core elements of ethical management every year, and the Legal Team, as a dedicated organization, inspects this and conducts anti-corruption training for all employees and executives. In addition, the Audit Committee periodically manages and supervises anti-corruption activities, and we operate Management Improvement Office directly under the CEO to assist this.

DAESANG has set the following anti-corruption goals and implements detailed plans to achieve each goal through the responsible departments in charge of each goal. Every year, the ESG Planning Team, Legal Team, Management Improvement Office, and other responsible departments review the status of each goal achievement and reset the goals.

### 1) General

- ① Percentage of employees and executives who received anti-corruption training
  - Mid- to long-term goal of 100% implementation by 2025
- ② Percentage of workplaces where regular internal audits are conducted for compliance with ethical management
  - Mid- to long-term goal of 100% by 2025

2) Prohibition of corruption, bribery and conflict of interest

- ① Number of reported cases of corruption (based on criminal punishment)
  - Mid- to long-term goal of 0 case by 2025

### 3. DAESANG Anti-Corruption Principles

DAESANG, as a member of society, recognizes that compliance with social norms such as laws, ethics, and company rules is essential for corporate activities and the minimum social responsibility expected of a company. This policy expresses this responsibility based on the management philosophy of DAESANG and supplements the Code of Ethics and Practical Guideline for Ethical Management and compliance management system of DAESANG.

1) Definition of terms

- 'Money or valuables' refers to various tangible and intangible benefits, including but not limited to the following:
  - Any property interests, including money, securities, real estate, goods, accommodation vouchers, memberships, admission tickets, discount coupons, invitations, tickets, and the right to use real estate, etc.;
  - Providing hospitality and entertainment such as food, alcohol, golf, etc., or convenience such as transportation and accommodation;
  - Other tangible and intangible economic benefits such as debt relief, job provision, and granting of interests.
- 'Public servant, etc.' refers to a person who falls under any of the following:
  - Employees and executives of the National Assembly, courts, Constitutional Court, National Election Commission, Board of Audit and Inspection, National Human Rights Commission, central administrative agencies (including agencies under the President and agencies under the Prime Minister) and their affiliated agencies, and local governments;
  - Employees and executives of government-owned or controlled businesses (public corporations, public institutions, etc.);
  - Political civil servants and candidates for public office;
  - Staff and executives of political parties;
  - Employees and executives of international organizations such as the World Bank and the United Nations;
  - A person performing public duties on behalf of the above person;
  - A person defined as a public official or a person equivalent to a public official according to the Anti-Bribery Act and other laws.

- 'Partner' refers to any individual or legal entity that has a business relationship with the Company, including agents, brokers, subcontractors, suppliers, and clients.
  - 'Third party agent' refers to an individual or legal entity that acts on behalf of the Company, such as an agent, consultant, or professional advisor (e.g. legal or tax advisor).
- 2) Prohibition of improper solicitation and receipt of money or valuables
- All employees and executives of DAESANG shall not solicit or receive solicitations in violation of the law for illicit gains, such as unfairly providing business opportunities or benefits to a specific person or company.
  - Employees and executives shall not provide, promise, suggest, or endorse (hereinafter referred to as 'provide') money or other benefits beyond the socially acceptable range to stakeholders in relation to the company's business. Additionally, they shall not receive money or other benefits from business stakeholders. Especially, no money or valuables shall be offered or received for the purpose of illegal solicitation.
  - Employees and executives must not provide money or valuables, including so-called facilitation payments, to public officials or others to obtain illicit benefits.
  - Even among employees and executives, excessive amounts of money or valuables shall not be offered or received.
  - Employees and executives must not engage in any illegal fund operations that involve fraud, money laundering, or other crimes, and conceal the source and purpose of funds.
  - DAESANG may require our partners and third-party agents to comply with this policy.
- 3) Prohibition of conflict of interest
- Employees and executives shall endeavor to avoid any actions or relationships that conflict with the interests of the company, and in the event of a conflict of interest between the company and an individual or department, they shall give priority to the interests of the company and act accordingly.
  - The employees and executives shall not use the position and authority granted to them by DAESANG or internal or non-public information acquired in the course of work to pursue personal gain or engage in unfair trade practices.
  - Employees and executives shall not trade stocks using inside information or non-public information obtained in the course of work.
  - Employees and executives shall not disclose confidential information of DAESANG to outside parties or provide it to third parties without the approval of DAESANG.
  - Employees and executives shall use the company's assets and facilities for business purposes only, and not use, make revenue, or cash out for private purpose.

- 4) Donations and sponsorships
  - DAESANG strictly complies with Article 31 of the Political Funds Act<sup>1</sup>, which prohibits political donations by corporations or organizations, and does not provide any lobbying, political funds, or election funds.
  - Charitable donations and sponsorships are promoted fairly in accordance with internal enforcement standards and procedures.
  
- 5) Appropriate accounting practices, record-keeping and monitoring
  - In order to prevent accounting fraud, DAESANG complies with domestic and international standards such as relevant laws and regulations, internal rules and social ethics, Korean International Financial Reporting Standards(K-IFRS), and this policy, and keeps accurate records of accounting books based on facts.
  - DAESANG has established an internal accounting management system in place to conduct self-inspections and regularly conduct audits on the appropriate accounting bookkeeping and storage conditions. We also regularly review the internal accounting management system and our compliance procedures, revising and improving them as necessary.

#### **4. Fulfilling Responsibilities for Anti-Corruption and Ethical Corporate Culture**

DAESANG operates systems to prevent corruption and realize an ethical corporate culture, including the compliance management system. Through this, DAESANG will comply with laws and regulations and continuously consult with relevant external stakeholders to prevent the occurrence of current or potential risks.

- 1) Compliance management system
  - The company operates a compliance management system to prevent all employees and executives from being exposed to the risk of compliance violations, and establishes the following to consolidate the compliance management system.
    - Consolidate compliance management system to ensure compliance with company-

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<sup>1</sup> Political Funds Act [Enforcement Date 2024.1.2.] [Law No. 19923, 2024.1.2., Partial revision] Article 31 (Restrictions on donations) ① Foreigners, domestic and foreign corporations or organizations may not donate political funds. ② No person may donate political funds with funds related to domestic and foreign corporations or organizations.

related regulations

- Establish a Chief Compliance Officer and dedicated organization, and establish compliance systems and regulations.
- Regularly evaluate compliance risks and operate control activities appropriate to each risk.
- Report the performance of compliance activities to the CEO and other executives. The report may include information on overall compliance activities, including the compliance management system, major internal and external compliance issues, plans and results of compliance activities, reporting and investigation procedures, and areas for improvement.

## 2) Anti-corruption training

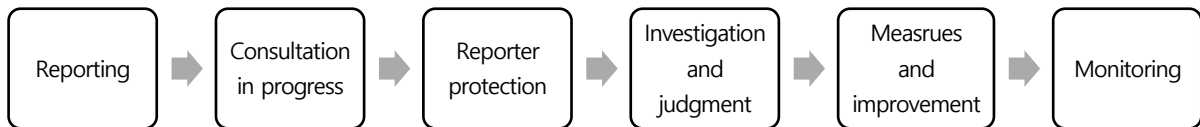
DAESANG provides anti-corruption training to employees and executives in order to create an ethical corporate culture and ensure that this policy is effectively implemented.

## 3) Corruption reporting process

- DAESANG consolidates a system to promptly consult through reporting channels and, if necessary, report to the CEO in the event that there is a suspicion of corruption, such as violation of domestic or international anti-corruption standards or this policy by employees, executives, partners, or agents of DAESANG, and establish fair procedures to protect both the reporter and the reported party.
- ShinMunGo system: To strengthen compliance with the Code of Ethics, prevent corruption and irregularities among employees and executives, prevent unfair practices with partners, and serve as a communication channel towards executives, all stakeholders including employees, executives, customers, and partners can report through the ShinMunGo system if they discover corruption or are concerned about the occurrence of corruption.  
URL: <https://www.daesang.com/kr/esg/governance/write.jsp>
- Hotline system: DAESANG also has a direct line to the Management Improvement Office. Anyone can report and provide suggestions for improvement to the company.
- Whistleblower protection policy: DAESANG operates a whistleblower protection program to ensure that whistleblowers can report with confidence without suffering any disadvantages. The reporter and the report content are thoroughly protected by a safe and secure security system, and the processing of reports is carried out by a limited number of people who have pledged to strictly keep the report content confidential.

## 4) Grievance handling process

- DAESANG operates a separate reporting channel to promptly and safely handle grievances from employees, executives and stakeholders.
- When a report is received, the Management & Safety Headquarters Grievance Handling Center promptly implements relief procedures in accordance with internal regulations. From the investigation of the damage to the conclusion, we prioritize victim protection, and when necessary, we cooperate with external experts to ensure fairness and transparency in handling.



[Appendix]

1. Document Summary

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|----------------------|--|---------------|--|
| Document No.         | Policy- 02-00- Anti-Corruption Policy_ 202409_01 |               |  |
| Date of enactment    | June 2022  |               |  |
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|                      | 2  | Oct. 2022     | Policy name change to Ethical Management Policy<br>Establishment of ethical management goals   |
|                      | 3  | Sept. 2024    | Policy name change to Anti-Corruption Policy<br>Addition of definition of terms related to the anti-corruption principles<br>Addition of provisions on donations and sponsorships<br>Addition of provisions on reporting procedures for corruption and grievance handling procedures |
| Department in charge | Legal Team                                       |               |  |