

Code of Ethics

(Rev. 05)

DY Deokyang CO., LTD.

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Ethical Management Charter

DY Deokyang aims to be a global company that contributes to the dreams of human society by creating a new future through creative thinking and endless challenges. The practice of ethical management is the foundation for this, and DY Deokyang must comply with this ethics charter to become a trustworthy partner for various stakeholders and increase customer value.

The scope of application of the Code of Ethics is all of DY Deokyang's current and former executives and employees (including executives, employees, and non-regular workers), and DY Deokyang's executives and employees shall act in accordance with this Code of Ethics when dealing with external stakeholders whose rights and interests are affected by the actions or decisions of executives and employees related to work. DY Deokyang's executives and employees shall perform their work in accordance with this Code of Ethics while complying with laws and regulations. Furthermore, they shall encourage all stakeholders who have business relationships with the company to respect this Code of Ethics.

First, We conduct business with honesty and fairness based on high ethical values, and take the lead in preventing corruption and creating a clean corporate culture.

First, We always think and act from the customer's perspective, and provide high-quality services that meet the customer's needs and expectations in a timely manner, thereby providing joy and comfort to the customer.

First, We pursue common development with all stakeholders by building mutual trust and cooperative relationships in ethical management.

First, We respect each member as an independent individual, and to this end, we provide fair working conditions and focus on improving the health and quality of life of our employees.

First, We comply with all domestic and international laws and regulations and fulfill our responsibilities and obligations to ensure that our country and society are sound, prosperous, and further developed.

First, We respect life and strive to prevent safety accidents and environmental pollution in order to create a clean natural environment, and we support the Science Based Targets Initiative (SBTi) activities.

Code of Ethics Implementation Guidelines

Chapter 1 Basic Company Ethics

1. Based on a culture of respect for humanity, pursue mutual trust and cooperation with customers, shareholders, employees, competitors, partners, local communities, countries, and the international community to achieve common prosperity.
2. By managing the company based on ethical values, comply with the laws and practices of local, national, and international societies.
3. Establish a fair trading order based on honesty and trust, and compete with the best quality and technology.

I . Responsibilities and Obligations to Customers

Always strive to find the value that our customers need, recognizing that our customers' development is our development.

- 1) Provide the highest quality products and services and do our best in technological development and quality improvement.
- 2) Always respect the customer's opinion and protect the customer's property and reputation.
- 3) Treat customers with sincerity and kindness.
- 4) Provide customers with accurate and useful information related to products and services to help them make sound decisions, and do not provide false or exaggerated information.
- 5) In order to protect customers' personal information, comply with relevant laws and regulations and do not engage in any acts that may illegally infringe on customers' personal information.
- 6) Take necessary measures to ensure that no customer is unfairly restricted from using products and services due to gender, age, disability, language, etc.

II. Fair competition and trade

Respect the market economic order worldwide in accordance with the principles of free competition and secure customer trust through the quality of our products and services.

- 1) All transactions are conducted fairly on equal footing, and sufficient consultation is conducted on transaction terms and procedures.
- 2) Respect the legitimate rights of competitors and use competitive relationships as an opportunity for mutual development.
- 3) Actively support our business partners to become more competitive through technical

support and management guidance, and we share the profits created through innovation with each other.

- 4) Provide all partners with fair opportunities in accordance with the company's established principles and procedures. Furthermore, do not exert influence or attempt to exert influence to favor or disadvantage a specific partner without just cause during selection.
- 5) Do not use counterfeit parts in procured raw materials, intermediate goods, or products.
- 6) Do not obtain information through unfair means from competitors, partners, or other organizations, and do not use or disclose information obtained unfairly by the company or a third party.
- 7) Do not engage in any acts related to money laundering of customers, partners, affiliates, other organizations, or individuals.
- 8) Protect the trade secrets of partners in a contractual relationship and do not infringe on the intellectual property rights of third parties or other persons.
- 9) In order to process tax affairs transparently and fairly, we comply with the tax laws of each country where our business is located and do not evade our legitimate tax payment obligations.
- 10) All business activities, both domestically and internationally, are conducted in compliance with the relevant country's laws and regulations and in respect of business customs.
- 11) All transactions are conducted fairly and on equal footing, and sufficient consultation is conducted on transaction terms and procedures.
- 12) Work with our partners to foster a clean business environment and maintain fair trade practices.

III. Responsibilities and Obligations to Executives and Employees

Executives and employees shall have pride and self-esteem, always maintain an honest and fair attitude, and strive to maintain personal dignity and honor with high ethical values.

- 1) Executives and employees must comply with laws and regulations and company regulations, and must not damage the company's reputation through personal unfair conduct that is socially unacceptable.
- 2) Do not engage in any behavior that may undermine the healthy organizational atmosphere, such as verbal abuse/assault, sexual harassment/sexual assault, bullying through social media or online media, antisocial language, or ostracism.
- 3) Executives and employees within the company shall not engage in excessive financial lending or conduct that goes against social norms or that may affect the performance of their duties or damage the reputation of the company through a disorderly personal life.
- 4) Do not engage in ostentatious acts such as exchanging wreaths or gifts or excessive internal protocols for promotions or transfers between executives and employees within the company.

- 5) The company's confidential information is kept secure, and any external disclosure of company information requires prior approval from the company and is disclosed only to authorized persons.
- 6) Do not discriminate based on gender, academic background, religion, etc., and we treat people fairly based on their abilities and contributions.
- 7) Comply with the labor laws of the countries where our business is located, prohibit child labor and forced labor within our business, and listen to the voices of our employees and strive to resolve their grievances.
- 8) Actively take necessary measures to ensure the safety of our employees and maintain a safe working environment free from occupational accidents, injuries, disasters, diseases, and infectious diseases.

IV. Responsibilities and Obligations to the Community and the Nation

As a member of the community that makes up the local community, respect traditions and culture.

- 1) Strengthen ties with local residents and actively participate in community service activities.
- 2) Contributes to employment promotion and economic and cultural development in the local community.

As a producer in the national society, fulfill our assigned duties with a sense of responsibility and pride in being the foundation of national economic development.

- 1) Enrich the lives of the people by creating jobs and providing quality products and services.
- 2) Take the lead in voluntary service to society, such as community service, disaster relief, and social enlightenment.

V. Responsibilities and Obligations to Shareholders

Do our best to respect shareholders' opinions and maximize shareholder value.

- 1) Put the interests of our shareholders, who are the owners and biggest supporters of the company, first and foremost, and always listen to their voices.
- 2) Pursue asset soundness and profit maximization through rational management focused on substance, thereby providing long-term, stable profits to shareholders.

VI. Respect for international trade practices

As an international company in the age of globalization, fulfill faithfully our obligations as a good company in the international market as we do in our own country.

- 1) Respect international laws and international trade practices within the scope of global ethical principles.
- 2) Respect local culture and customs, and maintain etiquette and dignity as an international citizen.

- 3) Respect practices regarding export-restricted items under international law.

Chapter 2 Basic Ethics for Executives and Employees

I. Basic attitude of executives and employees

All executives and employees have pride and self-esteem as DY people, always maintain an honest and fair attitude, and always strive to maintain personal dignity and honor with high ethical values.

- 1) All executives and employees have pride and self-esteem as members of the company and always maintain an honest and fair attitude.
- 2) All executives and employees of the company have high ethical standards and always strive to maintain their personal dignity and the company's reputation.
- 3) All executives and employees of the company shall comply with the following when engaging in any actions that may affect the performance of the company's duties.
 - (1) Act in accordance with the law, company regulations, and one's own conscience.
 - (2) Perform duties honestly and fairly, and do not engage in any unethical conduct that may be criticized by society in relation to duties.
 - (3) Do not receive, provide, or promise to provide any form of illegal or unethical benefit or bribe, whether monetary or non-monetary, from stakeholders.
 - (4) Improper requests between officers and employees and stakeholders or between internal officers and employees are prohibited.
 - (5) Do not leak confidential information, knowledge, or information obtained directly or indirectly through the performance of duties, or use them to pursue personal interests.
 - (6) Do not create or report documents based on manipulated content such as concealed, minimized, exaggerated, or false content, or share them with internal or external stakeholders.
 - (7) Employees must fulfill their individual responsibilities while performing the company's work regardless of time or place, and must use the company's assets and facilities only for work purposes.

II. Fair performance of duties

All executives and employees shall perform all duties honestly and fairly, always strive to create a sound corporate culture, and refrain from seeking any form of financial gain that may compromise fairness in relation to their duties.

- 1) Honest performance of duties
 - (1) Do not manipulate the coefficients of documents by using information or figures that are different from the facts, such as company performance related to business production, sales, bid-related data, or external market-related data.

- (2) Do not arbitrarily modify or discard company documents, or conceal, delete or discard related supporting materials such as bid documents.
 - (3) Do not report dishonest information to company management or superiors, or directly or indirectly manipulate information with the purpose of misleading recipients, such as making false reports.
 - (4) Do not omit or delay reporting or conceal facts.
- 2) Provision of money, gifts or hospitality / entertainment
- All executives and employees of the company shall not provide slush funds, bribes, or other money, gifts, or entertainment/hospitality to colleagues, customers, suppliers, etc. of the company in relation to the performance of their duties.
- 3) Receiving money, gifts or hospitality / entertainment
- (1) All executives and employees of the Company shall not request or accept any slush funds, rebates, bribes, or other monetary benefits that may compromise the fairness of judgment from colleagues, customers, or suppliers, nor any unfair transactions such as illicit acquisition of shares, joint investments, or acquisition of joint property, nor any gifts, entertainment, or hospitality. Furthermore, if an employee unknowingly receives a gift, money, or other benefits, they must immediately report it to the Committee and accept or return the gift as determined by the Committee.
 - (2) If an executive or employee of the company receives or discovers an offer of money, gifts, or entertainment/hospitality from a colleague, customer, or supplier of the company, he or she must report it to the Ethics Management Committee, and must fulfill the duty of care as a good manager in performing the duties that are naturally required of him or her in his or her position and must not engage in any act that causes loss to the company or damages its reputation.
- 4) Prohibition of discrimination
- (1) All executives and employees of the company shall not discriminate against colleagues, customers, or suppliers on grounds of blood ties, regional ties, school ties, gender, religion, etc.
 - (2) Employees who have been discriminated against or who have witnessed or discovered discrimination must report it to the Ethics Management Committee.

III. Conflict of Interest

- 1) Company interests and individual honor
- All executives and employees of the company must avoid any transactional activity that conflicts with the interests of the company and their personal interests when performing their duties for the company, and in such cases, they must give priority to the interests of the company and customers within the legal scope.
- 2) Use of confidential information

- (1) All executives and employees of the company shall not trade any securities or other property interests, including stocks, using non-public information about the company, customers, or suppliers acquired during their employment at the company.
 - (2) All executives and employees of the company shall not disclose confidential information to third parties, nor shall they advise on or influence the purchase or sale of securities or other property rights, including stock transactions, of third parties.
- 3) Prohibition on holding concurrent positions as an employee of another company or investing in stocks, etc.
- (1) The Company's former officers and employees may not assume positions as officers and employees of competitors, customers, or suppliers, or maintain consulting or other business relationships that may influence their independent judgment related to their duties or hinder the smooth performance of their duties, and may not invest in such competitors, customers, or suppliers (except in cases of acquisition of stocks of legitimate competitors or customer companies on the stock market).
 - (2) However, this does not apply if prior approval from the Ethics Management Committee has been obtained.
- 4) Prohibition of transactions with interested parties
- (1) In the course of performing their duties for the company, all executives and employees of the company shall not enter into a contract for the provision of supplies or services, etc. with the company in the name of themselves, their family members, relatives, or other interested parties.
 - (2) However, this does not apply if prior approval from the Ethics Management Committee has been obtained. Even in this case, the transaction terms must be the same as those of other suppliers or vendors.

IV. Maintaining security

- 1) All executives and employees of the company shall keep confidential and manage any information, plans, data, etc. regarding the company's business/finance/personnel or technology that is not publicly disclosed (including information obtained from other companies due to employment at the company), and shall never leak or disclose such information to third parties without prior permission or approval in accordance with the company's stated policies and procedures.
- 2) All executives and employees of the company shall not possess the original or copy of the above information, plans, data, etc. even when they leave the company, and shall permanently keep the contents of such information, plans, data, etc. confidential even after leaving the company.

V. Pledge and Education

In order to put this Code of Ethics and Code of Ethics into practice, company's executives and employees must write and submit a pledge to comply with the Code of Ethics and Code of Ethics (Appendix 1) upon joining the company and once a year on a regular basis, and complete training on the Code of Ethics at least once a year.

Chapter 3 Ethics Management Committee

I. Characteristics and composition of the ethics management committee

- 1) The Ethics Management Committee means a permanent consultative body within the company that exists to ensure compliance with the company's code of ethics and ethical regulations and to establish proper values for the company and its employees.
- 2) The Ethics Management Committee is composed of the president, each division's head, and the head of the human resources team, with the president as the chairperson and the head of the human resources team as the secretary.

II. Role of the Ethics Management Committee

- 1) The Ethics Management Committee may investigate violations of the Code of Ethics by officers or employees upon report by officers or employees or at its own discretion, and may decide whether to refer the officer or employee in question to the disciplinary committee based on the results of such investigation.
- 2) When an officer or employee applies for prior approval for concurrent employment with another company, investment in stocks, etc., or transactions with stakeholders in accordance with the relevant provisions of these Code of Ethics, the Ethics Management Committee shall decide whether or not to grant approval and notify the officer or employee in question.

III. Procedures for handling violations of regulations

- 1) Reporting violations of ethics regulations
If any employee of the company commits or witnesses any violation of this Code of Ethics, he/she must report it to the head of the Human Resources Team, who is the secretary of the Ethics Management Committee, in accordance with the reporting management procedures, and the reporter must take necessary measures to protect the reporter's safety and prevent unreasonable treatment, discrimination, or retaliation. However, if a serious matter that is difficult to report to the secretary occurs, the report must be made using the CEO's hotline.
- 2) Consideration of convening a committee
The Ethics Management Committee Secretary reviews whether or not the received matters

require deliberation by the Ethics Management Committee and reports to the Chairperson. However, for matters received through the hotline, the Chairperson directly orders an investigation into the matter and considers whether or not to convene the Committee.

3) Convening the committee

The secretary of the Ethics Management Committee shall notify the Ethics Management Committee members and the subject of the deliberation of the reasons for the deliberation, date and time, location, and other necessary matters to the Ethics Management Committee members and the subject of the deliberation at least 7 days prior to the holding of the Ethics Management Committee.

4) Committee deliberation

The subject of the review must appear before the Ethics Management Committee, respond to the committee's questions, and may explain the reasons for his or her review.

5) Decision to refer to disciplinary committee

The decision to refer a subject of investigation to the disciplinary committee is decided by a majority vote of the committee members, including the chairperson, and the decision on whether to convene the disciplinary committee is made based on the results of the vote.

6) Standards of Discipline

In the event of a violation of this Code of Ethics, the disciplinary standards for this will be applied in principle as per (Appendix Table 1). However, if the disciplinary standards are unclear, they will be applied in accordance with the reward and punishment provisions of our company's employment regulations and the company's personnel committee regulations.

IV. Resolution of the Ethics Management Committee

The Ethics Management Committee shall decide whether to refer an employee to the disciplinary committee or approve an application for approval with the attendance of a majority of all members and the agreement of a majority of the members present.

V. Processing period

The case must be processed within 30 days from the date of recognition or report. However, if the period is extended due to the need for additional investigation and confirmation of the case, the reason for the extension must be explained to the reporter and the period may be extended once for up to 30 days.

Supplementary provisions

REV0. This Code of Ethics and Code of Ethics shall be enacted and implemented from January 1, 2002.

REV1. This Code of Ethics and Code of Ethics shall be revised and implemented from January 1, 2007.

REV2. This Code of Ethics and Code of Ethics shall be revised and implemented from January 1, 2015.

REV3. This Code of Ethics and Code of Ethics shall be revised and implemented from April 1, 2024.

REV4. This Code of Ethics and Code of Ethics shall be revised and implemented from May 1, 2025.

REV5. This Code of Ethics and Code of Ethics shall be revised and implemented from December 1, 2025.

(Appendix Table 1.) Disciplinary standards for violations

Div.	Reason for violation	Disciplinary Criteria		
		1 Time	2 Times	3 Times
Accepting bribes	<ul style="list-style-type: none"> - Accepting cash, checks, and securities - Receipt of gift certificates, memberships (golf, health, etc.), airline tickets, etc. - When visiting a partner company, collect fuel vouchers and transportation fees - Receiving items worth more than 30,000 KRW for promotions, transfers, holidays, etc. - Receiving money or goods (products) in connection with the event as sponsorship 	Warning	Salary Reduction	Demotion or Dismissal
Hospitality and Cost Transfer	<ul style="list-style-type: none"> - Receiving entertainment or excessive discount benefits - Acts of making monetary bets (golf, gambling, poker, etc.) - Request for handling of public and private expenses during business trips - Request for processing of expenses incurred after a company dinner 	↑	↑	↑
Dining reception	<ul style="list-style-type: none"> - In case of receiving excessive dining treatment according to social norms 	Warning	Reprimand	Salary Reduction
Request	<ul style="list-style-type: none"> - When requesting or pressuring - When requesting a personal favor (selling products, signing up for insurance, selling various discount coupons, etc.) 	↑	↑	↑
Job performance	<ul style="list-style-type: none"> - When intentionally delay work and induce compensation from stakeholders or obstruct work - When an outsider damages the company's image by engaging in rude behavior during a visit - When talking to an outsider, create a sense of pressure by being directive and coercive. - In case of violation of the anti-retaliation guidelines 	↑	↑	↑
Etc.	<ul style="list-style-type: none"> - If the image of the company is damaged by unethical behavior not mentioned above. 	↑	↑	↑

Caution) The subject of disciplinary action is a person who has received specific benefits or advantages from a stakeholder.

Code of Ethics and Ethics Compliance Pledge

Dear CEO of DY Deokyang Co., Ltd.

I pledge to comply with the following in performing my duties:

1. I will respect my members, pursue mutual growth with our partners through fair trade, and compete fairly with our competitors to honestly provide the best value to our customers. I will also fulfill my responsibilities and obligations to shareholders and society.
2. I will fulfill my responsibilities and obligations to establish and practice a culture of ethical management within the organization.
3. I understand that ignorance of regulations does not exempt me from liability in performing my duties. I will familiarize myself with internal regulations and comply with compliance obligations, including the Monopoly Regulation and Fair Trade Act, and will not engage in any unfair or unlawful acts that violate these regulations.
4. If, during the course of my work, I receive suggestions of unfair trade practices, corruption, or irregularities by company employees, I will immediately report them to the company.
5. I will submit all materials requested by the company during investigations into violations of the Code of Ethics or compliance, consent to the company's review and use of such materials, and fully comply with all obligations of cooperation.
6. I will assume all liability arising from any violation of this pledge.

Date :

Affiliation :

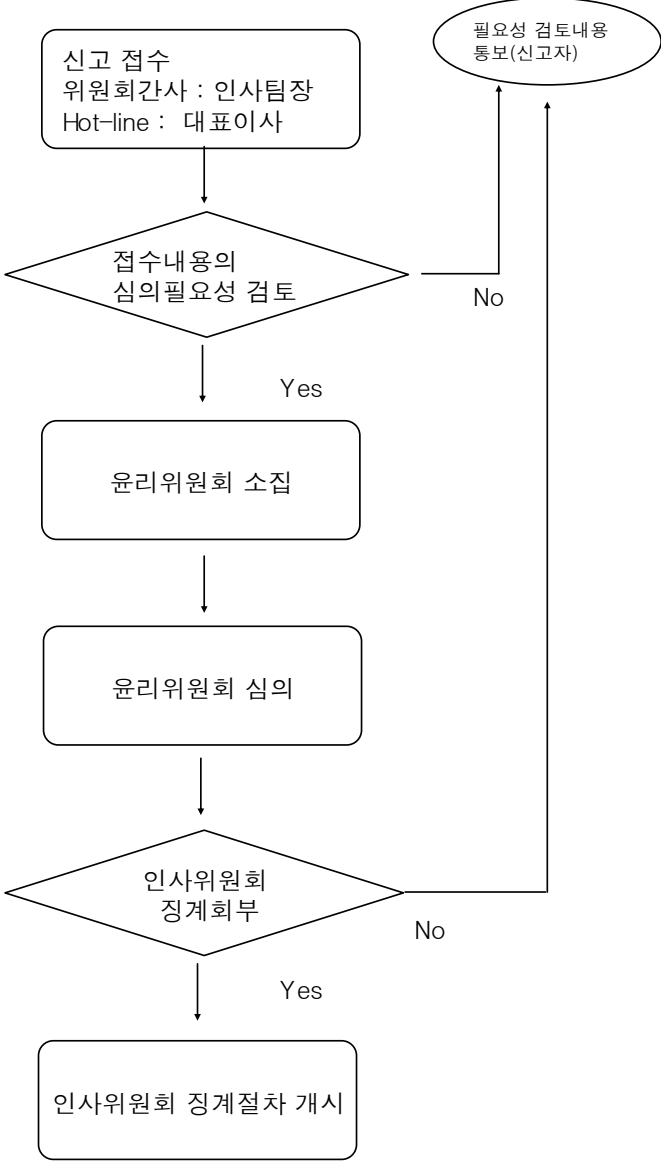
Employee Number :

Name : *(Signature)*

(Appendix 2)

Report of receipt of money or valuables				
No.		Date of receipt		Date of Process
Reporter	Name		Birth Date	
	Affiliation		Position (Rank)	
A person Who Provided Money or Goods	Name		Contact	
	Affiliation		Address	
	In the case of corporations, organizations, etc.	Name		
		Location		
Name of President				
Become How to Acquaint with The Provider				
The Circumstance				
Detail	Date			
	Location			
	Value			
Evidence				
Reamrt				
I hereby report the above facts.				
Date :				
Reporter (Signature)				

Procedures for handling violations of the Code of Ethics

Flow Chart	Remark
 <pre> graph TD A[신고 접수 위원회간사 : 인사팀장 Hot-line : 대표이사] --> B{접수내용의 심의필요성 검토} B -- No --> C(필요성 검토내용 통보(신고자)) B -- Yes --> D[윤리위원회 소집] D --> E[윤리위원회 심의] E --> F{인사위원회 징계회부} F -- No --> C F -- Yes --> G[인사위원회 징계절차 개시] </pre>	<p>* 신고방법 전화, E-Mail, 면담 : Hot-mail은 대표이사 E-Mail</p> <p>* 윤리위원회 개최 7일전 통보</p> <p>* 위원 과반수 찬성으로 의결</p>

※ Processing period: Within 30 days from the date of receipt
(can be extended once within 30 days if necessary)