

**Third Party Code of Conduct
for
SeAH Holdings and its Affiliates**

This Third Party Code of Conduct ("**Code**") was prepared by SeAH Holdings and its affiliates ("**SeAH**") to serve as an ethical basis, and to emphasize SeAH's firm commitment to respect the order of the free market economy, fulfill corporate social responsibilities, ensure that all members' human rights are respected, foster an eco-friendly and safe working environment, and grow and develop with various stakeholders including customers, employees, partners and shareholders. SeAH, along with its officers and employees, and various third-party partners dealing with SeAH such as its suppliers (including sub-supply chains), contracting partners, and business partners, intend to become a "business that makes the world more beautiful" by abiding by this Code.

This Code was prepared on the basis of the Responsible Business Alliance Code of Conduct. In the event of any conflict between this Code and any local laws and regulations, the stricter standard shall apply.

1. Labor Human Rights

All third party partners must protect and respect the human rights of all members. This applies to all types of employees, including temporary employees, migrant employees, interns and dispatched employees, etc. Further, all employees must be guaranteed lawful employment and rights as prescribed by local laws.

1.1. Voluntary Employment

- Any work and/or duties performed by employees of third party partners must be voluntary, and such employees must be able to terminate their employment at their own will without any penalty.
- Third party partners shall not engage in any form of forced labor, including bonded or indentured labor through servitude contracts (including servitude for payment of debts, etc.), slavery, involuntary prison labor, or trafficking of persons.
- Third-party partners shall not require employees to pay guarantees or recruitment fees as part of their employment.
- When foreign workers are employed by a third-party partner, their identity and/or immigration documents, such as government-issued identification cards, passports or work permits, must be kept by the workers themselves.
- When hiring or amending an employment contract, third party partners shall document and provide the terms and conditions of employment in a language and in a way that the employee can understand.

1.2. No Child Labor

- Any employment of child laborers by third party partners is strictly prohibited. The term "child" means any person under the age of 15, or under the age for completing mandatory education, or under the statutory minimum age for employment based on local laws, whichever is greatest.
- If a child laborer is identified among the members, the third party partner shall immediately cease employment of such child laborer and improve its process for age verification in the hiring process.

1.3. Compliance with Working Hours

- Third party partners shall not exceed the maximum working hours stipulated by law in their country.
- Third party partners shall guarantee at least one (1) day of holiday for every seven (7) days and, in case of unavoidable circumstances due to an emergency or unusual situation, shall grant a substitute day-off on another day pursuant to "flexible working hours."
- All overtime work performed by third party partners' members shall be voluntary.

1.4. Wages and Benefits

- Third party partners shall include minimum wage, overtime pay, and other legally mandated benefits in their employees' compensation and shall comply with all local laws and regulations.

- For overtime, third party partners shall pay higher than the applicable hourly pay for work during regular working hours as required by local laws and regulations.
- Pay slips provided by third party partners must specify wage payment criteria and items in an easily understandable way and be in a language that employees can understand.

1.5. Humane Treatment

- Third party partners shall not, and shall not threaten to, engage in inhumane treatment of employees, including sexual harassment, sexual abuse, physical or mental coercion, bullying, corporal punishment, harassment, public shame, or verbal abuse.
- Third party partners shall establish policies and procedures to ensure the humane treatment of employees and provide them with sufficient explanation so that they are aware of them.

1.6. Non-Discrimination

- Third party partners shall strive to eliminate workplace harassment and unlawful discrimination.
- Third party partners shall not discriminate against employees based on race, age, skin-color, gender, ethnicity, sexual orientation, disability, pregnancy, religion, union membership, political orientation, marital status, etc. in employment practices such as recruitment process and wage, rewards, promotion, and access to training.
- Unless mandated by law or necessary for workplace safety, third party partners shall not demand that employees or candidates for recruitment take a medical examination that can be used as a means of discrimination.
- If requested by employees, third party partners shall allow religious activities to a reasonable extent.

1.7. Freedom of Association

- Employees of third party partners shall be free to organize and join the labor-management council or the labor union in accordance with local laws and regulations, and third party partners shall respect the right of employees to freely associate with other employees for collective bargaining and peaceful assembly, and shall also guarantee the right of employees to refuse such right.
- Third party partners shall be able to freely communicate with management about working conditions and management policies without fear of harassment, discrimination, retaliation or threats.

2. Safety and Health

Third party partners shall recognize that the safety and health of employees are essential to all activities performed in connection with the company's business. In addition, third party partners shall exert efforts to provide employees with a safe and clean working environment in accordance with local laws and regulations.

2.1. Industrial Safety

- Third party partners shall identify, assess and prevent safety and health risks to which employees are potentially exposed (e.g., chemicals, electricity, fire, vehicles and fall hazards) via safe design, engineering and administrative controls, prevention and maintenance, safe work procedures (locks and safeguards), and establishment of relevant regulations. In addition, third party partners shall provide continuous safety training.
- For risks that cannot be properly controlled, third party partners shall provide employees training materials related to such risk and protective equipment necessary for work.
- Third party partners shall take reasonable measures to remove pregnant or nursing female employees from dangerous work environments and/or remove or reduce risk factors, and provide appropriate amenities for nursing female employees.

2.2. Emergency Precautions

- Third party partners shall identify and assess potential emergencies and incidents in advance.
- Third party partners shall establish emergency reporting, employee notification and evacuation procedures for emergency situations. Also, third party partners shall minimize damages by preparing and implementing emergency situation response plans including emergency evacuation drills for employees and securing and/or restoring escape facilities, fire detection and fire extinguishing equipment.

2.3. Industrial Accidents and Diseases

- Third party partners shall have a system to prevent, manage, track and report employees' industrial accidents and diseases.
- Such system must encourage employees to report freely and classify and record industrial injury and illness cases, provide medical treatment, and implement corrective measures upon occurrence of injuries and illnesses, thereby supporting the return of employees who are on leave due to industrial injury or illness.

2.4. Industrial Hygiene

- Third party partners shall identify, assess, and control the exposure of employees to physical, chemical, biological, high temperature, and radiation factors used in the workplace.
- If potential risks are identified, third party partners shall be able to remove and/or reduce hazards, and control such hazards by technical controls (such as improvement of production facilities) and administrative controls according to legal requirements.
- If these means are insufficient to control the risk factor, third party partners shall provide employees training materials related to such risk along with well-managed and appropriate protective equipment, and employees must use them.

2.5. Physical Burden

- Third party partners shall identify, assess and control situations where employees engage in repeated manual work, lift heavy materials, work in a standing position for a prolonged period or engage in physically exhausting work.

2.6. Safety Management of Dangerous Machinery, Instruments and Equipment

- Third party partners shall conduct safety tests of machinery, tools and equipment required for production. In cases where employees may be exposed to risks, third party partners shall manage such risks via physical safeguards, safety devices and protective walls, etc.

2.7. Hygiene, Food and Housing

- Third party partners shall provide clean toilets and drinking water to employees, and procure facilities and conditions in which foods can be hygienically cooked and stored.
- Dormitories provided to third party partners' employees must be clean and safe, with appropriate lighting, air-conditioning and heating facilities, emergency exits, personal lockers, and reasonable personal space.

2.8. Safety and Health Education

- Third party partners shall provide their employees with safety and health education related to all workplace hazards (mechanical, electrical, chemical, fire and physical) in a language that employees can understand.
- Third party partners shall conduct pre-assignment training for all employees, and regular training afterwards.
- Third party partners shall post safety and health-related information in a conspicuous place with easy access, and encourage employees to raise safety and health issues at any time.

3. Environment

Third party partners shall manage greenhouse gases, air pollutants, wastes, recycling, industrial water reuse and chemicals, etc. in compliance with laws and regulations on environmental protection. Also, third party partners shall identify the environmental impact of its manufacturing process, and protect public safety and health by minimizing negative impact on the community, environment, natural resources, etc.

3.1. Obtaining Environmental Permits

- Third party partners shall obtain, maintain and manage all environmental permits and licenses necessary for the operation of the company (e.g., air pollutant emission facilities) in compliance with updated laws. Also, third party partners shall comply with operational and reporting obligations necessary for the licensing process.

3.2. Prevention of Contamination and Reduction of Resource Use

- Third party partners shall exert efforts to eliminate or minimize pollutants by adding facilities to remove pollutants, improving processes and recycling or reusing.
- Third party partners shall preserve natural resources such as water, fossil fuels, minerals and primeval forest products by improving manufacturing processes, changing equipment processes, using alternative materials, recycling, reusing, preserving and maintaining.

3.3. Hazardous Substances

- Third party partners shall ensure safe handling, transportation, storage, recycling and reuse of all chemicals harmful to humans and the environment, and separately manage them through identification marking, labeling, etc. In addition, third party partners shall conduct emergency response training.

3.4. Waste Management

- Third party partners shall systematically identify, manage, and reduce wastes, and duly discard them.
- Third party partners shall establish a system to measure waste emissions, and exert efforts to minimize wastes that are buried or incinerated by expanding recycling and reuse.

3.5. Control of Air Pollutants

- Third party partners shall identify and continuously monitor the characteristics of volatile organic compounds, aerosols, corrosive gases, dusts, ozone-depleting substances and combustion by-products generated in their processes, manage them in accordance with applicable laws and regulations, and discharge pollutants after processing them.

3.6. Substance Regulatory Compliance

- Third party partners shall display information on substances during recycling and disposal, and comply with all applicable laws and regulations relating to prohibition and restriction of use for specific substances.

3.7. Water Resource Management

- Third party partners shall monitor their water usage and release records, explore ways to preserve them, and control channels of contamination.
- Third party partners shall identify the characteristics of all wastewater in accordance with laws and regulations prior to release or disposal, and continuously monitor their wastewater treatment system to maintain optimal performance.

3.8. Energy Consumption and Greenhouse Gas Emissions

- Third party partners shall establish a system to measure, calculate and manage energy consumption and greenhouse gas emissions.
- Third party partners shall set goals for greenhouse gas reduction, and continuously look for and implement means to minimize energy consumption and greenhouse gas emissions.

3.9. Animal Welfare

- Third party partners conducting animal testing for unavoidable reasons, shall comply with Article 23 of the Animal Protection Act.
- Third-party partners shall respect the five freedoms of animals set by the World Organization for Animal Health (WOAH).
 - Freedom from hunger and thirst;
 - Freedom from discomfort;
 - Freedom from pain, injury and disease;
 - Freedom to express normal behavior; and
 - Freedom from fear and distress.

4. Ethics and Fair Trade

Third party partners shall comply with all local laws and regulations for social responsibility and sustainable co-existence, and strive to improve its ethics standards.

4.1. Integrity

- Third party partners shall adhere to the highest standards of integrity in all business activities.
- Third party partners shall advocate a zero-tolerance policy prohibiting all bribery, unjust enrichment, extortion and embezzlement.

4.2. Prohibition of Undue Profits

- Third party partners shall not promise, offer, provide, authorize or receive bribes or improper advantages.
- The above includes promising, offering, authorizing and accepting, either directly or indirectly, money or valuables for the purpose of obtaining or granting a business right to a specific person or gaining unjust enrichment.
- Third party partners shall continuously monitor and follow relevant procedures to ensure compliance with anti-corruption laws and regulations.

4.3. Disclosure of Information

- Third party partners shall engage in all transactions in a transparent manner and accurately record and reflect such transactions in their accounting books.
- Third party partners shall disclose information on labor, safety and health, environmental management status, management activities, governance, and financial status in accordance with applicable laws, regulations and general business standards.
- Falsifying or misrepresenting records about the status and practices of third party partners shall not be tolerated.

4.4. IP Protection

- The intellectual property rights of third party partners shall be respected and the transfer of technology and know-how must be made under the protection of intellectual property rights. Third party partners shall respect and safely protect technologies, information, intellectual property, etc. learned from transactions with SeAH and other companies.
- No third party partner may unlawfully use or infringe any intellectual property, such as another person's patents or designs.

4.5. Privacy

- Third party partners shall strive to protect the personal data of all stakeholders in the business (including partners, customers, consumers, and employees).
- Third party partners shall comply with privacy and data security laws and regulations when collecting, storing, processing, transmitting, and sharing personal data.

4.6. Fair Trade, Advertising and Competition

- Third party partners shall comply with antitrust and fair trade laws, both domestic and foreign, that seek to promote free and fair competition and maximize consumer interests.
- All marketing and advertising by third party partners must be ethical and comply with all applicable laws, guidelines and industry rules.

4.7. Identity Protection and Non-Retaliation

- Third party partners shall operate an identity protection program to protect the confidentiality and anonymity of whistleblowers, unless prohibited by law. Also, third party partners shall notify its members of relevant procedures such that they may raise issues without fear of retaliation.

4.8. Responsible Material Management

- Third party partners shall procure minerals from conflict-affected and high-risk areas in accordance with the Organization for Economic Cooperation and Development's (OECD) Guidelines.
- No third party partner may use conflict minerals (Tantalum, Tungsten, Tin, and Gold produced in 10 African countries, including the Democratic Republic of Congo) that are expected to raise human rights and environmental concerns in any event.

4.9. Export Restrictions and Economic Sanctions Compliance

- Third party partners shall comply with applicable country-specific laws and international codes in relation to export restrictions.
- Third party partners may not transact with countries, territories and individuals that are subject to export restrictions and economic sanctions.

4.10. Anti-Money Laundering and Tax Evasion

- Third party partners shall comply with domestic and foreign laws and regulations for detecting and preventing the laundering of illegal funds, preventing terrorism and preventing tax evasion.

4.11. Conflicts of Interest

- In order to prevent a conflict of interest in the course of business, third party partners shall identify and assess potential conflicts of interest, and implement reasonable measures to prevent and manage conflicts of interest.
- In the event of an actual or potential conflict of interest, third party partners shall immediately notify all affected parties including SeAH.

5. Management System

Third party partners shall establish and continuously improve a management system to comply with the laws and regulations applicable to this Code, comply with customer demands, comply with this Code, and identify risks and opportunities associated with this Code.

5.1. Compliance Pledge

- Third party partners shall prepare in the local language, and post within the business premises a social and environmental responsibility pledge approved by the management which expresses the company's commitment to compliance and its commitment to continuous improvement.

5.2. Management's Duties and Responsibilities

- Third party partners shall identify representative(s) responsible for the implementation of the management system and related programs, and the representative shall review the status of the management system on a regular basis.

5.3. Legal and Customer Requirements

- Third party partners shall establish a process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this Code.

5.4. Risk Management

- Third party partners shall exert efforts to identify environment, safety and health, compliance, human rights, labor practices and ethics related risks.
- Third party partners shall understand the relative importance of each risk, control such risks technically or administratively and regularly check compliance with this Code.

5.5. Improvement Objectives

- Third party partners shall document goals and action plans to improve social, environmental and safety and health performance, including a requirement to periodically evaluate actual performance against the goals.

5.6. Training

- Third party partners shall implement policies, procedures and improvement objectives to ensure compliance with this Code, and train managers and employees to ensure compliance with applicable laws and regulations.

5.7. Communications

- Third party partners shall establish and implement a process that delivers clear information on policies, practices, expectations, and performance to employees, partners, and customers.

5.8. Member Feedback, Participation and Grievance Handling

- Third party partners shall establish an institutional mechanism to receive members' opinions on the terms of this Code on a named or anonymous basis, and establish a process to implement improvements based on such feedback.

5.9. Audit and Evaluation

- Third party partners shall conduct self-assessments on a regular basis to ensure compliance with legal and regulatory requirements relating to social and environmental responsibilities, and the contents and requirements of this Code.
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5.10. Corrective Process

- Third party partners shall establish a process to timely correct deficiencies identified through internal and external assessments, inspections, investigations and reviews.

5.11. Documents and Records

- Third party partners shall record and manage items relating to compliance with this Code and items required by the company to protect confidentiality of company and personal information.

[Appendix]

Letter of Commitment to Cooperate and Participate in the Code of Conduct for Third Parties of SeAH Holdings and its affiliates

As a third party partner of SeAH Holdings and its affiliates ("SeAH"), we fully understand the purposes and guidelines for the introduction of the Code of Conduct for SeAH Holdings and its affiliates ("**Code of Conduct**"). We will comply with the requirements of this Code of Conduct in accordance with its intent and will endeavor to communicate the requirements of this Code of Conduct to our supply chain.

We agree with this Code of Conduct and covenant that we will implement an appropriate internal code of conduct to comply with its principles and requirements. We also acknowledge that, to the extent permitted by law, SeAH may conduct an inspection on any conduct that is inconsistent with this Code of Conduct, and we will fully cooperate with such inspection if executed.

YYYY MM DD

Company Name:

Representative Director: (seal)