

## **Codes of Ethical Conduct for Directors and Managers**

### Article 1 : Purpose of and basis for adoption

These Guidelines are adopted to encourage directors and managerial officers of the Company (including general managers or their equivalents, assistant general managers or their equivalents, deputy assistant general managers or their equivalents, chief financial and chief accounting officers, and other persons authorized to manage affairs and sign documents on behalf of a company) to act in line with ethical standards, and to help interested parties better understand the ethical standards of the Company.

### Article 2: Prevention of conflicts of interest

Conflicts of interest occur when personal interest intervenes or is likely to intervene in the overall interest of the Company, for example, when a director or managerial officer of the Company is unable to perform their duties objectively and efficiently, or when a person in such a position takes advantage of their position in the Company to obtain improper benefits for either themselves or their spouse or relatives within the second degree of kinship.

The Company shall pay special attention to loans of funds, provisions of guarantees, and major asset transactions or the purchase (or sale) of goods involving the affiliated enterprise at which the above said persons work.

The Company shall establish a policy aimed at preventing conflicts of interest and shall offer appropriate means for directors and managerial officers to voluntarily explain any potential conflict between them and the Company.

### Article 3: Minimizing incentives to pursue personal gain

When the Company has an opportunity for profit, it is the directors and managerial officers' responsibility to maximize the reasonable and proper benefits that can be obtained by the Company.

The Company shall prevent its directors, supervisors, or managerial officers from engaging in any of the following activities: (1) Seeking an opportunity to pursue personal gain by using company property or information or taking advantage of their positions. (2) Obtaining personal gain by using company property or information or taking advantage of their positions.

### Article 4: Confidentiality

The Company's directors and managerial officers shall be bound by the obligation to maintain the confidentiality of any information regarding the Company itself or its suppliers and customers, except when authorized or required by law to disclose such

information.

Confidential information includes any undisclosed information that could result in damage to the Company or the suppliers and customers if exploited by a competitor or disclosed.

**Article 5: Fair trade**

Directors and managerial officers shall treat all suppliers and customers, competitors, and employees fairly and may not obtain improper benefits through manipulation, nondisclosure, or misuse of the information learned by virtue of their positions or misrepresentation of important matters, or through other unfair trading practices.

**Article 6: Safeguarding and proper use of company assets**

All directors and managerial officers are responsible for safeguarding company assets and ensuring that they can be effectively and lawfully used for official business purposes; any theft, negligence in care, or waste of the assets will all directly impact the Company's profitability.

**Article 7: Compliance to the laws and regulations**

The Company shall strengthen its compliance with the Securities and Exchange Act and other applicable laws, regulations, and bylaws.

**Article 8: Encouraging reporting on illegal or unethical activities**

The Company shall raise awareness of ethics internally and encourage employees to report to a managerial officer, chief internal auditor, or other appropriate individuals upon suspicion or discovery of any activity in violation of a law or regulation or the code of ethical conduct.

To encourage employees to report illegal conduct, the Company shall establish a concrete whistle-blowing system allowing anonymous whistle-blowing and make employees aware that the Company will use its best efforts to ensure the safety of whistle-blowers and protect them from reprisals

**Article 9: Disciplinary measures**

When a director or managerial officer violates the code of ethical conduct, the Company shall handle the matter in accordance with the disciplinary measures prescribed in the code and shall without delay disclose on the Market Observation Post System (MOPS) the date of the violation by the violator, reasons for the violation, the provisions of the code violated, and the disciplinary actions taken. The Company should establish a relevant complaint system to provide the violator with remedies.

Article 10: Procedures for exemption

The code of ethical conduct adopted by the Company must require that any exemption for directors or managerial officers from compliance with the code be adopted by a resolution of the board of directors. That information on the date on which the board of directors adopted the resolution for exemption, objections or reservations of independent directors, and the period of, reasons for, and principles behind the application of the exemption be disclosed without delay on the MOPS, in order that the shareholders may evaluate the appropriateness of the board resolution to forestall any arbitrary or dubious exemption from the code and to safeguard the interests of the Company by ensuring appropriate mechanisms for controlling any circumstance under which such an exemption occurs.

Article 11: Procedures for exemption

The Company shall disclose the code of ethical conduct it has adopted and any amendments to it, on its company website, in its annual reports and prospectuses and on the MOPS.

Article 12: Enforcement

The Company's code of ethical conduct, and any amendments to it, shall enter into force after being adopted by the board of directors, delivered to each supervisor, and submitted to a shareholders meeting.

The Guidelines were instituted on December 23, 2010.

The first amendment was made on March 26, 2015.

The second amendment was made on August 13, 2020.