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# Seoyon E-Hwa Code of Ethics

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	Rev. No.	Rev. Date	Effective Date	Major Changes
Revision History	0	2013.05.24	2013.05.27	Initial enactment
	1	2021.04.01	2024.04.01	Amendment (name change)
	2	2024.05.14	2024.05.17	Amendment (ESG disclosure)

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## **1. Basic Ethical Principles with Respect to Customers**

### **1.1 Overview**

Recognizing that customers as the true business foundation of a company, we shall always respect the opinions of all customers and continuously create value that benefit customers by providing services and benefits from the customers' point of view, so that we can gain steadfast trust from customers.

### **1.2 Respecting Customers**

We shall always listen to the opinions of our customers, believe that our customers are always right in terms of their needs, and make customer satisfaction the top priority in all our decisions and actions.

### **1.3 Providing Value to Customers**

1.3.1 We shall provide products and services of the highest quality and respond to customers' legitimate needs quickly and accurately.

1.3.2 Recognizing that when our customers advance, we advance, we shall identify the value needed from the customers' point of view and continuously create true value that can actually benefit our customers and draw customer satisfaction.

### **1.4 Keeping Promises to Customers**

We shall tell only the truth to customers and keep our promises to customers.

### **1.5 Protecting Customer Interests**

1.5.1 If we acquire information concerning our customers, we shall not disclose it or use it for any other purpose without their prior consent.

1.5.2 We shall not engage in other immoral behavior that harms the interests of customers.

### **1.6 Preventing the Use of Counterfeit Parts and Components**

We shall not produce or use unauthorized raw materials and parts or use or sell counterfeit raw materials and parts.

## **2. Basic Ethical Principles with Respect to Fair Competition**

### **2.1 Overview**

We shall comply with relevant laws and regulations in all regions where we conduct business activities, respect commercial practices, and secure

competitive advantages by applying legitimate methods and procedures.

## **2.2 Legitimate Collection and Use of Information**

2.2.1 We shall collect and utilize information fairly in accordance with laws and regulations and commercial practices.

2.2.2 We shall not unfairly disclose competitors' information, even if it is legitimately collected.

## **2.3 Preventing Anti-Competition (Unfair Competition)**

2.3.1 Parties to the transaction (customers, employees, suppliers, etc.) are not permitted to restrict the freedom of a counterparty or coerce the counterparty to accept disadvantages in an unfair manner.

2.3.2 The aforementioned actions are considered as anti-competition (unfair competition), which includes bribery, solicitation, collusion, abuse of authority, and unfair competition.

## **2.4 Compliance with Export Restrictions**

2.4.1 We shall comply with local laws and international agreements when exporting goods and services.

2.4.2 We shall not engage in business with countries and regions subject to export restrictions and economic sanctions.

# **3. Basic Ethical Principles with Respect to Suppliers**

## **3.1 Overview**

In accordance with the principle of autonomy, equal participation opportunities shall be ensured for all transactions, and mutual growth and development shall be sought from a long-term perspective by building mutual trust and partnership based on fair and transparent transactions.

## **3.2 Equal Opportunities**

3.2.1 All companies that have secured quality and price competitiveness shall be given equal opportunities to participate in the supplier registration and selection process.

3.2.2 Registration and selection of suppliers shall be conducted reasonably in accordance with the Supplier Management Process.

## **3.3 Procedures for Transparent Trade (Prevention of Unfair Trade)**

3.3.1 All transactions shall be conducted fairly with the parties to the transaction on an equal footing, with sufficient consultation in advance on the conditions and procedures.

- 3.3.2 We shall not engage in any form of unfair practices using our superior position.
- 3.3.3 When selecting a supplier, special related parties, i.e., family members, relatives, and friends of executives and employees, persons with whom executives and employees have personal ties based on their schools or regional background, and former employees of Seoyon E-Hwa, shall not be selected without observing the Supplier Management Process.
- 3.3.4 Suppliers, partners, and business agents shall be informed of Seoyon E-Hwa's ethical regulations and be required to comply with the regulations.

### **3.4 Pursuing Mutual Development**

- 3.4.1 We shall actively support our suppliers to strengthen their competitiveness and grow in the long term and mutually share the profits generated through innovation.
- 3.4.2 We shall maintain win-win relationships with our suppliers to establish a clean and transparent trading landscape and ensure fair trade.

### **3.5 Protecting Intellectual Property Rights**

We shall protect the trade secrets of business partners and do not infringe on the intellectual property rights of other companies or others.

## **4. Basic Ethical Practices of Employees**

### **4.1 Overview**

The executives and employees of Seoyon E-hwa shall internalize sound values and fulfill their given missions by relentlessly pursuing personal development and fair performance of job duties based on the principle of "mutual trust."

### **4.2 Basic Ethical Principles**

- 4.2.1 Employees shall maintain pride and confidence as members of Seoyon E-Hwa and always exhibit honesty and integrity.
- 4.2.2 Employees shall always strive to maintain class and honor based on high ethical standards.

### **4.3 Fulfillment of Mission**

- 4.3.1 All employees shall internalize the Company's management philosophy as well as the goals and values pursued by the Company and faithfully fulfill their respective missions in accordance with company policies.
- 4.3.2 Employees shall perform their assigned duties to the best of their ability in a fair manner and familiarize themselves and comply with all relevant laws and regulations as well as the Company's policies and systems.

- 4.3.3 Employees shall clearly recognize their respective authority and responsibilities and make decisions and act within the scope of their authority in line with the goals pursued by the Company.
- 4.3.4 Employees shall actively cooperate and communicate with colleagues and related teams to enhance work efficiency and effectiveness.

#### **4.4 Personal Development**

Employees shall seek to become creative talents by continuously pursuing personal development based on open-mindedness and openness to new endeavors.

#### **4.5 Fair Performance of Job Duties**

- 4.5.1 Employees shall perform their job duties honestly and fairly and not accept any form of financial benefits from stakeholders.
- 4.5.2 Employees shall not engage in unethical or illegal behavior that may be condemned by society in their daily lives and work.

#### **4.6 Prohibition of Exchange of Gifts Among Employees**

Providing gifts for personal gains or the gains of the team is strictly prohibited. In the case of exceptions such as congratulatory and condolence events and efforts to strengthen the organization, the Instructions for Ethical Practice shall be observed.

#### **4.7 Prohibition of Sexual Harassment in the Workplace**

Sexual harassment in the workplace can lead to loss of motivation to work and reduced work productivity for the victim, damaged reputation of the Company, legal proceedings, etc., so it shall be strictly prevented.

#### **4.8 Mutual Respect Among Employees**

- 4.8.1 Employees shall observe the basic ethical principles necessary for work life.
- 4.8.2 Employees shall not use disrespectful language to other employees or make slanderous remarks.
- 4.8.3 Employees shall not create cliques or discriminate based on educational background, sex, religion, place of origin, age, etc.
- 4.8.4 Employees shall not make unfair solicitations to other employees.

#### **4.9 Prohibition of Leaking Customer and Internal Information**

- 4.9.1 Employees shall not use any confidential information, intellectual properties, or undisclosed information of the Company for personal gain or leak them to others.



- 4.9.2 Employees shall not disclose the personal information of customers to third parties without obtaining prior consent from the customers concerned.
- 4.9.3 Employees shall not disclose the Company's internal information, such as company secrets and information on new business to third parties without the prior approval of their superiors, regardless of the time and place of work.
- 4.9.4 If any problems arise in identifying, tracking, and protecting intellectual properties, trade secrets, etc., it shall be immediately notified to the department in charge of intellectual properties or legal affairs so that it can be handled properly.

#### **4.10 No Smoking in the Workplace**

- 4.10.1 Smoking is prohibited in the workplace to maintain a pleasant working environment. Employees who work in areas where there is a high risk of fire such as production sites and offices are obligated to comply with the no smoking rule.
- 4.10.2 Smokers must smoke only at the designated smoking areas outdoors during breaks.

#### **4.11 Safety Management and Risk Prevention**

Employees shall endeavor to prevent safety incidents and immediately report on any possibilities of an accident occurring in accordance with the Safety and Health Management Process. Also, designated safety training shall be conducted at business sites.

#### **4.12 Transparent Management and Anti-Corruption**

- 4.12.1 Employees shall observe the highest standards of integrity required by the country where they work.
- 4.12.2 Employees shall not engage in bribery, extortion, embezzlement, arrangement, or solicitation by using their superior position in the business or seek illegitimate compensation by using someone's weakness or flaw against them.

#### **4.13 Anti-Money Laundering**

The Company and its employees shall not engage in any activities related to illegal money laundering with customers, suppliers, or other stakeholders and shall comply with relevant laws and regulations.

#### **4.14 Conflict of Interest**

- 4.14.1 When it is unavoidable to avoid conflicts of interest between the Company and individuals, priority shall be given to the interests of the Company and its customers within the legitimate scope.

4.14.2 If a conflict of interest arises, it shall be reported to one's immediate superior or notified to the department in charge of ethics.

#### **4.15 Documentation and Reporting**

Employees shall not create documents or make reports based on information that has been fabricated by means of concealment, understatement, overstatement, or falsification or share such information with internal and/or external stakeholders.

### **5. Basic Ethical Principles with Respect to Employees**

#### **5.1 Overview**

All employees shall respect one another as human beings with “mutual trust,” treat one another fairly according to their abilities and achievements and strive to fully utilize their creativity in accordance with the employment management procedures.

#### **5.2 Respecting Employees as Individuals**

5.2.1 Recognizing the human dignity and value of each employee, we shall do our best to improve their quality of life with “mutual trust”.

5.2.2 We shall do our best to help employees gain pride and feel rewarded through their work with a sense of ownership.

5.2.3 We shall listen to the voices of employees and do our best to resolve their grievances.

#### **5.3 Talent Development**

5.3.1 The Education and Training Process shall be implemented to foster creative talents among employees.

5.3.2 Employees shall provide the necessary guidance and advice to their subordinates in consideration of their aptitude and competencies to cultivate excellent successors.

#### **5.4 Fair Treatment**

5.4.1 We shall provide equal opportunities to employees according to their abilities and qualifications.

5.4.2 We shall evaluate, and fairly reward employees according to their abilities and achievements by applying the performance evaluation procedure.

#### **5.5 Promoting Creativity**

5.5.1 We shall promote creativity in our organizational culture by allowing creative thinking and ensuring voluntary participation based on the suggestion management Process with appropriate rewards.

5.5.2 We shall respect the privacy of individuals and build a mature professional culture based on mutual trust and understanding.

## 5.6 Protecting Whistleblowers

The organization in charge of ethical management shall protect the identity of whistleblowers and ensure their safety and take measures to ensure that whistleblowers are not subjected to unreasonable treatment, punishment, or reprisal.

## 6. Basic Ethical Principles with Respect to the Nation and Society

### 6.1 Overview

We shall protect the interests of shareholders and contribute to the enrichment of people's lives and social development by engaging in rational business practices and growing into a sound company.

### 6.2 Protecting the Rights and Interests of Shareholders

6.2.1 We shall realize fair profits through transparent management procedures to financially reward shareholders.

6.2.2 We shall secure competitive advantages through continuous quality management activities and technology improvement to ensure returns on investment.

6.2.3 Employees shall not trade stocks using inside information acquired in the course of their duties.

### 6.3 Conducting Social Contribution Activities

We shall contribute to social development by ensuring and encouraging employee participation in volunteer activities.

### 6.4 Protecting the Environment

We shall do our best to protect nature and preserve a clean environment and comply with all laws and regulations related to environmental protection.

### 6.5 Disclosing Violations

The organization in charge of ethical management shall disclose relevant information in an appropriate manner to prevent the recurrences of violations.

## 7. Addenda

7.1 The Code of Ethics : Practice Guidelines shall be effective as of May 24, 2013.

7.2 The Code of Ethics : Practice Guidelines shall be effective as of April 1, 2021.

7.3 The Code of Ethics : Practice Guidelines shall be effective as of May 14, 2024.

## ● List of Referenced Standards :

Internal Standard NO.	Management Standard	Drafted by	Enactment Date	Last Rev. Date	Rev. NO.
SMS-A-01-P01	투명경영 절차	감사실	2010.04.12	2023.10.01	04
SMS-A-01-P02	윤리경영 절차	감사실	2010.04.23	2024.02.15	05
SMS-A-01-P05	감사 절차	감사실	2013.10.01	2023.10.01	03
SMS-A-01-W02	윤리실천 지침	감사실	2010.04.23	2024.02.15	06
SMS-A-01-W04	감사실 운영 지침	감사실	2014.08.22	2023.10.01	04