

Anti-Corruption/Bribery Policy

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Document Management Department	Management Planning Team

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Preface

General Principles

Employees of Dongwon Metal Co., Ltd. and its affiliates, based on the principles of unity, technological innovation, and fulfilling responsibilities, create value for various stakeholders such as customers, employees, and shareholders, playing a key role in social and economic development. To achieve this, the company adheres to all relevant laws in the countries where it operates, respects the customs of transactions, and ensures transparent and fair business practices. In particular, the company establishes and complies with all applicable anti-corruption laws, aiming to become a globally trusted, enduring, and leading company.

Purpose

This policy aims to guide the employees of Dongwon Metal Co., Ltd. (hereafter referred to as "the company") towards proper ethical conduct, safeguarding the dignity of each employee and the company's reputation. It also seeks to ensure fairness in dealings with partners, establish a sound corporate culture, and set moral standards for practice.

Coverage

This policy applies to all employees of the company and its partners. This includes all suppliers directly doing business with the company, as well as all second-tier companies associated with the company.

Compliance with the Policy

All employees must diligently comply with this policy and are responsible for any violations. If an employee is forced into actions contrary to the policy or becomes aware of any improper conduct, they must report it to the relevant department. In the event of a violation, the company will thoroughly investigate the cause and implement education to prevent recurrence.

Anti-Corruption/Bribery Policy

1. Conduct of Duties

Employees of the company and its partners must recognize that their actions reflect on the company's reputation. To enhance a healthy corporate culture and reinforce the company's credibility, they should maintain the following attitudes in their duties:

- ① Always conduct tasks fairly and transparently, following legal procedures.
- ② Avoid any form of misconduct that exploits superior authority or dominant positions.
- ③ Ensure that tasks and reports are carried out honestly and impartially.
- ④ Adhere to all applicable anti-corruption laws in business relationships and contract fulfillment, refraining from actions that directly or indirectly violate or may be suspected of violating these laws.
- ⑤ Avoid spreading false information or causing misunderstandings to gain unfair advantages.

2. Prohibition of Unfair Trade Practices

The company leads by example, complying with all regulations and market order, and rejects any form of malpractice that undermines healthy business activities.

① Prohibition of Bribery

Employees of the company and its partners must not promise, offer, approve, or accept any form of improper monetary gain or other benefits. This includes giving or receiving bribes from stakeholders. Bribery encompasses any act of providing, promising, approving, or receiving improper financial or other benefits to gain or maintain unfair business advantages.

② Improper Solicitation

Improper solicitation between employees and stakeholders or with government agencies is prohibited. The company, on behalf of the company, shall not make any improper requests or solicitations to stakeholders, either directly or through a third party. In this case, any act that may raise suspicions of improper solicitation, even if no money or goods are provided, is prohibited.

③ Provision of Benefits to Government Officials

Gifts, meals, travel, gratuities, or lecture fees should not be provided to government officials. However, such benefits may be allowed within the scope of local customs and applicable anti-corruption laws, including the Improper Solicitation and Graft Act and other relevant domestic and international laws.

④ **Express Charges**

The company and all related stakeholders shall not pay any express charges to domestic or foreign public officials. Express charges are directly or indirectly paid to government employees to speed up the normal process or to avoid administrative delays.

⑤ **Donations and Sponsorships**

Political donations and sponsorships to domestic and foreign government officials are strictly prohibited. Charitable donations and sponsorships must be pursued fairly, following the company's execution standards and procedures.

⑥ **Accounting Records**

All employees and stakeholders must clearly record all accounting activities to avoid any confusion. All transactions, expenses, and costs related to the company must be accurately recorded and managed. Any omission or falsification of transaction records may be considered a violation of anti-corruption laws and result in penalties.

3. Handling of Policy Violations

- (1) If an employee becomes aware of or reasonably suspects a violation of anti-corruption laws, they may report or inquire about it through the company's reporting center.
- (2) If a partner violates anti-corruption laws related to a contract, the company reserves the right to immediately terminate all contracts with the partner, who will be responsible for compensating any damages resulting from the breach.
- (3) Employees of the company or partners who violate anti-corruption laws may face criminal or civil penalties, including fines or imprisonment, in accordance with applicable laws.

Appendix

Contact Information

Relevant Department: Management Planning Team

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If you have any inquiries regarding this policy, please contact the person in charge.

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