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# Code of Ethics Practice Guide

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2024. 05. 13

# Chapter 1 General Provisions

## Article 1 (Purpose)

The 'Code of Ethics Practice Guide' (hereinafter referred to as the 'Guide') serves as a standard for MCNEX Co., Ltd. employees to resolve ethical dilemmas encountered during their duties. Its purpose is to promote ethical decision-making and actions among employees, thereby realizing the company's ethical values.

## Article 2 (Applicability and Operation)

1. The Guide applies to all employees of MCNEX Co., Ltd., and its subsidiaries, including overseas entities, and is recommended for stakeholders engaged in business relationships with the company.
2. Employees must thoroughly understand and comply with the Guide. In the event of facing ethical dilemmas related to their duties, they should act based on the Code of Ethics and this Guide.
3. If employees become aware of any violations of the Guide, they must report it to the head of their department or the department in charge of ethical management. The company shall ensure the confidentiality and protection of the whistleblower's identity and guarantee that no discrimination or disadvantages arise from such reporting.

# CHAPTER 2 MEMBERS' MINDSET

## Article 3 (Loyal and Conscientious Performance of Duties)

Members must comply with all company rules and regulations, clearly recognize their authority and responsibilities, and perform their duties according to the principles of good faith and sincerity. Additionally, company assets and facilities should be used solely for business purposes.

## Article 4 (Protection and Appropriate Use of Company Assets and Information)

Members must use the company's tangible and intangible assets and expenses only for business activities and approved purposes.

1. Company property, facilities, programs, and other intellectual properties must be protected from unauthorized disclosure and leakage, and must not be used for personal purposes without approval.
2. Excessive personal use of company information and communication tools such as PCs, the Internet, email, and

telephones/faxes is prohibited.

3. Members must actively protect the company's intellectual property rights, safeguard the trade secrets of partners under contract, and equally protect the intellectual property rights of other companies and individuals. In particular, the use of illegal software is strictly prohibited.
4. Confidential information, data, software, and other job-related materials acquired during the course of work, whether related to the company or client companies, must not be disclosed even after resignation.

### **Article 5 (Conflicts of Interest)**

1. Employees must not use their position to make personal requests, such as personnel favors or demands for various conveniences, and must strictly prohibit any actions that seek private gain through family, friends, acquaintances, or agents.
2. In the event of a conflict of interest between the company and the individual, employees must prioritize the interests of the company, shareholders, and customers within the bounds of the law.

### **Article 6 (Corruption Extortion and Bribery)**

Employees must not accept any undue benefits, such as money, entertainment, or conveniences from stakeholders. All business activities must be conducted fairly and transparently. Additionally, employees must not offer money or entertainment to stakeholders for unfair advantage, nor accept personal conveniences from stakeholders, including partner companies.

### **Article 7 (Mutual respect between employees)**

Members must respect each other, maintain basic etiquette and dignity, and refrain from any speech or actions that could damage the company's credit or reputation. Additionally, there must be no discrimination against employees based on nationality, race, gender, religion, political views, social status, or other factors. Acts that infringe on individual rights, such as sexual harassment, verbal or physical violence, and workplace bullying, are strictly prohibited.

## **CHAPTER 3 Responsibilities to Partners**

### **Article 8 (Prohibition of Collusion)**

1. Employees must not engage in collusive activities such as fixing prices, controlling supply, or exchanging business information.
2. Interaction with competitors should be limited, and employees must not enter into agreements that restrict products or services, or allocate territories or customers.

## **Article 9 (Fair Trade and Competition)**

1. Employees must not unfairly discriminate against the company's products or services by comparing them to competitors' products or services, and must not engage in actions that hinder a fair market competition environment.
2. Employees must not propose unfair trading terms to business partners or demand unreasonable benefits.
3. Employees must recognize the company's social responsibility, adhere to ethical values, and prohibit activities related to money laundering involving customers, partners, suppliers, and other entities or individuals.

## **CHAPTER 4 COMPLIANCE WITH LAWS AND COMPANY MANAGEMENT POLICIES**

### **Article 10 (Creation of Management Information and Faithful Reporting)**

Accounting information must be accurately recorded and maintained in accordance with International Financial Reporting Standards (IFRS) and other generally accepted accounting principles. It must be managed transparently without any distortion of facts.

MCNEX employees must accurately prepare all company management information, including financial data, and must not falsify records by concealing, exaggerating, minimizing, or delaying reports.

MCNEX must disclose financial and non-financial information, including corporate activities, financial status, governance, and environmental and social performance, in a timely manner according to relevant laws and regulations.

### **Article 11 (Compliance with Quality Policy)**

To provide customers with the best products and services, customer requirements must be actively incorporated, and domestic and international standards related to quality and product safety must be strictly followed. Additionally, the use of unauthorized or counterfeit raw materials or components must be prevented to enhance customer trust and ensure product safety.

### **Article 12 (Compliance with Environment Safety & Health Policy)**

1. MCNEX complies with laws and international standards related to the environment, safety, and health, and strives to achieve sustainable goals to address global issues.
2. To ensure the safety and health of employees, a safe working environment must be created through regular training and adherence to safety rules.
3. Environmental laws and internal regulations must be thoroughly observed, and all efforts must be made to minimize the negative environmental impact of business activities.

### **Article 13 (Compliance with export restrictions)**

1. MCNEX strives to comply with national laws and international regulations related to export restrictions.
2. MCNEX prohibits transactions with countries, regions, and individuals subject to export restrictions and economic sanctions.
3. MCNEX regularly checks compliance with laws and regulations related to export restrictions and economic sanctions.

## **CHAPTER 5 Protection of Whistleblowers**

### **Article 14 (Protection of Whistleblowers)**

The identity of the information provider and the content of the report are kept strictly confidential to prevent disclosure, and the provider is protected from any disadvantage or discrimination resulting from the report. If the report is deemed to contribute to the company's interests or value enhancement, the whistleblower may be awarded an appropriate reward.

The reporting channels for violations of ethical management are as follows:

#### **Ethical Management Reporting Channels**

- ▶ Email : [esg@mcnex.com](mailto:esg@mcnex.com)
- ▶ Phone : 070-8630-6804
- ▶ Fax : 02-2025-3606
- ▶ Mail : MCNEX ESG Management Team, MCNEX Tower, 13-39, Songdo Science-ro 16beon-gil, Yeonsu-gu, Incheon, South Korea

## **Addendum**

- 1) This Code of Ethics Practice Guide is established as of May 13, 2024.