

Anti-Corruption and Bribery Policy

Last Revision Date	2023.12.28
Document Owner	Department (or Team) responsible for Planning

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Preface

General Principles

Employees of Dongwon Metal Co., Ltd. and its affiliates play a central role in social and economic development by creating value for various stakeholders, including customers, employees, and shareholders, based on unity, technological innovation, and responsible execution. To achieve this, all business activities, both domestic and overseas, are conducted in compliance with the laws of the respective countries and with respect for customary practices to ensure transparent and fair operations. In particular, the company establishes and strictly adheres to all applicable anti-corruption laws to gain trust from society and strive to become a world-class enterprise that endures and thrives permanently.

Purpose

This policy aims to provide employees of Dongwon Metal Co., Ltd. (hereinafter referred to as the "Company") with clear ethical guidelines and practical standards, maintaining individual dignity and company honor, ensuring fairness in transactions with business partners, establishing a proper corporate culture, and setting standards for moral conduct.

Scope of Application

This policy applies to employees of the Company and its business partners. (Business partners include all suppliers directly dealing with the Company, as well as all secondary suppliers.)

Compliance with Policy

All employees are required to fully comply with this policy, and any violation will result in accountability for the corresponding act. Employees who are forced to engage in acts contrary to the policy or become aware of any improper conduct must report it to the responsible department. In case of violations, thorough investigation and educational measures will be implemented to prevent recurrence.

Anti-Corruption and Bribery Policy

1. Attitude in Performing Duties

Employees of the Company and its business partners must recognize that their individual conduct reflects the reputation of their organization and maintain the following attitudes to foster a sound corporate culture and strengthen both internal and external credibility:

- ① Perform all duties fairly, transparently, and in accordance with lawful procedures.
- ② Refrain from any form of improper conduct leveraging superior authority or dominant position.
- ③ Conduct all work and reporting fairly and honestly.
- ④ Comply with all applicable anti-corruption laws in relation to transactions and contractual obligations with the Company, and refrain from acts that directly or indirectly violate, or could be perceived as violating, such laws.
- ⑤ Do not spread false information or engage in acts that could cause misunderstandings in order to obtain unfair benefits.

2. Prohibition of Unfair Business Practices

The Company leads by example in complying with all relevant laws and market regulations, rejecting any corruption that undermines sound corporate activities.

① Prohibition of Bribery

Employees of the Company and its business partners shall not promise, provide, authorize, solicit, or accept any form of improper financial or other benefits. Bribes include any act of providing, promising, authorizing, or accepting undue financial or other benefits to gain or maintain business or other unfair advantages.

② Prohibition of Improper Solicitation

Employees are prohibited from engaging in improper solicitations with stakeholders or government authorities. No employee shall make improper requests or solicitations, directly or through a third party, on behalf of the Company. Any act that could give rise to suspicion of improper solicitation is prohibited, even if no tangible benefits are provided.

③ Provision of Convenience to Government Officials

Employees shall not offer gifts, meals, travel, condolence money, or lecture fees to government officials. Such provisions may only be allowed within the limits permitted under applicable anti-corruption laws and local customs, strictly adhering to domestic and international legal requirements on solicitation and acceptance of gifts.

④ Prohibition of Expedited Fees (Facilitation Payments)

No employee or stakeholder shall pay any form of facilitation fees to domestic or foreign officials.

Facilitation payments refer to direct or indirect payments to government officials to expedite routine administrative procedures.

⑤ **Donations and Sponsorships**

Political donations or sponsorships to government officials, domestic or overseas, are strictly prohibited. Charitable donations and sponsorships must be conducted fairly in accordance with the Company's execution standards and procedures.

⑥ **Accounting Records**

All employees and stakeholders must maintain accurate accounting records to prevent confusion. All company-related transactions, expenditures, and costs must be accurately recorded and managed. Any omission or falsification of records related to expenses or transactions will be considered a violation of anti-corruption laws and subject to penalties.

3. Handling of Policy Violations

- ① Employees who become aware of, or have reasonable suspicion of, violations of anti-corruption laws may report or inquire through the Company's reporting center.
- ② If a business partner violates anti-corruption laws in relation to contracts with the Company, the Company may immediately terminate all related contracts, and the business partner shall be liable for any resulting damages.
- ③ Employees of the Company or business partners who violate anti-corruption laws may be subject to criminal, civil, or administrative penalties, including fines or imprisonment.

Dongwon Metal Co., Ltd.

CEO Sungyong Park

[Revision History]

Version	Date Issued	Effective Date	Key Changes	Author
0	2023-12-01	2023-12-01	Initial Establishment	Department (or Team) responsible for Planning

For any inquiries regarding this policy, please contact the responsible department.

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