

TES-109

Code of Ethics

Taihan Cable & Solution Co., Ltd.

Chapter 1 General Provisions

Article 1 (Purpose)

These regulations aim to establish the responsibilities, obligations, and specific judgment and behavioral standards for the company and its employees to achieve ethical management at Taihan Cable & Solution Co., Ltd.

Article 2 (Definitions)

The definitions of terms used in these regulations are as follows:

1. Monetary benefits: Cash, securities, goods, and other economic benefits.
2. Hospitality and Entertainment: Benefits such as meals, banquets, sports, entertainment, etc.
3. Convenience: Provision or support of goods or services related to facilities, transportation, accommodation, tourism, events, tours, inspections, etc., other than monetary benefits, hospitality, and entertainment.
4. Stakeholders: All individuals, corporations, or other entities outside the company that are affected by the actions or decisions of employees related to their duties.
5. Foreign Public Officials, etc.: Foreign government legislative, administrative, or judicial officials, international organization workers performing official duties, employees of public enterprises, or public officials in foreign countries performing public functions.
6. Whistleblower: Any employee who has an obligation to report monetary benefits, hospitality and entertainment, or conveniences related to their duties.
7. Date of Report: The day an employee receives or becomes aware of the monetary benefits, etc., and within three business days from that date based on the standard of working days at the company.
8. Generally Accepted Scope: Within the scope where monetary benefits, etc., are provided without burden and are considered purely voluntary, recognizing that there is no potential for bribery.
9. Specific Guidelines: Standards for determining violations and prohibited types developed annually by the Ethics Management Department reflecting management policies and social trends.
10. Ethics Management Department: The department overseeing the company's ethical management-related tasks.

Article 3 (Supervising Department)

The supervising department of these regulations is the Ethics Management Department.

Chapter 2 Basic Ethics

Article 4 (Responsibilities and Obligations to Customers)

1. Interact with customers with sincerity and kindness, respecting customer demands and suggestions.
2. Provide products and services that satisfy customers through continuous technological innovation and development.
3. Protect the property and information of customers and avoid providing false information.

Article 5 (Fair Transactions with Partner Companies)

1. Provide equal opportunities to qualified companies in all transactions and select them based on fair evaluation criteria.
2. Avoid making demands for unfair transactions or economic benefits using a dominant position.
3. Recognize partner companies as collaborators, pursuing mutual development based on mutual trust and cooperation.

Article 6 (Responsibilities and Obligations to the Company)

1. Share the company's vision and values, fostering a healthy organizational culture.
2. Comply with the company's management policies and regulations, faithfully performing assigned duties.
3. Uphold the dignity as an employee and refrain from acts that tarnish the company's reputation.

Article 7 (Respect for Shareholders)

Strive for the enhancement of shareholder value through transparent decision-making and efficient management activities.

Article 8 (Social Responsibility)

1. Comply with all laws and regulations domestically and internationally in all areas of activity, contributing to the development of a healthy economic, social, and cultural environment.
2. Make every effort for environmental conservation and disaster prevention.

Chapter 3 Practical Guidelines

Article 9 (Receipt of Monetary Benefits)

Employees must not accept any monetary benefits offered by stakeholders related to their duties and should politely refuse. However, exceptions are made for congratulatory money or goods within the Generally Accepted Scope related to celebrations.

Article 10 (Hospitality and Entertainment)

Employees must not accept any hospitality or entertainment provided by stakeholders in connection with their duties and should politely decline. However, if meals or similar benefits within the socially accepted range are offered, they may be accepted, but if there is a risk of the nature of hospitality and entertainment being compromised, immediate intervention or avoidance is necessary.

Moreover, employees should refrain from frequent meals or entertainment that may burden stakeholders.

Article 11 (Provision of Conveniences)

Employees must not accept any conveniences provided by stakeholders related to their duties and should politely refuse. However, exceptions are made for conveniences such as transportation, meals, and accommodation provided to all participants in official events organized by stakeholders within the Generally Accepted Scope.

Article 12 (Conflict of Interest)

Employees must avoid any act and relationship that conflicts with the interest of the company and personal interest, and employees must not abuse their position or work in the company for personal gain.

1. Paying off or repaying debts such as credit card bills, accounts receivable, or loans.
2. Providing guarantees or collateral, or borrowing money.
3. Acquiring property through joint investment or obtaining shares in the company through property provided by stakeholders.
4. Making unreasonable requests for private transactions.

Article 13 (Guarantees for the Future)

Employees must not receive guarantees related to employment, job placement, contract conclusion, or other personal benefits from stakeholders in connection with their duties.

Article 14 (Actions Through Family Members)

Employees engaging in prohibited actions from Article 9 to Article 13 through family, relatives, or friends will be considered to have committed those actions themselves.

Article 15 (Protection of Company Assets)

1. All company assets should be used only for the company's business activities and approved purposes, and unauthorized use or external transfer is prohibited.
2. Expenses unrelated to the company's business should not be processed as company expenses.

Article 16 (Protection of Company Information)

1. Company information must be rigorously protected in accordance with security regulations.
2. Unauthorized disclosure or improper use of company information without prior approval is prohibited.
3. Unauthorized disclosure of undisclosed company information to employees or others unrelated to the relevant business is prohibited.

Article 17 (Document Preparation and Reporting)

1. All types of documents and accounts related to business must be accurately and honestly prepared.
2. Instructing or engaging in acts of manipulation, tampering, or improper disposal of documents or accounts is prohibited.
3. False reporting intended to obscure or deceive decision-making is considered false reporting.
4. Acts of arbitrarily reducing the scope of the report target are considered false reporting.

Article 18 (Acts Among Employees)

Employees must not engage in the following acts or acts similar to these with each other:

1. Ignoring or concealing facts of work negligence.
2. Giving unfair instructions that could harm the company or following such instructions.
3. Exerting pressure such as solicitation or coercion in bids and contracts.
4. Demanding collateral, guarantees, or loans.
5. Disseminating false rumors or statements that encourage misinformation or hinder a healthy organizational culture.
6. Violating the obligation to keep salary information confidential, such as leaking one's own salary or attempting to know another employee's salary.
7. Any form of verbal abuse, assault, or behavior that disregards the dignity of the other person.
8. Repeatedly giving unnecessary or impossible tasks or excluding someone from work without just cause.
9. Harassment actions that disrupt company life or infringe on personal dignity.

Article 19 (Fair Trade)

1. Adhere to fair trade regulations in all transactions with cooperative companies and establish transparent and fair evaluation criteria for the selection of companies, as well as for processes related to registration, evaluation, and changes in trade conditions.
2. Do not engage in conduct that insults the dignity of employees of cooperative companies, such as verbal abuse or slander.

Article 20 (Compliance with International Anti-Corruption/Labor Conventions and Laws)

1. Comply with the laws and regulations of the respective country and respect trade customs.
2. Comply with international conventions and laws related to anti-corruption (including bribery and money laundering), such as the OECD Anti Bribery Convention, the UN Convention against Corruption, the U.S. Foreign Corrupt Practices Act and U.K. Bribery Act.
3. Comply with sanctions and export controls administered by the U.S. Department of the Treasury's the Office of Foreign Assets Control(OFAC), the U.S. Department of Commerce's the Bureau of Industry and Security(BIS), and other applicable sanctions measures.
4. Comply with all fundamental conventions of the International Labour Organization(ILO) including Convention No. 29, 1930, on forced labor, and Convention No. 138, 1973, on the prohibition of child labor. If child labor is found in the company or it's suppliers, we will immediately stop the child labor and take measures to ensure the human rights and fundamental rights of child.

Article 21 (Prohibition of Improper Solicitation)

Do not engage in acts that violate the 'Act on the Prohibition of Improper Solicitations and Bribery' by offering improper solicitation or bribing public officials, etc.

Article 22 (Specific Judgment Criteria for Violations)

The criteria for judgment and specific prohibited types for violations of the code of ethics are determined based on the attached specific guidelines.

Chapter 4 Reporting and Handling Procedures

Article 23 (Reporting and Processing Procedure)

1. If an employee violates the Code of Ethics or witnesses a violation, they must immediately report it to their immediate department head or the Ethics Management Department.
2. Reports can be made through methods such as email, phone, mail, or the cyber reporting system.
3. The Ethics Management Department reports the content of the complaint to the CEO and then verifies the facts.
4. If the contribution to the reported content is acknowledged, a reward or an appropriate monetary reward may be given in accordance with the internal reward and punishment regulations and employment rules.

Article 24 (Processing Method for Receipt of Monetary Benefits)

In cases where an employee unavoidably receives monetary benefits contrary to these regulations from stakeholders related to their duties, a report (Annex Form No. 1) must be completed and submitted to the Ethics Management Department.

1. Receipt of Monetary Benefits

If an employee unavoidably receives monetary benefits, the following methods are followed based on the report form:

1) If refundable:

The recipient must send the money back to the provider or the CEO of the provider's affiliated company in their own name.

2) If non-refundable:

If the return is impossible due to corruption, deterioration, damage, or an unknown recipient, it should be processed according to the handling method instructed by a higher-ranking official, and the details of the process should be reported on the form.

2. Receipt of Hospitality and Entertainment, Convenience

In cases where an employee unavoidably receives hospitality, entertainment, or convenience from stakeholders, a report must be submitted using the report form, and the following methods are followed:

- 1) The recipient must pay a fair consideration to the provider of hospitality, entertainment, or convenience.
- 2) If there are multiple attendees, the highest-ranking official among them must submit the report.
- 3) Other processing methods are applied similarly to the receipt of monetary benefits.

3. The processing methods for monetary transactions and guarantees for the future are also applied similarly to the receipt of monetary benefits.

Chapter 5 Miscellaneous

Article 25 (Pledge Writing)

All employees must submit an Ethics Pledge (Annex Form No. 2) every year, committing to thoroughly understand and adhere to the Code of Ethics. New employees (including those transferred from affiliated companies) must submit the Ethics Pledge upon employment.

Article 26 (Interpretation)

In cases of doubts or disputes regarding the interpretation of these regulations, the interpretation of the Ethics Management Department shall prevail.

Article 27 (Penalties)

Disciplinary actions will be taken in accordance with the regulations on rewards and punishments if these regulations are violated.

Supplementary Provisions

1. These regulations shall be effective from August 30, 2013.
2. These regulations shall be amended and effective from February 1, 2017.
3. These regulations shall be amended and effective from July 10, 2019.
4. These regulations shall be amended and effective from November 1, 2020.
5. These regulations shall be amended and effective from January 31, 2022.
6. These regulations shall be amended and effective from January 31, 2023.
7. These regulations shall be amended and effective from March 31, 2024.

(Attachment)

Specific Guidelines

1. Typical Types of Prohibition

a. Prohibition of Accepting Monetary Benefits

- 1) Prohibition of accepting any form of cash
- 2) Receipt of negotiable instruments such as gift certificates and checks is treated the same as receiving cash.

Violation Type	Amount	Under 1 million KRW	Over 1 million KRW Less than 2 million KRW	Over 2 million KRW Less than 3 million KRW	Over 3 million KRW
	Act of Receipt				
Conventional acceptance of monetary benefits	Passive	Salary Reduction	Suspension	Demotion	Disciplinary Dismissal
	Active	Salary Reduction	Suspension	Disciplinary Dismissal	
Receipt of monetary benefits related to duties but no illegal or unfair disposal	Passive	Salary Reduction	Suspension	Disciplinary Dismissal	
	Active	Suspension	Demotion	Disciplinary Dismissal	
Receipt of monetary benefits related to duties and illegal or unfair disposal	Passive	Suspension		Disciplinary Dismissal	
	Active	Demotion		Disciplinary Dismissal	

b. Prohibition of Accepting Hospitality and Entertainment

- 1) Hospitality and entertainment refer to benefits other than regular meals, such as social drinking sessions (2nd or 3rd rounds), sports events like golf or skiing, or gambling.
- 2) Meetings with stakeholders outside those officially approved by the company are strictly prohibited.

c. Prohibition of Receiving Conveniences

- 1) Conveniences refer to economic support (provision) for transportation, accommodation, tourism, events, tours, and visitations, excluding monetary gifts, hospitality, or entertainment.
- 2) However, exceptions apply in cases that are ① generally recognized, ② provided during official events, and ③ equally offered to all participants, including transportation, meals, and accommodation.

Category	Example	Principles of Conduct	Note
Money	Vacation pay, cash received under the pretext of an allowance, etc.	Never allowed	
Gift Certificates	Gift Certificates (department store), etc.	Never allowed	Treated the same as receiving cash
Hospitality and Entertainment	Entering luxurious or inappropriate establishments such as bars, nightclubs, massage parlors, casinos, etc.	Never allowed	Pay fair compensation immediately upon receipt
Expenses	Transfer of workshop expenses, team dinner expenses, etc.	Never allowed	In unavoidable cases, post-refund
Congratulations and Condolence Gifts	Congratulatory money, funeral condolence money, baby shower gifts, wreaths, etc.	Allowed up to 100,000 KRW	Allowed within socially accepted limits
Gifts	Holiday gifts, promotion or transfer commemorative gifts, etc.	Allowed up to 50,000 KRW	Same as above
Meals	Lunch, dinner, etc.	Allowed up to 50,000 KRW	Same as above
Conveniences	Free use of hotels, condos, complimentary vehicle support, etc.	Not allowed by principle	Same as above

2. Detailed Types of Prohibited Acts

Category	Prohibited Act	Note
Duty	<ol style="list-style-type: none"> 1) Unauthorized absence 2) Negligence or neglect of duty without justifiable reason 3) Non-compliance with working hours, including tardiness 4) Sleeping, personal internet searches and shopping during work hours 5) Unauthorized departure or leaving the workplace during work hours 6) Disclosure or external leakage of company information, including confidential information 7) Causing loss or accidents to company property 8) Giving or following unjust instructions that could harm the company 9) False report or failure to report important matters related to work 10) Treating non-business-related expenses as company expenses 	

	<ul style="list-style-type: none"> 11) Disseminating false information or inflammatory language that disrupts a healthy organizational atmosphere 12) Ignoring or concealing knowledge of work negligence 13) Violation of any internal regulations, including arbitrary decision regulations 14) Causing a social scandal that damages the company's reputation 15) Engaging in prohibited political activities and group actions according to related laws 16) Violation of the non-disclosure clause in the employment contract regarding salary 17) Falsification of application documents such as name, career, and education 18) Use of verbal abuse, assault, or threats within the company 19) Engaging in gambling, drinking, or other improper behavior during working hours 20) Rebellion or disobedience to legitimate job-related orders from superiors 21) Refusal to comply with legitimate personnel orders from the company 22) Theft or unauthorized removal of company property 23) Using undisclosed information within the company to buy or sell company stocks for unfair gains or short-term (within 6 months) trading of company stocks 24) Engaging in multilevel marketing or other commercial activities within the company 25) Neglect of overnight duty or facility management 26) Neglect of security checks 27) Private financial transactions, pledges, guarantees, etc., between business partners or employees 28) Engaging in dual employment or part-time work without company permission 29) Sexual misconduct in the workplace that damages the company's reputation, including violence against women. (Sexual assault, sexual harassment, internal affairs, etc.) 30) Acts of workplace harassment that damage the company's reputation 	
<p style="text-align: center;">Property Management</p>	<ul style="list-style-type: none"> 1) Damage to company property such as products, goods, facilities, equipment, etc. 2) Loss of company property such as machinery and tools 3) Negligence in equipment inspections or non-compliance 4) Neglect in handling firefighting equipment 5) Smoking or handling firefighting equipment in hazardous locations 6) Violation of the duties of safety managers or safety rules 7) Unauthorized use or disposal of raw and ancillary materials 8) Personal use of company office supplies 9) Refusal or obstruction of inspection of personal belongings or outgoing items 	

	<ul style="list-style-type: none"> 10) Improper selection of vendors or favoritism toward specific companies 11) Negligence in managing purchased items (improper storage, excessive purchases, etc.) 12) Unfair handling of bid-related matters 13) Acts of exerting pressure such as bribery and instructions in bidding and contracts 14) Negligence or unfairness in construction supervision or inspection 15) Unfair payment before delivery 16) Causing damage to the company through the illegal or unfair conclusion or mismanagement of contracts 	
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Category	Prohibited Act	Note
Accounting	<ul style="list-style-type: none"> 1) Embezzlement and misuse of funds 2) Falsification and unfair settlement of accounts 3) Failure to receive proper documentation 4) Causing damage to the company due to violations of accounting standards and tax laws, etc. 	
Document Management	<ul style="list-style-type: none"> 1) Long-term abandonment of documents exceeding the retention period 2) Improper disposal of documents 3) Loss of important documents 4) Forgery or alteration of documents 5) Unauthorized use and misuse of company seals 	
Other	<ul style="list-style-type: none"> 1) Neglecting supervision of subordinates 2) Obstruction of audit <ul style="list-style-type: none"> (a) Refusal or non-cooperation with the audit (b) Non-submission of audit materials (c) False statements (d) Other acts of non-cooperation with audits 	

(Annex Form No. 1)

Report Handling Procedure

●: Sender or Supervisor ○: Receiver

Category	Recipient (Reporter)	Vice Supervisor	Ethics Management Department	Provider	Note
1. Writing of report 2. Filing of report 3. Handling instructions given 4. Processing 5. Forwarding of report 6. Filing of supporting documents 7. Confirmation of results 8. Ethical management cooperation letter sent 9. Compilation Report (Semi-Annual)					(If the reporter is a department head, submit report to the head of the Ethics Management Department) (If necessary) <div style="border: 1px solid black; padding: 5px; width: fit-content; margin-left: auto; margin-right: auto;">Report to the CEO</div>

() Receiving Report

1. Personal Information

Category	Reporter	Provider
Department		
Position		
Name		

(Relationship to the reporter:)

2. Report Details

Category	Contents	Note
Date/Location of Receipt		
Type/Quantity/Amount		
Details of the Receipt (Specify)		
Reporter's Requests		
Instructions from Department Head		
Special Notes		

Reporter's Department:
Name : (seal)

Date filed:
Filed by:

(Annex Form No. 2)

Ethics Pledge

Department :

Name :

I, as an employee of Taihan Cable & Solution Co., Ltd., pledge to establish a sound professional ethical perspective based on the core values of 'People-Centric Culture, Customer Value, and Future-Oriented' and actively participate in the company's ethical management.

To achieve this, I commit to fostering a healthy corporate culture through business practices in line with the company's Code of Ethics and Ethical Charter, faithfully practicing ethical management.

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Pledgee: (Signature)

To the CEO of Taihan Cable & Solution Co., Ltd.