**DreamTowerSolution Code of Conduct Guidelines**

Supervising department: Business Planning team

Enacted on: 2023. 2.28

**Chapter 1 General provisions**

**Article 1 (Purpose)** The purpose of this guideline is to establish the Code of Ethics (Appendix 1) and specify the details for its implementation in order to establish a sound financial order and maintain the integrity of employees.

**Article 2 (Definitions)** The definition of terminology used in this guideline shall be as follows.

1. Stakeholders: This refers to individuals, corporations, and other entities, whose interests are affected by an employee's actions or decisions in connection with the business. (Including customers, companies with whom it has other contractual and transactional relationships, and their employees)
2. Public servant, etc.: This refers to public servants or persons engaging in public duties in accordance with Article 2 of the Improper Solicitation and Graft Act.
3. Private person performing public duties: This refers to a person who falls under any of the subparagraphs of paragraph 1, Article 11 of the Improper Solicitation and Graft Act.
4. Gifts: This refers to goods, marketable securities, lodging vouchers, memberships, admission tickets, and other similar items provided without consideration (including when the consideration is significantly less than the market price or trade practice).
5. Entertainment: This refers to entertainment such as food, golf, or other amenities such as transportation, accommodation, and other similar services.

Article 3 (Ethical practice answering own question) This guidance shall be applied to all employees and executives (except the non-executive director), who work at DreamTowerSolution and its subsidiaries, etc. Provided that, in the case of subsidiaries, the guidance may be adapted to take into account industry characteristics, etc. as long as it does not compromise market order and investor protection.

**Chapter 2. Ethical practice code of conduct**

**Article 4 (Ethical practice answering own question)** Whenever an ethical conflict arises regarding any action, including whether or not it is illegal, in the performance of their duties, all executives and employees shall endeavor to eliminate unethical behavior by asking themselves the following questions until they have made an ethical judgment and conviction.

1. Is my heart pounding right now as I do this?
2. Would I feel comfortable talking to my family about what I did?
3. What would I say if someone else did this?
4. What would others think of me if my actions were publicized?

**Article 5 (Prohibition of private use of company assets)**

1. Golf courses or luxury establishments are prohibited for employees using company financial resources such as corporate cards and departmental expenses provided by company. Provided that, there is an exception for prior reporting to the CEO for the purpose of organization revitalization.
2. Do not use the company's human and material resources for personal use or for the benefit of a third party.

**Article 6 (Restrictions on gifts, entertainment, etc. among employees and executives)**

1. You can give or receive modest gifts and entertainment that are within the boundaries of social norms, but the followings are prohibited.
2. A subordinate offering a gift to a superior
3. Accepting gifts among executives and employees, such as wreaths for holidays, promotions, job changes, etc.
4. Team-based sponsorship in accordance with pep rally, etc. is prohibited.
5. Exceptions to the application of paragraphs ① and ② above include gifts and entertainment provided by a superior to a subordinate in his or her organization for the purpose of morale enhancement such as comfort, encouragement, reward, etc.

**Article 7 (Restrictions on gifts, entertainment, etc. with stakeholders)**

1. Executives and employees shall not provide unfair contributions such as bribes to stakeholders even for the benefit of the company, and shall not accept gifts or entertainment in exchange for anything of value with stakeholders.
2. Acceptance of modest gifts and entertainment from stakeholders may be permitted on a limited basis if they are not in exchange for anything of value and are unavoidable in the performance of official duties. Provided that, in the event of unavoidable receipt of gifts, entertainment, etc. exceeding KRW 50,000, you must immediately report it to the compliance officer by filling out the ethical practice report form (Annex No. 1 form) and process it according to the method instructed by the compliance officer.
3. It is prohibited to make various guarantees with stakeholders, pay loans on behalf, provide collateral, purchase movable assets and real estate at a lower price than the market price, and conduct similar acts.
4. Executives and employees may not borrow or lend money to or from stakeholders or each other.

**Article 8 (Prohibition of improper solicitation and provision of money, etc. to public servant, etc.)**

1. Executives and employees shall not directly or through a third party make illegal solicitations to public servant, etc. (including private person performing public duties).
2. Executives and employees shall not provide, promise to provide, or express an intention to provide anything of value prohibited from acceptance to public servant, etc. (including private person performing public duties) or their spouses.
3. Executives and employees shall not engage in any of the following acts if the employee has the status of a public servant, etc. due to the company falling under a public institution, or if the company falls under a private person performing public duties due to the receipt of authority from a public institution and the employee is practically engaged in the work of the public service.
4. Performing duties in accordance with the improper solicitation
5. Accepting, soliciting, or promising anything of value that is not permitted to be accepted
6. Other compliance matters, such as the reporting and handling of illegal solicitations or prohibited gifts related to public servant, etc. (including private person performing public duties), shall be in accordance with the Improper Solicitation and Graft Act.

**Article 9 (Restrictions on transactions, etc. using job-related information)** Executives and employees shall not engage in financial transactions or investments related to marketable securities, real estate, etc. using undisclosed information learned in the course of their duties, or provide such information to others to assist in financial transactions or investments.

**Article 10 (Compliance related to the business activities)**

1. Executives and employees shall be familiar with and comply with various relevant laws and regulations in conducting business activities.
2. Do not engage in pretend behavior, such as communicating unverified facts (rumors) or false statements.
3. The collection of information must be justified by the customs of the commercial practice and no information will be unreasonably disclosed.
4. Do not knowingly conceal or manipulate material.
5. Do not sign on behalf of a customer or keep a registered seal and improperly use the seal, and do not accept documents based on such behavior.
6. Promising a customer to share all or parts of the loss (profits) arising from a transaction, or distributing or compensating for profits and losses, are prohibited.
7. Do not act as a trustee for a customer's transaction knowing that the transaction is insider trading or market manipulation.
8. Do not use improper methods (e.g., misstatement of ledgers) to conceal illegal transactions by customers.
9. Do not overemphasize competitors' weaknesses or slander them through unverified material.

**Article 11 (Compliance when responding to customers)**

1. Always listen to your customers, believe that their needs are always right, and put yourself in their shoes.
2. Actively provide customers with facts they need to know or deserve to know.
3. If you are unable to answer the call due to lack of knowledge or other unavoidable reasons, you must ensure that the customer does not repeat the question and transfer the call to an employee who can answer it correctly.
4. Always be courteous and sincere with customers, and always endeavor to be knowledgeable about your job-related financial expertise so that customers can trust you.
5. Keep the customer's information secure and take the highest possible care to ensure their privacy is not compromised.

**Article 12 (Prohibiting work performance disruption behavior)**

1. Do not engage in excessive Internet surfing, chatting, entertainment, or small talk during work hours that is not directly related to the individual's job duties.
2. Do not stay in the office after hours for personal use, such as excessive Internet surfing or other recreational activities that are not necessary for work, or claim late-night meal reimbursements.
3. Avoid going to luxury establishments that are out of proportion to your income or buying indiscriminately in order to maintain a healthy spending lifestyle.
4. Do not smoke outside of company smoking areas.
5. Avoid excessive alcohol consumption, entertainment, and hobbies that may interfere with company business.
6. Executives and employees must not engage in the following behaviors in connection with political activities.
7. Political activity in the workplace
8. Misrepresenting an individual's political positions and contributions, such as donations, as those of the company
9. Excessively voicing and pushing subjective, one-sided opinions about candidates, parties, etc. that you support

**Article 13 (Obligation to promote a healthy workplace, including preventing sexual harassment)**

1. Avoid gossiping and do not forcibly encourage drinking at parties.
2. Do not access pornographic sites or view or distribute pornographic material in the workplace.
3. Do not engage in unnecessary touching, sexual jokes, etc. that cause sexual humiliation.
4. Executives and employees shall always be aware that behavior based on their own subjective social norms may constitute sexual harassment to others.

**Article 14 (Mutual respect obligations among employees)**

1. Executives and employees shall strive to create a creative and autonomous work environment and an organizational culture based on mutual trust and understanding.
2. Do not create cliques and discriminate against individuals that have nothing to do with their abilities, such as education, region, blood ties, gender, etc.
3. Do not engage in conduct that objectively causes severe distress to another person, such as inappropriate name-calling, name-calling, curse, negative bias, or threatening behavior that takes advantage of the superior conditions such as one's position, physical condition, etc.
4. In relation to the task instructions and performance between superiors and subordinates, the following items shall be observed.
5. Subordinates must respect the opinions of their superiors in performing their duties and must absolutely obey legitimate orders and instructions.
6. A superior shall not give a subordinate an unfair work order that is illegal, and a subordinate shall reject such an order if received.
7. A superior shall not direct a subordinate to perform a private duty, and a subordinate may refuse to do so.
8. If a subordinate is concerned about damage to the company due to an unfair order from a superior, he/she is obligated to report it through the internal complaint processing management to prevent the expected damage, and the company shall ensure that the subordinate does not suffer any disadvantage due to such report.
9. No superior shall misrepresent the opinions and performance of a subordinate as his or her own.
10. Do not use disrespectful language or disparaging remarks about other executives and employees.
11. Executives and employees shall not request other employees to perform any of the following acts for the benefit of themselves, their relatives, and acquaintances.
12. Issuing credit cards and other cards
13. Signing up for an Internet homepage
14. Purchasing goods (including memberships, accommodations, admission tickets, etc.)
15. Providing qualifications for vendor referrals and vendor selection
16. Other similar behaviors

**Article 15 (Rewards and disciplinary action)** Executives and employees who comply with the Code of Ethics and the Code of Conduct Guidelines shall be rewarded for their contributions to the company's ethical management activities, and executives and employees who commit acts that violate the Code shall be disciplined. Details of rewards and disciplinary actions shall be determined separately.

**Article 16 (Interpretation standard)** In the event that the Code of Ethics and the Code of Conduct Guidelines do not provide for ethical management activities or there is a dispute over their interpretation, it shall be subject to the interpretation and decision of the compliance officer.

Addendum (2023.2.28)

This guidance shall be effective as of Feb. 28, 2023.

(Appendix 1)

**Code of ethics**

All executives and employees of DreamTowerSolution have established the Code of Ethics for Employees and pledge to actively implement it in order to promote the healthy growth of the company that prioritizes customer satisfaction and maximization of shareholder value.

One. We recognize that customers are the foundation of the company's existence and always strive to create profits from the customer's point of view in a fair manner, and prioritize the interests of customers over the interests of the company or individual employees.

One. We shall not engage in unfair trade practices that violate the public interest and establish a sound trade order through fair business activities.

One. In our business and personal activities, we shall always observe the dignity of a financial person, comply with financial laws and regulations, and not engage in any behavior that hinders the development of society or violates the company's goals and interests.

One. We hold honesty and trust as our most important values and fulfill our duties and missions through fair and impartial conduct based on moral ethics.

One. As members of a healthy society, we shall lead a moderate life and strive for self-development, and we shall not engage in any behavior that would damage the company's reputation.

(Annex No. 1 form)

**Ethical practice report form**

In accordance with the Code of Conduct Guidelines (paragraph 3, Article 7), I hereby report as follows that I have received excessive gifts, entertainment, etc. from stakeholders.

- Next -

|  |  |  |  |
| --- | --- | --- | --- |
| Description of stakeholders | Name of company / department (stakeholders) | Name of stakeholders / name of customer | Remarks |
|  |  |  |
| Description of received gifts / entertainment  (Describe in detail including the amount) |  | | |
| Cause of the occurrence |  | | |
| Comments for future processing |  | | |

Reporting date: Month Date Year

(Reporter)

Department:

Name: (Seal)