## Hankook Tire's Code of Ethics

Chapter 1 General Rules

## I. Article 1 (Purpose)

This regulation aims to establish and develop the code of ethics of the company by presenting the correct behavior and value judging standards that shall be obeyed to the employees of the company so that all employees can understand and practice the ethical management policy of the company. It is for that purpose.

## II. Article 2 (Scope of Application)

This regulation shall apply to all stakeholders including employees of the Company and partner companies that have a business relationship with the Company.

## III.Article 3 (Definition of terms)

- 1. Company : Company includes Hankook Tire & Technology, and domestic and overseas affiliates.
- 2. Employees : Employees and employees who receive wages in return for providing work to the company.
- 3. Stakeholder : A person who is directly or indirectly related to the performance of the company and influences the decisions of the company and its employees.
- 4. Decree : Laws and ordinances, enforcement regulations, and common law of the country where the Korean or overseas affiliates are located or the business of the company is operated.

#### IV.Article 4 (Management Organization of Code of Ethics)

- 1. The management organization of the Hankook Tire & Technology Code of Ethics shall be the Audit Team and the Ethics Management Committee.
- 2. If it is not provided in this regulation or the interpretation of the regulations is unclear, it shall be subject to the interpretation and decision of the Audit Team or the Ethics Management Committee.

Chapter 2 Basic Ethics of Employees

### V. Article 5 (Basic Principles)

- 1. Comply with relevant laws and company regulations in the performance of business.
- 2. Faithfully carry out the duties imposed in accordance with their position and position without harming the honor of the company.
- 3. Do not discriminate against others on the grounds of nationality, race, sex, religion, social status, etc.
- 4. Do not make any statements or actions that contain social and cultural prejudices such as sexual harassment or profanity.
- 5. Avoid adverse effect on a corporate order, causing any fear of undermining the company's social reputation from sexual harassment, such as sexual harassment outside the company, or deteriorating trust relationship with nearby colleagues and the company.

#### VI.Article 6 (Preparation and management of important information)

- 1. Do not manipulate documents or counts intentionally or inadvertently, record and report all information accurately, and keep the documents in accordance with statute and company regulations.
- 2. Do not obtain information in an unreasonable way and do not use it for fraudulent purposes or disclose it to a third party.
- 3. Do not use software that violates laws and corporate regulations.

#### VII.Article 7 (Fair Use of Company Assets)

- 1. All assets (tangible assets, intangible assets) of the company are used for business purposes only and not for personal purposes.
- 2. Do not reveal company's business secrets or use them unintentionally during or after retirement without prior permission or approval.
- 3. Protect the rights of the company while respecting the rights of others regarding intellectual property.

## VIII.Article 8 (partnership with partner companies)

- 1. Form a reciprocal relationship with partner companies in accordance with the principles of good faith.
- 2. Provide equal opportunities to all eligible suppliers and select suppliers in accordance with objective and fair judging criteria.
- 3. Do not make unreasonable demands on suppliers by using superior position.
- 4. The partner company shall be liable to the company if it fully understands the ethical management policy of the company, actively participates in ethical management activities.
- 5. Observe laws and company regulations when trading between affiliates.

# Hankook Tire's Code of Ethics

Chapter 3 Responsibility on Client, Shareholder, and Employee

## IX.Article 9 (Responsibility to Customer)

- 1. Customer satisfaction is the highest priority of all judgments and actions.
- 2. Customer information is not leaked to the outside or used for other purposes without prior consent of the customer.
- 3. As a responsibility of the Leading Global Tire Company, which provides value and enjoyment to the customer, the company adheres to consumer
- protection laws and does not engage in excessive and false advertising and customer deceit.
- 4. Adhere to fair competition principles without libeling or harassing competitors.

## X. Article 10 (Responsibility to Shareholders)

- 1. Respect the rights of shareholders, legitimate demands and suggestions by providing accurate and prompt management results.
- 2. Record and manage financial statements in accordance with generally accepted accounting standards.

## XI.Article 11 (Responsibility to Employees)

- 1. Respect the individual's basic human rights, such as the privacy, dignity, and personality of employees.
- 2. Evaluate and adequately compensate employees for their ability and achievement in accordance with fair standards.
- 3. Provide safe and pleasant workplace and office environment to employees.

#### Chapter 4 Ethical Management Organization Culture

## XII.Article 12 (Itemizing of Work)

- 1. If there is a conflict between the interests of the company and the individual, the interests of the company shall be prioritized.
- 2. Do not use the property of the company and its position to promote private interests, and do not engage in any misconduct such as embezzlement or utility of company assets.
- 3. Do not trade securities, such as trading securities, using information acquired in the course of business.
- 4. A company with a personal interest will report it to an advanced person in advance and will not exercise any unfair influence on the transaction.

#### XIII.Article 13 (Creating a sound organizational atmosphere)

- 1. Create a work environment where employees can demonstrate proactive leadership through constant self-development.
- 2. Maintain organizational culture based on mutual respect and mutual communication between top and bottom and peers.
- 3. Forbid all gambling activities in and out of the company, and avoid luxury, waste, overuse, and overfeeding, and make a thrift economy.

## XIV.Article 14 (Political Participation and Activities)

- 1. Respect for the right to vote and political will of employees, but do not engage in political activities within the company.
- 2. Employees shall not provide donations or expenses for political activities to political parties, politicians, and election candidates using the Company's assets.
- 3. Do not use the company's personnel, facilities, equipment, etc. for the purpose of political activities as well as donations (money or goods).

Chapter 5 Priority on Environment, Safety, and Health

## XV.Article 15 (Environmental Protection)

- 1. Observe international standards related to environmental protection, relevant laws and regulations, and company regulations.
- 2. The environment deeply recognizes that all human beings should be preserved forever, and leads the efficient use of resources such as recycling of resources.

## XVI.Article 16 (Safety and Health Consideration)

- 1. Comply with safety regulations and standards and strictly observe safety regulations.
- 2. Create a pleasant work environment and prevent safety accidents.

# Hankook Tire's Code of Ethics

Chapter 6 Social Responsibility as a Global Company Citizen

## XVII.Article 17 (Contribution to the State and Society)

- 1. The company respects and abides by all laws and regulations, accounting standards and trading customs at home and abroad.
- 2. Respect the principles of market competition and trade practices and trade practices; Do not take it.
- 3. The company contributes to the development of national and local communities by creating jobs and earnest payment of taxes as a corporate citizen. 4. The Company shall comply with laws and regulations such as the Foreign Exchange Control Law, and shall prepare the sources and names of funds in
- accordance with laws and accounting standards.
- 5. The Company is a Leading Global Tire Company and faithfully fulfills the laws and regulations related to import and export.
- 6. The Company shall endeavor to contribute to social contribution activities such as charitable donation for corporate social responsibility.

## XVIII.Article 18 (Global Entrepreneur)

- 1. All business activities abroad shall be carried out in accordance with the laws and regulations of the countries concerned and with respect to the culture and traditions of each country.
- 2. Comply with international agreements and laws for fair trade in each country (US Foreign Corrupt Practices Act, UK Bribery Act, OECD Anti-Bribery Convention, etc.).
- 3. The Company shall prohibit the use of facilitation payments in violation of laws and ordinances to facilitate the processing of business.

#### Chapter 7 Obeisance of Code of Ethics

### XIX.Article 19 (Basic Principles)

- 1. Employees shall strictly observe the ethical rules as a basis for action and value judgment.
- 2. The Company shall discipline its employees in violation of the Code of Ethics in accordance with the fine of discipline, but shall extenuate the circumstances when declaring voluntarily.

#### XX.Article 20 (Obligation to report)

Employees should report the facts to the Audit team when they know that the actions of others, as well as others, are in violation of the code of ethics.

#### XXI.Article 21 (Protection of Infringer)

We must thoroughly ensure the confidentiality of the prospective identity of ethical management violations and protect them from any form of disadvantage.

## XXII.Article 22 (Measures for Violation of Code of Ethics)

- 1. If it is perceived or determined to have committed an activity that is inconsistent with the Code of Ethics, Audit activities may be carried out.
- 2. If it turns out to be a violation of the Code of Ethics, it shall be referred to the personnel committee for deliberation and resolution.
- 3. All officers, including managers, are responsible for training and managing their employees to comply with the Code of Ethics.
- 4. This Code of Ethics shall be observed by the employees and stakeholders of the Company, and if it is violated, it shall exclude the generic penalties such as the exemption.

#### Addendum

- 1. The Hankook Tire & Technology Code of Ethics shall be enacted on August 1, 2001.
- 2. The Hankook Tire & Technology Code of Ethics shall be amended on February 01, 2005.
- 3. The Hankook Tire & Technology Code of Ethics shall be amended on July 15, 2007.
- 4. The Hankook Tire & Technology Code of Ethics shall be amended on October 08, 2010.
- 5. The Hankook Tire & Technology Code of Ethics shall be amended on April 01, 2013.
- 6. The Hankook Tire & Technology Code of Ethics shall be amended on July 01, 2014.
- 7. The Hankook Tire & Technology Code of Ethics shall be amended on August 01, 2017.
- 8. Details on the prohibition of illegal gain such as money and money shall be separately determined in the "Handling of Unfair Benefit Including Money and Worth."
- 9. The details of using social media are set out separately in 'Usage Tips for Social Media'.
- 10.Hankook Tire & Technology's code of ethics shall be revised and effective from January 29, 2021.
- Details of "Prohibition of receiving unfair benefits such as Wealth" and "Use of social media" shall be separately determined in "Ethics Regulations Practice Guideline."
- 11.Hankook Tire & Technology's code of ethics shall be revised and effective from 2/24/2021.

# **Operational Guidelines for Whistleblowing System**

Chapter 1: General Provisions

## I. Article 1 (Purpose)

The purpose of this guideline is to prevent misconduct and improve a unreasonable work process by protecting and supporting in-house misconduct whistleblowers and setting matters necessary for the operation of the whistleblowing system, such as receiving and handling reports and protecting and compensating for whistleblowers.

### II. Article 2 (Coverage)

This guideline applies to all stakeholders and outsiders, including the company's executives and employees, and business partners with which the company has its business relationship.

### III.Article 3 (Definition of Terms)

The definition of terms used in this guideline shall be as follows:

- 1. "Company" includes Hankook & Company, Hankook Tire & Technology Co., Ltd. and its affiliates.
- 2. "Employee" refers to all executives and employees who receive wages in return for providing their work to the company.
- "Stakeholder" refers to a person who is directly or indirectly related to the company's business operation and mutually influences the decision-making of the company and its executives and employees.
- 4. 'Reporting' refers to a series of actions that inform the Management Diagnosis Team 1 and 2 (hereinafter referred to as the Management Diagnosis Team) about the activity to be reported by the reporter through the reporting channel or to request the correction.
- 5. 'Reporting activity' refers to an act of making a statement, testifying, or providing data in investigation, examination, and litigation regarding the report.
- 6. 'Reporting channel' refers to the company's cyber audit office, which is opened for any employee and other party to submit a report, and make a phone call, send an e-mail, post mail, or direct visit to the Management Diagnosis Team.
- 7. "Reporter" refers to a person who submits a report.
- 8. 'Reporters' refer to a person who states, testifies, or provides data in investigation, examination, and litigation regarding the report.
- 9. 'Act subject to report' refers to an act that falls under any of the following sub-paragraphs (hereinafter referred to as 'misconduct')
  (1) abusing one's position or authority in relation to duty or violating laws, articles of incorporation, and company regulations (hereinafter referred to as "laws") to promote self or a third party's interest

(2) inflicting damage on the company property in violation of laws and regulations in using the company's budget or concluding and executing a contract to which the company is a party, or regarding acquisition, management, and disposition of its property

(3) violating the company's code of ethics and its subordinate rules (with receiving and taking unfair benefits such as money and valuables, sexual harassment...)

(4) causing damage on the company property due to irrationality and inefficiency of the business system

10. "Disadvantageous disposition" refers to any of the following dispositions:

- (1) disadvantageous measures corresponding to loss of identity, such as suspension or dismissal
- (2) unfair personnel measures such as warning, reprimand, wage reduction, suspension
- (3) personnel measures against a person's will, such as transfer, removal, non-assignment of duty, and job relocation
- (4) discrimination in performance evaluation and payment of wage or bonus
- (5) measures that give economic disadvantages, such as termination of contracts with business partners

#### IV.Article 4 (Management Organization and Operation)

- 1. The Management Diagnosis Team shall open and manage a report channel to activate the report, and handle the information received through the report channel.
- 2. The Management Diagnosis Team shall have a person in charge of the reporting matters under Paragraph 1 to perform the duty of each of the following sub-paragraphs:
  - (1) receive, consult and hand the reports
  - (2) provide counseling and relief procedure for reporters
  - (3) other tasks necessary for operation of the reporting system
- 3. The interpretation and decision of the management team shall be followed unless anything stipulated in this guideline or interpretation of the regulations is unclear.

Chapter 2: Report

### V. Article 5 (Obligation to Report)

- 1. Executives and/or employees shall report without delay if they are aware of, coerced, or offered to commit misconduct by other executives and employees in performing their duties.
- 2. Anyone who is obligated to take over his/her duty stipulated in the employment rule shall submit a report within 6 months from the time of taking over when recognizing any misconduct related to his/her duty.

# **Operational Guidelines for Whistleblowing System**

## VI.Article 6 (Reporter's Responsibility)

- 1. Making a report under Article 5, the reporter shall be convinced of truthfulness of the report or is in a situation that corresponds to it.
- 2. If the reporter shall not be protected under this guideline if he/she knew or could have known the report was false when making a report under Article 5.

## VII.Article 7 (Reporting Method)

- 1. The reporter shall specify the following matters in the 'Report' (Attachment 2) and submit it through the reporting channel along with the relevant evidence in accordance with the six-fold principle.
  - (1) personal information such as the reporter's name, department, and contact details
  - (2) personal information such as name, department, and contact details of the reported party
  - (3) purpose and reason for reporting
  - (4) details of misconduct
- 2. For Paragraph 1, in case of urgent need such as misconduct which is currently in progress at the time of reporting, only the fact shall be reported without evidence, and the report may be made under the real name or anonymously depending on the reporter's circumstances.

### VIII.Article 8 (Reporting Due)

- 1. The reporting due for an act subject to report shall be within 5 years from the date of completion of the act.
- 2. Reporting shall be made within 6 months from the date of becoming aware of the act. If the reporter is engaged in the act, the report shall be made within one month from the date of the end of the act.

### IX.Article 9 (Request for Supplemental Reporting)

- 1. If the information in the report is partially omitted or any detail is unclear, the Management Diagnosis Team may set a reasonable period and request supplemental information in the report.
- 2. The Management Diagnosis Team may request additional supplementation by setting a period of up to 7 days if the reporter does not provide any supplement within the period despite the request for supplementation under Paragraph 1. Unless any supplementation is provided within that period, the report may be closed in accordance with Article 11.

## X. Article 10 (Investigation of Report)

- 1. The Management Diagnosis Team who received the report shall file the report without any delay.
- 2. The investigation period shall be within 60 days from commencement of the investigation, and the period may be extended within 30 days for any justifiable reason.
- 3. The reporter has the right to be investigated in accordance with the fair procedure.

## XI.Article 11 (Delivering Report)

The report result shall be delivered immediately or have the periodic report be submitted to the CEO/audit committee depending on the severity of the case.

- 1. Issues to be reported immediately (such as misconduct with senior management and internal accounting management system; material impact on financial statements)
- : Management Diagnosis Team 1 & 2 Internal Control Team (Audit Committee Dedicated Organization) Audit Committee
- 2. Regular Reporting Issue: CEO

## XII.Article 12 (Closing Report)

- The Management Diagnosis Team may suspend or close the report without investigation if it falls under any of the following sub-paragraphs:
- 1. content of the report is clearly false
- 2. reporter's personal information is unknown
- 3. the reporter fails to provide supplementation within due even after receiving the request for supplementation of the report or proof data more than twice
- 4. the notification of the result of the handling of the report is reported again without any justifiable reason
- 5. the information of the report corresponds to the contents disclosed in the media, and there is no new evidence other than the disclosure
- 6. an investigation into the relevant misconduct has been started or has already been completed in accordance with other laws or company regulation 7. there is no evidence to prove the act to be reported

## XIII.Article 13 (Request for Institutional Improvement)

- 1. The Management Diagnosis Team may request the relevant department to improve the system to prevent any recurrence of the reported misconduct.
- 2. For Paragraph 1, the relevant department shall actively implement the improvement, discuss the progress with the Management Diagnosis Team, and notify the team of the improvement result without any delay.

# **Operational Guidelines for Whistleblowing System**

Chapter 3: Protection of Reporter

#### XIV.Article 14 (Adherence to Confidentiality)

- 1. No one shall inform, disclose, imply, or report on the reporter's personal information to anyone knowing that the person is the reporter. However, this is not the case when the reporter has written and consented to the 'Consent to Identity Disclosure' (Attachment 4).
- 2. Under Paragraph 1, the investigator (including members of the Management Diagnosis Team) regarding the report shall fill out and comply with the 'Non-disclosure Agreement' (Attachment 3).
- 3. If the reporter's identity is disclosed in violation of Paragraph 1 by an executive or employee, the Management Diagnosis Team shall investigate the exposure route to investigate and request a disciplinary action against those involved.

#### XV.Article 15 (Prohibition of Searching for Reporter)

- 1. No one shall inquire about the reporter's identity to the Management Diagnosis Team, or engage in any action that makes it possible to reveal the reporter's identity.
- 2. Receiving an inquiry as in Paragraph 1, a member of the Management Diagnosis Team shall explain that the question is an action prohibited immediately in accordance with this quideline, and may request a disciplinary action if necessary.
- 3. Deciding to be protected as the reporter identity is disclosed, the reporter may notify the Management Diagnosis Team of the fact and request the protection.

## XVI.Article 16 (Prohibition and Remedy for Disadvantageous Disposition)

- 1. No one shall be discriminated against personnel, disciplinary action by the company in terms of status or working condition (hereinafter referred to as 'disadvantageous disposition') based on reporting or related statement or data submission to the reporter.
- 2. No one shall prevent anyone from making a report, or force the reporter to withdraw the report.
- 3. When receiving a disadvantageous disposition for reporting, the reporter may request the Management Diagnosis Team to take measures to ensure the reporter's secure identity (hereinafter referred to as 'secure identity measure'), such as restoration of the disadvantageous disposition and personnel transfer.
- 4. When there is a request under Paragraph 3 or when it is suspected that there is a disadvantageous disposition, the Management Diagnosis Team shall initiate an investigation.
- 5. As a result of the investigation under Paragraph 4, if it is determined that the reporter is likely to suffer personnel or other disadvantage, the reporter may request the relevant department head to take measures to secure his/her status, and the department head shall comply therewith unless there is a justifiable reason.
- 6. The legal advice shall be obtained to protect the reporter if necessary.

#### XVII.Article 17 (Reduction of Liability)

- 1. If the reporter's misconduct is discovered, the disciplinary action may be reduced or exempted. However, this is not the case if the exemption is deemed inappropriate as it falls under any of the following conditions:
- (1) the reporter returns no unreasonable profit or compensation for damage
- (2) the person who has been reduced or exempted has committed the same or similar misconduct within 3 years
- 2. Reporting an act subject to report shall be deemed that no duty to comply with confidentiality, such as the employment rule, has been violated.

## Chapter 4: Rewards

### XVIII.Article 18 (Compensation Payment)

- 1. The Management Diagnosis Team shall determine the level of compensation for the reporter and pay compensation according to the 'Compensation Payment Standard' (Appendix 1) when the report has an effect of giving property to the company (increasing revenue or decreasing loss).
- 2. The compensation paid under Paragraph 1 shall be received by the Management Diagnosis Team for secure confidentiality; the payment shall be made into the savings account in the beneficiary's name. However, if the beneficiary wishes, payment may be made in other ways.
- 3. Under Paragraph 2, the department head and the person in charge of the compensation payment process shall fill out and comply with the 'Nondisclosure Agreement' (Attachment 3) for secure identity.

## XIX.Article 19 (Excluding Compensation Payment)

No compensation shall be paid for any of the following:

- 1. it is difficult to ascertain whether the information reported is not true or it is difficult to confirm the truth due to lack of evidence
- 2. issues have already been recognized by investigative agencies, judicial agencies, and investigations have been initiated, or any disciplinary procedure is in progress or has been completed
- 3. issues have already been reported and under investigation by the Management Diagnosis Team and other relevant division, or have undergone or completed the disciplinary procedure
- 4. issues have already been disclosed in media
- 5. unknown who the reporter is report has been submitted anonymously or with confidentiality
- 6. issues related to simple business improvement
- 7. report made by a member of the Management Diagnosis Team
- 8. compensation is deemed inappropriate for other compensation and immunity

# **Operational Guidelines for Whistleblowing System**

## XX.Article 20 (Return and Withdrawal of Compensation Payment)

The compensation shall be returned and the exemption shall be withdrawn if it is found that the subject of exclusion is identified after payment of compensation or exemption.

Chapter 5: Penalty

## XXI.Article 21 (Penalty)

- 1. The Management Diagnosis Team may request disciplinary action against those who violate this guideline, and severe punishment shall be given in accordance with the reward and punishment rule.
- 2. Those who report within the period of Article 5 (2) shall be reduced or exempted. However, the disciplinary action prescribed in the reward and punishment rule shall be aggravated for those in charge of duty who neglect to report after the period has been overdue.

## Addendum

- 1. This guideline shall take effect on July 1, 2015.
- 2. This guideline shall take effect on October 25, 2019.
- 3. This guideline shall take effect on May 23, 2020.
- 4. This guideline shall be revised and effective on January 29, 2021.
- 5. This guideline shall be revised and effective on December 1, 2021.

## **Ethics Regulations Practice Guideline**

Chapter 1: General Provisions

## I. Article 1 (Coverage)

This guideline applies to members of Hankook & Company Co., Ltd., Hankook Tire & Technology Co., Ltd., and its domestic and overseas affiliates.

## II. Article 2 (Policy)

This guideline sets the criteria for decision-making and behavioral judgment regarding the ethical conflict situations that may arise in doing business activities so that a member may correctly understand and implement the Ethical Regulations.

### III.Article 3 (Definition of Terms)

- 1. Wealth: All financial benefits such as money, securities, real estate, other goods, lodging vouchers, membership vouchers, admission tickets, discount vouchers, invitation vouchers, viewing vouchers, and other use vouchers, as well as any other tangible or intangible economic benefits such as offering entertainment, dinning or facilitation, debt repayment, employment, and business advantage
- 2. Entertainment and dinning: Offering or receiving meals, drink, golf, performance, domestic and international tourism, and speculative entertainment
- 3. Convenience: Refers to any benefit of receiving money and other goods, transportation in addition to entertainment, accommodation, tour information, and event sponsorship
- 4. Relatives: Any families in relation with the person and spouse
- 5. Stakeholders: Individuals or groups who may be directly or indirectly affected by their right or interest due to their job performance (i.e., members, shareholders, partners, local communities, countries)
- 6. Public money embezzlement: Keeping public money aside and using it as one's own asset
- 7. Use of public money: Misusing public money to other purposes privately
- 8. Theft of property: Unauthorized removal of company property for personal use or sale
- 9. Use for other purposes: Using the company's facilities, machinery, materials, and other goods for private interest
- 10.Negligence of work: Causing a loss to the company by not doing what should be done for his/her position.
- 11.Poor T&A: Deliberately or habitually being late for or absent from work, or abnormally handling T&A
- 12.Negligence of supervision: Causing loss to the company by failing to fulfill his/her duty of care as a manager
- 13.Unreasonable business conduct:
- (1) Fail to do what should be done or doing what should not be done for the purpose of giving advantage or disadvantage to a specific stakeholder
   (2) Delaying, obstructing, assisting, neglecting, or falsely reporting work for the purpose of causing advantage or disadvantage to a specific stakeholder
- 14.Supervisory act: Infringing on someone else's authority by engaging in a position, a task that should not be done under the position, or a task outside of one's authority
- 15.Sexual Harassment: Speaking or doing something that sexually humiliates the others
- 16.Personal information: Information about a living individual that allows identifying an individual with name, social security number, and video (including those that can be easily combined with other information even if the specific individual cannot be recognized by the information alone)
- 17.External lecture: Activities such as lecture, speech, contribution, review, and advice at external education, public relations, discussion meeting, seminar, public hearing, or other meetings, using information and knowledge acquired during the one's employment
- 18.Normal level: A level that does not violate any relevant law and regulation as it would have been recognized as being provided in a similar case where the location and purpose, scope and position of participants, and the organizer's internal standards and ability to bear it's cost are comprehensively considered
- 19.Count manipulation: Any actions that distort management with manipulation of sales, profit or loss, inventory and false reporting

Chapter 2 Receiving or Offering from Stakeholders

### IV.Article 4 (Unfair Solicitation and Acceptance)

- 1. Any solicitation and acceptance of solicitations that may violate a corporate regulation and law or impede fairness in relation to their duties are prohibited to stakeholders who perform their duties directly or through a third party.
  - · Signing a contract and guaranteeing any other similar advantage
  - · Intervening in HR such as recruitment and evaluation
  - · Asking or accepting an offer or mediation for future employment or recruitment
  - Asking or accepting unfair solicitation, mediation, or instruction for other private interest

#### V. Article 5 (Receipt of Wealth)

- 1. Principle: Offering or receiving any monetary advantage to a stakeholder shall be prohibited 'in any circumstance'.
  - Stakeholder: Any internal and external personnel who have a business interest with an employee
  - Monetary advantage: Anything tangible and intangible that can be economically valued

# **Ethics Regulations Practice Guideline**

## 2. Receiving wealth from external partners

## (1) Details of monetary advantage

Item	Description	Note		
Wealth	<ol> <li>Valuables: Cash, check, various securities</li> <li>Gifts and facilitation: Goods, lodging/membership/admission tickets</li> <li>Debt repayment (Settlement)</li> </ol>			
Entertainment	1) Meals, drinking, sports, performances, sightseeing			
Congratulations and Condolences				
Gambling · Sex	Sexual, speculative entertainment			
Others	<ol> <li>Borrowing, buying and selling in a high price</li> <li>Loan guarantee and money loan</li> <li>Job placement, contract agreement</li> </ol>			

- However, for meal and drink, exceptions shall be permitted for the following normal levels as long as the cost does not exceed 30,000 won per person :

[Normal level]

① There shall make no level of common sense, justification, work impact and mutual burden.

② It shall be appropriate to the place, purpose, method, frequency, frequency, timing, partner, social ethics, and customs.

③ There shall be no expectation of exchange in return.

There shall be no violence against the statute.

(5) It may vary depending on the specific situation, nature of work, position...

(2) No congratulations and condolences of yourself or your co-workers shall be received nor notified directly or indirectly to any business partner. In this case, notifying through a third party is also regarded as an act of notification.

If a supplier provides a wreath or congratulations and condolences even though the supplier has not informed of any of them, it shall be returned to the supplier after reporting it to the management diagnosis.

(3) If a stakeholder offers a gift or other wealth, it shall be politely refused or returned. Even if it is inevitably received, it shall not be owned by an individual, and shall be reported to the management team and returned to the partner company, and items which are in danger of being damaged, such as food shall be reported to the management team and used for social contribution such as donation. However, for souvenirs not exceeding 30,000 won, an exception shall be permitted.

(4) An employee shall report immediately in writing to the management team for the following concerns:

① when an employee him/herself receives or offers prohibited wealth or gift, or a promise of the act or an indication of intention

② when an employee or any family member receives or offers wealth or other prohibited gifts if you acknowledge that you have received the promise or indication of intention to act

An employee shall return it to the provider without delay or disclose his/her intention to reject it in the case of () In addition, the intention to cancel shall be disclosed to the person who is expected to receive the wealth.

An employee shall have his/her family member return to the provider without delay, or have their intention to refuse In the case of *Q*. In addition, a family member shall have his/her intention to cancel to those who are expected to receive the wealth.

(5) Wealth received inevitably shall be handled as follows:

1 If return is possible

- An employee shall submit wealth and other items which can be returned to the management diagnose team, who shall attach a notice and return it to the provider or any representative director of the provider.
- ② If return is impossible
  - If it is not returned due to a risk of corruption, deterioration, damage, its volume and weight, it shall be donated to a social welfare facility or other religious organizations in the provider's name.
  - If donation is impossible due to the corruption already progressed, it shall be disposed immediately.
  - If the provider's identification is unknown, it shall be donated to a social welfare facility or other religious organizations in the company's name. - If a high-value item which is not suitable for donation to an external organization, or if an appropriate donor cannot be found, or if it is difficult
  - to determine how to handle this, ask the management diagnose team to take care of it.
  - In the above case, the employee shall submit the relevant proof (i.e., donation receipt, certificate of destruction) to the management diagnose team without delay.

(6) Violation

- ① If anyone gets aware that a violation of this guideline has occurred or is occurring, it can be reported it to the management diagnose team.
- ② The reporter shall identify him/herself, the violator and details of the violation.
- ③ The personnel of the management diagnose team who receives reporting a violation shall ensure confidentiality of the reporter and any detail, and that the reporter shall not suffer any disadvantage from the report.

# **Ethics Regulations Practice Guideline**

### (7) Disciplinary Action

- ① The company may take disciplinary action against the employee who violated the prohibition of receiving wealth or other goods in accordance with the 'Reward and Punishment policy.'
- ② If an employee inevitably receives an unfair advantage such as wealth, but voluntarily reports and endeavors the follow-up process without delay, the penalty may be waived.

#### 3. Receiving/Offering wealth between employees

1	) I )etails	ot	monetary	/ advantage

, Details of monetary advantage							
ltem	Description	Note					
Entertainment	(1) Meals, drinking, sports, performances, sightseeing	Normal Level					
Congratulations and Condolences	(1) Promotion, advancement, inauguration	Normal Level					
Others	<ol> <li>Borrowing, buying and selling in a high price</li> <li>Loan guarantee and money loan</li> <li>Job placement, contract agreement</li> </ol>	Absolutely prohibited (Regardless of the normal level)					

#### [Normal level]

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① There shall make no level of common sense, justification, work impact and mutual burden.

② It shall be appropriate to the place, purpose, method, frequency, frequency, timing, partner, social ethics, and customs.

③ There shall be no expectation of exchange in return.

④ There shall be no violence against the statute.

⑤ It may vary depending on the specific situation, nature of work, position...

However, exceptions shall be permitted in the following cases: - Good-bye gifts between members at the normal level according to retirement and transfer

- (2) Wealth offered by subordinate members to the supervisor (officer) who have the power to make decision about evaluation and promotion shall not be accepted regardless of the normal level. No one shall offer or ask for money or anything for a business relationship. Customary promotion, forced meal and entertainment on birthday shall be prohibited.
- (3) Use the in-house bulletin board for congratulations and condolences between employees; sending personal in-house e-mail and invitation (obituaries and wedding invitations) shall be prohibited.
- (4) Souvenirs or promotional supplies for distribution to an unspecified number of people shall comply with the pre-decision rules and proceed after obtaining payment for the product when offering to a company's business partner.

(5) Wealth publicly offered to the employees in difficulty due to illness or disaster, such as rewards or prizes received through contests, lotteries does not constitute receipt of wealth.

- (6) Acts regarding donation and sponsorship
  - (1) The company's donation and sponsorship shall be done after obtaining approval according to the established procedure within the scope permitted by the relevant laws and social norms. However, any donation and sponsorship for the political purpose shall be strictly prohibited.
  - (2) Suffrage and political will of the employees shall be respected, however, no political activities shall be allowed within the company or during business hours.

## VI.Article 6 (Entertainment)

- 1. Accepting or making request or promise to the interested parties for entertainment shall be prohibited. Hospitality refers to various activities conducted for meetings and exchanges due to business, such as meals, drinking, golf, performances, and entertainment.
- However, exceptions shall be permitted in the following cases:
- Food, such as meals or drinks, provided by the organizer to all attendees at a formal event within the usual range
- 2. In principle, the cost of meals with business partners shall be basically borne by the company, and hospitality shall be provided within the limit. However, if the cost shall be inevitably shared with the supplier and paid at their expense, or if the supplier pays the full amount, it shall be approved by the supervisor (director).
- 3. Expensive meals, drinks, access to entertainment, golf exceeding the normal level with partners shall be prohibited.
- 4. Any entertainment at bars with an employee of opposite sex shall be prohibited regardless of the amount.

## **Ethics Regulations Practice Guideline**

#### VII.Article 7 (Provision of Facilitation)

Facilitation refers to offering or receiving a benefit such as transportation, accommodation, tourism, and event support. Accepting or making requests or promises to stakeholders inside and outside your business shall be prohibited.

However, facilitating transportation, accommodation, food that the organizer provides to all attendees uniformly within the usual range in an official event shall be exceptional.

#### VIII.Article 8 (Exemption of debt, repayment, guarantee and loan of assets such as Wealth)

- 1. Requesting or accepting offers from stakeholders for exemption, repayment, guarantees (regardless of the type of loan institution) for debts (card payment, credit value, loan, interest, etc.) shall be prohibited.
- 2. Lending or borrowing assets such as money with stakeholders is prohibited, and is considered a violation whether a contract is signed, interest, rent, or loan is paid or received.

### IX.Article 9 (Restrictions on illegal solicitation and offering wealth to spouse and other relatives)

A member including spouse and other relatives shall fulfill their usual duty of care and management, as it is an act of receiving or providing anything value in return to the interested parties according to Chapter 2 Receiving or Offering from Stakeholders.

#### X. Article 10 (Business with company in the name of the person, spouse, and relatives)

1. No one shall do business with the company in the name of the person, spouse or other relatives.

- However, exception is made when prior approval of the management team has been obtained for the following situations:
- when purchasing a company-owned asset under the name of the person, spouse, or other relatives
- when selling the assets of the person, spouse, or other relatives to the company
- 2. A member shall report to the management diagnosis team that the transaction has special relation whether or not it has violated the rule if he/she holds some shares in a company (i.e., suppliers, agencies, retail stores) where the person, spouse, and other relatives may exercise his/her management rights or if he/she is under the duty of management such as CEO, auditor, executive.

### XI.Article 11 (Joint investment with stakeholders, acquisition of joint property)

The person, spouse, and relative cannot acquire an asset such as movable property and real estate (including condominium, golf/health club membership, and joint venture business) to make joint invest with the company's stakeholders regardless of his/her purpose. Any act of pursuing unfair interest from the business partners using your title and position shall be prohibited. Here, the business partner refers to a company which has a business relationship with the company and is not an affiliate of the company. Even if the business is acquired in the name of another person, all assets that have a substantial equity ownership relationship shall be considered to have been jointly invested with stakeholders.

## XII.Article 12 (Investment in Partner Companies)

In principle, any personal investment in stocks and bonds of business partners that have a risk of affecting independent judgment in relation to their duties or hindering their sincere performance of their duties shall be prohibited.

#### XIII.Article 13 (Private use of confidential information and disclose to third party)

Buying or selling securities or other property interests, including stock trading, using important information acquired during your tenure shall be prohibited, nor consult or engage in any actions that affect this shall be allowed.

\* Important: Changes in organizational structure for financial performance of Hankook & Company Co., Ltd., Hankook Tire & Technology Co., Ltd. such as profits and dividends announcement of major new products or services, significant progress in research...

#### XIV.Article 14 (Concurrent positions with third-party employment)

Regarding the job, engaging in a second job or a side job that may affect the person's independent judgment or interfere with the sincere job conduct. However, it is possible to join an investment company or affiliated company approved by the company's needs. If additional remuneration is incurred due to the joint position, it shall be dealt with in consultation with the HR organization. In the event that an adjunct or concurrent position is held without the company's approval, it shall be reported to the management diagnosis team for review and approval.

#### XV.Article 15 (Outside Lecture)

- 1. When giving lectures outside the company using the information and knowledge acquired during your tenure, an approval of the HR organization is required.
- 2. The organization in charge of HR, the head of the department in charge, or the management diagnosis team may prohibit the outside lecture if it is judged that it causes a risk of disturbing the job or releasing sales secrets or information.

#### XVI.Article 16 (Releasing company labor)

1. Assisting in disclosing a members' personal or contact information to the outside or introduce them to headhunters shall be prohibited.

# **Ethics Regulations Practice Guideline**

Chapter 3 Illegal leaking company assets or private use

## XVII.Article 17 (Disclosing company assets and information)

- 1. Embezzlement and misappropriation of public fund, leakage of property, use of other purposes shall be prohibited.
- 2. Company information and sales secrets shall not be disclosed or provided internally or externally without a prior approval.
- 3. Any stakeholder's bidding, technology, trade secrets, personal information shall not be disclosed to a third party.
- 4. All employees shall protect the company brands and trademarks of Hankook & Company Co., Ltd. and Hankook Tire & Technology Co., Ltd.. The brands and trademarks can be used only with an appropriate approval.
- 5. In order to protect the company's information of property value, an employees shall observe safety instructions and, if there is a special reason, disclose the related information after obtaining approval from the company.
- 6. Care shall be taken not to disclose information of property value due to personal negligence, and even after the employment relationship with the company has been terminated, the company's information learned during employment shall be kept confidential.
- 7. Sales secrets or other confidential information of other parties shall not be obtained in a unfair way, and any illegal activity to collect important information from competitors shall be prohibited.
- 8. All employees shall keep secret for any confidential information such as customers, business partners or suppliers.
- 9. No one shall share information of the company's property value with friends, family members, employees, or former colleagues.
   \* Information with property value: Revenue and other financial data, business plans, information on current and future/product services, and personnel information including executive and organizational changes

### XVIII.Article 18 (Budget waste and private use)

- 1. Avoid unnecessary budget waste in executing company funds such as investment budget and expense budget execution.
- 2. Company expenses shall not be used privately, enforced for the purpose of use, and false evidence shall not be used.
- 3. In principle, expenses such as welfare shall be used transparently and appropriately for the purpose of the business. In particular, it shall not be used at times, places, or circumstances which are not related to business, or for fraudulent activities such as prepayment.

#### XIX.Article 19 (Marketing and Sales Using Correct SNS)

- 1. Customer information, company confidentiality with any information that may infringe on the company's trade secrets shall not be disclosed, posted, disclosed or announced on social media.
- 2. Participating in an online conversation or forum about information that could harm the company, provide false facts or inaccurate information shall be prohibited. If such posting is found, it shall be immediately reported to the management diagnosis team or related department.
- 3. Engaging in illegal activities such as defamation of others, infringement of human rights, leakage of personal information, and distribution of pornography on social media shall be prohibited.
- 4. Use of social media shall not infringe on the copyright, trademark, portrait rights and other intellectual property rights of any third parties.
- 5. Improper use of Cls, including official logos and brand-related images of Hankook & Company Co., Ltd. and Hankook Tire & Technology Co., Ltd. on social media shall be prohibited for personal purpose.
- Even when used for business purposes, avoid violating the company's official CI guideline.
- 6. Any false and exaggerated advertisement related to products and services shall be prohibited. An employee in charge shall provide only verifiable and truthful information about products and services.
- 7. No materials related to advertising, marketing, and sales shall include exaggerated content on product quality and performance that may cause customer's misunderstanding. It is also forbidden to make false or illegal claims about competitors' products and services.
- 8. When expressing opinions through public announcements or social media, be careful not to be delivered as mistaken for the opinions of Hankook Tire or its entire employees.
- 9. Employees shall recognize that Hankook Tire and Technology's Ethics Regulations Practice Guideline applies equally to all online channels and social media use, and shall actively endeavor to ensure sound social media use.

Chapter 4 Harming Healthy Corporate Culture

### XX.Article 20 (Negligence of work and poor attendance)

Negligence of work, poor attendance, negligence of supervision, unreasonable business activity, and supervisory acts, such as failure to fulfill personal responsibilities or misuse of authority, shall not allow any cause of loss to the company.

## XXI.Article 21 (False Report)

Intention to conceal, reduce, exaggerate, omit, or delay documents and counts differently from the facts, thereby failure to fulfill personal responsibilities or misuse of authority, shall not allow any cause of loss to the company shall be prohibited. No one shall do anything that causes damage to the company.

## **Ethics Regulations Practice Guideline**

#### XXII. Article 22 (Prohibition of unfair treatment and discrimination against members)

1. Discrimination among members, unjust work orders from superiors, private instructions using one's title and position, verbal abuse, assaults, and speculative entertainment shall not allow any harm to the healthy corporate culture. Hospitality refers to various activities conducted for meetings and exchanges due to business, such as meals, drinking, golf, performances, and entertainment. However, exceptions shall be permitted in the following cases:

- Unreasonable business instruction from a supervisor: Instructing an unfair transaction with a company, counting and manipulating important reporting topics...

- Private instruction: Personal errands which are not related to work (Child care, delegate driving, banking...)
- Violent language and violence: Any language or action that violates individual human rights and impedes the working atmosphere.
- Spectral entertainment: Cards that exceed the level of temporary entertainment, Hwatu, Majak...
- 2. The company shall provide fair opportunity to our employees and never discriminate anyone based on their sex, race, region of origin, ethnicity, nationality, religion, age, marriage, gender identity, social status, disability, pregnancy, military service status, political orientation, etc.

#### XXIII.Article 23 (Sexual Harassment)

No member shall engage in any of the following behaviors that may cause sexual shame:

- Touching or contacting a person's specific body part
- Making obscene jokes or telling obscene and vulgar stories
- Posting or showing obscene photos or pictures
- Forcing drinking, dancing, singing at a dinner party, workshop, or group event
- Acts that induce sexual shame according to other popular beliefs
- Other details shall be subject to the relevant laws and regulations such as the Act on Equal Employment of Men/Women and support for Work-Family Balance and the Employment Rule.

Chapter 5 Any other action that may damage dignity of an individual and affect the company's reputation

#### XXIV.Article 24 (Damaging dignity of individual and company's reputation)

- 1. A member shall keep in mind that his/her words and actions may represent the company, and do their best to protect the company's trust and reputation.
- 2. A member shall perform his/her duty honestly and fairly in accordance with laws, company regulations, and one's conscience, and avoid engaging in unethical behaviors (gambling, sexual crimes, violence, fraud, etc.) that may damage dignity of an individual and affect the company's reputation.

Chapter 6 Behavior with Conflict of Interest

## XXV.Article 25 (Prevention of conflict of interest between an individual and the company)

- 1. All employees shall contact a supervisor, management team or the HR team a conflict of interest where there may be a conflict of interest between an individual and the company if it is necessary to report a supervisor, management team or the HR team such a case.
- 2. The conflicts of interest are as follows; in addition to these, the conflict of interest shall be applied with a strict judgment by the employees.
  - Taking personal profits by using the company's assets or management information for a personal purpose
  - Use of company information for external activities such as lecture, interview, or SNS posting
  - Side business activities that consume enough effort to hinder the faithful performance of work

Chapter 7 Violation of international conventions and laws related to anti-corruption (i.e., Fair trade, bribery, insider transaction, money laundering)

#### XXVI.Article 26 (Compliance with international conventions and laws related to anti-corruption)

- 1. International conventions and fair trade laws of each country (US Foreign Corrupt Practices Act, UK Bribery Act, OECD Anti-Bribery Convention, UN Anti-Corruption Convention, Fair Trade Act, etc.) shall be complied.
- 2. Unfair acts such as bid rigging and abuse of market dominance shall be prohibited.
- 3. In accordance with the Anti-Money Laundering Act, no one shall launder any fund collected from various crimes or irregularities, or help committing such a crime in any case.
- 4. Any internal transaction shall comply with laws such as the Fair Trade Act.
- 5. Interpretation of violation of the anti-corruption law shall be handled after consultation with the legal or management team.

## **Ethics Regulations Practice Guideline**

Chapter 8 Whistleblower and Reporter Protection

- 1. In accordance with the operating guideline for the whistleblower system, personal information of the whistleblower or any fact that he/she is the whistleblower shall not be disclosed or notified.
- 2. No act that attempts to find out identity of the whistleblower or reporter or that makes identity of the whistleblower be disclosed is allowed.
- 3. No one shall discriminate anyone in terms of any disadvantages or working conditions, such as personnel and disciplinary measures based on any activities of whistleblowing and reporting.
- 4. No one shall interfere with whistleblowing or reporting, nor force a whistleblower to cancel his/her whistleblowing.

Chapter 9 Compliance with the Ethics Regulations Practice Guideline

- 1. A member shall have a responsibility and an obligation to comply with the Ethics Regulations Practice Guideline.
- 2. Organizational leaders shall be responsible for supporting and managing their members and business-related stakeholders to properly understand and comply with the company's ethical code practices, and shall set an example by taking the initiative to follow them.
- 3. Failure to follow the Ethics Regulations Practice Guideline, the person shall be subject to an appropriate disciplinary action and follow-ups in accordance with the procedure.

#### Supplementary Provisions

- 1. Hankook Tire & Technology's Ethics Regulations Practice Guideline shall be enacted and enforced as of 8/16/2021.
- 2. Hankook Tire & Technology's Ethics Regulations Practice Guideline shall be revised and enforced as of 5/23/2020.
- 3. Hankook Tire & Technology's Ethics Regulations Practice Guideline shall be revised and enforced as of 1/29/2021.
- 4. Hankook Tire & Technology's Ethics Regulations Practice Guideline shall be revised and enforced as of 6/29/2021.