

# The Code of Conduct for Business Partner

## Chapter 1 Overview of the Code

### 1. Purpose

· Kukdo Chemical Co., Ltd. (hereinafter “Kukdo”) is committed to fulfilling its responsibility for the sustainability of our society, environment, and economy. To this end, it has established and complied with the ESG Management Policy, and intends to collaborate with business partners that adhere to the consistent principle of sustainability.

### 2. Scope of Application

· This Code applies to all business partners that supply goods or services to Kukdo or engage in any other form of transactions with it (hereinafter “Business Partners”). Furthermore, in order to ensure compliance with the provisions of this Code throughout the entire supply chain related to Kukdo, Business Partners subject to this Code are requested to encourage their trading entities (hereinafter “Business Sub-Partners”) to comply with this Code.

· Business Partners shall comprehend the content of this Code and conduct their business in accordance with the provisions specified herein. In the event that the criteria specified in this Code differ from the local laws of Business Partners, it is imperative that they comply with these criteria while operating within the constraints of the relevant legal framework.

### 3. Disclosure

· If Business Partners are obliged to disclose information related to this Code in accordance with domestic and/or international standards, they must diligently fulfill such obligations. Even in cases where no mandatory disclosure is required, Business Partners should make efforts to disclose such information voluntarily.

### 4. Inspection

· With respect to compliance and implementation status of this Code, Business Partners must provide the necessary information requested by Kukdo, or allow on-site inspections. If a Business Partner fails to comply with or violates this Code, neglects to furnish relevant information, or does not put into effect recommended measures or suggestions, Kukdo reserves the right to take appropriate actions, including termination of business relationships.

## Chapter 2 Business Ethics

### 1. Ethical Management

- Business Partners shall comply with laws and regulations and conduct business in an ethical manner.

### 2. Anti-Corruption

- Business Partners shall not engage in corruption, bribery, fraud, unfair gains, or any such activities, and shall not tolerate them.

### 3. Fair Trade

- Business Partners shall not participate in unfair trade and shall not engage in activities that undermine fair market order and competition.

### 4. Intellectual Property Rights

- Business Partners shall make efforts to protect intellectual property rights.

### 5. Compliance with Export Restrictions

- Business Partners shall comply with country-specific laws and international agreements concerning export restrictions, and shall not engage in transactions involving countries, regions, or individuals subject to export restrictions or legitimate economic sanctions.

### 6. Conflict Minerals

- Business Partners shall not handle conflict minerals sourced through unethical methods and shall comply with relevant country-specific laws and international agreements.

## Chapter 3 Human Rights Management

### 1. Prohibition of Forced Labor and Child Labor

- Business Partners shall prohibit forced labor against the will of employees.
- Business Partners shall comply with the minimum age requirement for employment specified by the laws of the countries and regions in which they operate business.

### 2. Anti-Discrimination

- Business Partners shall not discriminate against employees based on gender, race, nationality, religion, disability, age, social status, or ideology in terms of employment and treatment within the company.

### 3. Adherence to Working Hours

- Business Partners shall adhere to the working hours as stipulated by applicable laws and provide

appropriate compensation for any overtime work that occurs.

#### **4. Freedom of Association**

- Business Partners shall guarantee freedom of association for employees, including the right to collective bargaining.

### **Chapter 4 Environmental Protection**

#### **1. Legal Compliance**

- Business Partners must comply with the environmental laws and regulations of each country in which they operate, and they must obtain and maintain all environmental licenses and permits related to the operation of their business.

#### **2. Environmental Protection**

- Business Partners shall be responsible for measuring, managing, and minimizing environmental impacts related to the operation of their business, including reducing emissions of greenhouse gases, pollutants, and waste and diminishing the consumption of energy and water.

### **Chapter 5 Safety and Health**

#### **1. Worker Safety**

- Business Partners must ensure safe and healthy working conditions within the workplace, prepare procedures for managing safety accidents, and allocate a sufficient budget for this purpose.

#### **2. Process Safety**

- Business Partners must systematically diagnose and control risks that may occur in all processes such as research, manufacturing, and transportation, and report and manage risks and accidents in a timely manner.

#### **3. Product Safety**

- Business Partners must comply with product safety regulations to ensure that people using products provided to Kukdo are not harmed by hazardous substances.

### **Chapter 6 Management System**

### **1. Sustainability**

· Kukdo considers sustainability as a core business value of its business and, therefore, requests that Business Partners understand the purpose and values of this Code and willingly comply with and collaborate on them.

### **2. Grievance Resolution**

· Business Partners must operate a grievance resolution for reporting and addressing violations related to this Code, and ensure the protection of the reporter's identity and prohibition of retaliation.

### **3. Business Sub-Partner Management**

· Business Partners must supervise their Business Sub-Partners to ensure that they comply with laws and regulations within the ethical, human rights, environmental, and safety aspects outlined in this Code. In the event of a violation, the Business Partner must make efforts such as advising the Business Sub-Partner in violation of the Code to implement improvements.

August 31, 2023

Kukdo Chemical Co., Ltd.

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