

# **Code of Ethics**

**Park Systems Corp.**

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## **Chapter 1. General Provisions**

### **Article 1 (Purpose)**

This code of ethics (the "Code") of Park Systems Corp. (the "Company") is intended to suggest a standard of right behavior and value judgment to be complied with by the officers and employees of the Company while carrying out their duties so that all of them will understand and practices the ethical management policy of the Company and the ethical management of the Company will be settled and developed.

### **Article 2 (Scope of Application)**

This Code applies to all stakeholders including officers, employees, and its partners who have transactions with the Company.

### **Article 3 (Definitions)**

As used herein, the following terms means as follows:

3.1 'Ethics' is a value system which becomes principle and a standard of behavior of right and wrong that prescribes what humans ought to do.

3.2 'Interested Party' means people the right and interest of whom are affected even though they are not the party to certain fact and legal act and the examples of them` are family members and relatives.

3.3 'Stakeholder' is an individual or group the right or interest of whom may directly and indirectly be affected by his or her duties and the examples of them are customers, shareholders, investors, consumers, members, partners, and countries.

### **Article 4 (Management Organization of Code)**

4.1 The management organization of this Code shall be compliance team.

4.2 Any matter which is not set forth herein or the construction of which is not clear shall be determined by applicable laws, regulations and authoritative interpretation and decision of compliance team.

## **Chapter 2. Basic Ethics of Officers and Employees**

### **Article 5 (Basic Principle)**

5.1 In carrying out their duties, the officers and employees of Company shall comply with applicable laws, regulations and this Code.

5.2 The officers and employees of Company shall faithfully carry out its duties based on its position and shall not cause any loss of Company or damage the reputation of Company.

5.3 The officers and employees of Company shall not unjustly discriminate against people due to their nationality, race, gender, religion, hometown ties, school ties, and physical disability and just opportunity shall be given based on their ability and talents.

5.4 The officers and employees of Company shall not make any speech or behavior which contains any social and cultural prejudices including sexual harassment and insulting words to the disabled shall not be made.

#### **Article 6 (Preparation and Management of Material Information)**

6.1 Any act which manipulates documents and coefficient and makes internal/external Stakeholders to make wrong or misunderstood decision and judgment.

6.2 Information shall be correctly recorded and reported.

6.3 Any information shall not be obtained with wrongful method and obtained information shall not be used for wrongful purpose, divulge, or provide to any internal or external 3rd party.

6.4 Unlawful software shall not be used.

#### **Article 7 (Legitimate Use of Company Asset)**

7.1 All assets of Company (including tangible and intangible assets) shall be used only for the duties under the process and shall not be used for private purpose.

7.2 Any intangible asset (including intellectual property right and goodwill) shall not be divulged or wrongfully used without prior permit or approval during office term and even after resignation.

7.3 The right of others to any intellectual property shall be respected and his or her own right shall be protected at the same time.

#### **Article 8 (Attitude to Rival Company and Partners)**

8.1 Company shall respect fair and free market economic order and comply with the laws and regulations on fair trade.

8.2 Reciprocity relationship shall be formed with partners in good faith principle.

8.3 A trading opportunity shall be equally provided to all qualified companies and the partners shall be selected based on objective and fair screening criteria.

8.4 Any wrongful act shall not be forced, or any influence shall not be exerted to a partner by using superior position.

8.5 Partners shall fully understand the ethical management policy of Company and actively participate in Company's ethical management activities.

### **Chapter 3. Responsibilities for Customers, Shareholders, Officers, and Employees**

#### **Article 9 (Responsibilities for Customers)**

9.1 In making judgment and behaving, the Company shall put customer satisfaction first.

9.2 Company shall not divulge or use for other purposes any customer information without prior consent of the customer.

#### **Article 10 (Responsibilities for Shareholders and Investors)**

10.1 Company shall protect its shareholders' right and respect their just request and suggestion.

10.2 Company shall fairly and equally treat all of its shareholders including minority shareholders.

10.3 Company shall provide its financial condition and management performance.

10.4 Company shall promptly provide correct management information under applicable laws and regulations.

#### **Article 11 (Responsibilities for Officers and Employees)**

11.1 Company shall respect individuals' basic human rights including private life, dignity, and personality.

11.2 Company shall evaluate and compensate for the ability and performance of officers and employees based on fair criteria.

11.3 Company shall provide its officers and employees with pleasant workplace and office environment.

### **Chapter 4. Organizational Culture of Ethical Management**

#### **Article 12 (Separation of Private and Public Matter)**

12.1 The officers and employees of Company shall not seek for their private interest by using Company's property and their position in Company nor commit any wrongful acts including embezzlement and misappropriation of Company's assets.

12.2 The officers and employees of Company shall not trade securities including the sales and purchase of the shares by using information obtained from their position.

12.3 The officers and employees of Company shall not carry out any trade (including supply of goods and services) with Company under the name of Interested Party: Provided that this shall not apply to the cases where a prior report thereof is made to the representative director of Company and prior approval thereof is obtained through fair process on the same condition with other Stakeholders.

#### **Article 13 (Formation of Sound Organizational Atmosphere)**

13.1 The officers and employees of Company shall not commit any act which affects organizational atmosphere including work negligence, poor attendance, and arrogation.

13.2 The officers and employees of Company shall maintain an organizational culture which is based on smooth communication and mutual respect among juniors, seniors, and fellow workers.

13.3 The officers and employees of Company shall not commit any act which hurts sound organizational culture including wrongful behavior such as sexual harassment, discriminatory treatment, abusive language and speech and assault and speculative entertainment among them.

#### **Article 14 (Political Participation and Activities)**

14.1 The officers and employees of Company shall not carry out any political activities in the Company even though their political rights and decision shall be respected.

14.2 The officers and employees of Company shall not provide any political party, politician or election candidate with donation or political activity expenses by using Company's asset.

14.3 The officers and employees of Company shall not use any personnel, facilities and equipment of Company not only for donation (money or goods) but also for the purpose of political activities.

### **Chapter 5. Corporate Social Responsibility**

#### **Article 15 (Contribution to Nation and Society)**

15.1 Company respects and complies with domestic and overseas laws, regulations, international conventions, accounting standard and trade practices.

15.2 Company respects the principle of market competition, commercial morality and trade customs and shall not take profits in wrongful way.

15.3 Company makes contribution to the development of nation and local community by creating jobs and faithfully paying taxes.

#### **Article 16 (Responsibility as Global Company)**

16.1 In carrying out all overseas business activities, the Company complies with all rules and regulations of each country and respect their culture and tradition.

16.2 Company complies with international conventions and fair-trade laws (including the Foreign Corrupt Practices Act of USA, the Anti-Bribery Act of UK, and the OECD Convention on Combating Bribery of Foreign Public Officials.

16.3 Company adopts policies for prevention of money laundering and terrorist financing, trade sanction policy, and anti-corruption compliance policy and conducts educations for its officers and employees each year that they will comply with applicable policies.

#### **Article 17 (Environmental Protection)**

17.1 Company complies with applicable international standards, laws and regulations related to environmental protection.

17.2 Company takes the initiative in efficiently using natural resources including resources recycling.

#### **Article 18 (Emphasis of Safety and Health)**

18.1 Company complies with laws, regulations and standard for safety and strictly keep the safety rules.

18.2 Company seeks for and takes measures to ensure that the health and safety of its officers and employees will be secured.

## **Chapter 6. Compliance of Ethical Code**

#### **Article 19 (Basic Principle)**

19.1 The officers and employees of Company shall faithfully comply with this Code as a standard of their behavior and value judgment.

19.2 Company take disciplinary action against its officer and employee who have violated this Code under its personnel regulations.

#### **Article 20 (Report Obligation)**

If they are aware that any behavior of them or others have violated this Code, the officers and employees of Company shall make a report thereof under the operational rules of internal report system.

#### **Article 21 (Protection of Informant)**

Company shall strictly protect identities of informant who has reported the violation of ethical management rules and protect the informant to ensure that he or she will not be disadvantaged.

#### **Article 22 (Measures against Violation of Ethical Code)**

22.1 If it recognizes or considers any activities in violation of this Code, the Company may conduct audit activities.

22.2 If any violation of this Code is discovered, the Company may refer to its personnel committee for examination and resolution.

22.3 All managers including officers is responsible for educating and managing the employees to ensure that such employees will comply with this Code and take measures against any office and employee who have violated this Code under the reward and punishment rules of Company.

## **[Supplementary Provisions]**

### Article 1 (Execution Date)

This Code shall be established and executed from the 1st day of September 2022.