CODE OF CONDUCT 2022. 09



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Chapter 1: General Provisions

Article 1 (Purpose)

The purpose of this code is to ensure that all executives and employees of Park Systems Corporation (hereinafter referred to as the "Company") properly understand and effectively implement the Company's ethical management policies. This code provides executives and employees with guidelines for appropriate conduct and decision-making to establish and promote the Company's ethical management.

Article 2 (Scope of Application)

This code applies to all executives and employees of the Company, as well as to business partners and other stakeholders engaged in relationships with the Company.

Article 3 (Definitions of Terms)

The terms used in this code are defined as follows:

- 1. Ethics: Principles that distinguish between right and wrong and good and evil, serving as a value system and a standard for conduct and obligations that all individuals are expected to follow.
- 2. Interested Party: Refers to individuals or entities that, while not direct parties to a particular factual or legal act, are affected in terms of their rights or interests. This includes the family member and relatives of the individual concerned.
- 3. Stakeholder: Refers to individuals or groups that may be directly or indirectly affected by the execution of duties, such as customers, shareholders, investors, employees, business partners, and governments.

Article 4 (Ethics Management Organization)

- 1. The Compliance Team is responsible for managing the ethical guidelines of the Company.
- 2. In cases where this code does not explicitly address specific matters, or their interpretation is ambiguous, related laws and the authoritative interpretations and decisions of the Compliance Team shall apply.

Chapter 2: Basic Ethics for Executives and Employees

Article 5 (Basic Principles)

- 1. Executives and employees must comply with relevant laws and Company regulations when performing their duties.
- 2. Executives and employees must fulfill their assigned responsibilities diligently and avoid causing any loss to the Company or damaging its reputation.
- 3. Executives and employees must provide fair opportunities based on abilities and qualifications, without discrimination based on nationality, race, gender, religion, regional origin, educational background, or physical disabilities.
- 4. Executives and employees must avoid any language or behavior that perpetuates social or cultural prejudice, such as sexual harassment or mocking individuals with disabilities.

Article 6 (Preparation and Management of Critical Information)

- 1. Executives and employees must not manipulate documents or figures, either intentionally or negligently, in a manner that misleads internal or external stakeholders' decisions or judgments.
- 2. Information must be accurately recorded and reported.
- 3. Executives and employees must not acquire information through improper means, nor use acquired information for wrongful purposes, disclose it to external parties, or provide it to third parties.
- 4. Illegal software must not be used.

Article 7 (Proper Use of Company Assets)

- 1. All Company assets, including tangible and intangible assets, must be used solely for business purposes in accordance with established procedures and not for personal gain.
- 2. Intangible assets of the Company (e.g., intellectual property, goodwill) must not be disclosed or improperly used without prior approval, both during employment and after resignation.
- 3. Executives and employees must respect the intellectual property rights of others and safeguard the Company's intellectual property rights.

Article 8 (Attitudes Toward Competitors and Business Partners)

- 1. The Company respects fair and free market competition and complies with all applicable fair trade laws.
- 2. Relationships with business partners must be based on mutual trust and good faith.
- 3. Equal opportunities for transactions must be provided to all qualified vendors, and selection must be based on objective and fair evaluation criteria.
- 4. Executives and employees must not exploit a dominant position to coerce or exert undue influence over business partners.
- 5. Business partners must be fully informed of the Company's ethical management policies and encouraged to actively participate in ethical management activities.

Chapter 3: Responsibilities Toward Customers, Shareholders, Executives and Employees

Article 9 (Responsibility to Customers)

- 1. Customer satisfaction must be the highest priority in all decisions and actions.
- 2. Customer information must not be disclosed to external parties or used for purposes other than its intended use without the customer's prior consent.

Article 10 (Responsibility to Shareholders and Investors)

- 1. The rights of shareholders must be protected, and their legitimate requests and proposals must be respected.
- 2. All shareholders, including minority shareholders, must be treated fairly and equally.
- 3. The Company's financial status and performance must be communicated transparently.
- 4. Accurate management information must be provided promptly in accordance with applicable laws.

Article 11 (Responsibility to Executives and Employees)

- 1. The Company must respect the privacy, dignity, and fundamental human rights of executives and employees.
- 2. The performance and abilities of executives and employees must be evaluated and rewarded based on fair criteria.
- 3. The Company must provide a safe and pleasant working environment for executives and employees.

Chapter 4: Ethical Corporate Culture

Article 12 (Distinction Between Public and Private Affairs)

- 1. Executives and employees must not use Company assets or their position for personal gain, nor engage in any fraudulent activities such as embezzlement or misappropriation.
- 2. Executives and employees must not use information obtained through their duties to engage in securities trading, such as buying or selling stocks.
- 3. Executives and employees must not engage in transactions with the Company under the name of interested parties (e.g., family or relatives), unless prior approval is obtained from the CEO, and the same transaction terms apply as those for other third parties.

Article 13 (Cultivating a Positive Ethical Workplace Culture)

- 1. Executives and employees must avoid actions that disrupt the organizational environment, such as negligence, absenteeism, or abuse of authority.
- 2. A culture of mutual respect and open communication must be maintained among executives and employees.
- 3. Executives and employees must not engage in inappropriate behaviors such as "harassment", "discrimination", "verbal abuse", "physical violence", or "gambling" that undermine a healthy organizational culture.

Article 14 (Political Participation and Activities)

- 1. While the political rights and opinions of executives and employees are respected, political activities are not permitted within the Company.
- 2. Executives and employees must not use Company assets to provide donations or political funds to political parties, politicians, or election candidates.
- 3. The Company's personnel, facilities, and equipment must not be used for political purposes, including donations (in cash or kind).

Chapter 5: Corporate Social Responsibility

Article 15 (Contributions to the Nation and Society)

- 1. The Company respects and adheres to domestic and international laws, conventions, accounting standards, and business practices.
- 2. The Company respects market competition principles and business ethics and does not seek to gain benefits through improper methods.
- 3. As a corporate citizen, the Company contributes to national and regional development through job creation and faithful tax payments.

Article 16 (Responsibility as a Global Corporation)

- 1. All overseas business activities must comply with the laws of the respective countries and respect their culture and traditions.
- 2. The Company adheres to international agreements and national laws promoting fair trade (e.g., the U.S. Foreign Corrupt Practices Act, U.K. Bribery Act, and OECD Anti-Bribery Convention).
- 3. The Company implements anti-money laundering and anti-terrorist financing policies and ensures compliance through annual training programs.

Article 17 (Environmental Protection)

- 1. The Company complies with international standards and relevant laws concerning environmental protection.
- 2. The Company takes the initiative in efficient resource use, including resource recycling.

Article 18 (Emphasis on Safety and Health)

- 1. The Company complies with safety laws and standards and ensures adherence to safety rules.
- 2. Measures to safeguard executives' and employees' health and workplace safety must be developed and implemented.

Chapter 6: Compliance with the Ethics Code

Article 19 (Fundamental Principles)

- 1. Executives and employees must adhere to the Ethics Code as a standard for conduct and ethical judgment.
- 2. The Company imposes disciplinary measures on employees who violate the Ethics Code in accordance with the HR regulations

Article 20 (Obligation to Report)

Executives and employees must report any known violations of the Ethics Code, whether committed by themselves or others, through the internal reporting system.

Article 21 (Protection of Whistleblower)

The Company strictly ensures that the confidentiality of whistleblowers' identities and protects them from any form of retaliation or disadvantage.

Article 22 (Measures for Ethics Code Violations)

- 1. If an activity is suspected or determined to violate the Ethics Code, the Company may initiate an audit to investigate.
- 2. Confirmed violations of the Ethics Code are escalated to the HR Committee for thorough review and appropriate resolution
- 3. Supervisors are responsible for educating and managing their teams to ensure compliance and may be subject to actions under the rewards and penalties regulations for failing to fulfill this responsibility.

Appendix

Article 1 (Effective Date)

This code is effective from September 1, 2022.

Enabling Nanoscale Advances

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