윤리정책 및 행동지침

(Ethics Policy and Code of Conduct)

2025.5

1. Purpose of Establishment

Hanwha Advanced Materials establishes this Code of Ethics to pursue sustainable growth and fulfill its social responsibilities as a global company. This Code clearly outlines the ethical values and standards of conduct that all executives and employees must adhere to and aims to foster a culture of honesty and transparency in management and to grow into a trusted company among stakeholders. Through this, Hanwha Advanced Materials is committed to fair and responsible management, protecting the rights and interests of all stakeholders—including customers, partners, employees, and local communities—and strengthening mutual trust.

<Code of Ethics>

1. We place the highest value on customer satisfaction and pursue shared prosperity through mutual trust and respect with employees, partners, and shareholders as co-creators of value.
2. We respect the cultures and customs of all regions and countries where we conduct business, comply with laws and ethical standards, and fulfill our rights and responsibilities as a sound corporate citizen through fair competition.
3. We value the core principles of challenge, dedication, and integrity, and uphold the honor and dignity of Hanwha Advanced Materials based on trust and loyalty.
4. We carry out our duties with honesty and sincerity, create a healthy organizational culture based on mutual respect and consideration, and foster cooperative labor-management relations.

2. Basic Principles

2.1 Ethics for Executives and Employees

1) Bribery: Executives and employees shall neither solicit nor accept, offer, or promise to offer any form of illegal or unethical benefit, whether monetary or non-monetary, from or to stakeholders.
2) Improper Solicitation: Any form of improper solicitation between employees and stakeholders, or among employees, is strictly prohibited.
3) Conflict of Interest: In unavoidable situations involving a conflict between the company and personal interests, employees shall act in accordance with legal boundaries and prioritize the interests of the company and its customers.
4) Insider Trading: Confidential information, knowledge, or data obtained directly or indirectly through one's duties shall not be disclosed or used for personal gain.
5) Workplace Ethics: Regardless of time or location, employees must fulfill their responsibilities when performing company-related duties. Company assets and facilities must only be used for work-related purposes, and any private use or pursuit of personal gain is prohibited.
6) Abuse of Authority: Employees shall not use their position or authority to exert undue influence or seek illegal benefits for themselves or the company.
7) Documentation and Reporting: Creating or reporting documents based on concealed, minimized, exaggerated, or false information is prohibited. Such manipulated content shall not be shared with internal or external stakeholders.

2.2 Fair Competition and Transactions

1) Antitrust: No acts that may impede fair competition shall be committed, including unfair trade practices such as abuse of a dominant market position or superior trading position.
2) Collusion: Employees shall not enter into agreements with competitors that unfairly restrict competition with regard to pricing, supply volume, transaction regions, or trade terms.
3) Unfair Competition: Employees shall not acquire information from competitors, partners, or other institutions through dishonest means, nor shall they use or disclose information obtained illegally by the company or any third party.
4) Money Laundering: All applicable anti-money laundering laws shall be observed, and continuous efforts shall be made to prevent and monitor any involvement with customers, partners, suppliers, institutions, or individuals that may present money laundering risks.
5) Intellectual Property Rights: Trade secrets of partners in contractual relationships shall be protected, and the intellectual property rights of other companies or individuals shall not be infringed.
6) The company shall comply with tax laws in all countries where it operates and shall not evade any legitimate tax obligations to ensure transparent and fair tax practices.
7) Fair and mutually beneficial relationships with suppliers shall be pursued, and any form of unfair business practice shall be avoided.
8) Fraud: Any act of intentionally deceiving others or engaging in unfair or illegal conduct to obtain improper benefits shall be prohibited.

9) Export Control Compliance: The company shall comply with domestic

and international export control laws and international sanctions regulations, and shall adhere to all relevant laws regarding the export, transfer, or provision of products, technologies, and services.

2.3 Realization of Customer Value

1) Customer Safety: Customer safety shall be the top priority throughout the entire process—from R&D, raw material sourcing, production, sales, and distribution to after-sales service.
2) Quality: Actions that compromise the standards required to provide customers with the best possible products and services in a stable manner are prohibited.
3) Information Provision: Accurate and useful information related to products and services shall be provided to help customers make informed decisions. False or exaggerated information shall not be given.
4) Privacy Protection: Relevant laws and regulations shall be followed to protect customer privacy, and no actions shall be taken that unlawfully infringe upon it.
5) Customer Feedback: Feedback on products and services shall be actively listened to, and customers' reasonable demands and suggestions shall be positively considered.
6) Accessibility: Reasonable measures shall be taken to ensure that no customer is unfairly restricted from accessing or using products and services due to gender, age, disability, or language.
7) Product Liability: Necessary information shall be actively provided to prevent harm or risk to customers, and all safety and quality assurance

measures for products and services shall be carried out responsibly.

2.4 Respect for Employees

1) Human Rights: Each employee shall be respected as an individual with dignity, and proactive measures shall be taken to protect universally recognized human rights.
2) Child and Forced Labor: National labor laws where the business operates shall be observed, and child or forced labor within the workplace are strictly prohibited.
3) Discrimination: Discrimination based on nationality, place of origin, race, gender, age, culture, religion, disability, education, political orientation, or personal preferences shall not be tolerated.
4) Equal Opportunity: Equal opportunities for training and career development shall be provided based on ability and qualifications, and performance shall be evaluated and rewarded fairly.
5) Workplace Harassment: All forms of verbal or physical violence, sexual harassment, bullying, and threats—whether online or offline—that insult an individual's dignity are strictly prohibited.
6) Safety and Health: Active efforts shall be made to ensure workplace safety, and working environments shall be maintained to protect employees from accidents, injuries, disasters, diseases, and infections.

2.5 Commitment to Sustainability

1) Sustainable Development: The company shall fulfill its responsibility to contribute to achieving the Sustainable Development Goals (SDGs) by

addressing environmental and social issues facing humanity in management decision-making.

2) Environment: Recognizing the environment as a valuable asset to be preserved for future generations, the company shall strive to minimize environmental impact across all business areas and actively promote sustainable resource management and energy efficiency.
3) Social Contribution: The company shall actively identify pressing social issues and work toward viable solutions to benefit society and humanity as a whole.
4) Stakeholder Engagement: The company shall identify stakeholders who are affected by or can affect business operations and proactively engage and act on key sustainability issues.
5) Donations and Sponsorships: Charitable donations and sponsorships shall be carried out fairly according to internal guidelines and procedures. Political donations and sponsorships are prohibited.
6) Shareholder Value: Sustainable management practices shall be pursued to enhance the value of both the company and its shareholders.
7) Disclosure of Information: Financial and non-financial information shall be disclosed in a timely manner in accordance with applicable laws and regulations.

3. Implementation Plan

3.1 Operation of Procedures for Handling Violations of Ethics Management Policies and Regulations

1) Reporting and Receiving Violations of Ethics Management Policies and Regulations

: An internal reporting system shall be operated to receive reports from employees and external parties (reporters) who violate or are aware of risks of violation of the ethics management policies and regulations.

Upon receipt of a report, the relevant departments in charge shall discuss specific solutions for the violation, taking into account the characteristics of the reported case.

2) Handling Ethics Violation Reports

: In addressing reported cases, the company shall refer to court precedents, relevant regulatory agency guidelines, past internal practices, and industry norms. With support from the relevant departments, the company shall seek the most appropriate and effective resolution.

<Ethics Reporting Channel>

- Contact Person: Samuel Park
- Email: samuel.park@hanwhaus.com

3) Protection of Reporter Identity

: All employees of Hanwha Advanced Materials must not disclose, report, or publicize any information that reveals the identity of the reporter or allows others to infer it. This includes information about the reporter, the subject of the report, remedial actions, and investigation outcomes. The company shall take all necessary measures to ensure that reporters are protected from any disadvantage or retaliation as a result of their report.

4) Appeal Process

: If the reporter disagrees with the outcome of the investigation, they may file an appeal through the ethics reporting channel. In such cases, the reporter must clearly state the reason for the appeal, referencing the basis of the previous decision.

3.2 Training

Hanwha Advanced Materials may conduct ethics training with the aim of enhancing employees' understanding and awareness of ethical management, as well as communicating the company's ethical management policies and implementation plans.

4. Scope and Priority

1) All employees and executives shall comply with this policy, and where applicable laws and internal regulations exist, they shall take precedence over this policy.

5. Supplementary Provisions

1) This Ethics Management Policy shall be established and effective as of July 22, 2025.