



Policy Ethics

Prepared By: Chloe Lee Pei Fen

Checked By: Leang Yoke Ngoh

Approved By: Hooi Chee Liong

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Part 1 : Section Labour

1) Freely chosen employment

All employees have the right to decide whether or not to engage in work. Any actions taken to impede on this right are considered a violation of a person's right to freely choose their employment.

1. There is no forced, bonded or involuntary prison labour.
2. Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

All employees should be free to leave their employer after giving reasonable notice and are not required to lodge deposits or payment with their employers. There should be no forced, bonded or involuntary labour. Specifically, suppliers must not engage in modern slavery or human trafficking or other actions and take all reasonable measures to ensure its full supply chain does similarly not engage in any such acts. Your employees should have a written contract of employment, which needs to comply with local legislation and be clear about wages. Wages and benefits need to be in accordance with relevant legislation. All deductions from wages should be lawful and with the expressed permission of the employee.

2) Passport Access Policy For Migrant Workers

MAC believes that employment should be freely chosen and that there shall be no forced labour in its own or supplier facilities. Key to ensuring workers are free to leave their employer is ensuring that all workers and particularly migrant workers have unrestricted access to their passport at all times.

Foreign Workers' Responsibilities

Upon receiving their passports or any forms of travel documents, foreign workers have the responsibility:

- To keep their passport in a secure place;

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- To keep their passport in good condition and take precautions to avoid damages;
- To provide their passport to management 2 months prior to their visa expiry for renewal purposes;
- To pay for replacing stolen, lost or damaged passports when under their care; and to immediately inform management upon such loss or damage.

Company's responsibilities

Upon returning foreign workers' passports, the company is responsible:

- To ensure workers' have 24 hours 7 days a week access to secure facilities (such as personal lockers) to keep their passports and other valuables; and to ensure such facilities are well-maintained and are in a location convenient for the workers;
- To ensure workers' are aware of their right to keep their own passport;
- To ensure all workers' are given back their passports in case passports have been retained previously;
- To ensure workers' are made aware when they need to return their passport for visa renewal purposes;
- To provide workers' with a certified copy of their passport during the renewal period; and
- To pay for replacing stolen, lost or damaged passports when under their care.

3) No Child Labour Policy

M.A.C does not employ any person below the age of eighteen years at the workplace. MAC prohibits the use of child labour and forced or compulsory labour at all its units. No employee is made to work against his/her will or work as bonded/forced labour, or subject to corporal punishment or coercion of any type related to work.

Monitoring

All suppliers are obliged to keep M.A.C informed at all times about all places of production/ work sites (including their sub-contractors). Any undisclosed production centres/ work sites found would constitute a violation of this code of conduct.

Through the General Purchasing Conditions for the supply of products to The Company M.A.C has reserved the right to make unannounced visits at any time to all places of production/ work sites (including their sub-contractors) for goods intended for supply to The Company. The

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Company furthermore reserves the right to assign, at its sole discretion, an independent third party to conduct inspections in order to ensure compliance with The Company's Child Labour policy.

Remediation And Punishment

Violations of the No Child Labour policy may lead to disciplinary action up to, and including, termination of employment/partnership. Disciplinary process will be undertaken in accordance with all applicable local laws and other legal requirements. The Company shall take immediate and effective measures to prevent and eliminate any form of child labour. In case The Company and /or any of its supplier is accused or found guilty of negligence in assuring the respect of this policy, it will resolve the matter as soon as possible and provide remediation to the parties victim of such negligence or mistake.

Qualified organisations/ experts might be involved in the development of a responsible solution that is in the best long-term interests of the children. The Company (and any supplier involved) will agree a corrective action plan, which may comprise of the following actions:

- Collate a list of all potential child labourers and young workers
- Seek advice and help from a recognised local non-governmental organisation that deals with child labour or the welfare of children
- Develop a remediation plan that secures the children's education and protects their economic well-being, in consultation with The Company and where possible a local NGO, and in consultation with and respecting the views of the child as well as the family of the child.
- Explain the legal requirements and restrictions on working ages to the children and assure them that, if they wish, they will be employed when they reach working age
- Understand the children's desires and explore the opportunities for them to re-enter education.
- Whether the child contributes to the livelihoods of their family or they are self-dependent, his or her wage should continue be paid until they reach working age, or until an alternative long-term solution has been agreed with the child and their family (for example employment of an unemployed adult family member in place of the child labourer).
- Ensure that the child worker has adequate accommodation and living conditions.
- Document all actions
- Develop processes to prevent recurrence

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4) Sexual Harassment Protection

Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient. Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal. Examples of conduct or behaviour which constitute sexual harassment include, but are not limited to:

Physical conduct

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault
- Physical contact, e.g. touching, pinching
- The use of job-related threats or rewards to solicit sexual favours

Verbal conduct

- Comments on a worker's appearance, age, private life, etc.
- Sexual comments, stories and jokes
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the worker
- Condescending or paternalistic remarks
- Sending sexually explicit messages (by phone or by email)

Non-verbal conduct

- Display of sexually explicit or suggestive material
- Sexually-suggestive gestures
- Whistling
- Leering

Formal complaints mechanism

If the victim wants to make a formal complaint or if the informal complaint mechanism has not led to a satisfactory outcome for the victim, the formal complaint mechanism should be used to resolve the matter. The designated person who initially received the complaint will refer the matter to a human resources manager to instigate a formal investigation. The human resources manager may deal with the matter him/herself, refer the matter to an internal or external investigator or refer it to a committee of three others in accordance with this policy.

The person carrying out the investigation will:

- Interview the victim and the alleged harasser separately
- Interview other relevant third parties separately
- Decide whether or not the incident(s) of sexual harassment took place
- Produce a report detailing the investigations, findings and any recommendations
- If the harassment took place, decide what the appropriate remedy for the victim is, in consultation with the victim (i.e.- an apology, a change to working arrangements, a promotion if the victim was demoted as a result of the harassment, training for the harasser, discipline, suspension, dismissal)
- Follow up to ensure that the recommendations are implemented, that the behaviour has stopped and that the victim is satisfied with the outcome
- If it cannot determine that the harassment took place, he/she may still make recommendations to ensure proper functioning of the workplace
- Keep a record of all actions taken
- Ensure that the all records concerning the matter are kept confidential
- Ensure that the process is done as quickly as possible and in any event within [...] days of the complaint being made

Sanctions and disciplinary measures

Anyone who has been found to have sexually harassed another person under the terms of this policy is liable to any of the following sanctions:

- verbal or written warning
- adverse performance evaluation

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- reduction in wages
- transfer
- demotion
- suspension
- dismissal

The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial. Certain serious cases, including physical violence, will result in the immediate dismissal of the harasser.

5) Personal Particulars (Employee Biodata) – Personal Data Protection Policy (PDPA)

Purpose

The Personal Data Protection Act 2010 of Malaysia (“Act”) regulates the processing of personal data in commercial transactions. The Act requires the Company to inform data subjects about personal data that is collected from them and processed by the Company. This Policy will act as guidance for the processing of personal data in commercial transactions as well as for employment and charitable purposes, in compliance with the Act.

It is compulsory for every employee to fill in the employee personal data accurately at the beginning of their service with the Company.

The employee must also report any changes of the information from time to time to the Human Resources Group promptly and as and when necessary.

The Company shall always refer to the latest information provided by employee in performing daily administrative functions.

The Company shall not be held responsible for any false and non-updated declaration information provided by the employee.



The Company shall always comply with the principles of data protection enshrined in the Personal Data Protection Act (PDPA) 2010 where all the personal data of employees are collected, stored, used and protected by the Company accordance with the provisions of the PDPA 2010.

The Company shall not disclose any of the information to third parties unless the consent of the employee is obtained.

Personal Data Protection

The Company will take reasonable efforts to protect Personal Data in our possession or our control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.

Employees who are found to have deliberately, disclosed any of such information shall be liable to disciplinary action. Any Employee who breaches this rule after ceasing employment with the Company may still be made liable to pay compensation through court proceedings.

Security of the Personal Data

MAC are committed to ensuring that the Personal Data is stored securely. In order to prevent unauthorized access, disclosure or other similar risks, we endeavor, where practicable, to implement appropriate technical, physical, electronic and procedural security measures in accordance with the applicable laws and regulations and industry standards, and ensure that our employees adhere to the aforementioned security measures, to safeguard against and prevent the unauthorized or unlawful processing of your Personal Data, and the destruction of, or accidental loss, damage to, alteration of, unauthorized disclosure of or access to your Personal Data.

- Our security measures are as set out below:

- * ensuring that all employees involved in the processing of personal data are registered or identifiable by their respective departments;
- * only enabling authorized employees and third parties on a strict “need-to-know” basis to access Personal Data;
- * implementing a “Clean Desk Policy”, where all documents at the employees’ workspace at secured at the conclusion of the workday or when employees expect to be away from their

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workspace for an extended period of time, by placing said documents in locked drawers or cabinets;

- * ensuring all desks and cupboards in which documents are stored are locked before the conclusion of a workday;

- * ensuring all used papers, printed documents or other documents exhibiting personal data are destroyed by using shredding machines or other appropriate methods;

- * ensuring the filing cabinets and filing cabinet rooms are locked, unless an employee is present within the filing cabinet room;

- * ensuring the filing cabinet rooms and server rooms are placed under 24-hour CCTV surveillance;

- * ensuring the IT Department is able to remotely access any lost company devices to remotely wipe the devices or terminate user IDs and passwords from lost company devices;

- * using updated encryption and cyber-security software to protect data and strict security standards on company devices and IT infrastructure;

- * prohibiting the use of removable media devices and cloud computing services to transfer personal data, except with authorization by the top management of the Company; and

- * ensuring all company data is backed up to the company servers with recovery systems in place.

- * We will make reasonable updates to security measures from time to time and ensure authorized third parties only use your Personal Data for the purposes set out in this Policy.

Internet Related

- * Security procedures with regard to your electronic communications directly with us. All our employees and data processors, who have access to, and are associated with the processing of your Personal Data, are obliged to respect the confidentiality of your Personal Data.

- * Third party websites and /or links to such third party websites that are accessible from our website not under the care and control of the Company (if any) do not operate under this Policy and we do not accept any responsibility or liability arising from those websites. Likewise, if you subscribe to an application, content or a product from our strategic partner and you subsequently provide your Personal Data directly to that third party, that Personal Data will be subject to that third party's privacy/personal data protection policy (if they have such a policy) and not to this Policy.

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* Please be aware that communications over the Internet, such as emails are not secure unless they have been encrypted. We cannot and do not accept responsibility for any unauthorized access or interception or loss of Personal Data that is beyond our reasonable control.

* The Company collects information about your use of our website from cookies. Cookies are packets of information stored in your computer which assist your website navigation by customizing site information tailored to your needs. Cookies in themselves do not identify the individual user, just the computer used. You are not obliged to accept cookies. If you are concerned, you can set your computer either to accept all cookies, to notify you when a cookie is issued, or not to receive cookies at any time. However, rejection of cookies may affect your use of our website.

Photography Restrictions

No Employee or visitor is allowed to take any photograph within the Company's premises for any purpose except with the prior approval from the Company via the Human Resource Group.

6) Workers Accommodations

Any accommodation provided for workers must be safe, clean, well maintained with sleeping, living and food preparation areas segregated by gender. Accommodations must be fit for purpose and of durable construction. Fire safety and prevention, first aid access and fire emergency procedures must be in place at all workers accommodation.

Responsibilities

As a condition of employment with M.A.C, all employees staying in a company-provided accommodation must understanding and consent of this Policy and its corresponding expectations. It is the responsibility of the person in charge to report any violations. Although it is the responsibility of the person in charge to report violations, each employee is encouraged to report inappropriate or suspicious behavior and any other concerns as it relates to these rules to their accommodation supervisor or HR manager.

Policy Statements

Rules and Guidelines while staying at accommodations: -

Personal Conduct

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Employees must treat all employees with respect, dignity and courtesy. Each employee is expected to respect the privacy and rights of all other employees and/or occupants. Violence, fighting, harassment, sexual harassment, discrimination, verbal abuse, insults, physical or psychological threats and intimidation to others will not be tolerated.

Common Courtesies

Company-provided accommodations may have quiet hours as indicated at these location and employees are expected to abide by these rules. Quiet hours reflect the rights of others, on both day and night shift, to receive adequate sleep and relaxation without interruption. Although there are designated quiet hours, employees should at all times be courteous and polite to others with respect to the noise level being created.

Alcohol and Illicit Drugs

The use and possession of alcoholic beverages are prohibited in the facilities. Any illicit drugs are always prohibited at any company-provided accommodation and at the worksite. The company prohibits any employee from bringing illicit drugs onto company premises or property. Having possession of, being under the influence of, using, consuming, transferring, selling or attempting to sell or transfer any form of illicit drugs is strictly prohibited. Misuse or abuse of prescription drugs (including medical marijuana) is also prohibited.

Smoking

Employees are expected to adhere to the rules applied at all company-provided provided accommodations with regards to smoking. Certain locations may not permit smoking or have designated smoke areas and employees are expected to abide by these rules.

Weapons/Explosives

Weapons including but not limited to pellet guns, paintball guns, knives, swords, explosives, and dangerous/hazardous substances are not permitted at any company-provide accommodations and at the worksite.

Guests

Any company-provided accommodations are to be used by employees only. Guests and/or relatives are not allowed to stay at these locations. Any exceptions may be apply for approval from accommodation supervisor or HR manager.

Maintenance/Cleanliness

Employees are jointly responsible for the care of the company-provided accommodation.

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Employees shall keep facilities in a good state of preservation and cleanliness. All garbage/trash must be removed promptly and disposed of properly. Employees are responsible for the cleanliness and proper usage of all appliances and utilities. Problems with these appliances or utilities should be reported to the appropriate personnel in a timely manner.

Personal Property

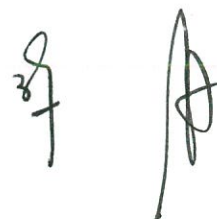
M.A.C is not responsible for the theft or loss of any personal property. The company is not liable for damage to employee's property caused by acts of nature, by failure of plumbing, electric, gas, water, or fixtures, and/or damage arising from the acts of other employees or occupants.

Damages

Each employee will be responsible for any damage they cause to company-provided accommodation. The cost to repay such damage will be assessed and may be deducted from the employee's pay. The employee that causes any damage to company-provided accommodation will be subject to disciplinary action, up to and including termination.

7) Freedom of Association

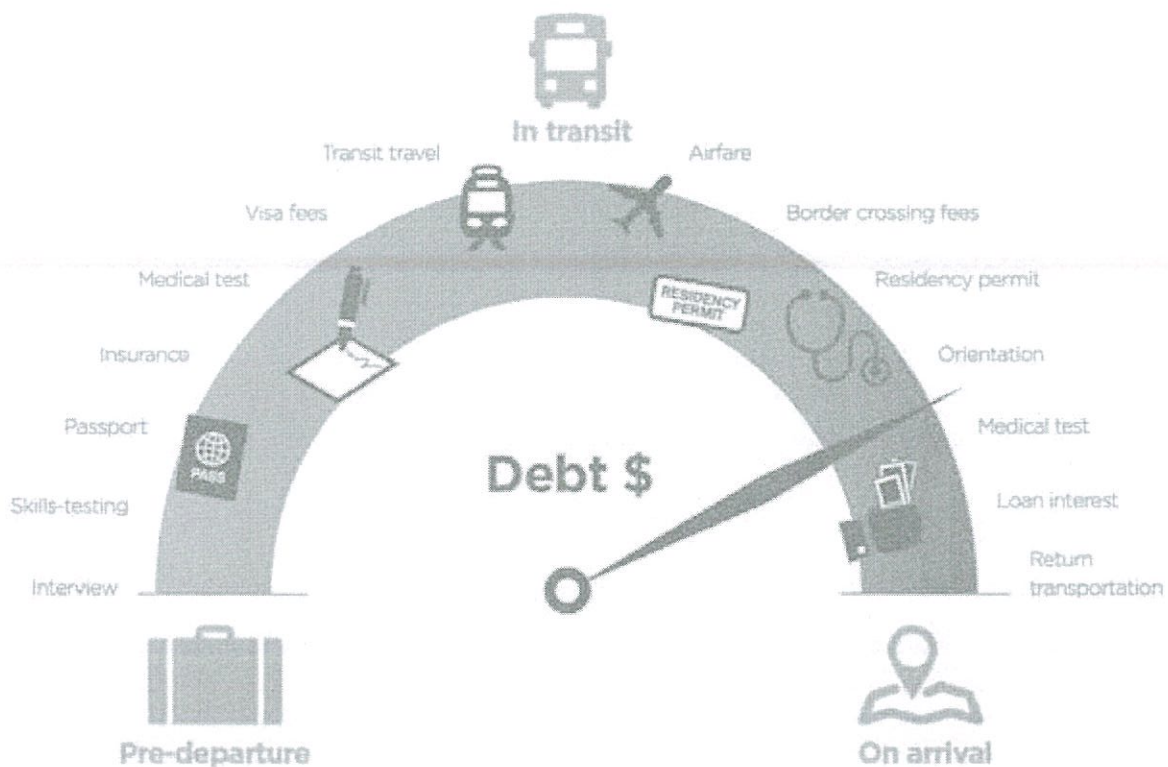
MAC respect freedom of association and collective bargaining as part of our commitment to support the fair and equitable treatment of our workers. The workers, without distinction, have the right to join or form trade unions of their own choosing without prior authorization, and to bargain collectively. MAC will refrain from any activity that is likely to discourage workers from exercising their union rights. Trade unions have access to the MAC factory, and MAC will not interfere with the organizing of activities of workers, worker representatives, or representatives of trade unions. Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace. The freedom of association shall be instituted according and within the Trade Union Act 1959, Industrial Relations Act 1967 and Immigration Act 1956/63 of Malaysia. Where the right to freedom of association and collective bargaining are restricted under the law, MAC will allow its workers to choose their representatives freely.



8) Zero Recruitment Fees

Recruitment fees can be defined as any cost borne by migrant workers to secure a job. These costs may be incurred at any time during the employment relationship either at the time of recruitment, or during and after being engaged in a job.

Image: Migrant Worker Recruitment Fees - The Increasing Debt Burden



It can be a challenge for companies to reimburse workers for illegal recruitment fees because agents rarely, if ever, provide receipts or other documents that evidence the actual costs of recruitment. The standard practice is for recruitment agents in the worker's origin country to give them receipts that only refer to the amounts legally permitted by state authorities or their employer. Testimonies are often the only source of information regarding the actual fees paid by workers. It may be possible to verify what migrant workers have paid for if the responsibility of identifying these costs is shifted from workers to suppliers. Legitimate commercial agreements for recruitment

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should have supplier contracts between the recruitment agency and the supplier, purchase orders, receipts and proof of electronic bank transfers.

The supplier can work out the agreed-upon expenses with the itemization provided by the recruitment agent and the information provided by newly arrived workers. But, this practice is usually only possible when there are formal agreements between the recruitment agents in origin countries and the suppliers that require this documentation. Recruitment agents in origin countries are encouraged by poor monitoring and regulation mechanisms in origin countries to evade taxes for their recruitment billings.

Reimbursement payments often represent months or years of potential wages for migrant workers. In order to secure this settlement, workers may be encouraged to inflate or lie about recruitment payments. It could also encourage other corrupt practices including fake recruitment fee receipts, possibly in collusion with recruitment agents.

Policy enforcement

According to MAC Zero Recruitment Fees policy, where recruited foreign workers are concerned, no recruitment fees, including any fees incurred to them at any stage of the recruitment process, whether by us, our contractors, our agents, or their sub-agents in receiving and sending countries will be charged to them.

Recruitment agencies are responsible for monitoring their possible sub-agencies to make sure that they follow these guidelines and do not charge any recruitment related fees from the workers. If such fees are found to be charged to the workers, MAC will require the recruitment agency to repay the workers. If such an action has not been undertaken by the recruitment agency, MAC will suspend any relationship with the agency until the matter is rectified. MAC will terminate all contract or partnership with any recruitment agency that is found to be non-compliant with the MAC policies after the necessary investigations and warnings.

Once it is discovered that the employee has paid the agency a recruiting fee. Human Resources Department must investigate immediately. Afterwards, the Human Resources Department must report to the superior supervisor for a management meeting to discuss countermeasures.

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Part 2 : Section Ethics

1) Code of Ethics

Employee of M.A.C Technology (M) Sdn Bhd hereby engage to follow a code of conduct to establish ethical management for creating customer trust as below,

1. Do not accept any kind of cash, securities, valuables, rebates, and compliment fees from related person.
2. Do not accept any kind of gift from related person for business activity.
3. Do not accept any kind of money and entertainment from related person for personnel evaluation, promotion, transfer and other work.
4. Do not use official budget to personal purpose.
5. Do not spill out any kind of information related with customer and company to outside.

For details, please refer to the Integrity Management Code of Practice.

2) Company Property (Intellectual Property Protection)

All Company properties or monies entrusted to an Employee shall be returned to the Company before the Employee leaves the employment of the Company or otherwise the Employee is liable to pay the purchase value for replacement of such property to the Company.

Every Employee found guilty of vandalism or deliberately causing damage to the Company's property shall be liable to pay for the damages.

Any Employee who leaves or intends to leave the employment of the Company with outstanding sums of money to be paid to the Company or engages in causing deliberate damage to the Company's property shall be liable for legal action and costs for such actions shall be fully borne by the said Employee.



Removal of Company Property

Every Employee who, in the course of his work, requires to take the Company's property out of the Company's premises for any reason whatsoever, must approved by authorized personnel or by any process as may be determined by the Human Resource Group from time to time.

Security Personnel shall have the authority to search and seize any device used by the Employee in breaching or being suspected of breaching this rules. Such device shall be returned to the Employee upon removal or deletion of the image which contravened this provision unless there are special reasons not to do so.

Employees or visitors are not allowed to take photographs within the factory premises for any purpose except with prior approval from the Company.

Incoming Vendors and Visitors

Every Employee, who, in the course of his work, is required to invite a vendor or visitor into the Company premises must first obtain approval. The approval must be obtained from authorized personnel or anyone else whom the Human Resource Group may designate from time to time.

The Company's Security personnel shall have the authority to refuse entry of any person or persons into the Company's premises if the person in charge or any other Employee meeting the visitor fails to duly obtain the approval under the "Guest Management System".

For details, please refer to the Integrity Management Code of Practice.

3) Disclosure of Information

Information regarding Suppliers labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain is unacceptable.

At M.A.C Technology (M) Sdn Bhd , all of our advertising activities are designed to provide the public with accurate information on who we are and what we make through fair and high-quality



advertisements, thus helping customers with their buying decisions. Worldwide media and potential customers, we recognize that creating a good image through mass media is as important as innovative products. We also are highly aware of the fact that delivering overall company and product information accurately to shareholders is significant for their investment decisions. Since we understand that a ripple effect is part of the advertising process, we are attentive to every detail, from meticulous planning to the final release on media. In a broad sense, M.A.C Technology (M) Sdn Bhd advertisement is centered on the empowerment of corporate brand identity and product. In M.A.C Technology (M) Sdn Bhd , the Public Relations team is in charge of the PR functions, whereas each business units marketing team is in charge of the product advertisements. Most advertising made for consumers is outsourced to advertising agencies. In these cases, the TV advertisement is released on media after careful examination by the organizations of advertisement consultation to make sure that the ad meets legal and moral concerns. For printed advertisements, the in-house committee conducts an examination with ethical code after their public release. We firmly abide by the laws, regulations and moral concerns of the state in which we operate.

For details, please refer to the Integrity Management Code of Practice.

4) Whistle Blower Protection

M.A.C Technology 's Whistle Blower Policy is designed to enable employees, Labor agencies and Business partners ("Individual") to raise concerns internally at a sufficiently senior level and to disclose information which the Individual believes shows malpractice or wrongdoing which could affect the business or reputation of M.A.C Technology . No unfair treatment will be meted out to a Whistle Blower by virtue of his/her having reported a Disclosure under this Policy. The M.A.C Technology, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against the Whistle Blowers. Concerns under the policy are to be raised to any of the Employee Relation Staff or HR head of M.A.C Technology. Any individual may also approach the concern in charge of the Audit Committee of M.A.C Technology directly who has the right to refer the concern to the Employee Relations Staff or any other person. In the event that any of the Employee Relations Staff are the individual against whom



the concern is raised, then the concern will be passed on to the HR Head. For any concerns against the HR Head or In Charge of Audit Committee of M.A.C Technology , the same will be passed on to the Chain of the Managing Director of M.A.C Technology , who will appoint an appropriate person to look into the concern. All allegations which fall within the scope of fraud, financial malpractice, improper conduct or unethical behavior, criminal activity, breach of company policy, health and safety and attempts to conceal any of these activities, will always be seriously considered and investigated. Reference should be made to M.A.C Technology's Whistle Blower Policy.

For details, please refer to the Integrity Management Code of Practice.

5) Prohibition of Accepting Bribery

Article 5.1 (Prohibition the Rights to Privileges)

Employee shall not allow getting the rights to advantages and privileges by abuse authority.

Article 5.2 (Prohibition Request for a Job)

Employee shall not request to interrupt a duty for getting illicit advantage. b. Employee shall not introduce related person to other person and department for getting illicit advantage.

Article 5.3 (Limit transactions by business information)

Employee shall not make a business and transaction a stock, real estate, investment, and provide information to other person for getting illicit advantages.

Employee shall not reveal below information which get during the work to third party without permission.

- a). personnel information
- b). business secret and personnel information which get during the work
- c). Contract information about construction, service and procurement.
- d). information which will be used illicit purpose

Article 5.4 (Prohibition of Official properties)

Employee shall not use company's vehicle, real estate and properties to personnel purpose.

Article 5.5 (Limit provide Accepting Bribery)

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Employee shall not receive any kind of entertainment such cash, securities, valuables, rebates and compliment fees from a person in charge or related person.

Article 5.6 (Prohibition of loan)

Employee shall not borrow a loan of money or real estate with free of charge or very low interest from a person in charge and related person.

Article 5.7 (Prohibition of family event)

a. Employee shall not inform a person in charge or related person of family event but except below cases;

- a). relatives
- b). colleagues in same department
- c). through by newspaper and broadcasting
- d). through by intranet
- e). through by company notice board

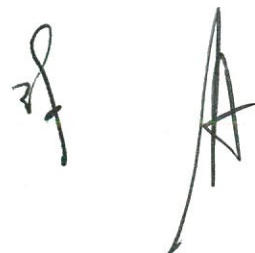
b. Employee shall not provide excessive expense for congratulations and condolences compare socially acceptable rationale. But except below cases;

- a). between relatives
- b). personnel purpose group as religion, friendship
- c). Through by president, department, and company

Article 5.8 (Prohibition Accepting Bribery by spouse)

Employee's spouse or relatives are prohibited to receive any kind of briberies.

For details, please refer to the Integrity Management Code of Practice.

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