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Guidelines for Managing Entertainment Expenses for Overseas Buyers

Article 1 (Purpose)

The purpose of this Guideline is to ensure transparency and ethical standards in the use of entertainment expenses for overseas buyers, while complying with relevant laws and internal regulations, thereby fostering a fair business environment.

Article 2 (Scope of Application)

This Guideline applies to all employees of the company when providing entertainment to overseas buyers and shall be equally applicable to all overseas subsidiaries and branches of the company.

Article 3 (Principles for Use of Entertainment Expenses)

- 1. The visit of overseas buyers must be directly related to business, and entertainment expenses shall be used reasonably and within the minimum scope necessary for business purposes.
- Payments for entertainment shall be made directly to service providers. In cases where minor costs are unavoidably paid to the overseas buyer, a receipt or other supporting documentation must be submitted.
- 3. Expenses must not violate applicable laws or international anti-corruption regulations (e.g., FCPA, UK Bribery Act), and the level of entertainment must not be excessive or inappropriate in light of the ethical standards of the buyer's company or country.
- 4. All usage of entertainment expenses must be documented, retained, and reported in a transparent manner.

Article 4 (Permissible Standards for Entertainment)

- Reasonable meals and refreshments related to official business meetings are allowed.
- 2. Entertainment shall be limited to overseas buyers who are directly related to business activities.
- 3. Provision of low-value promotional items, such as corporate-branded souvenirs, within the usual business scope is permissible.
- 4. Provision of airfare, accommodation, or sightseeing may be allowed only when directly connected to the business itinerary and must follow internal standards and approval procedures, and such provision must be reasonable and customary in nature.
- 5. Entertainment expenses must be used within the designated budget. Any excess requires prior approval.
- 6. Entertainment is only allowed within the bounds of fair business practices.









Article 5 (Prohibited Activities)

- 1. Entertainment expenses shall not be used for the purpose of obtaining or retaining improper business advantages.
- 2. Buyers shall not be invited or entertained arbitrarily outside the scope of official requests, consultations, or contracts.
- 3. Provision of cash, gift certificates, precious metals, or other monetary gifts is strictly prohibited.
- 4. Entertainment of individuals unrelated to business, such as family members, acquaintances, or agents of the buyer, is prohibited.
- 5. Inappropriate entertainment before or after contract signing that may be deemed as bribery is prohibited.

Article 6 (Reporting and Management)

- 1. The Business Process Innovation Team conducts regular and ad hoc inspections of entertainment expense usage. If any violations of the operational guidelines are identified, the team notifies the CP Team and instructs the relevant department head to implement corrective measures to prevent recurrence.
- 2. Any individuals found to be involved in fraudulent or unethical conduct may be subject to internal disciplinary action.

Article 7 (Amendment and Training)

- 1. This Guideline may be revised in accordance with changes to applicable laws or the company's internal policies.
- 2. All employees must complete ethics training related to entertainment expenses at least once per year.

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This Guideline shall become effective as of November 1, 2025.

Proposed by GM: Human Resources

BK-Makhongwan

05 NOV 2025

Date

Reviewed by the CFO

SV 180

05 NOV 2025

Date

Approved by the CEO

YS Shin

05 NOV 2025

Date







