

Kangwon Land Code of Ethical Conduct

for Executives/Employees

12th revision 2020-05-22

Chapter 1. General Provisions

Article 1 (Purpose) This Code of Conduct (hereinafter “this Code”) aims to provide the standards of conduct to be followed by the executives/employees of Kangwon Land which is a public institution trusted by the people (hereinafter “the Company”), by prohibiting unlawful solicitations and giving/taking of money and other valuables (bribes) and ensuring fair performance of duties by executives/employees.

Article 2 (Definitions) The terms used herein are defined as follows.

1. The term “executive/employee” refers to the following.

A. Executive (officer) under Article 26 of the Articles of Incorporation

B. Employee under Article 3 of the Rules of Employment

C. Non-regular employee under Article 2 of the Detailed Rule on Non-Regular Employees

D. Dispatched worker

2. The term “work-related person” refers to an individual (an executive/employee, when in the capacity of a private person, is deemed an individual)

or corporation/organization related to an executive’s/employee’s duties who:

A. Has filed or raised a (pending) complaint or legal dispute against the Company or is clearly likely to do so;

B. Is subject to authorization/permission, inspection, audit, crackdown, guidance, etc.;

C. Directly advantaged or disadvantaged by decisions, appraisals, tests, assessments, adjustments, etc.;

D. Has entered a contract with the Company or is clearly likely to do so;

E. Requests actions from the Company or is financially affected by an executive’s/employee’s exercise or non-exercise of official authority;

F. Directly advantaged or disadvantaged by decision or execution of policies, businesses (projects), etc.; or

G. Is otherwise related to the work prescribed by the CEO (President) to prevent corruption.

3. The term “work-related executive/employee” refers to another executive/employee directly advantaged or disadvantaged in connection with an

executive’s/employee’s performance of duties who falls under any of the following.

A. A subordinate who receives a job order in connection with an executive’s/employee’s work

B. An executive/employee in the same organization as the executive/employee who performs jobs such as personnel (HR), budgeting, audit, awards, or evaluation

C. In the case of entrustment of work, the executive/employee receiving the entrustment

D. Other executives/employees designated by CEO (President)

4. The term “money and other valuables” refers to any of the following.

A. Any financial benefits, such as money, securities, real property, goods, accommodation tickets, membership, admission tickets, discount coupons, invitation tickets, viewing tickets, and use (right) of real property, etc.

B. Provision of treatment or entertainment such as food, drinks and golf or of convenience such as transportation and accommodation

C. Other tangible, intangible economic benefits, such as exemption of debt, provision of employment and grant of interest (concession)

5. The term “corruption” refers to any of the following.

A. An executive’s/employee’s abuse of his/her position or authority or violation of laws (including ordinances, rules, regulations, etc. Hereinafter the same) in connection with his/her job, in order to seek his/her or a third party’s interests

B. In the event of using the Company’s budget, acquiring, managing, and disposing of the Company’s properties, or entering into and performing contracts to which the Company is a party, an act of inflicting financial damages to the Company in violation of laws

C. Forcing, recommending, proposing or inducing an act under Item A or B or concealment thereof

Article 3 (Duties of the Company) ① The Company shall endeavor to create a work environment where executives/employees can fairly and cleanly (with integrity) perform their duties.

② To ensure fair and clean performance of duties by executives/employees, the Company shall create an organizational culture that does not tolerate unlawful solicitations or giving/taking of money and other valuables.

③ To prevent any corruption, if it is deemed that there are contradictions in terms of law, system or administration or any other matters requiring improvement, the Company shall immediately improve or correct the same.

④ The Company shall take proper protective measures so that an executive/employee will not be disadvantaged as a result of actions hereunder (e.g., reporting of violations).

Article 4 (Obligations of executives/employees) ① An executive/employee shall fairly and cleanly (with integrity) perform his/her duties without being affected by personal interests.

② In connection with performance of duties, an executive/employee shall be fair, and shall not give preference to or discriminate against a work-related person.

Article 5 (Scope of application) This Code applies to all executives/employees of the Company.

Chapter 4. Prohibition of Accepting Unfair Profits Such as Money, Valuables, etc.

Article 15 (Prohibition of interest intervention, etc.) Employees shall not make unfair profits or let others gain unfair profits by directly using their positions.

Article 16 (Prohibition of private use of position) Employees shall not use or let others use the company's name or position by publishing or posting it for private gain outside the scope of their duties.

Article 17 (Prohibition of illegal solicitation, etc.) ① Executives and employees refer to public officials, etc. (Public officials, etc. under Article 2 (2) of the Anti-Solicitation Act) for the unjust benefit of themselves or others. The same shall not apply for mediation or solicitation of unfair business practices that harm the fair performance of duties.

② Executives and employees shall not introduce job-related persons to other job-related persons, public officials, etc. for the unfair benefit of themselves or others in connection with the performance of their duties.

③ Executives and employees shall not engage in any of the following mediation, solicitation, etc. to public officials, etc. by exercising their authority to perform their duties for the unjust benefit of themselves or others, or by exercising their de facto influence derived from their position, job title, etc.:

1. To intervene or influence an individual, corporation, or organization to invest, deposit, lend, participate, invest, donate, sponsor, or sponsor.

2. The act of intervening in or influencing personnel affairs or disciplinary affairs, such as recruitment, promotion, or transfer;
3. Disclosure of business secrets concerning bidding, auction, research and development, testing, patents, etc.;
4. The act of intervening in or influencing the selection of a party to a contract, whether or not a contract has been concluded;
5. The act of having a specific individual, corporation, or organization sell, exchange, use, profit, occupy, or provide goods or services away from normal trading practices;
6. To intervene or influence the work of admission, grades, performance evaluations, etc. of schools of all levels <New Year's Day, May 29, 2019 2019
7. The act of intervening or influencing various awards, rewards, selection of outstanding institutions or outstanding persons, selection of scholarship students, etc.;
8. The act of allowing a specific individual, corporation, or organization to be selected or excluded from an audit or investigation, manipulating the results of an audit or investigation, or allowing them to tolerate such violations;
9. Illegal solicitation under the provisions of Article 5, Clause 1 of the Anti-Solicitation Act.
10. Other acts determined by the Representative Director (President) by judging that they constitute a mediation, solicitation, etc. that hinders the fair performance of non-public officials.

Article 18 (Prohibition of personnel solicitation, etc.) ① Executives and employees shall not make other persons request favors from the person in charge of personnel affairs in order to have an unfair impact on personnel appointments, such as appointment, promotion, or transfer.

② Executives and employees shall not use their positions to unfairly intervene in personnel appointments, such as appointment, promotion, or transfer of other employees.

Article 19 (Prohibition of performing duties in accordance with illegal solicitation) Employees who have received fraudulent solicitation shall not perform their duties accordingly

Article 20 (Reporting and processing of illegal solicitation) ① When an employee receives a fraudulent request, he/she shall notify the person who made the fraudulent request that it is an illegal request and clearly indicate his/her intention to refuse the request.

② Employees, etc. shall include attached Form 2 (electronic documents) if they have received the same fraudulent request again despite taking measures under paragraph 1. The same shall be prepared and submitted to the Representative Director (President) (or Code of Conduct Officer, hereinafter the same shall apply in the same Article).

③ A person who is aware that an employee has received a fraudulent request shall prepare attached Form 2-2 (for reporting to a third party) and submit it to the Representative Director (President).

- ④ If a person who intends to report pursuant to paragraphs (2) through (3) has obtained evidence to prove the details of the report, he/she shall submit it together.
- ⑤ Upon receipt of a report under paragraphs (2) through (3), the Representative Director (President) shall promptly investigate the details, purport, contents, evidential data, etc. of the report to confirm whether the details of the report fall under fraudulent solicitation, and take measures against the results of the investigation according to the following classifications: However, Nos. 1, 3, 2, and 3 may be taken simultaneously.
1. Where there is a suspicion of a crime or it is deemed necessary to investigate: notification to the investigative agency
 2. Where a fine is to be imposed: Notify the court having jurisdiction over the fine.
 3. Where subject to disciplinary action: Proceeding with disciplinary procedures
- ⑥ The Representative Director (President) may take the following measures against executives and employees who have received fraudulent requests if he/she becomes aware of any illegal solicitation or if he/she deems that it interferes with the performance of the relevant duties in the course of reporting and verifying the illegal solicitation under paragraphs (2) through (5):
1. Suspend participation in a job
 2. Designation of a job agent
 3. Telegraph
 4. Other measures prescribed by company regulations, such as the designation of a co-executive officer, changes in the division of duties, etc.
- ⑦ Notwithstanding paragraph 6, the Representative Director (President) may have the employees perform their duties in any of the following cases:
- In such cases, the Company's Code of Conduct Officer or other employees, etc. shall periodically check and inspect whether the employees perform their duties fairly.
1. Where it is extremely difficult to replace employees who perform their duties;
 2. In case the impact on the performance of duties of employees is not significant;
 3. Where the need for performing duties is greater due to the promotion of public interest;
- ⑧ Executives and employees may report to the supervisory agency, the Board of Audit and Inspection, the investigative agency, or the Anti-Corruption and Civil Rights Commission under paragraphs 2 through 3.
- ⑨ When the Representative Director (President) receives a report under paragraphs 2 through 3, he/she shall notify the reporter of the results of the investigation in writing within 10 days from the date of completion of the investigation. The results of the investigation notified at this time shall include the following matters:
1. The result of handling reported matters and the reason for processing them
 2. Matters that the reporter needs to know in relation to the reported matters
- ⑩ Except as otherwise provided for in paragraphs (1) through (9), the Anti-Solicitation Act, the Enforcement Decree of the same Act, and the Guidelines for Handling Reporting on Improper Solicitation and Receiving Money and Money, etc. shall apply.

Article 21 (Processing of unfair requests from politicians, etc.) ① Where executives and employees are forced to perform their duties unfairly by public officials, politicians, political parties, etc. or receive unfair requests, they shall prepare attached Form 3 and report it to the Representative Director (President) or consult with the Code of Conduct Officer before processing it.

② The Representative Director (President) or the Code of Conduct Officer who has received a report pursuant to paragraph (1) shall take appropriate measures to ensure that the employees perform their duties fairly.

Article 22 (Prohibition of accepting money, valuables, etc.) ① No executive or employee shall receive, request, or promise money or valuables exceeding 1 million won or 3 million won per fiscal year from the same person, regardless of their job-related status and the name of donation, sponsorship, or donation.

② Executives and employees shall not receive, request, or promise money or valuables, etc. of less than the amount prescribed in paragraph 1 regardless of whether they are paid in return for their duties.

③ In the case of an honorarium for external lectures, etc. under Article 44 or any of the following, the money or valuables shall not fall under the prohibition of acceptance under paragraphs 1 through 2:

1. Money and valuables, etc. paid by the company to employees, etc. or provided by senior employees to lower-level employees for the purpose of comfort, encouragement, or reward.

2. Food, expenses, gifts, etc. provided for the purpose of smooth performance of duties, social affairs, rituals, or assistance, and money and valuables within the scope of the anti-graft law and the enforcement ordinance of the same Act;

3. Money and valuables, etc. provided by legitimate authority, such as the performance of debts due to private transactions (excluding gifts);

4. Relatives of employees, etc. (referring to relatives under Article 777 of the Civil Act). money and valuables, etc. provided by the same)

5. Money and valuables provided to employees, such as employees' compensation association, club, alumni association, fellowship, fellowship, religious organization, social organization, etc., and money and valuables provided to employees in difficult situations due to illness or disaster by those who have a special long-term and continuous friendship with their employees, such as those who have a special long-term and continuous relationship with their employees, such as disease, disaster, etc.

6. Money and valuables, such as transportation, accommodation, food, etc., provided uniformly by the organiser to the attendees at official events related to the duties of executives and employees.

7. Souvenirs, promotional items, etc. for distribution to an unspecified number of persons, compensation, goods, etc. received through contests and drawings;

8. Money and valuables, etc. permitted under other statutes, standards, or social norms

④ The spouse, lineal ascendant or descendant of an employee shall not receive, request, or promise to receive money or valuables, etc. (hereinafter referred to as "prohibited money or valuables, etc.") that are prohibited to be received by an employee pursuant to paragraph (1) in connection with his/her duties.

Article 23 (Prohibition of offering money, valuables, etc.) ① Employees shall not provide money or valuables to employees who are prohibited from receiving money or other goods from them. However, this shall not apply to cases prescribed in each subparagraph of Article 22 (3).

② Executives and employees shall not provide money, valuables, etc. to public officials, etc. related to their duties for the benefit of the company. However, this shall not apply to cases prescribed in each subparagraph of Article 22 (3).

Article 24 (Reporting and processing of money and valuables prohibited from accepting) ① In any of the following cases, executives and employees shall, without delay, prepare a report in attached Form 4 and submit it to the Representative Director (President): However, if there is an urgent or unavoidable reason, a written statement may be submitted after first reporting in oral form.

1. Where an employee receives prohibited money or valuables, etc., or has received a promise or expression of intention to provide such money or valuables;

2. Where he/she finds out that his/her spouse and lineal ascendant or descendant of an employee received prohibited money or valuables, or that he/she has received a promise or expression of intention to provide such money or valuables;

② Executives and employees shall prepare attached Form 5 and report to the Representative Director (President) (or Code of Conduct Officer) if a person with a particularly long-term and continuous relationship has provided money and valuables, etc. as a job-related person or job-related employee, even if it is a money or valuables, etc. that are allowed to be received pursuant to Article 22 (3) 5.

③ Executives and employees who intend to report pursuant to paragraph (1) shall submit evidence to prove the details of the report.

④ Employees shall, without delay, return or express their intention to the provider if they receive prohibited money or valuables, or if they find out that their spouse or immediate blood relatives have received prohibited money or valuables, or have received promise or intention to provide them. In such cases, the executives and employees may request the CEO (President) to pay for the return of the evidence along with the evidentiary materials. However, if the money or valuables, etc. received falls under any of the following, it shall be delivered to the Representative Director (President):

1. Where there is a concern of destruction, corruption, deterioration, etc.;

2. Where the provider of money or valuables is unknown;

3. Other circumstances which are difficult to return to the provider;

⑤ When the Representative Director (President) receives a report pursuant to paragraph (1) or receives money or valuables, etc. pursuant to the proviso to paragraph (5), he/she shall, when he/she deems that the money or valuables, etc. fall under prohibited money or valuables, etc., return or deliver them or indicate his/her intention to refuse them, and if he/she deems it necessary to investigate, he/she shall notify the investigation agency without delay.

⑥ The Representative Director (President) may take the same measures as in Article 20 (6) and (7) to the relevant employees when he or she or his

spouse or spouse finds out that he or she has received prohibited money, valuables, etc., promises or expressed his or her intention to provide, or if he or she deems that the return, delivery, or notification of money, etc. under paragraphs (1) through (5) may impede the performance of his or her duties.

⑦ Upon receipt of a report under paragraph (1), the Representative Director (President) may handle the money and valuables, etc. in accordance with any of the following standards:

1. Dispose of money, valuables, etc., which are of no economic value due to corruption, deterioration, etc.;
2. Donation of money, valuables, etc. that may damage economic value due to corruption, deterioration, etc. to social welfare facilities or public interest organizations;
3. In cases other than subparagraphs 1 and 2, except as otherwise provided in other laws, donations to social welfare facilities or public interest organizations;
4. Other standards set by the CEO (President)

⑧ The Code of Conduct Officer shall record and manage the provider and the person who has received the money and valuables, the time and time of the offer, and the details of the processing of the money and valuables, etc. processed pursuant to paragraph (7), and notify the provider of the relevant facts. However, in the case of money and valuables, etc., which are difficult to return immediately, such as the unknown address of the provider, the results of the processing shall be disclosed so that outsiders can read them.

⑨ Executives and employees may report or deliver a report under the proviso to paragraph (1) or (4) to the supervisory agency, the Board of Audit and Inspection, the investigative agency, or the Anti-Corruption and Civil Rights Commission.

⑩ When the Representative Director (President) receives a report under paragraph (1) 2 from an executive or employee, and recognizes that the employee's spouse, lineal ascendant or descendant's refusal to return money or valuables, etc. belongs to prohibited money or valuables, etc., he/she shall require the spouse, lineal ascendant or descendant of the employee to return the money or valuables, etc. to the provider.

⑪ Except as otherwise provided for in paragraphs (1) through 10, Article 20 (5) and 9 shall apply to the provisions of paragraphs (1) through 10 and shall be governed by the Anti-Solicitation Act, the Enforcement Decree of the same Act, and the Guidelines for Handling Reporting on Improper Solicitation and Receiving Money and Money.