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# Ethics charter and Code of Conduct

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| Final Revision Date | February 27, 2026                |
| Revision No         | 2                                |
| Management Team     | Process Quality Engineering Team |

**Kamtec Co., Ltd.**  
**CEO, Sung-Kun Kim**



## 1. Purpose

Kamtec strives to become a global company by promoting sustainable management and leading innovative future automobile technology. For this growth, the practice of ethical management is the basis and the ethical charter and practice norms are established to become a reliable partner for various stakeholders. All executives and employees of Kamtec must comply with this ethical charter and practice norms.

## 2. Scope

This policy applies to domestic and foreign corporations, executives and employees, and in-house partners.

It also encourages all stakeholders in a business relationship to respect and comply with this Charter of Ethics and Code of Practice.

It shall comply with the laws and regulations of the country and, at the same time, perform its duties in accordance with this policy.

- Kamtec executives and employees and in-house partners
- Kamtec Auto Romania executive and employees and in-house partners
- Zhangjiagang Kamtec executive and employees and in-house partners

## 3. Ethics Charter

- 1) **We lead by example to create a clean workplace culture, and we fulfill our responsibilities given to sincerity and the best on a clear and transparent basis.**
- 2) **We clearly distinguish between public and private affairs, compete fairly, and**

trade fairly with the other party in a contractual relationship.

- 3) We provide safe products, best services, and correct information and thoroughly protect personal information to realize customer value.
- 4) We respect each member as an independent person, and for this purpose, we provide fair working conditions and a safe working environment.
- 5) We contribute to the implementation of sustainable development that can thrive with various stakeholders through the fulfillment of social responsibility.

## 4. Code of conduct

### 4-1. Ethics for executives and employees

We lead by example to create a clean workplace culture, and we fulfill our responsibilities given to sincerity and the best on a clear and transparent basis.

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| <b>Bribery</b>               | It does not accept, provide, or promise to provide any illegal or unethical benefit or bribe from stakeholders in any form of money or non-monetary.  |
| <b>Improper solicitation</b> | It prohibits illegal solicitation between executives and employees and stakeholders or between internal executives and employees.   |
| <b>Conflicts of interest</b> | If it is inevitable to avoid conflicts of interest between the company and the individual, act by prioritizing the interests of the company and customers within the legal scope.   |
| <b>Insider trading</b>       | Confidential, knowledge, and information acquired directly or indirectly through the performance of duties shall not be leaked, or used to pursue personal interests.   |
| <b>Workplace ethics</b>      | Employees, regardless of time or space, must fulfill their responsibilities given to individuals during the performance of the company's business, and the company's assets and facilities must be used for business purposes only. |

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| <b>Health care</b>                   | To maintain a safe and healthy workplace, substance abuse and alcohol consumption that impairs work performance are strictly prohibited. All employees have the responsibility to perform their duties in peak condition. |
| <b>Abuse of power</b>                | It does not use its job authority or position to exert undue influence or pursue the illegal interests of the company or individual.  |
| <b>Documentation &amp; Reporting</b> | Do not prepare or report documents based on manipulated content such as concealment, reduction, exaggeration, and false content, or share them with internal and external stakeholders.                                   |

#### 4-2. Fair competition and trade

We clearly distinguish between public and private affairs, compete fairly, and trade fairly with the other party in a contractual relationship.

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| <b>Anti-trust</b>            | It does not engage in activities that are likely to hinder fair competition through unfair transactions, such as abusing its market dominant position or abusing its trading position.   |
| <b>Collusion</b>             | It does not agree to unreasonably restrict competition with other business operators regarding the price, supply, transaction area, transaction conditions, etc. of goods or services.   |
| <b>Unfair Competition</b>    | Do not obtain information illegally from competitors, partners, or other agencies, and do not use or disclose information illegally obtained by the company or a third party.  |
| <b>Money Laundering</b>      | Do not engage in acts related to money laundering by customers, partners, partners, partners, other institutions and individuals.  |
| <b>Intellectual property</b> | protect the trade secrets of our contractual partners and do not infringe upon the intellectual property rights of other companies or individuals. Furthermore, we comply with all legal procedures and ethical standards when using copyrighted materials, such as books, audio recordings, and software. |

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| <b>Tax compliance</b> | In order to handle transparent and fair tax affairs, it complies with the tax laws of each country where the workplace is located, and does not avoid fair tax obligations given. |
| <b>Procurement</b>    | It pursues a fair win-win relationship with its suppliers and does not engage in unfair transaction activities.   |

#### 4-3. Realization of customer value

We provide safe products, best services, and correct information and thoroughly protect personal information to realize customer value.

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| <b>Customer safety</b>        | In the entire process of R&D, procurement of raw materials, production, sales and distribution, and post-sales service, no decision is made to compromise with the safety of customers.                     |
| <b>Quality</b>                | Do not act to undermine the quality standards necessary to stably supply the best products and services to customers.   |
| <b>Complete Information</b>   | Provide correct and useful information related to products and services to customers to help them make the right decisions, and do not provide false and exaggerated information.                           |
| <b>Privacy protection</b>     | In order to protect the customer's personal information, it complies with relevant laws and regulations, and does not engage in actions that may illegally infringe on the customer's personal information. |
| <b>Customer communication</b> | Listen to customers' opinions on products and services, and actively accept customers' legitimate needs and rational proposals.   |
| <b>Accessibility</b>          | Take necessary measures to ensure that no customers are unfairly restricted from using products and services due to gender, age, disability, and language.  |
| <b>Product liability</b>      | Actively provide necessary information to prevent damage and risk to customers, and responsibly implement measures to ensure the safety and quality of products and services.                               |

#### 4-4. Respect for executives and employees

We respect each member as an independent person, and for this purpose, we provide fair working conditions and a safe working environment.

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| <b>Human rights</b>                 | Respect individual executives and employees as independent personalities and take active measures to ensure that human rights universally pursued by human society are protected.                                 |
| <b>Child labor and forced labor</b> | It complies with the labor laws of the country where the workplace is located, and prohibits child labor and forced labor in the workplace.   |
| <b>Discrimination</b>               | Employees shall not be discriminated against on the grounds of nationality, region of origin, race, gender, age, culture, religion, disability, educational background, political orientation, or personal taste. |
| <b>Equal opportunity</b>            | Employees are given equal opportunities for education and growth according to their abilities and qualities, and performance is evaluated and compensated fairly.   |
| <b>Harassment</b>                   | It prohibits all online or offline activities that defame a member's personality or undermine human dignity, such as verbal or physical violence, sexual harassment, bullying, and intimidation.                  |
| <b>Safety and health</b>            | Actively take necessary measures for the safety of executives and employees, and maintain a safe working environment from accidents and injuries, disasters, diseases and transmission on the job.                |
| <b>Work-Life balance</b>            | Efforts should be made to provide a work environment in which the work and life of executives and employees are harmoniously balanced.  |

#### 4-5. Commitment to sustainability

We contribute to the implementation of sustainable development that can thrive with various stakeholders through the fulfillment of social responsibility.

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| <b>Sustainable development</b>      | It is responsible for contributing to the achievement of sustainable development goals to solve the environmental and social problems facing human society in the management decision-making process.           |
| <b>Environment</b>                  | Recognize that the environment is a valuable asset to be preserved for the next generation, and actively fulfill responsibilities to minimize negative impacts on the environment in all areas of the business. |
| <b>Philanthropy</b>                 | We will actively discover the social problems facing our society and furthermore, and actively seek solutions.  |
| <b>Stakeholder engagement</b>       | Identify stakeholders who are affected by the company's management or who may affect the company and actively communicate and act on important sustainability issues.   |
| <b>Contribution and sponsorship</b> | Charitable donations and sponsorships are promoted fairly in internal enforcement standards and procedures, and donations and sponsorships for political purposes are prohibited.                               |
| <b>Information disclosure</b>       | Financial and non-financial information is disclosed in a timely manner in accordance with relevant laws and regulations.   |

## 5. Grievance and handling (Cyber audit office)

### 1) Reporting received

Anyone who becomes aware of the occurrence of a violation of this policy may report the details, and Kamtec shall take appropriate measures, such as conducting an investigation without delay, when receiving a report.

## ■ Reporting Channel

- Team name : General management team
- E-mail : 5257602@seohan.com
- Tel : 043-530-3721
- Cyber audit office : [https://www.kamtec.co.kr/dh/sustain08\\_1](https://www.kamtec.co.kr/dh/sustain08_1)

## 2) Handling procedures

When reporting and receiving reports, take measures according to the following steps.



- ① The schedule of action varies depending on the contents of the report or the confirmation procedure, and may be transferred to the relevant department depending on the nature of the report.
- ② The notification of the results of the processing shall be substituted by posting it on this website without a separate written reply procedure.
- ③ The deadline for processing shall not exceed 30 days from the date of receipt, and shall be extended if further investigation is required.
- ④ The informant may raise an objection within 10 days of notification of the result.

## 3) Protection of informants

Confidentiality : Prohibits the act of disclosing or implying the identity of the informant without the consent of the informant.

Security of identity : Protects against disadvantages or discrimination from business relationships or affiliated departments for reasons such as reporting, statements, and submission of data.

Liability reduction : Disciplinary action may be reduced or exempted for the informant if the informant's negligence or error is found in connection with the informant.

## 6. History of enactment and revision

| No | Date              | Contents  | Remark |
|----|-------------------|---|--------|
| 0  | Dec 19, 2024      | The first enactment   | -      |
| 1  | Sep 5, 2025       | Change the person in charge of the reporting channel                                | -      |
| 2  | February 27, 2026 | Revised 4-1 (Ethics for executives and employees), 4-2 (Fair competition and trade) | -      |