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# Anti-corruption & Anti-bribery Policy

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|---------------------|----------------------------------|
| Final Revision Date | September 5, 2025                |
| Revision No         | 1                                |
| Management Team     | Process Quality Engineering Team |

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



## **1. Purpose**

Kamtec strives to establish transparent management to promote sustainable development based on trust between internal and external stakeholders and increase customer value.

The purpose of this policy is to prevent the occurrence of corruption and bribery practices, economic criminal acts that damage our tangible and intangible assets and hinder the fair performance of our members, and to actively practice them according to ethical and moral value standards.

All executives and employees of Kamtec and business partners must comply with all relevant laws and regulations in performing Kamtec's business. It includes laws on the prohibition of malpractice and business malpractice, illegal solicitations, and receipt of money and goods under the domestic criminal law, and other local corruption prevention laws.

If this policy conflicts with the laws of the local country, it may be used by revising the policy to comply with local laws first and reflect the laws and industrial characteristics required by the country.

## **2. Scope**

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

Except for special provisions in local laws and regulations, the company's articles of association, and private regulations, the work shall be carried out 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
- Kamtec business partners (customers and partners, etc.)

### **3. Implementation Guidelines**

#### **3-1. Prohibition of bribery and giving**

It does not accept, provide, or promise to provide any form of illegal or unethical profit or bribe, money or non-monetary interest from customers and internal and external stakeholders. Bribery refers to any form of offering or receiving for the acquisition of money or non-monetary illegal profit, and includes money, services, hospitality, gifts, donations, subsidies, preferential measures, and convenience provision.

If it is inappropriate for a Kamtec employee or business partner to pay a direct price, the same price should not be paid indirectly. In particular, even though the circumstances of the bribe provision have been captured, it should not be ignored as it is beneficial to Kamtec.

#### **3-2. Prohibition of improper solicitation**

Unfair solicitations between executives and employees and stakeholders, or between internal executives and employees, are prohibited directly or through third parties for the purpose of obtaining business benefits or benefits. You should not make unfair demands or receive rewards by using your superior or dominant position in the business.

Stakeholders should not mediate or solicit unfair transactions with the company or its partners.

Avoid trading on favorable conditions for specific customers or partners. You should express your intention to refuse requests for business convenience. If you receive an illegal request, report it to your boss immediately.

### **3-3. No gifts and entertainment**

beyond the simple level recognized by social norms, entertainment, souvenirs, and gifts that can affect the fair performance of work are not exchanged. The congratulations and condolences are not publicly notified to the stakeholders in the job, and the condolences and gifts must not exceed the normal level in social customs. There may be laws and cultural practices specific to each country in relation to gifts and entertainment for the formation or maintenance of sound work relationships, but in any case, they must be provided within the legal and legitimate range.

\*Examples of prohibiting gifts and entertainment

- Provision of money and goods such as gift certificates, gas vouchers, gift expenses, and excessive congratulatory and condolence expenses
- the provision of entertainment for drinking, sightseeing, etc
- Convenience of transportation, accommodation, informal event expenses (golf, etc.)
- Provision of property benefits, such as discounts on goods or services

### **3-4. Ban on payments to government and government officials**

Consideration for transactions with government or government agencies must be paid in the government's home country, and if payment is made outside the home country, prior approval must be obtained from the local legal and responsible organization.

Where a public official pays for meals, accommodation, transportation, etc. in the contract, marketing or promotion of Kamtec products and services, he/she shall comply with domestic and foreign laws, such as the Act on the Prohibition of Illegal Solicitation and Receiving Money.

### **3-5. No express charges**

In order to speed up the daily processing of procedures or avoid administrative delays, the so-called payment of express fees directly or indirectly to government officials is prohibited. Even if government officials illegally demand express fees, our employees must reject them to eradicate express fees and immediately report them to their bosses.

\*Express charges: An act of paying a predetermined bribe directly or indirectly to a government official to speed up the handling of daily procedures or to avoid administrative delays

### **3-6. No money laundering**

It prohibits acts such as concealing the actual source of funds or falsifying the acquisition process to make illegally obtained funds look legitimate. It also illegally prohibits the acquisition of funds itself.

### **3-7. Prohibiting the provision of other benefits**

It is prohibited from offering, promising, or providing job opportunities, rental of company facilities, profits exceeding the value of services provided, and other convenience and friendly opportunities with the intention of earning or illegally exerting influence.

## **4. Donations and sponsorship**

Donations and donations shall be promoted fairly as prescribed by law, and any executives and employees shall be prohibited from donating and sponsoring in the name of Kamtec or on behalf of Kamtec for political purposes.

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

### 1) Report 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  | March 28, 2024 | The first enactment                                  | -      |
| 1  | Sep 5, 2025    | Change the person in charge of the reporting channel | -      |