
Code of Ethics

Final Revision Date	July 22, 2026
Revision No	5
Management Team	General Management Team

Kamtec Co., Ltd.

CEO, Sung-Kun Kim



Chapter 1. General Provisions

Article 1 (Purpose)

The purpose of this Code of Ethics (hereinafter referred to as the "Code") is to establish standards of conduct that employees of Kamtec (hereinafter referred to as the "Company") must comply with to promote sustainable development based on honesty and trust, prevent corruption, and foster a clean organizational culture.

Article 2 (Definitions)

The terms used in this Code shall be defined as follows:

1. "Stakeholders" refer to individuals or organizations related to the employee's duties, including:
 - 1) Individuals or organizations requesting or clearly intending to request business from the Company
 - 2) Individuals or organizations subject to audits, inspections, approvals, supervision, etc.
 - 3) Individuals or organizations directly affected by decisions, evaluations, tests, assessments, mediations, etc.
 - 4) Individuals or organizations with existing or potential contracts with the Company
 - 5) Individuals or organizations seeking specific actions or affected by the exercise or non-exercise of an employee's authority
 - 6) Individuals or organizations affected directly by policies or projects of the Company
 - 7) Other parties designated by the CEO as stakeholders for the purpose of corruption prevention
2. "Related Employees" refer to other employees who are directly affected by the performance of an employee's duties, including:
 - 1) Subordinates under the employee's direct authority
 - 2) Employees involved in HR, budgeting, audits, commendations, or evaluations, and those related to them
 - 3) Employees entrusted with delegated duties
 - 4) Other employees designated by the CEO
3. "Gifts" refer to items, securities, accommodation tickets, memberships, admission tickets, etc., provided without compensation (or at a price significantly lower than market value).
4. "Entertainment" refers to food, golf, or other hospitality, including transportation and lodging conveniences.

Article 3 (Scope of Application)

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

It also encourages all stakeholders in business relationships to respect this Code of Ethics.

If the matters covered in this Code of Ethics conflict with the laws of the local country, the local laws and regulations shall be followed first.

- 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 Auto USA executive and employees and in-house partners
- Kamtec business partners (customers and partners, etc.)
- Other suppliers, consumers, local communities, and business associates

Chapter 2. Pursuit of Sustainable Development

Article 4 (Pursuit of Customer Satisfaction)

1. The Company shall fulfill its responsibility to improve the quality of life by providing products and services that meet customer expectations.

2. Employees shall devote all their time and attention during working hours to ensure the Company can fulfill the responsibility outlined in Paragraph 1.

3. Employees shall comply with the Company's policies, guidelines, and procedures for quality management and strive to improve product quality.

Article 5 (Fair Competition)

1. Employees shall recognize other employees, customers, business partners, and stakeholders as partners for mutual survival and prosperity, and shall treat them fairly.
2. Employees shall comply with competition and fair trade laws such as the Monopoly Regulation and Fair Trade Act and the Fair Transactions in Subcontracting Act.
3. Employees shall not engage in lobbying activities or provide political donations (including monetary contributions, goods, or services) to the government (including local governments) on behalf of the Company without written approval.

Article 6 (Honest Competition)

1. Materials used for sales or marketing purposes shall be based on clear evidence and comply with relevant laws such as the Act on Fair Labeling and Advertising.
2. Employees shall provide customers with important product information that may influence their decisions, based on accurate evidence.
3. Employees shall immediately report to the Company if any defects or issues are found in products.

Article 7 (Transparent Disclosure of Information and Financial Responsibility)

1. Employees shall acquire and manage all management and business-related information in a lawful and transparent manner, and accounting/financial records shall be prepared and maintained accurately and honestly based on facts, in accordance with applicable laws and generally accepted accounting principles.
2. Employees shall not disclose internal information acquired in the course of their duties to external parties or use such information improperly without the Company's approval, and shall not engage in false or exaggerated reporting, or concealment or monopolization of material information.
3. The Company shall disclose management information in a timely manner in accordance with applicable laws and regulations to ensure transparency and credibility, and shall protect the personal data and trade secrets of customers, business partners, and employees.

Article 8 (Respect for Human Rights)

1. Employees shall comply with labor laws regarding working hours and shall not force others to work overtime.
2. Employees shall treat others with respect and dignity, and shall not discriminate based on race, color, gender, sexual orientation, gender identity, marital status, pregnancy, parental status, religion, political opinion, nationality, ethnic background, social origin, social status, birth status, disability, age, or any other characteristic.
3. Employees shall not engage in physical punishment, verbal or physical abuse, harassment, bullying, threats, or any act that violates the dignity of others.
4. Employees shall comply with laws related to health and safety.
5. The CEO shall take measures to minimize risks employees may face and provide appropriate health and safety information and training, including proper handling and labeling of chemicals and machinery.
6. The Company shall respect employees' privacy, protect personal information, and prevent any form of mental or physical coercion, abuse, or unfair treatment.
7. Employees shall respect labor laws and guarantee rights to collective bargaining and action without facing unfair treatment. This includes the freedom to peacefully assemble or to refrain from such activities.
8. Employees shall ensure that human rights of local communities are not violated during business operations and work to protect their rights to health, safety, and residence. The Company shall also ensure the protection of human rights of vulnerable groups such as children, migrant workers, people with disabilities, and women without discrimination.

Article 9 (Environmental Conservation)

1. Employees shall avoid damaging surrounding facilities and environments to ensure that local residents enjoy a pleasant living environment.

2. Employees shall make every effort to prevent pollution and protect nature.

Article 10 (Prudent Communication)

1. Employees shall not defame others, disparage business partners or customers, disclose trade secrets, or post content that infringes on copyrights or patent rights.

2. Employees shall not speak on behalf of the Company regarding Company-related matters when approached by news reporters, industry experts, or stakeholders, and shall refer them to the public relations department.

Article 11 (Information Protection and Security)

1. Employees shall maintain confidentiality regarding trade secrets and proprietary information of the Company, its customers, and partners, unless disclosure is permitted by law or contract.

2. Employees shall comply with the Personal Information Protection Act and other relevant laws when collecting, using, or providing personal information, and shall take measures to prevent data leaks.

3. Employees shall not use personal information beyond the agreed scope or provide it to third parties without proper consent.

Article 12 (Protection of Intellectual Property)

1. Employees shall protect the Company's intellectual property rights, including patents, utility models, trademarks, design rights, copyrights, and trade secrets. If employees become aware of any infringement, they must immediately report it to the relevant department.

2. If an employee creates inventions or works related to their job that are subject to intellectual property rights, they shall report it to the Company and cooperate in transferring such rights or applying for patents under the Company's name.

Article 13 (Compliance with Export Restrictions)

1. Employees shall comply with export control laws and international regulations of each country.
2. Employees shall not conduct transactions with countries, regions, or individuals subject to export restrictions or economic sanctions.
3. Employees shall regularly check for compliance with export restriction and economic sanction laws and regulations.

Article 14 (Prevention of Counterfeit Parts)

1. Employees shall not produce or use unauthorized raw materials or components and shall not use or sell counterfeit materials or parts.
2. Employees shall periodically inspect the workplace for the use or production of counterfeit materials and, upon discovery, shall report immediately to the authorities or customers.
3. Employees shall ensure that produced materials and parts are used and distributed according to the intended business purpose or contract requirements.

Article 15 (Responsible Sourcing of Materials)

1. A process must be established to trace the origin and smelter of all minerals and raw materials, including conflict minerals such as tantalum and gold.
2. The Company shall make efforts to identify and evaluate any serious human rights violations, ethical issues, or negative environmental impacts related to the origin and smelter of such minerals and raw materials.
3. If the Company primarily handles such minerals and raw materials, it shall strive to verify the absence of such risks through internal confirmation or external certification.

Chapter 3: Ethical Performance of Duties

Article 16 (Handling of Unethical Orders)

1. Employees must not give orders to subordinates that violate laws or internal regulations for the benefit of themselves or others, or that significantly hinder the fair performance of duties (hereinafter referred to as "unethical orders").
2. If a subordinate receives such an unethical order, they may explain the reason to their superior and refuse to follow the order.
3. If the same order continues despite the refusal under paragraph 2, the employee must immediately consult with the Ethics Management Officer (as defined in Article 41, hereinafter the "Ethics Officer") or report it to the CEO.
4. Upon receiving a consultation under paragraph 3, the Ethics Officer shall review the order and, if necessary, report to the CEO for cancellation or modification of the order.
5. Upon receiving a report under paragraph 3 or 4, the CEO shall take appropriate action, such as canceling or modifying the order, if deemed necessary. In such cases, superiors who repeatedly issue unethical orders may be subject to disciplinary actions.

Article 17 (Avoidance of Conflict of Interest Duties)

1. Employees must avoid participating in or making decisions about work that is related to the interests of the following persons:
 - 1) The employee themselves, their spouse, lineal ascendants or descendants, or relatives within the fourth degree of kinship (as defined in Article 767 of the Civil Act);
 - 2) If the employee's spouse, lineal family, or relatives within the fourth degree are related to the duties;
 - 3) If the involved party is a former organization or its agent in which the employee worked within the past two years, or if they maintain a close personal relationship through blood, academic background, regional ties, religion, etc., making fair performance difficult.
2. Employees seeking to recuse themselves based on paragraph 1 must notify their department head or the Ethics Officer, and if unclear, consult the Ethics Officer.

3. Upon receiving such a notification or consultation request, the department head or Ethics Officer must consider the following factors. If it is deemed inappropriate for the employee to continue the task, they must report to the CEO. However, if the department head has authority to reassign the task temporarily, they may do so without reporting.

- 1) Degree of conflict of interest;
- 2) The employee's role and discretion in task execution;
- 3) Sensitivity of the task internally and externally;
- 4) Difficulty of reassigning the task to another employee;
- 5) Other factors affecting fairness.

Article 18 (Exclusion of Preferential Treatment)

Employees must not give preferential treatment or discriminate against individuals based on regional, familial, academic, or religious affiliations.

Article 19 (Restrictions on Private Contact with Stakeholders)

1. Employees must not engage in private contact with stakeholders (including retired stakeholders) during the period from the start to the end of a task if they are in a superior position. If unavoidable, they must report to their department head in advance (or after the fact if unavailable), and must not disclose internal company information.

2. "Private contact" includes:

- 1) Traveling privately with the stakeholder;
- 2) Engaging in speculative games (e.g., mahjong, cards) with the stakeholder.

3. "Unavoidable reasons" include:

- 1) Participating in business-related meetings involving affiliate employees under Seohan Group;
- 2) Attending events where the stakeholder's presence was unknown in advance.

Article 20 (Prohibition on Soliciting Sponsorships from Stakeholders)

1. Employees must not solicit sponsorships from stakeholders when organizing or supporting company events (e.g., sports events, volunteer activities), except where the event is clearly co-hosted or co-supported with the stakeholder.
2. "Sponsorship" includes provision of expenses, goods, services, manpower, or venues necessary for conducting the event.

Article 21 (Prohibition of Misuse of Budget)

Employees must not cause financial loss to the Company by using budgets such as travel or entertainment expenses for purposes other than their intended use.

Article 22 (Handling Unjust Demands by Politicians or Public Officials)

1. Employees who receive unjust requests or coercion from public officials, politicians, or political parties must consult with the CEO or Ethics Officer before responding.
2. Upon such consultation, the CEO or Ethics Officer must take appropriate actions to ensure fair performance of duties.

Article 23 (Prohibition of Personnel Solicitation)

1. Employees must not induce others to solicit personnel decisions (e.g., appointment, promotion, transfer) on their behalf.
2. Employees must not use their position to unfairly influence personnel matters of others.
3. Employees must not solicit personnel decisions for family or acquaintances by directly or indirectly contacting relevant officers of Kamtec, affiliates, or customers (e.g., Hyundai-Kia Motors Group).

Article 24 (Conflict of Interest)

In the event of a conflict between the interests of the employee and the Company, the employee must prioritize the interests of the Company and its customers in all business activities. The Company strictly prohibits personal gain through transactions with relatives or misuse of company assets and information.

Chapter 4: Prohibition of Unjust Enrichment and Related Conducts

Article 25 (Prohibition of Involvement in Interests)

Employees shall not use their position to obtain unjust benefits or to allow others to do so.

Article 26 (Prohibition on Private Use of Position)

Employees shall not use or allow others to use the Company's name or their position for private gain outside the scope of their duties by means such as publicizing or posting.

Article 27 (Prohibition of Solicitation and Corrupt Practices)

1. Employees shall not obstruct the fair performance of duties by other employees, nor engage in any form of solicitation, request, or acceptance of money, goods, or entertainment, or any other corrupt practices, for the purpose of obtaining undue benefits for themselves or others.
2. Employees shall not engage in prohibited acts, including improper monetary or material transactions, with public officials or parties related to their duties, as defined in Article 2, Paragraph 3 of the "Act on the Prevention of Corruption and the Establishment and Management of the Anti-Corruption and Civil Rights Commission.
3. Employees shall not, in any form, participate directly or indirectly in money laundering, fraud, illicit financing, accounting fraud, or the financing of terrorism, and shall immediately report any suspected activities to the Company upon becoming aware of them.

Article 28 (Restriction on Transactions Using Job-Related Information)

Employees shall not use undisclosed information learned during the course of their duties to engage in transactions or investments related to assets such as stocks, securities, or real estate, nor shall they provide such information to others for these purposes.

Article 29 (Prohibition of Private Use or Benefit from Company Property and Opportunities)

1. Employees shall not use or benefit from the Company's assets (including those owned, leased, or rented) such as vehicles, memberships, or real estate for private purposes without just cause.
2. Employees shall not privately use items such as goods or gift certificates provided incidentally through budget spending without just cause; such items must be used for business purposes.
3. If employees discover business opportunities based on their position or the Company's assets or information, they must ensure such opportunities are used for the Company's benefit and shall not privately exploit them.
4. Employees shall not engage in any activity that competes with the Company.
5. Employees shall not accept paid or unpaid positions that conflict or may conflict with the Company's interests without the Company's approval.

Article 30 (Restrictions on Receiving Money or Gifts)

1. Employees shall not receive money, real estate, gifts, or entertainment (hereinafter "gifts, etc.") from stakeholders. Exceptions are as follows:
 - 1) Legitimate payments based on proper rights in private transactions not violating this Code, other regulations, or laws (excluding gifts).
 - 2) Food or convenience provided unavoidably in the course of duty within customary limits (less than 30,000 KRW).
 - 3) Transportation, accommodation, or food uniformly provided to all participants by the host at an official event related to duties.
 - 4) Souvenirs or promotional items distributed to an unspecified number of people.

- 5) Openly provided money or items intended to assist employees facing difficulties due to illness or disaster.
- 6) Other items approved by the CEO within the scope necessary for smooth performance of duties.

2. Employees shall not receive gifts, etc. from other employees related to their duties. Exceptions are as follows:

- 1) Cases specified in Paragraph 1 above.
- 2) Small gifts (less than 50,000 KRW) given within customary practices (e.g., condolence or congratulatory return gifts).
- 3) Items provided publicly by internal employee mutual aid associations.
- 4) Items provided by superiors to subordinates for encouragement, reward, or morale boosting.

3. Employees shall not receive gifts, etc. from former stakeholders or employees in relation to duties performed at that time, except as permitted under Paragraphs 1 and 2.

Article 31 (Restrictions on Receipt of Gifts by Spouse or Lineal Family Members)

Employees shall ensure that their spouse or lineal ascendants/descendants do not receive gifts, etc. prohibited under Article 26.

Article 32 (Restrictions on Giving Gifts)

1. Employees shall not provide gifts, etc. to other employees from whom receiving such is prohibited under Article 26(2), except in the cases specified in Article 26(2).

2. Employees shall not provide gifts, etc. to public officials or politicians related to their duties for the Company's benefit, except in cases specified in Article 26(1).

3. Employees shall ensure that their spouse or lineal ascendants/descendants do not provide gifts, etc. to persons prohibited under Paragraphs 1 and 2.

Article 33 (Fair and Transparent Contract Execution and Fulfillment)

1. Employees shall fairly and transparently conduct bidding, contracting, and contract execution according to applicable laws, regulations, and Company policies.
2. Employees shall not use their superior trading position in such processes to demand gifts, etc., impose unfair conditions, interfere in management, or make other unjust demands.
3. When consulting or meeting with stakeholders during contract processes, employees shall use the Company's business or meeting facilities. In unavoidable cases such as business trips, related regulations must be followed.
4. Employees shall avoid dining with stakeholders during the performance of related duties. If unavoidable, employees shall not accept meal costs from stakeholders even under Article 26(1)(2).
5. In executing contracts, employees shall confirm whether they or their counterparts have relationships defined in Article 14 and, if a conflict of interest exists, shall immediately report it to their department head, who shall take appropriate measures. If necessary, consultation with the Ethics Manager may be sought.
6. Employees responsible for contracts must retain the executed contract (including electronic copies).
7. The Ethics Manager shall inspect compliance with laws, regulations, fairness, and integrity of contracts at least once a year and may conduct additional inspections if necessary.
8. Employees shall cooperate actively by submitting contracts or contact information of counterparties as required under Paragraph 7.
9. If any violation of laws or regulations or misconduct is discovered through such inspection, it shall be handled under this Code and related disciplinary regulations.
10. The Ethics Manager shall notify employees of inspection results and any required improvements.

Chapter 5: Fostering a Healthy Workplace Culture

Article 34 (Reporting of External Lectures and Meetings)

1. Employees must report in advance to their immediate supervisor when giving paid lectures, speeches, presentations, discussions, evaluations, consultations, or decisions (hereinafter referred to as "external lectures or meetings") at seminars, public hearings, forums, symposiums, training courses, or conferences. The report should include the requester, reason, location, date, and compensation. However, reporting is not required if the requester is a national or local government (including affiliated institutions).
2. Compensation for external lectures or meetings must not exceed the standard rates typically applied by the requesting organization.

Article 35 (Prohibition on Borrowing Money and Other Prohibited Activities)

1. Employees shall not borrow or lend money to stakeholders (excluding relatives within the fourth degree) or other employees involved in related duties, nor shall they receive real estate under unfair or gratuitous terms (including cases where the rent is significantly below market value). This does not apply to loans from financial institutions under normal conditions in accordance with the Act on Real Name Financial Transactions and Confidentiality.
2. If an employee must borrow or lend money or receive real estate gratuitously due to unavoidable circumstances, they must report to the CEO.

Article 36 (Establishing a Sound Culture of Congratulatory and Condolence Events)

1. Employees shall take the initiative to establish a sound culture for such events.
2. Employees must not inform stakeholders of personal celebratory or condolence events unless it falls under one of the following:
 - 1) Notification to relatives
 - 2) Notification to current or former colleagues
 - 3) Notification via internal communication channels accessible only to employees
 - 4) Notification to members of affiliated religious or social groups
 - 5) Posting on the employee's personal SNS account

3. Employees must not give or receive congratulatory or condolence gifts exceeding KRW 100,000, except in the following cases:

- 1) Gifts exchanged between employees and their relatives
- 2) Gifts given in accordance with internal rules of religious or social organizations
- 3) Gifts provided under the name of the CEO or executive leadership
- 4) Gifts provided under standards set by the CEO, up to a maximum of KRW 300,000

Article 37 (Restrictions on Golf with Stakeholders)

Employees in positions involving contracts, reviews, approvals, or inspections must not play golf with individuals who could be directly affected by their work. Exceptions include:

1. When necessary for public policy formation, implementation, or consultation
2. For official consultations with public institutions, private organizations, or affiliates
3. When stakeholders are part of family gatherings, alumni associations, or social clubs

Chapter 6: Disciplinary Measures

Article 38 (Consultation on Potential Violations)

1. When unclear whether their actions violate this Code, employees must consult with the Ethics Management Officer.
2. The Ethics Management Officer must document and manage consultation records.

Article 39 (Reporting and Confirmation of Violations)

1. Anyone who becomes aware of a violation of this Code may report it to the Ethics Management Officer.

2. Reports must include the identities of both the reporter and violator and specific details of the violation. Anonymous reports shall be handled in accordance with separate internal rules.
3. The Ethics Management Officer shall investigate reported violations and report the findings to the CEO.

Article 40 (Protection of Whistleblowers)

1. The CEO and Ethics Management Officer must protect the identity of whistleblowers and ensure they do not suffer disadvantages due to their report.
2. If a whistleblower suffers a disadvantage, they may request remedial action from the Ethics Management Officer, CEO, or Planning Division. Appropriate measures must then be taken.
3. If a violation is discovered through self-reporting, disciplinary measures may be reduced or exempted.
4. Paragraphs 1 to 3 also apply to consultations and reports made under this Code.

Article 41 (Disciplinary Action)

1. The CEO shall take disciplinary action or other necessary measures against employees who violate this Code.
2. The type, procedure, degree, and effect of such disciplinary actions shall follow the company's disciplinary regulations. However, any retaliation against whistleblowers may result in aggravated disciplinary action.

Article 42 (Handling of Prohibited Gifts)

1. Employees must return any received gifts that exceed permissible limits or are otherwise prohibited.

2. If the gift cannot be returned due to spoilage, loss, or unknown origin, it must be reported to the Ethics Management Officer.

3. The Ethics Management Officer may dispose of the gift in the following ways:

- 1) Discarding items with no economic value
- 2) Donating perishable or near-expiry items to welfare organizations or public interest groups
- 3) Donating other items to welfare organizations or public interest groups, unless otherwise regulated by law
- 4) Handling based on separate criteria established by the CEO

4. The Ethics Management Officer must record details of the gift in a registry, including the identities of giver and recipient, gift description, date received, and disposal method. If the giver's address is unknown, the result must be publicly disclosed.

Chapter 7: Supplementary Provisions

Article 43 (Training)

1. The CEO must establish and implement training programs to ensure compliance with this Code.
2. Such training must be conducted at least once a year.
3. Employees confirmed to have violated the Code under Article 36 may be required to attend external training.

Article 44 (Lifecycle-based Ethics Training)

The CEO shall conduct ethics training tailored to the employee's career stage, including new hires and those receiving promotions.

Article 45 (Designation of Ethics Management Officer)

1. The CEO shall appoint the head of planning, HR, legal, or audit departments as the Ethics Management Officer.
2. The Ethics Management Officer shall perform the following tasks:
 - 1) Ethics training and consultation
 - 2) Monitoring and evaluating Code compliance
 - 3) Receiving, investigating, and processing violation reports and protecting whistleblowers
 - 4) Other necessary matters related to Code operation
3. The Ethics Management Officer must not disclose any confidential information learned during their duties.

Article 46 (Compliance Checks)

1. The Ethics Management Officer shall conduct regular annual inspections of employee compliance with the Code.
2. Additional inspections may be conducted during corruption-prone periods such as holidays.
3. Results of inspections shall be reported to the CEO.

Article 47 (Commendations)

The CEO may reward employees who contribute to the implementation and advancement of this Code, including through personnel evaluations.

Article 48 (Suggestions)

Employees may propose improvements to inefficient practices or ethical issues to the Ethics Management Officer.

Article 49 (Operation of the Code)

The CEO may establish detailed provisions necessary for the operation of this Code.

Addenda

Article 1 (Effective Date) This Code shall take effect from June 15, 2018.

1. Public officials under the National Public Service Act and the Local Public Officials Act, or those recognized as public officials under other laws
2. Heads and employees of public institutions
3. Heads, faculty, and staff of private schools and executives and employees of school foundations

*** History of enactment and revision**

No.	Date	Contents	Remark
0	June 15, 2018	The first enactment	-
1	July 3, 2023	Added Article 13 (Compliance with Export Restrictions), Article 14 (Prevention of Counterfeit Parts), and Article 15 (Responsible Sourcing of Materials)	
2	April 19, 2024	Added Article 8 (Respect for Human Rights), outside of clauses 6, 7, and 8	
3	August 13, 2025	Revised Article 7 (Transparent Disclosure of Information and Financial Responsibility), Article 27 (Prohibition of Solicitation and Corrupt Practices)	
4	April 20, 2026	Revised Article 3 (Scope of Application)	-
5	July 22, 2026	Revised Article 3 (Scope of Application)	-