

Business Partner Code

Third Party Code of Conduct

August 2022

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Who shall need to comply with this Business Partner Code?

All Business Partners, including suppliers, distributors, vendors, and subcontractors (collectively, the “Business Partner”), of Yanolja Co., Ltd. and its affiliated companies that are consolidated in the financial statement (Collectively, the “Company”) shall comply with the Business Partner Code (the “Code”).

What is the Business Partner?

Business Partner means all suppliers, distributors, vendors, subcontractors, and business partners that have business relationships with the Company.

What is the Company?

The Company means Yanolja Co., Ltd. and its affiliated companies. The major companies of the Company are stated as following.

Yanolja, Yanolja F&G, Yanolja M&D, Yanolja F&B Solution, InterparkTriple, SanHa IT, Go Global, Apart Tech, Connectfy Cloud, Dable, Yanolja Cloud Solution, etc.

※ On the base of the data in November 2023. Please refer to the business report of Yanolja [About affiliated companies]

What is the Employee?

The Employee means all directors, officers, and employees of the Company.

The Company is contributing to societies in various ways, such as developing the leisure industry, revitalizing the travel market, and building sustainable value for all Business Partners. The Company is committed to improving customer satisfaction, supporting its business partners, operating the business in a way that protects the environment, and enhancing the local communities. The Company values honest, ethical, and responsible behaviors in all aspects of the business, enabling rapid response to internal and external challenges and opportunities.

The Company also values the relationships with the Business Partners. Expecting the Business Partner to share its values and operate in the way of the Company, the Company demands all Business Partners comply with this Code. All the Business Partners and the Company must comply with all applicable laws, regulations, and industry codes, conform their practices to any published standards for their industry, obtain all applicable permits, and always follow the limitations and requirements of the permits.

BUSINESS CONDUCT AND ETHICS

The Company operates its business in an honest and ethical manner. The Company is committed to the following, accordingly.

- Compete on the merits of the Company products and refuse to engage in behavior that violates the laws and principles to promote fair competition.
- Never, directly or indirectly, give, receive, or attempt to give or receive anything of value to obtain or retain business or favorable treatment.
- Disclose and resolve all circumstances of conflicts of interest.
- Be cautious when exchanging gifts and entertainment.

The Company also expects the Business Partner to be aligned with the commitment to ethical business conduct.

1. FAIR TRADE

The Business Partner must comply with all applicable laws, such as antitrust, merger controls, and fair competition laws, that govern the jurisdictions in which they conduct the business, respectively.

2. ANTI-BRIBERY AND ANTI-CORRUPTION

The Business Partner shall never make, promise to make, or offer to make any payments or provide any item of value, directly or indirectly, to anyone to improperly obtain or retain business, secure an improper business advantage, or induce the recipient to perform a job function improperly.

- ▷ An “item of value” may take many forms, including, but not limited to, travel, personal favors, offers of employment, or other benefits that the Employee might not believe to be traditional gifts.

The Business Partner must comply with all applicable anti-bribery and anti-corruption laws,

including but not limited to the Korea Anti-grift Act, the U.S. Foreign Corrupt Practices Act of 1977, as amended, and the U.K. Bribery Act of 2010. In addition, the Business Partner must comply with anti-money laundering laws, as well as laws governing lobbying, gifts, and payments to public officials, political campaign contribution laws, and other related regulations.

3. CONFLICTS OF INTEREST

The Business Partner is expected to make decisions solely based on sound business judgment. A conflict of interest may occur if the Business Partner has a bias or personal interest that interferes with its ability to make an objective business decision in the Company's best interest. Any potential conflicts of interest, actual or perceived, should be disclosed immediately to the Company through the mechanisms described in the section [30. Reporting Channel] in the Code.

4. GIFTS AND ENTERTAINMENT

Gifts and entertainment may be used to disguise bribery and corruption. All the Employees and the Business Partners are strictly prohibited from offering or accepting gifts or entertainment to or from the Business Partner unless such gifts or entertainment are reasonable, directly related to a proper business purpose, and made in accordance with local laws governing such activity. Cash or cash equivalents are also strictly prohibited.

The Business Partner should not offer personal gifts, favors, exceptional hospitality, loans, entertainment, or any other form of compensation or benefit to the Employee if doing so might impair, or appear to impair, the Employee's ability to exercise judgment in a fair and unbiased manner. For example, any offer of a gift or entertainment to one of the employees during an open bidding process in which such employee is, or has been, involved is strictly prohibited. If the Employee has doubts about what The Business Partner may or may not offer or receive from the employees with respect to gifts and entertainment, do not hesitate to contact the Compliance Department in Yanolja directly for clarification.

QUALITY OF PRODUCTS AND SERVICES

The success and reputation of the Company depend on the ability to develop safe and high-quality products and services. All members of Y-Communities are committed to the following.

- creating the highest quality products and services;
- complying with all regulatory requirements; and
- protecting the safety, well-being, and sensitive information of everyone who uses products or services of the Company.

5. QUALITY

Where applicable, the Business Partner supplying the Company with materials or services must comply with the quality requirements agreed upon by the Company. The Business Partner is expected to supply all aspects of the materials or services (e.g., labor, supervision, machinery, equipment, materials, supplies, licenses, permits, and all other requirements necessary to supply the materials or services) in compliance with the Code. The Business Partner shall adhere to all applicable quality guidelines and regulations as set forth in every other jurisdiction, including the Republic of Korea and other local laws.

LABOR AND EMPLOYMENT PRACTICES

The Company fosters a respectful and safe workplace. The Company is committed to the following:

- valuing the strength of the differences of the Company and avoiding discrimination;
- treating one another respectfully and prohibiting all forms of harassment; and
- creating an environment where everyone feels safe.

The Company expects the Business Partner to share its commitment to labor, human rights, and equal opportunity in the workplace.

6. VOLUNTARY LABOR

The Business Partner shall ensure that all work is voluntary. However, the Business Partner shall not traffic persons or use any enslaved persons, forced, bonded, indentured, or prison labor.

7. PROHIBITION OF CHILD LABOR

The Business Partner shall abide by all applicable laws regarding child labor, including requirements relating to the minimum age for workers and working conditions.

8. NON-DISCRIMINATION

No Business Partner shall discriminate against any worker in hiring and other employment practices based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by applicable national or local law.

9. FAIR TREATMENT

All Business Partners shall commit to a workplace free of harassment and abuse. All workers in the supply chain deserve a fair and ethical workplace. Workers must be treated with the utmost dignity and respect, and the Business Partner shall uphold the highest human rights standards.

10. WAGES, BENEFITS, AND WORKING HOURS

The Business Partner shall fully abide by all applicable laws regarding hours of work, the payment of wages, and mandated benefits, including minimum wages and overtime payments.

11. FREEDOM OF ASSOCIATION

The Business Partner shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek representation, and join the councils of workers. All employees of the Business Partner shall be able to communicate openly with the management regarding working conditions/environments without the threat of reprisal, intimidation, or harassment.

HEALTH AND SAFETY

The Company seeks ways to improve the environment of world health. One way to express the value is to perform health and safety duties at the highest level. The Company is committed to the followings:

- Conducting business in a manner that never compromises the health of people;
- Having a strong safety culture; and
- Working together to maintain a safe and healthy workplace to reduce risk and prevent injuries.

The Company expects all Business Partners to share their commitment to health and safety.

12. WORKER PROTECTION

The Business Partner shall provide a safe and healthy working environment, including any company-provided living quarters, and engage with workers regarding health and safety issues through regular awareness training and updates. Health and safety measures shall be extended to contractors and subcontractors on third-party sites.

The Business Partner shall protect workers from overexposure to chemical, biological, physical, and radiological hazards and excessive physical or psychologically demanding tasks in the workplace and any company-provided living quarters. The Business Partner shall also ensure appropriate housekeeping and provide workers with access to potable water, sewer, septic, and waste disposal facilities.

13. HAZARD INFORMATION

Safety information about hazardous materials shall be available to educate, train, and protect workers from hazards. The Business Partner shall ensure appropriate communication to the Company in the value chain, as appropriate, to ensure risks are appropriately disclosed and managed.

14. PROCESS SAFETY

The Business Partner shall have programs to prevent, mitigate, or respond to catastrophic events, including but not limited to releases of chemicals or biological agents, fires, and explosions.

15. EMERGENCY PREPAREDNESS AND RESPONSE

The Business Partner shall identify and assess emergencies in the workplace and any company-provided living quarters and minimize their impact by implementing emergency plans and response procedures.

ENVIRONMENTAL PROTECTION

The Company operates the business in a way that minimizes the environmental impact and protects the environment with innovative technology. The Company is committed to the following.

- complying with all applicable environmental health and safety regulatory requirements,
- seeking to improve the EHS management systems continually,
- minimizing the carbon footprint, finding ways to offset the impact,
- reducing the magnitude of global carbon dioxide emission, and
- protecting and preserving biodiversity.

The Company expects the Business Partner to share its commitment to conducting business environmentally friendly.

16. ENVIRONMENTAL AUTHORIZATIONS

The Business Partner shall comply with all applicable environmental regulations. All required environmental permits, licenses, information registrations, and restrictions shall be obtained, and their operational and reporting requirements shall be followed.

17. WASTES AND EMISSIONS

The Business Partner shall have systems to ensure the safe handling, movement, storage, recycling, reuse, or management of waste, air emissions, and wastewater discharges. Any waste, wastewater, or emissions that may adversely impact human or environmental health shall be appropriately managed, controlled, disposed of, or adequately treated prior to release into the environment.

18. SPILLS AND RELEASES

The Business Partner shall have systems to prevent and mitigate accidental spills and releases to the environment.

HONESTY AND TRANSPARENCY

The Company operates the business honestly and transparently. The Company is committed to the following.

- maintaining good records;
- following sound financial controls and reporting information accurately and honestly;
- communicating in a way that is clear and straightforward; and
- promoting the products and services truthfully.

The Company expects the Business Partner to share its commitment to truthfulness and transparency.

19. BOOKS AND RECORDS

The Business Partner must provide complete, accurate, and timely information about financial transactions and results of operations in accordance with applicable accounting regulations, securities laws, and professional standards.

20. MARKETING AND PROMOTIONAL PRACTICES

The Business Partner shall maintain only marketing and promotional materials and activities that conform to high ethical standards and comply with all applicable laws and regulations. Marketing and promotional materials must be complete, accurate, and not misleading. Promotional materials and activities that mention the products or services of other companies (e.g., the competitors of the Company) must fairly and accurately represent those products and services.

CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

The Company understands that confidential and proprietary information and intellectual property enable us to develop and discover products that make a difference in the leisure industry. The Company is committed to the following:

- safeguarding confidential and proprietary information, including any Business Partner information to which the Company has access;
- protecting the intellectual property, including the intellectual property rights of the Business Partner with whom the Company works; and
- prohibiting the Employee from infringing upon the intellectual property rights of the Business Partner.

21.CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

The Business Partner must respect and protect the Company's intellectual properties, including, but not limited to, its trademarks and copyrighted materials. The Company expects the Business Partner to share its commitment to protecting confidential, proprietary, and sensitive information.

The Business Partner with access to the Company's confidential or proprietary information and/or intellectual property are strictly obligated to protect it as they would protect their own and in accordance with any applicable confidentiality agreements. The Business Partner may not share the Company's confidential information with others, including competitors of the Company, without explicit written approval from the Company. This obligation shall remain even after business relationship between the Company and the Business Partner ends. The Business Partner must respect and comply with the intellectual property rights of the Company, including, but not limited to, its trademarks and copyrighted material.

MANAGEMENT SYSTEM

The Company expects all Business Partners to utilize the proper management systems to facilitate continual improvement and compliance with its commitments under the Code. The key elements of the management system include the followings.

22. BUSINESS CONTINUITY

The Business Partner is responsible for developing and implementing appropriate business continuity plans for operations supporting the business of the Company. These plans should be designed and kept current to promptly recover and restore partially or completely interrupted critical functions to minimize disruption to the business of the Company and protect its reputation.

23. COMMITMENT AND MANAGEMENT

The Business Partner shall demonstrate commitment to the concepts described in this Code by allocating appropriate resources. The Business Partner shall have appropriate and effective mechanisms to determine and manage risks in all areas addressed by this Code.

24. DUE DILIGENCE AND INTERNAL CONTROLS SYSTEM

The Business Partner is expected to cooperate with internal and external auditors. In addition, the Company and its external representatives have the right to inspect and audit the Business Partner's books, records, and accounts relating to work done for or on behalf of the Company, as well as to conduct operational audits, assessments, inspections, and/or management reviews, upon the provision of reasonable notice.

The Business Partner is expected to continually improve its internal controls, including, but not limited to, setting performance objectives, executing implementation plans, and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections, and/or management reviews.

25. DOCUMENTATION

The Business Partner shall maintain the documentation necessary to demonstrate compliance with the Code of Conduct and applicable regulations.

26. FRAUD PREVENTION PROCESS

The Business Partner shall implement a robust fraud prevention process. The Business Partner is required to report to the Company instances of fraud, whether perceived or actual, involving the business of the Company, regardless of materiality.

27. REPORTING

The Business Partner shall encourage all workers to report concerns or illegal activities in the workplace without the threat of reprisal, intimidation, or harassment. The Business Partner shall proceed with their own internal fact-findings and take the relevant corrective actions if needed.

28. LEGAL AND CUSTOMER REQUIREMENTS

The Business Partner shall identify and comply with applicable laws, regulations, standards, and relevant customer requirements.

29. TRAINING

The Business Partner shall have a training program that achieves an appropriate level of knowledge, skills, and abilities in management and workers to address the expectations under this Code.

REPORTING CONCERNS

The Company is committed to encouraging a speak-up culture through open communication channels.

30. REPORTING CHANNEL

The Company encourages the Business Partner to seek guidance and contact the Company to ask questions and/or report concerns about any potential misconduct or unethical behavior. The Audit Department in Yanolja provides multiple mechanisms to speak up confidentially and anonymously through a third party and to report concerns and/or misconduct:

- Online Reporting Website URL: <https://www.kbei.org/center/?code=yanolja&lang=en>

The Company does not tolerate reprisal, threats, retribution, or retaliation against any person who, in good faith, has reported a violation or a suspected violation of law or this Code or against any person assisting in any investigation with respect to such a violation. Any form of retaliation is a violation of the policy of the Company and the laws in certain jurisdictions.

