

# Y-CoC

## Yanolja Group Code of Conduct

**Established on August 1, 2022**

**Amended on January 08, 2026**

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## Who shall need to comply with the Y-CoC (Yanolja Group Code of Conduct)?

All employees, officers, and directors of Yanolja Co., Ltd. and its affiliated companies that are consolidated in the financial statement (Collectively, the “**Company**” or “**Yanolja Group**”) are required to comply with this Yanolja Group Code of Conduct (the “**Y-CoC**”).

### What is the “Company”?

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

Yanolja, NOL UNIVERSE, Yanolja Partners, Yanolja NEXT, SanHa IT, Go Global Travel, Dable, Yanolja Cloud Solution, etc.

※ Please refer to the business report of Yanolja [About affiliated companies]

The Y-CoC presents the Company's principles of behavior. It describes how the Company should collectively operate its business practices with the highest standards of ethics. Every Employee shall read the Y-CoC and understand how to apply it to their duties. If there is an independent code of conduct in each company, the stricter code and rules shall always prevail.

The Company also expects its suppliers, contractors, consultants, and other business partners (Collectively, the “**Business Partner**”) to follow the Y-CoC and its principles when providing goods and/or services or acting on behalf of the Company. The Business Partner is also required to comply with the **Business Partner Code**, whenever they do business with the Company.

The Company’s officers, directors, and supervisors are expected to develop an ethical culture that is committed to the spirit of the Y-CoC. All supervisors are also expected to ensure that the Business Partner conforms to the standards outlined in the Y-CoC when working for or on behalf of the Company. The compliance culture within each Employee's assigned area of responsibility will be an important factor in evaluating the quality of that individual's performance.

The Y-CoC cannot completely cover every daily circumstance and describe every detailed principle

related to honest and ethical conduct. However, this Y-CoC addresses conducts that are particularly important to proper dealings with the individuals or entities with whom the Company interacts. From time to time, the Company may address additional policies and guidelines with which the Employee and the Company are expected to comply, if applicable. Each Employee is responsible for applying common sense and their own highest personal ethical standards, in business decisions where there is no stated guideline in the Y-CoC.

Actions of the Employee's family, significant others, or other persons who live in the household (Collectively, the "**Family Members**") may potentially result in ethical issues to the extent that they are also involved in the business of the Company. For example, accepting inappropriate gifts by the Family Members from one of the business partners could create an issue of conflict of interest, which may result in a violation of the Y-CoC attributable to the Employee.

Section [21. COMPLIANCE STANDARDS AND PROCEDURES] details the compliance resources available to the Employee. The Employee should not hesitate to question whether any action may violate the Y-CoC, raise their voice of concerns, or clarify the gray areas. In addition, the Employee should be alert to possible violations of the Y-CoC by others and report suspected violations without fear of retaliation. Violations of the Y-CoC will not be tolerated. Any Employee who violates the standards in the Y-CoC may be subject to disciplinary action, which may range from a warning or reprimand up to and including termination of employment and, in appropriate cases, civil legal action or referral for a regulatory or criminal prosecution, depending on the nature of the violation and the history of the Employee.

All Employees should read and understand the Y-CoC. The Employee will also be asked to participate in training.

## CORPORATE ETHICS & COMPLIANCE WITH THE LAWS

The Company fully complies with the laws and operates the business honestly and ethically. The Company is putting its best efforts into the following matters.

### 1. HONEST AND ETHICAL CONDUCT

The Company shall promote high standards of integrity by operating the business honestly and ethically. The Company's reputation depends on the honesty, fairness, and integrity brought to the job by each Employee.

### 2. LEGAL AND COMPLIANCE

Obeying the law, both in letter and in spirit, is the foundation of the Y-CoC. The Employee shall comply with the Y-CoC even where applicable laws are less restrictive than the Y-CoC. The success of the Company depends upon each Employee operating within legal guidelines and cooperating with local, national, and international authorities.

All Employees shall be fully aware of the legal and regulatory requirements applicable to their respective business units and areas of responsibility. The Company holds periodic training sessions to ensure that all Employees comply with the relevant laws, rules, and regulations associated with their employment, including laws prohibiting insider trading. While the Company does not expect the Employee to memorize every detail of these laws, rules, and regulations, the Employee should be able to determine when to seek advice from others. If the Employee does have a question related to legal compliance, they shall not hesitate to seek answers from the supervisor or the Compliance Department in the Yanolja Co., Ltd. (the “**Compliance Department**”)

Violation of the law cannot be tolerated. Violation of domestic or other international laws, rules, and regulations may result in civil and/or criminal penalties to the Employee as well as the Company. The Employee should be aware that all Employees' conduct and records, including emails, are subject to internal and external audits and to discovery by third parties in the event of a government investigation or civil litigation. It is in everyone's best interests to understand and comply with the legal and ethical obligations of the Company.

### 3. INTERNATIONAL BUSINESS LAWS

The Company and the Employee are expected to comply with the applicable laws in all countries to which they travel, in which they operate, and where the Company otherwise operates a business, including laws prohibiting bribery, corruption, or the conduct of business with specified individuals, companies, or countries. The fact that certain laws are not enforced in some countries or that violation of such laws is not subject to public criticism will not be accepted as an excuse for non-compliance. In addition, the Company expects all Employees to comply with other international laws, rules, and regulations governing the conduct of business corporations outside of their jurisdictions.

Such International laws, rules, and regulations, which extend to all the activities, include:

- The Foreign Corrupt Practices Act, which prohibits, directly or indirectly, giving, or attempting to give, anything of value to a “foreign official” to obtain or retain business or favorable treatment, and requires the maintenance of accurate books of account, with all company transactions being properly recorded.
- The U.S. Sanctions, which generally prohibit the U.S. companies, their subsidiaries, and their employees from doing business with specific companies and/or individuals identified by the U.S. Treasury Department and from doing business with, including certain travel to, certain countries subject to sanctions imposed by the U.S. government.
- The U.S. Export Controls, which restrict the export from the U.S., restrict the re-export of goods, software, and technology from other countries, and prohibit the transfers of U.S.-origin items and other items subject to the U.S. export control laws and regulations to denied persons and/or entities,
- Antiboycott Regulations, which prohibit the U.S. persons and companies from taking any action that has the effect of furthering or supporting a restrictive trade practice or boycott imposed by a foreign country against a country friendly to the U.S. or against any U.S. person,
- Anti-graft law (refer to the Improper Solicitation and Graft Act) in the Republic of Korea, which prohibits civil/public officials, including media, professors, etc., from accepting

certain amounts of bribes/entertainment, regardless of whether the money was related to an official's duties or position, or whether was given in return; and

- The Dodd-Frank Act of 2010, prohibits unfair deceptive, or abusive acts or practices and promotes financial stability by improving accountability and transparency in the financial system, including establishing protection for whistleblowers.

If the Employee has a question as to whether an activity is restricted or prohibited, they should seek assistance before taking any action, including by receiving confirmation from the Compliance Department as to whether such activity violates or would violate any applicable laws, policies, or regulations.

#### 4. ANTI-MONEY LAUNDERING

The Company legitimately operates the business with licit funds. Money laundering is illegal and strictly prohibited by the Company.

- ▷ **“Money Laundering”** means the illegal process of making large amounts of money generated by criminal activity, such as drug trafficking or terrorist funding, appear to have come from a legitimate source.

In certain countries, the Company is required to report suspicious activity. If the Employee deals with business partners directly, the following examples may signal potential money laundering:

- attempts to make large payments in cash;
- payments by someone who is not a party to the contract;
- requests to pay more than provided for in the contract;
- payments made in currencies other than those specified in the contract;
- payments from an unusual, nonbusiness account; and
- transactions forming an unusual pattern such as bulk purchases of products, gift cards, or repetitive cash payments.

## 5. ANTITRUST

Antitrust laws are based on the premise that the public interest is best served by vigorous competition and will suffer from illegal agreements or collusion among competitors. Antitrust laws generally prohibit the following:

- agreements, formal or informal, among industry competitors that would harm competition or customers, directly or indirectly, including price-fixing and allocations of customers, territories, or contracts;
- agreements, formal or informal, and agreements which may be inferred from conduct among industry competitors that raise, lower, or stabilize prices or competitive terms; and
- the acquisition or maintenance of a monopoly or an attempted monopoly through anticompetitive conduct.

Certain information, such as pricing, production, and inventory, should not be exchanged with competitors, regardless of how innocent or casual the exchange may be and regardless of the setting, whether business or social.

Antitrust laws impose severe penalties for certain types of violations, including, but not limited to, criminal penalties, monetary fines, and awards for damages, which may be tripled under certain circumstances. Understanding the requirements of antitrust and unfair competition laws of the various jurisdictions where the Company operates the business can be difficult. The Employee is urged to seek assistance from the supervisor or the Compliance Department whenever the Employee has a question relating to these laws.

## 6. FAIR DEALING

The Company strives to outperform the competition fairly and honestly through superior performance. Acquiring proprietary information from others through improper means, possessing trade secret information that was improperly obtained, or inducing improper disclosure of Confidential Information from past or present employees of other companies is expressly prohibited, even if motivated by an intention to advance the interests of the Company. If information is obtained

by mistake that may constitute a trade secret or other Confidential Information of another business, or if the Employee has any questions about the legality of proposed information gathering, the Employee must consult with the supervisor or the Compliance Department as further described in Section [21]. Compliance Standard and Procedures].

The Employee is expected to deal fairly with the Company's customers, Business Partners, other Employees, and anyone else with whom the Employee has contact in the course of performing their job. The Employee involved in procurement is responsible for adhering to principles of fair competition in purchasing products and services by selecting suppliers based exclusively on normal commercial considerations, such as quality, cost, availability, service, and reputation, and not on the receipt of special favors.

## 7. CONFLICTS OF INTEREST

The Company respects the rights of the Employee to manage their personal affairs and investments and does not wish to intrude on their personal lives. At the same time, the Employee should avoid conflicts of interest that occur when their personal interests may interfere in any way with the performance of their duties to, or in the best interests of, the Company.

- ▶ **“Conflict of Interest”** means when an Employee's personal interests—family, friendships, financial, or social factors—could compromise their judgment, decisions, or actions in the workplace.

A conflicting personal interest could result from an expectation of personal gain now or in the future, regardless of whether such expected gain is realized or from a need to satisfy a prior or concurrent personal obligation. The Company expects all Employees (including a member of his or her family) to be free from influences that conflict with the best interests of the Company (including those of its subsidiaries and affiliates) and from influences that might deprive the Company of their undivided loyalty in business dealings. Even the appearance of a conflict of interest where none exists can be damaging and should be avoided. For details on conflicts of interest, please refer to the separate policies and guidelines of the Company.

## 8. CORPORATE OPPORTUNITIES

The Employee shall not take personal advantage of opportunities for the Company presented or discovered by any Employee as a result of the position or through corporate property or information. Even opportunities acquired privately by the Employee might be questionable if they are related to existing or proposed lines of business. Participation in an investment or outside business opportunity directly related to the lines of business must be approved in advance.

## 9. GIFTS AND ENTERTAINMENT

Business gifts and entertainment are meant to create goodwill and sound working relationships, not to gain improper advantage with current or potential Business Partners or to facilitate approvals from government officials. The exchange of gifts, meals, or entertainment as a customary business courtesy is limitedly acceptable if it is permitted under applicable laws and the recipient's organization, is not extravagant or given too frequently, and is given openly and without any expected action in return.

Unless express permission is received from the supervisor and the Compliance Department, the Company shall not offer, provide, or accept the gifts, meals, and entertainment unless consistent with customary business practices and following the Y-CoC. Gifts of cash or cash equivalents are never permitted. This principle applies to all Company's transactions everywhere in the world, even where the practice is widely considered "a way of doing business." The Employees should not accept gifts or entertainment that may reasonably be deemed to affect their judgment or actions in performing their duties. All Business Partners of the Company and the public should know that the Employee's judgment is not affected by any economic benefits.

Under some statutes, such as the U.S. Foreign Corrupt Practices Act and the Republic of Korea's Anti-bribery Act (further described in Section [3. International Business Law]), and other applicable anti-corruption laws, giving anything of value to a government official or a private individual to obtain or retain business or favorable treatment is a criminal act subject to prosecution and conviction. Discuss any proposed entertainment or gifts with the supervisor or the Compliance Department if the Employee is uncertain about their appropriateness.

## 10. DUE DILIGENCE OF THIRD PARTIES

The Business Partner who acts illegally may expose the Company to civil and criminal liability. Before hiring any Business Partners who will act on behalf of the Company, the Employee must take appropriate steps to determine its reputation for ethical behavior, experience in performing the services they will be retained, familial or other relationships with government officials, and other relevant information. The Employee must investigate and notify the Audit Department of any suspicious information obtained through due diligence.

## BUSINESS TRANSPARENCY

To operate the business honestly and transparently, the Company is doing its best to comply with the following.

### 11. MAINTENANCES OF CORPORATE BOOKS, RECORDS, DOCUMENTS, AND ACCOUNTS; FINANCIAL INTEGRITY; PUBLIC REPORTING

The transparency of the Company's records and its public disclosure depends upon the validity, accuracy, and completeness of the information supporting the entries to the books of account. The Company's records serve as a basis for operating the business. It is important to meet the business obligations to customers, suppliers, creditors, Employees, and others with whom the Company does business. As a result, it is also important that books, records, and accounts accurately and fairly reflect, in reasonable detail, our assets, liabilities, revenues, costs, and expenses, as well as all transactions and changes in assets and liabilities. Any false or misleading entries are strictly prohibited. With this, the Employee shall comply with the following:

- no entry be made in our books and records that intentionally hides or disguises the nature of any transaction or of any of liabilities or misclassifies any transactions as to accounts or accounting periods;
- all transactions be supported by appropriate documentation;
- the terms of all commercial transactions be reflected accurately in the documentation for those transactions, and all such documentation be reflected accurately in the books and records;
- Employees comply with the system of internal controls; and
- no cash nor any other asset be maintained for any purpose in any unrecorded or "off-the-books" fund.

The Company's accounting records are relied upon to produce reports for management, stockholders, creditors, and governmental agencies. In particular, the Company shall also rely upon our accounting and other business and corporate records in preparing periodic and current reports

that the Company files with the Securities and Exchange Commission ("SEC"). The Employee shall comply with the following.

- no Employee of the Company may take or authorize any action that would cause any of the financial records or financial disclosures to fail to comply with any generally accepted accounting principle, any rule or regulation of the SEC, or any other applicable laws or regulations;
- all Employees of the Company must cooperate fully with the Accounting Department, as well as independent public accountants and counsel, respond to their questions with honesty, and provide them with complete and accurate information to help ensure that books and records, as well as reports filed with the SEC, are accurate and complete;
- no Employee of the Company may coerce, manipulate, mislead, or fraudulently influence the finance and accounting personnel, the independent public accountants or counsel; and
- no Employee should knowingly make (or cause or encourage any other person to make) any false or misleading statement in any of reports filed with the SEC or knowingly omit (or cause or encourage any other person to omit) any information necessary to make the disclosure in any of reports accurate in all material respects.

The Employee is responsible for promptly reporting their knowledge to a supervisor, the Audit Department, the Audit Committee, or the Online Whistleblowing Website described in Section [21. Compliance standards and procedures].

## 12. INSIDER TRADING

The Employee who has access to confidential information (“**Inside Information**”) is not permitted to use or share that information for stock trading purposes or for any other purpose except to conduct the Company’s business.

- ▷ “**Inside Information**” is all non-public information about the Company or other companies with which the Company does business.

All non-public information about the Company or companies with which the Company does business is considered Inside Information. Using material non-public information in connection with buying or selling securities, including "tipping" others who might make an investment decision based on this information, is not only unethical but also illegal. All Employees must exercise the utmost care when handling material inside information.

## 13. MARKETING AND PROMOTIONAL PRACTICES

The Employee shall maintain only marketing and promotional materials and activities of the Company that conform to high ethical standards and comply with all applicable laws and regulations. Marketing and promotional materials must be complete and accurate and must not contain any misleading information. Promotional materials and activities that mention the products or services of third parties (e.g., Yanolja’s competitors) must fairly and accurately represent those products and services.

## CORPORATE ASSETS & DATA PROTECTION

The Company acknowledges the importance of corporate assets, confidential information, and intellectual properties and is making efforts to protect them.

### 14. PROTECTION AND PROPER USE OF COMPANY ASSETS

The Employee is expected to protect the assets of the Company and ensure their efficient use. All properties are expected to be used only for legitimate business purposes, although incidental personal use may be permitted. The Employee may not use the corporate name, brand name, trademark owned or associated with the Company, or letterhead stationery for personal purposes. While acting on behalf of the Company or while using the computing or communications equipment or facilities, the Employee may not either:

- access the internal computer system (also known as "hacking") or any other resource of another entity without express written authorization from the entity responsible for operating that resource.
- If the Company receives authorization to access another entity's internal computer system or other resources, the Employee must make a permanent record of that authorization so that it may be retrieved for future reference, and the Employee may not exceed the scope of that authorization.
- commit any unlawful or illegal act, including harassment, libel, fraud, sending of unsolicited bulk email (also known as "spam") or material of objectionable content in violation of applicable law, trafficking in contraband of any kind, or any kind of espionage.
- Unsolicited bulk email is regulated by law in a number of jurisdictions. If the Employee intends to send unsolicited bulk email to persons outside of the Company, either while acting on behalf of the Company or using the Company's computing or communications equipment or facilities, the Employee must obtain prior approval from their supervisor or the IT Security Department.

All data residing on or transmitted through the computing and communications facilities, including email and word processing documents, is the exclusive property of the Company. Any misuse or suspected misuse of assets must be immediately reported to the supervisor or the Audit Department.

## 15. CONFIDENTIALITY

One of the most important assets of the Company is the Confidential Information.

▷ **“Confidential Information”** means any confidential information a party may disclose or has disclosed to the other party, whether before or after the Effective Date and whether disclosed orally, in writing, or through review of records, data, materials, site visits or otherwise, that is designated as confidential or that reasonably should be understood by the receiving party to be confidential. Confidential Information includes, without limitation, all information provided by or relating to any End User (including the fact that any such End User is being serviced using the Pilot Services), all personal data and data files, and the trade secrets, business plans, business methods, client lists (whether former, current or prospective), vendor lists, financial projections, product plans, internal procedures and documentation for development, sales, finance and accounting and passwords of the disclosing party, pricing terms, and all reports based on any of the foregoing.

The Employee is expected to keep confidential information confidential unless and until that information has been released to the public through approved channels, as described in Section [16. Intellectual property]. The Employee may also gain information about other companies that are confidential in the course of interacting with other companies or organizations. The Employee must treat such information in the same manner as they are required to treat Confidential Information of the Company. There may even be times when the Employee must treat the fact that the Company has an interest in, or is involved with, another company as confidential.

The Employee shall refrain from disclosing confidential information of the Company or other companies gained in the course of their duty until that information is disclosed to the public through permitted channels. In compliance with this Y-CoC, unless the Employee has a legitimate need to disclose such information to perform their job, they should not discuss Confidential Information with outsiders or even other Employees. The unauthorized use or distribution of confidential information

could also be illegal, resulting in civil liability and/or criminal penalties.

The Employee should also take care not to disclose Confidential Information inadvertently. Materials that contain, or could reasonably be expected to contain, Confidential Information, such as memos, notebooks, mobile devices, thumb drives or other data storage devices, computer disks, and laptop computers, should be stored securely. Any unauthorized post, tweet, or discussion of any information (excluding publicly available information) concerning the business or prospects on the Internet, any social media outlet, forum, or other platforms of a similar type is strictly prohibited. The Employee may not discuss the business, information, or prospects in any "chat room," regardless of whether the Employee uses their name or a pseudonym. Be cautious when discussing sensitive information in public places like elevators, airports, restaurants, and "quasi-public" areas within or around the Company's facilities. All Company emails, voicemails, and other communications are presumed confidential and should not be forwarded or otherwise disseminated outside of the Company, except where required for legitimate business purposes.

In addition to the above responsibilities, if the Employee is handling information protected by any privacy policy, they must handle that information according to the applicable policies. Always remember that the Company asks users to trust us with their personal information. Preserving that trust requires that each of us respect and protect the privacy and security of that information. The security procedures strictly limit access to and use of users' personal information and require that each of us take measures to protect user data from unauthorized access. The Employee shall fully understand their responsibilities under these procedures and collect, use, and access the personal information of users only as authorized by any security and/or relevant privacy policies published by the Company and applicable data protection laws and regulations.

## **16. INTELLECTUAL PROPERTY**

Intellectual property rights of the Company (trademarks, logos, copyrights, trade secrets, "know-how," and patents) are among the company's most valuable assets. Unauthorized use of the intellectual property rights may lead to loss or serious loss of value to the Company. The Employee must respect all copyright and other intellectual property laws, including laws governing the fair use

of copyrights, trademarks, and brands. The Employee must never use the Company's logos, marks, or other protected information or properties for any other business or commercial purposes without prior approval from the Company. The Company strongly encourages the Employee to report any suspected misuse of trademarks, logos, or other Company's intellectual properties to the Audit Department.

Likewise, all Employees shall respect others' intellectual property rights. The Employee is strictly prohibited from using illegal software. Inappropriate use of others' intellectual property may result in criminal and civil fines and penalties to the Company and the Employee. Please seek advice from the Compliance Department before the Employee solicits, accepts, or uses Confidential Information from others outside the Company or lets them use or have access to the Company's Confidential Information. The Employee should also check with the Compliance Department if they are developing a service or a product utilizing content that does not belong to the Company.

## **17. MEDIA/PUBLIC DISCUSSIONS**

The Company's policy is to disclose material information concerning the Company to the public only through specific limited channels to avoid inappropriate publicity and ensure that all those interested in the Company will have equal access to such information. The Employee is expressly prohibited from providing any information to the media about us off the record, for background, confidentially, or secretly, including postings on internet websites, chat rooms, or blogs. Only the designated Employees, such as the Chief Executive Officer or the Chief Financial Officer, and the leader of the Communication Department, may respond to the questions, concerning the financial performance, strategic direction or operating performance of the Company, and operational issues, such as research and development, regulatory developments, sales, and marketing, etc., on behalf of the Company. If the Employee receives an inquiry or a call from a press or others, they need to contact the Communication Department for guidance. In this regard, all Employees shall disclose information concerning the Company to the media and public in accordance with the policies and detailed guidelines published by the Company.

## WORKING ENVIRONMENT

The Company is doing its best to foster respectful and safe working environments.

### 18. DISCRIMINATIONS

The Company is committed to providing a work environment free of any form of unlawful harassment or discrimination, including any unwelcome comments, behaviors, actions, or conduct that denigrates or demonstrates hostility based on protected personal characteristics. The Company is committed to maintaining a respectful, courteous work environment that respects the dignity and worth of each Employee. Inappropriate workplace behavior and unlawful harassment are wholly inconsistent with this commitment. The Employee must maintain a work environment free of harassment, discrimination, retaliation, and bullying and report any such conduct they become aware of.

### 19. DIVERSITY

The Company strives to create a diverse work environment for and amongst the Employees. The Company believes that the diversity of viewpoints, backgrounds, professional experiences, education, and personal characteristics, including gender, race, ethnicity, national origin, age, sexual orientation, gender identity, and other similar demographics perpetuate a cohesive and productive work environment. The Employee shall treat all Employees of the Company with dignity, respect, and professional courtesy. The policy of the Company is to conduct the business in a socially responsible way that promotes congeniality and inclusivity. The Company is also committed to ensuring that the workforce and business model reflect the diversity of the communities that the Company serves by employing diverse employees, engaging with diverse business partners, and including various individuals in the research.

## 20. ENVIRONMENT, HEALTH AND SAFETY

### **Environment Law Compliance**

Relevant Environmental laws impose criminal liability on any person or company that contaminates the environment with any hazardous substance that could cause injury to the community or environment. Violations of environmental laws may lead to monetary fines and imprisonment. The Employee shall comply with all applicable environmental laws and regulations.

It is the Company's policy to conduct the business in an environmentally responsible way that minimizes environmental impacts. The Company is committed to minimizing and, if practicable, eliminating the use of any substance or material that may cause environmental damage, reducing waste generation and disposing of all waste through safe and responsible methods, minimizing environmental risks by employing safe technologies and operating procedures, and being prepared to respond appropriately to accidents and emergencies.

### **Safety and Healthy Working Environments**

The Company is committed to a safe, healthy, and violence-free work environment. Behavior that risks the safety, health, or security of customers, extended workforce, or visitors is prohibited. If any Employee becomes aware of a risk to the safety, health, or security of the workplace, they should report it to the Safety Personnel and Data Protection Department of the Company immediately. If it is life-threatening or an emergency, call the local police, fire, or other emergency responders first, then report it to the Safety Personnel.

### **Drug & Alcohol**

The Company cares about the health and safety of the Employee. All Employees are expected to comply with the Company's guidelines regarding alcohol, drugs, and smoking, whether in the workplace, at Company-sponsored events, or while conducting the business. The Employee is not permitted to be under the influence of any legal or illegal drug that impairs the ability to perform the job. All Employees are prohibited from manufacturing, soliciting, distributing, possessing, or using any illegal drugs or substances in the workplace or while working.

## WHISTLEBLOWING & OTHERS

The Company is committed to encouraging the Speak-up culture and operating different communication channels.

### 21. COMPLIANCE STANDARDS AND PROCEDURES

#### Compliance Channel

To facilitate compliance with the Y-CoC, the Company has implemented an awareness and training program as part of the broader compliance programs. The Company has appointed the Compliance Officer to oversee this program. The Employee may address the Compliance Officer or the Compliance Department (Compliance@Yanolja.com) regarding any questions or concerns related to the Y-CoC or any other legal or regulatory compliance matters. In addition to responding to questions or concerns concerning potential violations of the Y-CoC, the Compliance Department is also responsible for all other legal or regulatory compliance matters.

The Employee's most immediate resource for any matter related to the Y-CoC is their supervisor. Supervisors may have the information that they need or may be able to refer the question to another appropriate source. There may, however, be times when the Employee prefers not to go to the supervisor. In these instances, they should feel free to discuss the concerns with the Compliance Department. If the Employee is part of the Compliance Department and it is difficult to discuss with the Compliance Department, they may contact the Chief Executive Officer or the Compliance Officer.

An Online Whistleblowing Website ("Y-Siren") is also available to those who wish to ask questions about the Company's policy, seek guidance on specific situations, submit concerns regarding questionable accounting or auditing matters, or report violations of the Y-CoC.

The Employee may use the Online Whistleblowing Website ("Y-Siren") via either anonymous reporting mechanism; however, the Audit Department may not obtain follow-up details from the whistleblower, or in general, that may be necessary to fully investigate the matter. Whether the whistleblower identifies themselves or remains anonymous, the contact with the Online Whistleblowing Website will be kept strictly confidential to the extent reasonably possible within the

objectives of the Y-CoC. The whistleblower may access the Online Whistleblowing Website using the information below:

- **Online Whistleblowing Website URL:** <https://www.kbei.org/y-siren>

### **Clarifying Questions and Concerns; Reporting Possible Violations**

If the Employee encounters a situation or is considering a course of action and its appropriateness is unclear, they should promptly discuss the matter with their supervisor or the Compliance Department because even perceived impropriety can be very damaging and should be avoided.

If the Employee is aware of a suspected or actual violation of the Y-CoC by another Employee of the Company, they have a responsibility to report the situation thoroughly and accurately to the Company. The Employee is expected to promptly provide a specific description of the violation that they believe has occurred, including any information the Employee has about the persons involved and the time and date of the alleged violation. Whether the Employee chooses to speak with their supervisor or the Audit Department, they should do so without fear of retaliation. The Company will take prompt disciplinary action against any Employee who retaliates against the whistleblower, up to and including termination of employment.

Supervisors must also promptly report any complaints or observations of Y-CoC violations to the Audit Department. If the Employee believes the supervisor has not taken appropriate action, they should contact the Audit Department directly. The Audit Department will investigate all reported possible Y-CoC violations promptly and with the highest degree of confidentiality possible under specific circumstances. Cooperation in the investigation will be expected unless the Employee files the report anonymously. As needed during the regular course of investigation on any reported Y-CoC violation, the Audit Department may consult with the Human Resources Department, outside legal counsel, or the Audit Committee. It is the Company's policy to employ a fair process to determine violations of the Y-CoC.

For any complaints received or observations of Y-CoC violations that may involve accounting, internal accounting controls, or auditing concerns, the Audit Department shall promptly inform the

Chair of the Audit Committee. The Audit Committee or such other persons as the Audit Committee may designate to be appropriate under the circumstances shall be responsible for supervising and overseeing the inquiry and any investigation that is undertaken. In addition, any matters involving accounting, internal accounting controls, or auditing concerns reported via an Online Whistleblowing Website shall be routed to the Audit Department and the Chair of the Audit Committee.

If any investigation indicates that a violation of the Y-CoC has likely occurred, the Company will take such action as the Company believes to be appropriate under the circumstances. If it is determined that the Employee is responsible for a violation of the Y-CoC, they will be subject to disciplinary action up to, and including, termination of employment and, in appropriate cases, civil legal action or referral for regulatory or criminal prosecution. Appropriate action may also be taken to deter any future Y-CoC violations.

While the Company desires to address matters internally, nothing in the Y-CoC prohibits the Employee from reporting any illegal activity, including any violation of the securities laws, antitrust laws, environmental laws, or any other federal, state, or foreign law, rule, or regulation, to the appropriate regulatory authority. The Employee shall not discharge, demote, suspend, threaten, harass, or in any other manner discriminate or retaliate against the whistleblower because they report any such violation. The Y-CoC should not be construed to prohibit the Employee from engaging in concerted activity protected by the rules and regulations of the National Labor Relations Board or from testifying, participating, or otherwise assisting in any state or federal administrative, judicial, or legislative proceeding or investigation.

## **22. WAIVERS**

Any waiver of the Y-CoC for the officers (including, where required by applicable laws, the executive officer, financial officer, accounting officer, or controller (or persons performing similar functions)) or the directors of the Company may be authorized only by the Board of Directors of the Company and will be disclosed as required by applicable laws, rules, and regulations.

### **23. UP-TO DATE STATUS OF Y-CoC & AMENDMENT**

The Company shall review and update the Y-CoC every year to keep it current and reflective of emerging laws, regulations, policies and best practices. Since the Y-CoC is an important policy of the Company, it is amended with the approval of the Board of Directors.

