



# LX Code of Ethics

**Standards for valuation and ethical behavior  
to be observed by all LX managers and employees**

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# Duties of Employees

## Guidelines for Practice

- (1) All company employees shall learn their roles, acknowledge and observe the LX Code of Ethics and corresponding regulations, and practice Jeong-Do Management when executing business duties.
- (2) All company employees shall promptly report to the **Ethics Bureau**<sup>1)</sup> in accordance with the specified procedure when they or others violate the Code of Ethics.
  - ① Employees can elect to report ethics violations directly to their supervisors before submitting to the Ethics Bureau. Supervisors must then report to the responsible executive prior to submitting relevant facts to the Ethics Bureau according to procedures governing report content.
  - ② All company employees shall acknowledge that ignorance of the LX Code of Ethics and corresponding regulations does not exempt them from their responsibilities.
- (3) All company employees must complete the 「Jeong-Do Management Pledge of Practice」 and submit to the Company on a periodic basis.

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1) **Ethics Bureau** is an organization responsible for performing general duties in support of "Jeong-Do" Management and ensuring compliance with the Code of Ethics.

# Duties of Employees

## Jeong-do Management Pledge of Practice (Executives and Employees)

- ① The 「Jeong-do Management Pledge of Practice」 shall be filled and submitted when joining the Company or being promoted.
- ② Method for submitting the 「Jeong-Do Management Pledge of Practice」 (online & offline), and the management department shall be determined by each company.
- ③ Standard Form

### Jeong-do Management Pledge of Practice

In conducting business tasks, I hereby pledge to obey the following

1. To respect team members, work towards mutual development with business partners through fair transaction, create and provide the best value to customers through fair competition and to work hard to fulfill responsibilities and obligations related to stakeholders and society.
2. To create an intern Jeong-do Management culture as a LX Employee and to work hard to fulfill responsibilities and duties in order to practice the Jeong-do Management.
3. I understand that ignorance of laws and regulations relevant to my duties does not exempt me from responsibilities. I promise to obey and never violate Regulations including the LX Code of Ethics and all obligations relating to compliance issues including what is required under antitrust law.
4. Unfair transactions, illegal actions or irregularities by LX Employees must be reported immediately to the Company. Likewise, unfair transactions, illegal actions or irregularities by business partners must also be reported immediately to the Company.
5. I shall perform my duties to cooperate, including the submission of materials requested by the Company (including documents, e-mails and any other electric files stored in the Company PC or VDI), in case of regular and irregular investigations of unfair transactions and illegitimate/improper acts that violate the LX Code of Ethics or any other compliance obligations.
6. I shall bear full responsibility for all consequences that may arrive from my actions if I violate this agreement.

Date . . .

Department  
Employee no.  
Name

# Responsibilities and Obligations to Customers

## 1. Respecting Customers

### LX Code of Ethics

We value the opinions of our customers and validate their true needs at all times.  
We regard our customers as the primary standard for our decisions and conduct.

### Guidelines for Practice

- (1) Customers have top priority, thus all cases are to be judged and evaluated from the viewpoint of consumers.
- (2) Do not engage in unethical acts that can damage the customer's benefits.
- (3) Maintain confidentiality of all information regarding customers. Do not disclose such information or use it for other purposes without receiving prior consent from the customer or as regional by applicable law.

# Responsibilities and Obligations to Customers

## 2. Creating Value

### LX Code of Ethics

- (1) We work hard to create value for our customers. Through customer satisfaction, we can build the foundation of our sustainable prosperity.
- (2) We continuously create practical value that fully benefits and satisfies our customers.

### Guidelines for Practice

- (1) Generate innovative and differentiated ideas.
- (2) Stay one step ahead of customers and anticipate their needs effectively.
- (3) Always search for better ways to accomplish your tasks and goals.

# Responsibilities and Obligations to Customers

## 3. Providing Value

### LX Code of Ethics

- (1) We are always true to our customers and never fail to keep our word.
- (2) We offer the highest quality products and services at affordable prices and respond to customers' requests promptly and accurately.

### Guidelines for Practice

- (1) Provide accurate information to enable customers to select the best products and services.
- (2) Provide the best products and services that exceed customers' expectations.
- (3) For items that require safety precautions, make sure that customers have the information needed to fully understand the details.
- (4) Ensure customers do not feel dissatisfied due to defective products or by providing poor service, etc. Respond promptly and accurately to reasonable requests of refund, exchange or services.

# Fair Competition

## 1. Pursuing Free Competition

### LX Code of Ethics

- (1) We uphold the principles of the free market economic system and pursue open competition around the world. We earn our customers' trust through top-quality products and services.
- (2) We compete fairly and capably with our competitors and do not interfere with their interests or exploit their weaknesses.

### Guidelines for Practice

- (1) Acquire general information on competitors through fair methods that will not be subjected to social criticism.
- (2) Perform all types of activities to increase competitive advantage through fair principles and methods.
  - ① Do not plagiarize or infringe on competitors' tangible/intangible assets.
  - ② Do not degrade competitors' status or abuse their weaknesses.
- (3) Do not inflict damage to customers and other businesses by unfairly colluding with competitors to set sales prices, sales conditions or market allocation.
- (4) Obey regulations and guidelines related to fair transactions, and immediately inform related department(s) in cases of infringement or possible infringement.



# Fair Competition

## [Precautions related to the gathering and use of information]

- Gathering confidential information on competitors from customers or subcontractors is prohibited
- When employing staff from previous competitors, do not under any circumstances gather confidential information or request consultation from competitors
- It is prohibited to provide information gathered directly from competitors
  - Gathering information from competitors can be misunderstood as mutual consent with competitors
- It is prohibited to gather illegal information through survey agencies, consulting companies and other specialists

## [Precautions related to the prohibition of unfair mutual consent]

- Prohibition of mutual consent of prices and bidding with competitors
  - Agreement related to price calculation methods or the setting of prices, margin rate, etc.
  - Agreement related to successful bidder, bidding price, etc. in bids
- Prohibition of mutual consent limiting product types, transaction quantities and production facilities, etc.
  - Limitation of product/service types and quantities or expansion of production facilities, etc.
- Prohibition of mutual consent limiting competitors and transaction regions or transaction partners
  - Assignment of sales regions, allotment and fixing of traders, etc.
- Prohibition of exchange of business information with competitors without previous examination with the judicial affairs department
- Prohibition of attending meetings with ambiguous purposes with competitors
  - Can become an evasion of agreement or exchange of information, etc. with managers and employees of competitors

# Fair Competition

## 2. Complying with Laws and Regulations

### LX Code of Ethics

We conduct our domestic and overseas business activities in strict accordance with local laws and regulations, and with respect to local business customs.

### Guidelines for Practice

- (1) Compete through fair methods while respecting the regulations and business customs and practices of related regions.
- (2) Comply with all rules and regulations to prevent unfair competition, both nationally and internationally.
  - ① It is prohibited to ask or provide money or anything of value to a public official (directly or indirectly) in order to receive a special benefit or business advantage.
  - ② 「Bribery Prevention Law related to Foreign Officials in International Business Transactions」  
(Prevention Law Against Bribery in Overseas Transactions)
    - It is prohibited to promise, provide or express the intention of providing bribery related to work to foreign officials directly or indirectly with the purpose of gaining unfair advantages related to international transactions
  - ③ However, actions which do not violate the law and are within the boundaries of socially accepted can be excepted.
- (3) All employees shall complete and submit the 「Pledge of Compliance to Bribery Prevention Laws」

# Fair Competition

## [Pledge of Compliance to Bribery Prevention Laws]

- ① All employees must complete and submit the 「Pledge of Compliance to Bribery Prevention Laws」 when joining the company or being promoted.
- ② The department and methods (online & offline) related to the 「Pledge of Compliance to Bribery Prevention Laws」 shall be determined by each company.
- ③ Standard form

**Pledge of Compliance to Bribery Prevention Laws**

I pledge to comply with the business principles of this Company based on the concepts of transparent and fair transaction according to the principles of the free competition through equal participation in the performance of my duties, and with all rules and regulations related to corruption prevention nationally and internationally according to the ‘Regulations related to the

Prohibition of Acceptance of Illegal Requests and Money and Valuables, etc.’ and the ‘Bribery Prevention Law related to Foreign Officials in Overseas Transactions.’

- 1. I shall observe the company policies regarding bribery in overseas transactions and the prohibition of bribery in international commercial transactions.
- 2. I acknowledge the laws and regulations prohibiting bribery in national and overseas transactions and Company guidelines on prohibiting bribery in national and overseas transactions. I shall not commit bribery or express any intention to bribe foreign officials, etc. for the purpose of illegitimate gains regarding international commercial transactions.
- 3. I shall fulfill my duties to monitor and supervise transactions to prevent bribery of foreign officials by overseas affiliates, or other third parties in international commercial transactions, in compliance with the laws and regulations on prohibiting bribery in overseas transactions and company guidelines.
- 4. I acknowledge that the Company will face losses and damages if the laws and regulations on prohibiting bribery, or the Company guidelines are violated. I shall not raise any objection to any punishment and/or restitutions the Company may impose on me for any violation of the related laws committed by myself.

Date . . .

Department  
Employee no.  
Name

# Fair Transactions

## 1. Equal Opportunity

### LX Code of Ethics

- (1) LX offers equal opportunities to all qualified companies seeking to become our business partners.
- (2) We register and select all applicants in a systematic manner according to a fair and objective evaluation process.

### Guidelines for Practice

- (1) Establish and utilize general regulations and systems related to the [Business Partner Selection Process] to select and register business partners based on a fair and transparent evaluation criteria in all transactions.
- (2) The [Business Partner Selection Process] shall include detailed evaluation items and methods and the selection shall take into consideration characteristics of the business.
- (3) Provide fair opportunities to all business applicants according to the principles and procedures established by the Company. Additionally, specific companies cannot receive preferential treatment or experience disadvantage without a legitimate reason during the selection process.

# Fair Transactions

## [Precautions Related to the Selection of Business Partners]

- Prohibition of participation limitations
  - Limitations to transaction partners or transaction areas cannot be applied without clear reasons in the selection or exclusion of specific companies
- Prohibition of rejection of unilateral transactions
  - Rejection of transactions without concrete reason such as legal issues or disqualifications according to the Company's regulations
- Prohibition of discrimination
  - The application of different delivery price, quality conditions, etc. without reason in order to favor or punish specific companies, or adjust supply at ones' discretion, or adjust priority order of transactions.
- Prohibition of requests
  - Receiving or offering favors to the person responsible or third parties with the purpose of influencing the selection of partners
  - ⊗ The acceptance of favors related to the business received from internal or external members must be reported immediately to the **Ethics Bureau**

# Fair Transactions

## 2. Fair Transaction Process

### LX Code of Ethics

- (1) We conduct all business transactions under equitable circumstances. The terms and procedures of the transaction are thoroughly discussed between the parties involved.
- (2) We never engage in any form of unfair transaction taking advantage of any superior position.
- (3) We exchange transaction information through appropriate procedures in a timely manner. Transaction results are evaluated on a regular basis and mutual cooperation measures are taken.

### Guidelines for Practice

- (1) Mutually agreed transaction terms based on coexisting principles must be obeyed through collaboration with business partners, and sound opinions for the improvement and innovation of transactions shall be reflected in duties.
- (2) Regulations related to fair treatment during transactions with business partners and the unfair use of higher positions, mistreatment, etc. must be obeyed.
- (3) Influence to obtain preferential treatment or to cause disadvantage shall not be exercised in specific companies without a fair reason.
- (4) Compensate business partners fairly for damages caused by errors on our part.
- (5) Inevitable alterations to the transaction terms with business partners must be reported to the executive board and the superior before being approved according to the procedures established by the Company; obtain agreement from the business partner when necessary.
- (6) Approval from the other party must be obtained when using its technology or assets, and all information from business partners provided for the transaction must not be revealed externally without a written approval by the business partner. Losses to the operating activities of the related business partner or to the outflow of human resources cannot be caused by the provision of such information to competitors.

# Fair Transactions

## [Precautions Related to Fair Trade Procedure]

- Unfair transaction refusal prohibition
  - Discontinuing transactions with business partners or notably decreasing transactions without cause
- Discriminatory treatment prohibition
  - The action of unfairly discriminating prices, transaction conditions, etc. according to the transaction partner
- Prohibition of forced transaction
  - Selling products or services by force to customers of competitors, such as tie-in sale, etc.
- Prohibition of status abuse during transactions
  - Selling products or services by force to those who have no intention of purchasing them
  - Forced provision of economic benefits in return for transactions, or disadvantageous treatment during the transaction
  - Interfering with business partner's management activities, such as HR management, production, and transactions without just cause
- Prohibition of conditional detention transactions
  - Requesting the condition of not making transactions with competitors or other companies, or limiting the transaction area or transaction partners
- Prohibition of disturbance of business activities
  - The action of unfairly disturbing business activities of other parties such as the unfair use of technology, unfair employment of personnel, moving of business clients, etc.
- Prohibition of unfair support related to specific companies
  - The action of providing excessive support to specific companies through unfair capital, assets, products, personnel support or addition of transaction levels, etc, causing relative disadvantage to other companies

# Fair Transactions

## 3. Pursuing Mutual Growth

### LX Code of Ethics

- (1) We support the long-term growth of our dealers and vendors by enhancing their competitiveness through technological and managerial assistance. We share the profits derived from business innovations.
- (2) We pursue mutual efforts and cooperate with our business partners in promoting a healthy business environment and maintaining fair business processes.

### Guidelines for Practice

- (1) Establish and implement standards for supporting and helping the development of business partners.
- (2) Standards for helping the development of business partners must state the requirements of business partners and include detailed operational standards, such as technical support and managerial guidance.
- (3) Any profit generated from technical support or managerial guidance shall be fairly shared.
- (4) To ensure that business partners adopt the Jeong-Do Management, the 「Jeong-Do Management Pledge of Practice」 must be submitted and administered accordingly.



# Fair Transactions

## [Jeong-do Management Pledge of Practice(for business partners) ]

- ① The department and methods (online & offline) related to the 「Jeong-Do Management Pledge of Practice」 shall be determined by each subsidiary.
- ② The Ethics Bureau shall supervise the receipt of the 「Jeong-Do Management Pledge of Practice」 from business partners, and the management levels.
- ③ Standard form

### Jeong-do Management Pledge of Practice

We as a business partner (hereinafter referred as “We”, in conducting business tasks, hereby pledge to, actively practice the Jeong-Do Management founded upon fairness, honesty and integrity, to maintain integrity and transparency in all our dealings, and to pursue mutual growth by observing the following:

1. We shall not pursue unfair dealings or commit illegitimate/improper acts in any situation during transactions with your Company.
  2. Unfair or irregular actions by managers or employees during transactions with your Company will be reported immediately as a violation to the Jeong-Do Management to the report center.
  3. We shall do our duties to cooperate, including submission of materials requested by the Company (e.g. documents required for investigation of unfair dealings or illegitimate/improper acts), when We are requested to cooperate in an investigation of unfair dealings and illegitimate/improper acts.
  4. With our keen respect to LX’s Jeong-Do Management, We are fully aware that eliminating all unfair dealings and/or acts of corruption is critical to ensure that our business dealings with the Company are carried out in fair terms and conditions. Therefore, We acknowledge that our compliance with this agreement constitutes a critical element for our contractual and cooperative relationship with the company. If We violate this agreement, We shall bear responsibility for all consequences, but not limited to, termination of our contract.
- ☞ Two copies of this Agreement shall be made, one is to be held by the business partner and the other is to be submitted to the Company.

Date . . .

Department  
Employee no.  
Name

# Basic Ethics of Employees

## 1. Basic Ethics of Employees

### LX Code of Ethics

- (1) LX Employees are proud of the Company and always act honestly and fairly.
- (2) LX Employees strive a high standard of morality and continuously strive to maintain their personal dignity and the Company's honor.

### Guidelines for Practice

- (1) ) LX Employees shall strive to behave morally and ethically to maintain the honor of LX Employees.
- (2) LX Employees must obey the law or the Company's employment regulations and shall not damage the Company's name due to individual unfair practice not acceptable as a social practice.
- (3) LX Employees shall not hinder a healthy organizational environment by starting and spreading rumors or creating an atmosphere of distrust.
  - ① Verbal abuse/violence, sexual harassment, bullying or antisocial words or actions, etc. through the SNS (Social Networking Service) or online media.
  - ② Excessive cash loans out of social conventions between employees within the Company.
  - ③ Disorderly private life that may influence negatively duty performance.
- (4) Gift giving among employees within the Company is not allowed.
  - ① Exchange of presents, flower garlands, etc. due to promotion or transfers, excessive intern protocols, etc.

# Basic Ethics of Employees

## 2. Accomplishing Missions

### LX Code of Ethics

- (1) LX Employees accomplish their duties in accordance with the visions and policies of the Company.
- (2) LX Employees perform assigned duties in the best possible and professional manner while obeying relevant regulations.
- (3) LX Employees protect and preserve Company's properties and maintain confidentiality on information gained during employment.
- (4) LX Employees openly communicate and cooperate with colleagues and related departments to enhance work efficiency.

### Guidelines for Practice

- (1) Know Company policies and standards and observe them faithfully when conducting business tasks.
- (2) When conducting business tasks, employees shall clearly understand their mission and do their best to accomplish the mission, taking responsibility for the results.
- (3) When serious situations damaging corporate assets have occurred or could occur, report them promptly and take appropriate actions.
- (4) Maintain confidentiality on all information acquired during employment. Do not disclose such information without prior consent of LX.

# Basic Ethics of Employees

## 3. Self-development

### LX Code of Ethics

- (1) LX Employees understand the meaning of an ideal employee and constantly strive to meet these standards through self-development.

### Guidelines for Practice

- (1) Employees shall understand the Company's visions and targets and actively strive to acquire required skills in order to achieve them.
- (2) Employees shall complete all required training programs, which are critical components of the Company's policies.

# Basic Ethics of Employees

## 4. Fair handling of Job

### LX Code of Ethics

- (1) LX Employees carry out their duties based on honesty and fairness, always seeking to contribute to fostering a sound business culture.
- (2) LX Employees do not accept any form of financial benefits from stakeholders that may influence their clear judgement.
- (3) LX Employees do not engage or unethical behavior in performing their duties.

### Guidelines for Practice

- (1) Employees shall prepare records and reports accurately and honestly.
  - ① The manipulation of documents or figures, or false reporting are subject to corrective action and judgment by the head of the related department, and should be considered as obvious misconduct capable of causing substantial harm or losses to the Company.
  - ② Ordering the falsification of documents or figures and following it even if knowing it is wrongful are equally considered as misconduct.
  - ③ All the accounting documentation including the settlement of accounts must be framed fairly according to the Tax Law and the Corporate Accounting Standards, before being reported to concerned persons such as stakeholders, etc.
- (2) Regardless the reason, LX Employees or their family members are not allowed to accept or request benefits<sup>1)</sup> from stakeholders, and if such are accepted due to unavoidable circumstances, it shall be reported according to related procedures.
  - ① As a rule, private transactions with stakeholders shall not be conducted.
  - ② Details not specified in the contract with stakeholders cannot be required directly or indirectly.

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1) Benefits from concerned parties are all types of actions recognized as bribery.

Please refer to the Forms of Prohibition for detailed contents.

# Basic Ethics of Employees

## Guidelines for Practice

(3) Unfair transactions such as unfair share acquisition or joint investment, joint assets acquisition, etc. related to stakeholders<sup>1)</sup> that LX can exercise influence over.

- ① The ownership of stocks of interested parties, joint investment, joint assets acquisition, etc., must be reported according to predetermined procedures and handled as necessary.
- ② If this regulation is violated, the value related to the share based on the real ownership relation can be considered as received from the stakeholder.
- ③ If the share is recognized as non-reported, the employee is responsible for all civil and criminal liabilities, and the transaction relations between the Company and the related business partner can also be severed.

(4) Employees shall perform the duties of their positions and titles, and should not be involved in activities (even in private) that may incur losses to the Company or harm its reputation.

- ① Possible risks must be recognized in advance, duties must be performed with care and attention, and problems must be handled with a sense of responsibility. Managers must strive to supervise the work of subordinates.
- ② Unfair actions by employees must be ensured to do not reoccur or expand by sharing the fact with the related superior or the related department immediately, and effort must be made to solve the matter.
- ③ Unfair directions or requirements related and unrelated to duties by the abuse of position or rights are not allowed.
- ④ Decisions out of one's duty rights and responsibility limits, or promises not possible to be kept are not allowed.

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1) Companies registered as a business partner and companies that the Company has influence on even if not registered directly as a business partner.

# Basic Ethics of Employees

## [Forms of Document and Figures Manipulation and Unfair Reporting ]

- Manipulation of documents and figures
  - Use of untruthful contents or numerical values
    - Data related to bid or Company's results such as production, sales, etc., data about external market, etc.
- Delete, dispose documents at one's discretion
  - The action of correcting, deleting or disposing documents at one's discretion before the preservation period expires according to laws and LX's management standards.
  - The action of concealing, deleting or disposing evidence data related to bid documentation, approval request, etc.
- Unfair reporting
  - Reporting unfair contents to the Company management or superiors
  - Submitting or stating untruthful contents requested by the internal audit department such as the Jeong-Do Management Organization, etc.
  - Transmitting untruthful contents to external stakeholders
  - The action of manipulating information intentionally to induce misunderstanding by the information recipient, and reporting contents falsely
  - The action of concealing facts or delaying or omitting reports

# Basic Ethics of Employees

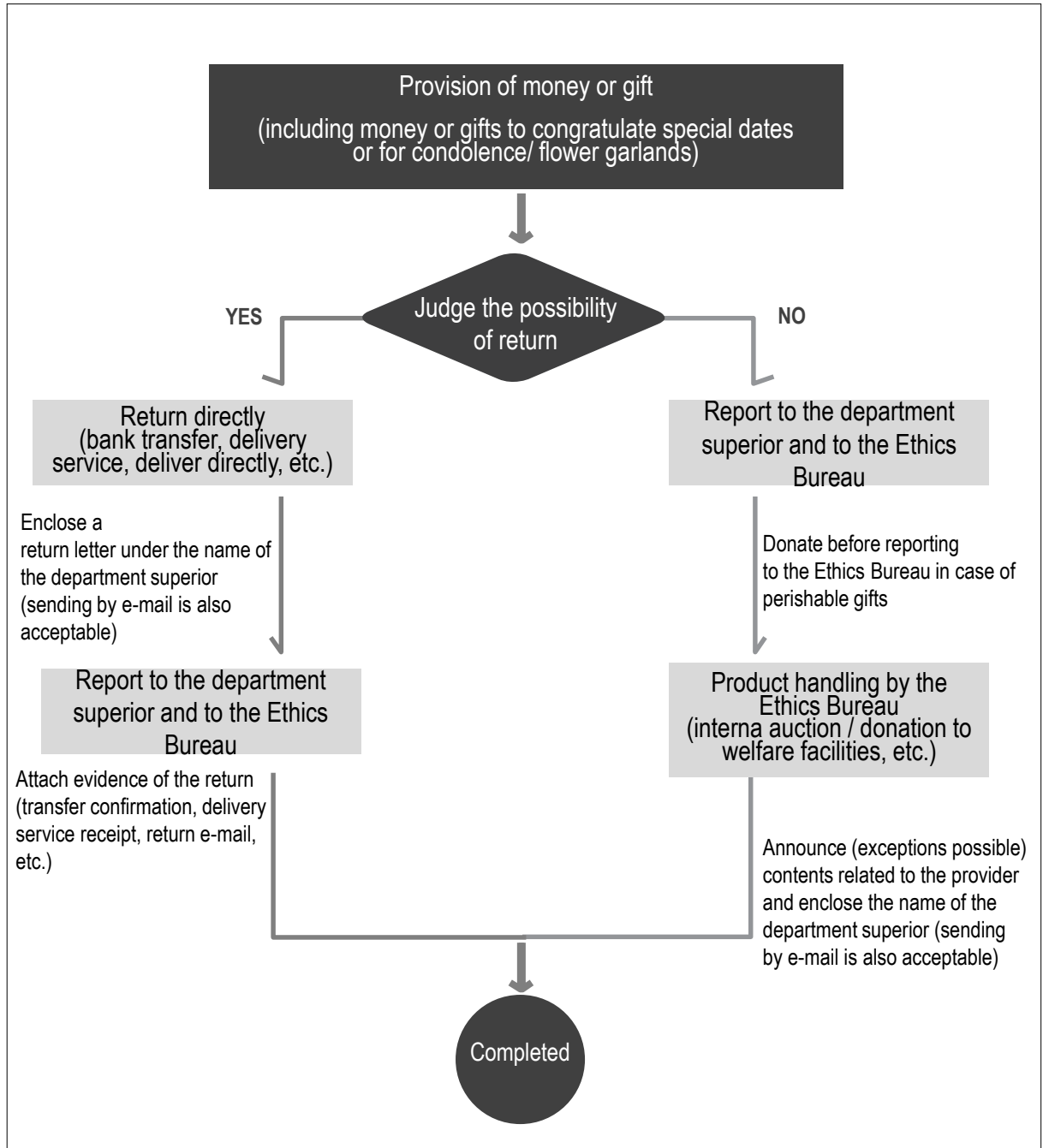
## [Forms of Prohibited Money, Acceptance of Gifts ]

- Money / Tuition fees
  - Cash, checks and other marketable securities
  - Receiving tuition fees for lecturing in events organized by concerned parties
- Presents
  - Goods, vouchers of facilities, services, gift cards, admission tickets, sales promotions or discounts limited to specific persons, etc.
- Expenditure for congratulatory and condolence events
  - Acceptance of congratulatory and condolences money or gifts (flower garlands, gold rings celebrating the baby's 1st birthday, etc.)
- Borrowing / purchase / sales
  - Hire, set mortgages, free acceptance, purchase, etc. of assets owned by stakeholders such as movable assets / real estate, etc
- Debt redemption
  - Payment of private debts such as credit card bills, credit payment, loans, etc. or repayment by proxy



# Basic Ethics of Employees

## [Report Procedures of Money or Gifts Acceptance]



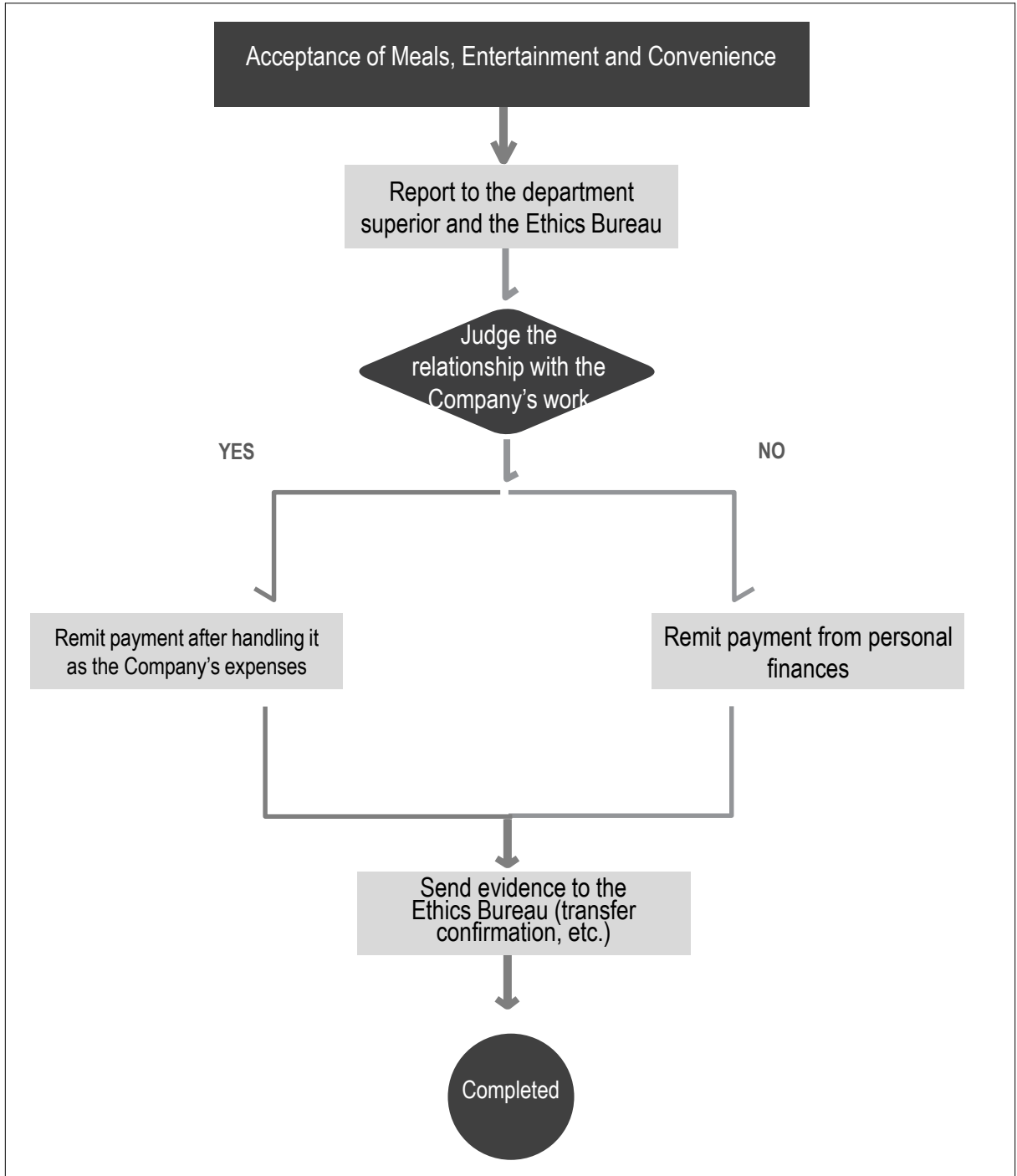
# Basic Ethics of Employees

## [Forms of Prohibited Meals, Entertainment and Convenience Acceptance]

- Burden of expenses
  - The action of allowing concerned parties to bear with eating and drinking expenses and other private expenses
- Meals
  - Receiving socially unaccepted treats for business negotiations
- Unhealthy business
  - Entering unhealthy businesses and speculation business (casino, etc.)
- Sports / trips
  - Gatherings for entertainment with stakeholders except for official events must be written approval (Golf, ski, fishing, traveling, etc.)
  - Events unrelated to the Company's work invited by the stakeholders
    - Training with the purpose of domestic or international tourism/ seminars, etc.
- Acceptance of convenience
  - Accepting convenience from concerned parties or, requesting the provision of convenience from concerned parties
    - Training with the purpose of domestic or international tourism/ seminars, etc.
- Sponsorship / support
  - Asking or accepting sponsorship for the Company or department's events
    - Money, goods, etc
- Future guarantee
  - Promising or guaranteeing employment after retirement from stakeholders
  - Promising transactions after retirement with Stakeholders

# Basic Ethics of Employees

## [Report Procedures of Meals, Entertainment and Convenience Acceptance]



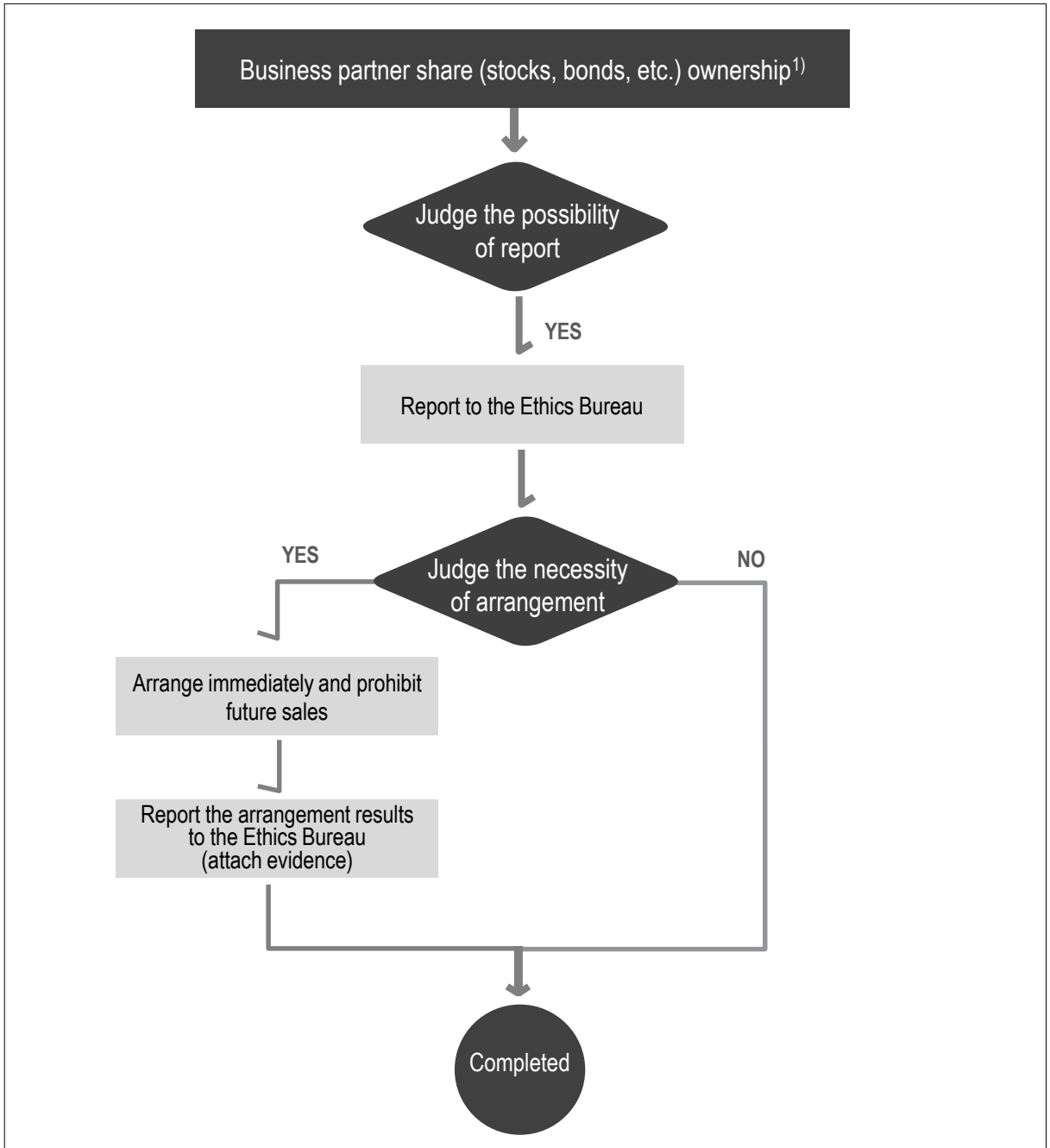
# Basic Ethics of Employees

## [Forms of Prohibited Share Participation of Business Partners]

- Stocks
  - Holding of stocks from all business partners with transactions with the Company
  - Including all cases when the Company can exercise influence when considering the relationship when the company is not registered as a business partner
- Joint investment / joint asset acquisition
  - Acquisition of movable and immovable assets by joint investment of capital with stakeholders by the Company employees and their family members
    - . Membership such as condominium, golf, health club, etc., real estate investment, etc.
  - The action of owning business partners through transaction relations with the Company by joint investment with stakeholders under the name of the Company employees and their family members
- Concurrent job with business partners
  - The action of being registered as a Director in the company of stakeholders or, having a concurrent job and performing real duties to the related company

# Basic Ethics of Employees

## [Report Procedures of Share Participation of Business Partners]



1) Including ownership under the name of family members (parents, spouse, children, siblings and the parents and siblings of the spouse), and borrowed names.

# Basic Ethics of Employees

## 5. Avoiding Conflict of Interests with the Company

### LX Code of Ethics

- (1) LX Employees avoid personal behaviors or relationships that are in conflict with the Company's interests.
- (2) LX Employees do not use the Company properties to pursue personal interests.

### Guidelines for Practice

- (1) Employees shall not engage in the management of or invest in businesses that are in direct/indirect competition with the Company.
- (2) Employees shall submit a report in advance and obtain approval if employed by another company or perform business tasks similar to the Company tasks in another company. Additionally, normal or fair work cannot be disrupted by the management of private businesses.
- (3) If relatives of employees know stakeholders of the Company, the fact must be informed to the department superior. Contradictions with the stakeholders shall be avoided by changing duties, etc.
- (4) Tangible/intangible corporate assets and expenses must be used for the Company's business activities and for authorized purposes only according to related regulations.
  - ① If used for personal purposes, report the fact to the department superior and executive; related expenses must be repaid to the Company according to the applicable regulations.

# Basic Ethics of Employees

## Guidelines for Practice

- (5) All internal and external information related to work may only be used for authorized purposes and within permitted limits according to related regulations.
  - ① Confidential and property information of the Company must be protected from unauthorized disclosure.
  - ② Legal approval procedures and security principles must be obeyed when sharing information with others.
  - ③ Information protection includes the Company's intellectual properties, personal information and information about third parties.
- (6) Potential conflicts of interest with the Company and cases where judgment is difficult should be reported to the person in charge as well as the Ethics Bureau before being suitably handled.

# Basic Ethics of Employees

## [Forms of Document and Figures Manipulation and Unfair Reporting]

- Misappropriation and Improper use of Tangible assets
  - Fixed Assets: exclusive & unauthorized use of tangible assets, especially to generate private profits, with the exception of tangible assets used for business purposes, such as land, building, installation, machines, etc.
  - Work assets: unauthorized use of assets for work such as vehicles, PC, expensive supplies, office supplies, etc., provision to family members, transferring of maintenance costs
  - Corporate card: exclusive expense accounts, personal use, etc.
- Improper use of Intangible assets
  - Using intangible assets for personal use or providing them to competitors through disclosure of business/confidential information, product design or information systems etc.
  - Gathering of information utilizing one's position or personal profit-making activities using knowledge
    - . Approval is required from a superior executive when external lectures, business, consulting, etc. are necessary for work based on knowledge obtained from the Company
- Misappropriation and Improper use of public money
  - Private misappropriated donation of public money to stakeholders through unauthorized withdrawal of public money, personal loan, manipulation of accounting ledger, etc.
  - Illegal use of the corporate card (illegal cash-back transaction)
  - Payment of expenses through false receipts
  - Abuse of the expense handling system without evidence (personal use)
  - Unauthorized use or provision of the corporate card to family members/relatives
- Violation of the information security



# Corporate Responsibilities for Employees

## 1. Respecting Humanity

### LX Code of Ethics

- (1) LX treats each employee with warmth and trust and values every individual's dignity.
- (2) LX makes every effort to help employees feel pride and personal fulfillment by giving them a sense of ownership in their jobs.
- (3) LX has established regulations and educational guidelines and takes necessary actions to assist employees in performing their duties in a fair and effective manner.

### Guidelines for Practice

- (1) The Company shall establish an image of an ideal employee and create policies for human resources development.
- (2) The Company shall establish and fully promote a system which nurtures its employees to be voluntary and creative.
- (3) The Company shall assign tasks by taking into account the wishes, aptitudes and capabilities of each employee and facilitate development of human resources through job execution.
- (4) The Company shall strive to create a working environment which helps employees improve their quality of life

# Corporate Responsibilities for Employees

## 2. Fair Treatment

### LX Code of Ethics

- (1) LX offers equal opportunities to all employees based on their abilities and talents.
- (2) LX evaluates the abilities and performance of its employees using fair means and rewards.

### Guidelines for Practice

- (1) The Company shall not discriminate against its employees' based on education, gender, or regional origins in offering opportunities to enhance their capabilities (training, transfer, promotion, job assignment, etc.), Such opportunities shall be offered fairly.
- (2) The Company shall establish a criteria for evaluating employees talents, abilities and performance, and conduct fair evaluations in order to motivate self-development and ensure fair recognition.

# Corporate Responsibilities for Employees

## 3. Promoting Creativity

### LX Code of Ethics

- (1) LX makes every effort to create a working environment conducive to creative thinking and autonomous behavior.
- (2) LX actively develops employee abilities and manages its human resources based on a long-term plan.
- (3) LX respects personal lifestyles and creates a developed organizational culture through mutual trust and understanding.

### Guidelines for Practice

- (1) The Company shall establish a system and corporate culture that encourages employees to freely express their suggestions, opinions and complaints.
  - ① Inappropriate discrimination, bullying, sexual harassment, physical or psychological pressure, etc. must be prevented, and procedures to protect and assist possible victims must be applied.
- (2) The Company shall take the measures necessary to ensure the occupational health and safety of its employees. In particular, the Company shall take appropriate safety measures at work sites with hazardous elements.
- (3) The Company shall protect the privacy of its employees as long as the work environment and public morality are not adversely affected.
- (4) The Company shall not force its employees to participate in the activities of particular religions or political parties, and it shall respect the religious/political convictions of its employees.

# Responsibilities for the Environment, Society and Stockholders

## 1. Protecting Environment

### LX Code of Ethics

- (1) We strive to make our best efforts in preventing environmental pollution and conserving nature for the preservation of a clean environment.

### Guidelines for Practice

- (1) Diligently adhere to all relevant environmental regulations and spare no effort in environmental protection, including but not limited to mitigating global warming, conserving energy, and safeguarding water resources.
- (2) Strive to minimize the environmental impact throughout the entire lifecycle of our products and services, from production and distribution to use and disposal.
- (3) Rigorously implement safety management to prevent accidents and damages resulting from unforeseen events or disasters.

# Responsibilities for the Environment, Society and Stockholders

## 2. Compliance with social responsibility

### LX Code of Ethics

- (1) We conduct our business with respect for social values as integral members of the community.

### Guidelines for Practice

- (1) Respect the ethical values of society, refraining from actions that may harm the community or create discomfort, and engage in businesses that align with the prevailing sense of decency among the general public.
- (2) Provide equal employment opportunities to everyone without discrimination based on race, gender, region, religion, or any other factors.
- (3) Listen to the voices of all segments of society and make efforts to promote the common good.

# Responsibilities for the Environment, Society and Stockholders

## 3. Protecting the interests of shareholders

### LX Code of Ethics

- (1) We enhance the company's value through rational and transparent management, while protecting the interests of our shareholders.

### Guidelines for Practice

- (1) Respect shareholders' right to information about the company and provide them with accurate disclosures.
- (2) Protect the interests of minority shareholders by strengthening the independence of outside directors and ensuring transparent operations of the board of directors.
- (3) LX employees refrain from engaging in unfair stock trading practices to gain profit using undisclosed internal company information or leaking internal information that could harm the interests of shareholders.

# Supplementary Provisions

## Subject of Application

- (1) Companies that are part of the LX subsidiaries group including LX Co., Ltd., and employees of affiliated companies and managers and employees of overseas corporations must obey the Code of Ethics and Code of Ethics Guidelines (referred as 'Code of Ethics' hereafter).
- (2) For overseas corporations that LX exercises managerial rights, part of the Code of Ethics can be changed considering local regulations and customs. However, main contents must be discussed with the LX Ethics Bureau in advance.
- (3) LX must actively encourage independent third parties<sup>1)</sup> with transactions with LX to sympathize and participate in the compliance with the contents of the Code of Ethics, and ensure such contents are reflected in the transaction contracts.

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1) Independent third parties: investment companies, business partners, sales agencies, consultants, agents, mediators, etc.