



Global Business Standards

FICT BRAND Code of Conduct

FICT The Future is Interconnected

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FICT BRAND

The FICT BRAND is a statement of the FICT Group's ("FICT") raison d'etre in society, the values it upholds, and the principles by which each and every employee should conduct themselves in their daily activities. By sharing the FICT BRAND equally and putting it into practice in our daily activities, all FICT employees will work together as a group to further enhance our corporate value and contribute to the international and local communities in which we operate.

FICT's corporate philosophy is "We will contribute to the creation of an affluent and sustainable society as a company that co-creates new value with our customers and partners by connecting technology and people through interconnect technology.

FICT's corporate philosophy is to "connect technology and people through interconnect technology and contribute to building a prosperous and sustainable society as a company that co-creates new value with customers and partners.

FICT BRAND and Global Business Standards(“GBS” for short)

At FICT, we believe that integrity is a major factor in the success of a sustainable business, and we are committed to upholding the promises made in the FICT BRAND.

The FICT BRAND contains a code of conduct that outlines the rules and guidelines to be strictly followed by each and every FICT employee. The FICT BRAND includes a Code of Conduct, which represents the rules and guidelines that each and every FICT employee should adhere to. What is stated in this Code of Conduct must be followed in all dealings and actions.

The Global Business Standards are a more detailed version of the FICT BRAND Code of Conduct to serve as a guide for FICT employees, wherever they may be in the world. The objectives of these Global Business Standards are to

- Prevent violations of the law
- Maintain high standards in business conduct
- Protect FICT's global reputation

FICT employees must understand and comply with the Global Business Standards.

The Global Business Standards apply to all FICT employees and all persons engaged in FICT business. The Global Business Standards also apply to all business activities conducted by FICT employees worldwide.

• Global Perspective

The Global Business Standards provide common guidelines throughout the FICT.

Each company will implement a company-specific program to effectively implement the Global Business Standards, reflecting the unique characteristics of its region, country, and business area.

Each company will implement a company-specific program to ensure effective implementation of the Global Business Standards, reflecting the unique characteristics of their region, country, and business area.

Compliance at FICT

Why do we need Global Business Standards?

One of the fundamental principles of the FICT BRAND is to be a good corporate citizen, always paying attention to society and the environment, and acting as a good corporate citizen. The Global Business Standards are designed to help us achieve this goal.

The Global Business Standards define the following people and communities with which FICT may interact in the course of its business and dealings.

- Shareholders
- Employees
- Customers
- Business partners
- Government agencies
- Other companies (including competitors)
- Global Environment
- Local Communities

Global Business Standards are,

- Provide guidance on the behavior expected of FICT employees, and
- Designed to ensure that FICT's excellent reputation is maintained; and
- It is intended to ensure that FICT employees and all those who interact with FICT employees do not cause or become involved in compliance issues.

Acting responsibly and with integrity in an ever-changing corporate and legal environment requires great care, and the Global Business Standards and our compliance rules are designed to help us all act with care and integrity. The Global Business Standards and our respective compliance rules are designed to help us all act with care and integrity.

What are our responsibilities as they relate to the Global Business Standards?

The Global Business Standards apply to FICT employees and officers, and to anyone else involved in FICT's business.

What we are committed to

- We understand the Global Business Standards and apply them to our roles and operations.
- We understand all relevant laws and regulations that apply to our business.
- We comply with all relevant laws and regulations at all times and in all aspects of our work.
- We discuss with colleagues how the Global Business Standards and their respective compliance rules apply to our day-to-day operations.
- We discuss human rights and compliance issues with colleagues.
- We will not do through others what we would not do ourselves.
- We understand our authority and will not take actions that exceed that authority.

In addition, our executives will

- Create a work environment where ethical conduct is recognized, valued, and exemplified.
- Ensure that colleagues and subordinates understand and follow the Global Business Standards.
- Ensure compliance with the Global Business Standards.
- When managing third parties (including temporary employees, contractors, etc.), ensure that they understand their compliance obligations.
- When managing third parties (including temporary employees, contractors, etc.), ensure that they are aware of their compliance obligations.

How do the Global Business Standards relate to compliance-related regulations?

The Global Business Standards cannot fully describe all of FICT's policies, standards, and business practices, etc. The Global Business Standards set forth the structure and processes for each company to promote compliance and explain the relevant laws and regulations that must be followed in common by each company. The Global Business Standards also provide the basis for each company's regulations by explaining the relevant laws and ordinances that must be commonly observed. Each company's compliance-related regulations provide more detailed information.

All rules and standards must be consistent with the Global Business Standards and must not deviate from or simplify the Global Business Standards. If a company's compliance-related regulations set a lower standard than required by the Global Business Standards, the Global Business Standards shall prevail.

How do the Global Business Standards relate to local laws?

FICT does business around the world, and FICT employees are required to comply with the relevant laws and regulations of many different countries.

The Global Business Standards set minimum standards that are required throughout FICT, no matter where you work. If local laws or regulations set a lower standard than required by the Global Business Standards, the higher Global Business Standards

standard must be followed. If relevant local laws or regulations require a higher standard than that required by Global Business Standards, we must comply with the relevant local laws or regulations.

Compliance Monitoring and Implementation of Global Business Standards

FICT has several different mechanisms in place to monitor compliance with the Global Business Standards, including

- Risk Management System
- Regulatory compliance audits
- Educational programs to raise awareness of compliance issues so that employees can recognize and report noncompliance
- Whistleblowing system

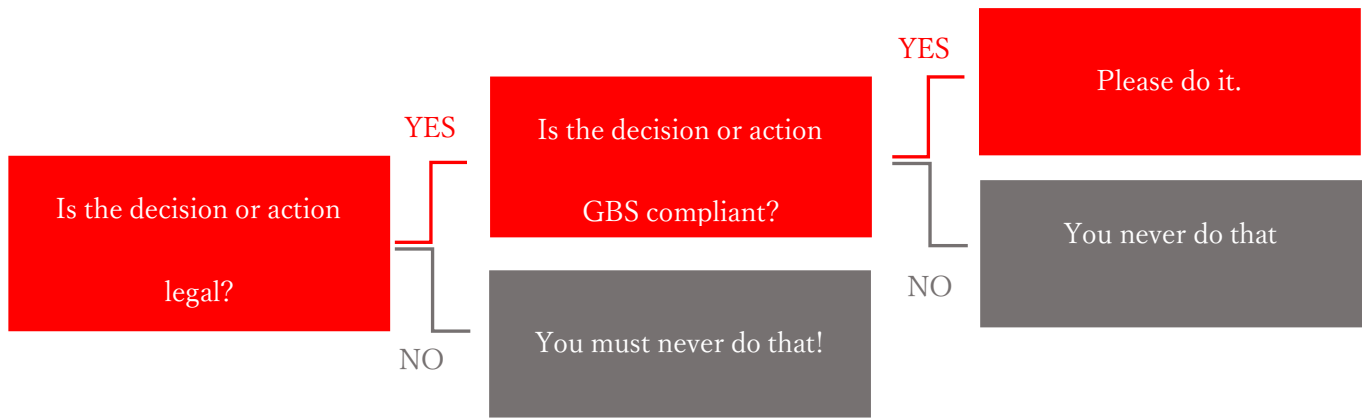
In the event of a report of noncompliance or potential noncompliance, FICT will properly investigate the report, confirm the facts, and take appropriate action.

FICT employees may be subject to disciplinary action for violations of the Global Business Standards.

Reporting Violations of the Global Business Standards and Prohibition of Adverse Treatment

FICT employees and all persons involved in FICT business are encouraged to report any violations or potential violations of the Global Business Standards of which they become aware.

Global Business Standards Decision Making Procedures



When in doubt, refer to the above procedure.

If you are not sure, seek advice from the Legal Department or others.

Global Business Standards

1. Nothing is more important than Safety.

A safe work environment is a corporate asset and the foundation of management. The FICT Group ("FICT") is committed to prioritizing safety in all of its activities. We promote and establish KYT (hazard prediction training), comply with relevant laws and regulations and work procedures, and create a workplace with a clear system of responsibility for occupational safety, traffic safety, occupational health, and safety and disaster prevention.

2. We respect human rights.

2.1 Respect for Human Rights

The FICT Group ("FICT") supports the respect and promotion of human rights. We respect human rights.

By way of example, FICT will not
Force anyone to work against their will.
Forcing or allowing child labor.
Violate labor laws in the countries in which we operate.

2.2 Discrimination or Harassment

FICT's workforce is composed of people of many different nationalities, cultures, religions, and other personal characteristics. This diversity is one of FICT's key strengths.

We respect the human rights of each individual and do not unfairly discriminate on the basis of race, color, religion, creed, gender, social status, family origin, disability, or sexual orientation. We must not encourage or tolerate such discrimination.

We, as employees, will not tolerate harassment based on any of the aforementioned personal characteristics or any abuse of authority that adversely affects the dignity of any individual. FICT employment decisions are based on job-related criteria (education, qualifications, experience) and competencies (skills, performance).

2.3 Healthy work environment

FICT is committed to maintaining a healthy work environment under a system of mutual respect, trust, and fair employment practices. Every one of our employees retains the right to fair treatment, consideration and respect.

FICT executives and employees are expected to
Encourage positive, open communication.
Demonstrate exemplary behavior and results themselves.
Demonstrate openness and integrity.
Set clear and realistic goals and delegate appropriate responsibility and authority to subordinates.
Create an open and communicative relationship with subordinates.
Create an environment in which Global Business Standards are always adhered to and where people feel free to raise issues.
Proactively report any noncompliance or potential noncompliance, and encourage others to do so as well.
encourage others to do so as well.

The work environment should be free of any behavior that could lead to harassment or the deterioration of relationships. Threats, intimidation, or violence will not be tolerated.

3. We comply with all laws and regulations.

3.1 Respect and comply with all relevant laws and regulations

We respect and comply with all relevant laws and regulations. Violations of relevant laws and regulations will not be tolerated, even if the motivation is based on the interests of FICT.

We will strive to understand all relevant laws and regulations that affect our work and will not violate them through our work.

We also understand and will comply with local customs and business practices that are recognized as legal and fair and consistent with the Global Business Standards. We cooperate with government regulatory authorities and respond to investigations and inquiries honestly and accurately.

3.2 Financial Reporting and Internal Records

Shareholders, analysts, customers, creditors, and many others expect FICT to provide reliable information regarding its business operations, financial results, and their prospects. The absence of falsification or errors in recordkeeping and financial reporting is critical to maintaining confidence in FICT and is necessary to prevent financial improprieties and fraud.

All records and reports prepared by the FICT must be free from falsification or error. This applies equally to records and reports prepared for internal use and those published and distributed externally.

3.3 Environment and Products

FICT aims to be a company that grows together with its customers and employees by promoting the effective use of resources and efforts to reduce environmental impact in order to realize a sustainable society. To achieve these goals, we will meet appropriate technical standards and comply with all relevant laws and regulations through our own environmental management system.

We will take action to address environmental challenges and to fulfill our environmental responsibilities to a greater extent. For example

- We aim to reduce FICT's global CO2 emissions by implementing Green Policy Innovation (environmental impact reduction projects).
- In the product development process, environmentally friendly technical design, technical safety, and protection of health are key requirements.

All FICT products will be manufactured in accordance with appropriate technical, safety, and environmental standards and will comply with relevant laws, regulations, and license agreements.

3.4 Health and Safety

FICT will provide a safe and healthy work environment with "safety before all else" as the highest priority norm. We will also take appropriate measures to prevent accidents. We, the employees, have a duty to comply with the Health Maintenance and Promotion, Health and Safety, and Security policies. We will report any health or safety issues that arise or may arise to the appropriate department.

In compliance with social norms and relevant laws and regulations, we will not

- Possess or traffic in illegal drugs.
- Engage in illegal drug use.
- Become intoxicated by drugs or alcohol while on FICT premises or while performing their duties.

The above health and safety declarations cover the workplace, equipment and work processes, as well as safety management systems and individual behavior in the workplace.

We, the employees, have a responsibility to consider the health and safety of ourselves and our co-workers as well as all those involved in FICT's operations.

3.5 International Trade

The import and export of products and services is strictly regulated. Certain products, services, software, and information may not be supplied or exported to certain countries, customers, or specific end users. Violation of export control regulations can lead to very serious penalties, including fines and even jail time for individuals.

FICT complies with all relevant laws and regulations regarding the supply of products, services, software, and information by companies.

3.6 Money Laundering

Persons involved in criminal activities such as terrorism, drug trafficking, bribery, and fraud may attempt to "launder" the proceeds of their crimes to hide them or make them appear legitimate. Many countries now have laws that prohibit transactions involving proceeds from criminal activities and mandate safeguards to prevent inadvertent money laundering.

FICT complies with all anti-money laundering and anti-terrorism laws and regulations and only conducts business with reputable customers engaged in legitimate business activities.

4 We conduct fair business practices.

4.1 Fair Competition

(See Annex "Global Policy for Compliance with Bribery and Antitrust Laws")

Competition and antitrust laws ("Competition Laws") are designed to protect free and fair competition and ensure that consumer interests are protected. These laws apply in each country in which the FICT conducts business activities, and some laws may have extraterritorial application.

The FICT engages in fair and lawful competition and complies with all applicable competition laws in any country in which it operates.

These laws are complex areas and advice should be sought, particularly from the legal department and others, when questions or concerns arise. Actions that impede competition include, for example

- Entering into any arrangement with a competitor regarding selling prices.
- Directing or restraining the FICT as to the price at which the reseller sells the FICT's products and services.
- Agreeing not to compete.
- Discussing bids with other prospective bidders (bid-rigging).
- Participate in market allocation (e.g., agree to allocate a certain customer or group of customers or a certain geographic area).
- Agree on production or sales volumes.
- Selling products or services below market value in order to exclude competitors from the market (dumping).

The consequences of competitive practices can be very serious. For example

- Fines in the EU can be as high as 10% of worldwide sales
- Jail sentences for convicted individuals
- Exclusion from doing business with governments
- Losses due to negative reputational impact
- Significant adverse impact on future contract awards

It is important to immediately report any possible violations of the principles of fair competition to the Legal Department or your manager (and if necessary, to the Whistleblower Hotline). Many countries have systems in place to reduce fines for violations that are voluntarily reported to the authorities.

4.2 Bribery

(See Annex "Global Policy on Anti-Bribery and Corruption")

FICT competes on the quality and price of its products, services and solutions. We do not give or accept bribes, directly or indirectly, in any form. Nor shall anyone acting on behalf of FICT give or accept a bribe. A "bribe" means any advantage, financial or otherwise.

Gaining an advantage by making an improper payment is not tolerated by the FICT and exposes you and the company to criminal prosecution.

Each of the following actions may be perceived as a bribe or corrupt payment

- Offering or promising money, goods, or services to public officials or customers
- Payment of gratuities to government officials or employees of other companies to expedite paperwork
- Payment of disproportionate fees for services rendered

We, as employees, must be very careful in our relationships with public officials. In many countries, gifts and improper payments to public officials are prohibited by law. It is also prohibited to act against foreign public officials.

Those who do business through consultants, intermediaries, or other third parties will ensure that such third parties likewise comply with the above rules.

4.3 Dealing with Governments

FICT may do business with governments and government-owned companies. In the course of our work, our employees frequently come into contact with government agencies and officials. In each instance, we adhere to the highest ethical standards and comply with all relevant laws and regulations.

In particular, we will comply with the following

- Comply with all laws and regulations governing our dealings with the government
- Be honest and accurate when dealing with government officials and agencies
- Ensure that reports, certifications, statements, and proposals are current, accurate, and complete
- Ensure that contractual requirements are properly identified and mutually understood, and that products or services provided do not deviate from contract requirements without the written approval of an authorized public official
- Avoid charging inaccurate or unauthorized costs in government contracts
- Take special care when dealing with governments of developing and emerging market countries or with foreign governments with whom you have not previously done business

Seek advice from the legal department or others when contacting government regulatory officials or authorities.

4.4 Fair and Ethical Purchasing

FICT's suppliers play an important role in enabling FICT to conduct its business and provide products and services to its customers; FICT's suppliers are carefully scrutinized by FICT's stakeholders from an ethical standpoint, and their actions directly affect FICT's reputation. Their actions have a direct impact on FICT's reputation. If our suppliers do not meet FICT's standards, the compliance and integrity that FICT strives for in its business is compromised.

We carefully select our suppliers based not only on service and price, but also on their ability to comply with applicable laws and regulations. We expect our suppliers to act in a manner consistent with the principles and standards set forth in these Global Business Standards.

We will not treat our business partners unfairly or abuse our dominant position over them.

4.5 Marketing and Advertising

FICT values its reputation, which has been built through years of excellent products and services and integrity in our business activities. FICT prohibits false, misleading, or deceptive practices.

We will use the FICT brand and trademarks consistently, legally and in accordance with FICT policies.

4.6 Political and Media Activities

Many countries have strict limits on corporate contributions to political parties and politicians. Violations can lead to serious penalties, including fines and imprisonment. When making donations, we must ensure that there is no negative impact on FICT's reputation.

We will not make direct or indirect political contributions on behalf of the FICT to political parties or politicians without the written approval of the competent department(*).

We, the employees, will not speak to the media or make statements on behalf of the FICT without approval from the department responsible for public relations.

* For FICT: Business Management and Human Resources Department.

5 We protect and respect intellectual property.

5.1 Protection of FICT's Intellectual Property Rights

We must act with a strong awareness that intellectual property supports FICT's business activities as an important management asset, and that this is what makes our customers feel secure in us as a partner.

Specifically, it is important to properly acquire and secure rights such as patents, copyrights, and trademarks, and utilize them in our own business to improve corporate earnings.

We, the employees, will comply with, among other things, the following

Identify and protect FICT's intellectual property.

Comply with all FICT policies regarding the protection of intellectual property.

Consult with the department or others involved in intellectual property and legal affairs before disclosing FICT-specific information to others or permitting others to use FICT's intellectual property.

5.2 Respecting the Intellectual Property Rights of Third Parties

Unauthorized use of the intellectual property of others may subject FICT or its employees to lawsuits, damages, fines, or criminal penalties.

We must respect the intellectual property of others and follow due process in obtaining and using it.

- We, the employees, shall, among other things, comply with the following
- Respect the copyrighted works and other intellectual property rights of third parties.
- Consult with departments and others involved in intellectual property and legal affairs regarding any licenses or permissions necessary to use the intellectual property of others.
- Take safeguards to prevent inadvertent disclosure of proprietary information belonging to past employers.
- Respect the intellectual property rights of third parties provided for limited purposes under confidentiality agreements (see 5.3).

6 We maintain confidentiality.

6.1 General Principles

Proper handling of information is an integral part of FICT's business activities. The loss or leakage of information due to inadvertent errors can lead to tremendous damage and loss of reputation. We, the employees, shall comply with the FICT Group Basic Policy on Information Security, as well as the relevant rules for the handling of information in its various forms. Furthermore, we, the employees, recognize the importance of data security in our daily work and will ensure that confidential and personal information is not inadvertently lost or leaked.

6.2 Protection of Confidential Information

FICT information that we, the employees, have access to in our daily work is considered confidential information. It is also critical to the success of our business. Confidential information includes business matters, pricing, research and development, product, manufacturing, human resources, accounting information, and know-how.

- To protect confidential information, we, the employees of FICT, shall take appropriate steps to safeguard FICT's confidential information.
- Not disclose confidential information to anyone outside the company without following proper procedures (e.g., entering into a confidentiality agreement).
- Use FICT confidential information only for FICT business purposes.
- Record, copy, or create a database of confidential information only as necessary for FICT's business.
- respect and protect FICT's Confidential Information even after our employment with FICT ends.

6.3 Protection of Confidential Information of Customers and Other Third Parties

We, employees of FICT, may disclose or receive confidential information under contracts with suppliers or customers. Since various conditions are imposed on such confidential information of third parties (confidential information of other companies) in each contract, such as the purpose of use, method of management, and period of time for which the information is to be used, we employees shall handle such information appropriately so as not to violate the contractual confidentiality obligation.

6.4 Handling of Personal Information

FICT is committed to protecting the personal information of its employees, customers, business partners, and others in accordance with relevant local laws and regulations. Whenever we collect and retain personal information for any purpose, we will handle, manage, and use it appropriately and in accordance with all applicable laws and regulations.

In particular, we will comply with the following

- We understand and comply with all relevant laws and regulations regarding personal information that affect our business activities.
- We understand and comply with our company's privacy policy.
- We collect, use, and process personal information only for legitimate business purposes.
- We use anonymous information in place of personal information when it is appropriate to do so.
- We limit access to personal information to those who need the personal information for legitimate business purposes.
- We take precautions to prevent accidental loss or destruction of personal information.
- We take appropriate measures immediately upon becoming aware that personal information has been used for other purposes, lost, or destroyed.
- We manage personal information appropriately.
- We transfer personal information across borders legally and with appropriate security control measures.

7 We do not use our business position for personal purposes.

7.1 General Principles

We, employees, will not use our position or duties at the company, company information, company facilities or assets, or disobey our duties at the company to benefit ourselves, our relatives, friends or other third parties.

7.2 Conflicts of Interest

We will not conflict our responsibilities to FICT with our own interests, whether on or off the job. We will avoid situations in which putting our own interests ahead of those of others would prevent us from making appropriate decisions as employees of FICT. Even the mere suspicion of a conflict of interest can have a negative impact. When a potential conflict of interest arises, we as employees will handle it with care.

- Cases to watch out for include the following
- When we have a non-business activity or financial interest that could easily be a conflict of interest or be perceived as a conflict of interest.

- Engaging in non-FICT business activities during FICT work hours and using FICT resources or facilities for non-FICT business activities (including civic, charitable, or non-profit activities that require approval from your supervisor)
- To take personal advantage of opportunities that arise through your work for FICT
- When you are an officer in an outside activity (even non-profit organizations may be asked or expected to support the FICT)
- Accepting gifts, discounts, or entertainment from existing or potential clients
- Doing business with a business owned or operated by a friend or family member
- Hiring, promoting, or being in direct control of a family member or close friend

FICT employees are committed to effectively preventing conflicts of interest by proactively reporting actual or apparent conflicts of interest to their managers, and by discussing and documenting them with their managers.

We will not engage in off-the-job activities that may damage FICT's reputation. For example, we will not post inappropriate messages about the company on online bulletin boards or social networking sites.

7.3 Gifts and Entertainment

We will fully understand and comply with our company's policies on gifts and entertainment when we

- Giving or receiving gifts.
- Entertain guests.
- Give or receive other benefits.

However, to the extent permitted by company policy, we may accept gifts or other benefits with the prior approval of our managers.

If gifts, entertainment or other benefits are considered inappropriate, we will not give or receive them.

7.4 Insider Trading

Insider trading laws prohibit the buying or selling of a company's securities on the basis of material information (inside information) that is not publicly available.

We will not use inside information obtained from FICT or any third party during the course of our employment to trade in stocks or other securities. We will not disclose such information to others.

We, the undersigned employees, will comply with the following

- We will not use inside information to buy or sell, directly or indirectly, financial instruments related to any company or entity, including FICT.
- We do not recommend or suggest financial products to others based on inside information.
- Maintain the confidentiality of FICT's information.

7.5 Protection of Company Assets

FICT's assets are used to conduct its business. If company assets are damaged, stolen, abused, or used wastefully, it will adversely affect FICT's business and financial condition and ultimately affect each and every employee.

We, the employees, will not use, sell, rent or dispose of company assets, including software, hardware, other equipment, networks or facilities, for any purpose other than the conduct of FICT's business.

We will use company assets only for legitimate business purposes and will not use company equipment or systems to access, download, or transmit information containing inappropriate content. We will understand and comply with the more detailed rules in each company's information security regulations.

Global Business Standards Annex

This Annex supplements and is integral to GBS Sections 3.2 ("Bribery") and 3.1 ("Fair Competition").

Except as otherwise provided, all provisions of the GBS apply to this Annex.

• Global Anti-Bribery and Corruption Policy

1. Payments prohibited by law

FICT competes on the quality and price of its products, services and solutions. We, the employees, will not give or accept bribes, directly or indirectly, in any form. Nor shall anyone acting on behalf of FICT give or accept a bribe. A "bribe" means any advantage, financial or otherwise.

Gaining an advantage by making corrupt payments is not tolerated by the FICT and exposes you and your company to criminal prosecution.

In accordance with internationally agreed anti-corruption rules, bribery is prohibited by law in many countries. The UK Bribery Act 2010 and the US Foreign Corrupt Practices Act, among others, are globally applicable and strictly enforced.

Any of the following actions can be perceived as a bribe or improper payment. However, these are not exhaustive, and we will consider the circumstances of any questionable case to determine whether it is prohibited by this policy.

- Offering or promising to offer money, goods or services to public officials or customers
- Payment of gratuities to public officials or employees of other companies to expedite paperwork
- Payment of disproportionate fees or charges for services rendered
- Receipt of lavish or excessive entertainment, hospitality, or gifts
- Making contributions to political parties, politicians, or political activities
- Contributions to charitable causes related to or at the request of a public official or customer

Under certain circumstances, our employees should take special care not to make bribes or improper payments, as they may increase the risk of being involved in improper conduct. Some examples of them are listed below.

- Doing business in a country with a reputation for corruption cases
- When a consultant, agent, or other third party asks for an unreasonably large fee or increases a previously agreed upon fee in order to close a deal
- If the consultant, agent, or other third party's credibility is in question
- The consultant, agent, or other third party is required to pay to a bank account designated by an individual, another country, or an account number, or to pay in cash
- If you are requested to make a contribution to a political organization or charity or to use a specific subcontractor
- The payment, gift, or entertainment would affect the fairness of the recipient
- The recipient of the payment, gift, or entertainment is not considered to have a business purpose or is considered to have a personal purpose
- The payment, gift, or entertainment would be detrimental to the reputation of the company if it were made public

2. Public officials

Extreme caution should be exercised in dealing with public officials. In many countries, gifts or improper payments to public officials are prohibited by law. Some countries extend such laws to foreign public officials.

The following are examples of public officials as defined by anti-corruption laws in countries where FICT does business

Employees of state-owned or publicly owned enterprises

Employees of publicly traded companies that are controlled or owned by the government and over which they have significant authority

Faculty members of public universities

Doctors or nurses in government-run health care facilities

Family members of government employees

Employees of political parties or candidates for public office

Employees of international organizations such as the United Nations, World Bank, or International Monetary Fund

We, employees, will not give gifts to public officials if such gifts are uncustomary or illegal in the country, if the gifts are expensive, or if we do not have prior authorization within the limits of each company's established authority. We will not give gifts even if local business customs allow or tolerate bribery.

In business with public officials, FICT will pay genuine expenses (e.g., travel, lodging, and meals) incurred by public officials in connection with the promotion, presentation, or demonstration of goods or services, or the execution or enforcement of a contract, only if the payment is justified and necessary and authorized in advance by the head of the The FICT may be allowed to pay genuine expenses (e.g., travel, lodging, and meals) only if the payment is justified, necessary, and approved in advance by your department head. First class airline tickets, travel, leisure activities, and gifts of money are not considered legitimate and necessary, not only for the individual but also for his/her spouse or other family members.

3. Accounting and bookkeeping requirements

To comply with anti-corruption laws and company policies, all business transactions will be properly authorized and fully and accurately recorded in accounting records and reports.

The records and reports prepared by the FICT must be meticulously maintained to reflect business transactions and disposition of property without falsification or error. This includes recording the basis of valuation and the period during which the transaction occurred.

False or misleading entries in accounting records are strictly prohibited. For example, not recording any improper transactions (e.g., kickbacks or bribes), recording false records to conceal bribery, not recording payments made by or to the company, etc. Payments made on behalf of the FICT are not allowed in any case except for the purpose stated in the documentation describing the payment. In no event shall the FICT authorize any payment on behalf of the company. Furthermore, the creation and retention of unrecorded funds or assets is not permitted.

We will not transact business (without electronic transfers, checks, etc.) in paper money or coins, except for such petty cash as is customarily required. 4.

4. Third parties

If we do business through consultants, brokers, contractors, sales representatives, partners, agents, or other third parties, we will endeavor to ensure that they comply with the above rules in the same manner as we do. Both we as employees and FICT may be legally liable for the actions of such third parties. We, the employees, will not do business with third parties whose conduct violates the GBS.

FICT will not do business with any third party unless proper due diligence has been conducted and a written agreement has been executed. Such agreements will include a commitment to comply with applicable anti-corruption laws and FICT's anti-corruption standards.

It is important that we continue to pay close attention to the actions of third parties. Signs that a third party is bribing include the following

- Exorbitant, false, or inaccurate payment requests
- Requests to enter into subcontracts with terms that are unusual or unduly favorable to the other party compared to other transactions
- When unnatural or incomplete documents are presented, and when requested documents are not provided or are refused to be provided

We will require documentation or justification before paying expenses, and we will demand an explanation for any irregular or exorbitant expenses.

We will not pay for any expenses that are not in line with our company's policies. If we suspect bribery or other improper payments to third parties, we will contact the Legal Department or others involved.

5. Education, etc.

The FICT will conduct periodic training to ensure that all employees understand the importance of complying with its anti-corruption policy and standards. FICT will also obtain written undertakings from relevant directors, officers, employees and third parties to comply with relevant anti-corruption laws and regulations, and retain such written undertakings for a minimum of five years.

If you are in any doubt as to whether a transaction is prohibited by the Company's anti-corruption policies and standards or by applicable laws or regulations, please contact the Legal Department.

- Global Policy for Compliance with Competition and Antitrust Laws

1. background

- More than 100 countries have enacted competition and antitrust laws ("competition laws"). Competition laws also apply extraterritorially.
- Authorities around the world cooperate across national borders to actively investigate and prosecute violations of competition laws.
- Violations of competition law can result in large fines for companies, fines and imprisonment for individuals, and even civil litigation.

2. what does the Competition Law prohibit?

(a). Price agreements

Agreeing to price agreements is strictly prohibited. Agreeing with a competitor on price or any element of price (e.g., terms of sale, list price, discounts, range of selling prices and discounts, minimum selling prices, prices offered to specific customers or bids, fixing selling prices, terms of resale, customer quotas, production volume or volume limits, etc.) is strictly prohibited worldwide. Consent is strictly prohibited throughout the world. Consent is prohibited, even if it is not a clearly expressed, well-formed, or written consent. In other words, competition law prohibits implicit or verbal agreement to price agreements. In addition, definitions of consent vary, with some countries having a broader definition of consent than others.

In addition, definitions of consent vary, and in some countries, a broader range of actions are considered consent than in others.

(b). Exchange of Information with Competitors

Exchange of information with competitors is prohibited. In addition to agreeing to price agreements, competition law prohibits the exchange of

In addition to agreeing to price agreements, competition laws also prohibit exchanging commercial information with competitors that is not publicly available, such as

- Future sales prices or pricing strategies
- Status and strategy of negotiations with customers
- Discounts, incentives, and rebates
- Internal forecasts of market trends
- Planned capital expenditures, new product developments, and new technologies
- inventory levels, production capacity and facility utilization, future sales volumes, or order status

Exchanging information with competitors, even if you have not agreed to a pricing arrangement with them, may be a violation of competition laws. Simply receiving

undisclosed commercial information from a competitor is a significant risk. 3.

3. relationships with competitors

Contact with competitors is inherently risky and should be avoided except in limited circumstances where contact is necessary for legitimate business purposes. For example, forums, seminars, workshops, industry institutes, standards bodies with lawyers specializing in competition law, trade shows, and meetings of legitimate industry associations often involve contact with competitors, which can be very beneficial to business. At the same time, however, these contacts can become venues for the exchange of information that has no legitimate business purpose, and thus pose a risk to competition law.

For whatever reason and under whatever circumstances (even if the competitor's employee is your personal friend, former colleague or relative), you should not discuss sensitive commercial information when in contact with a competitor. You must not agree or exchange competitive information with competitors.

Certain types of contacts with competitors involve very high risks. Certain contacts with competitors carry very high risks because they provide an opportunity to give or exchange prohibited consents or information. Even if you are not engaged in prohibited activities, they may appear to be inappropriate. Such contacts include, for example, the following activities

Informal meetings, gatherings with competitors, courtesy calls to or from competitors
 Repeated socializing with competitors (golf, dinners, social clubs, etc.)
 Direct contact via e-mail, cell phone messages, phone calls, etc.

Even if the relationship with a competitor is initially just a social interaction, repeated contact over a long period of time may change the nature of the relationship between the parties and lead to prohibited conduct, such as the exchange of inappropriate information.

4. Strict Sanctions for Violations

Strict sanctions are imposed for any behavior that harms competition. Violations of competition laws can result in huge fines for companies, fines and imprisonment for individuals, and even civil litigation. Stifling competition is never in the best interest of either the company or its employees.

For example

- Individuals in various countries have been sentenced to imprisonment for engaging in or directing conduct that violates competition laws.
- Competition authorities around the world are imposing huge and ever-increasing fines and penalties on companies that impede competition.
The amount of fines and penalties is increasing. In one case, several cell phone companies were fined a total of 50 million euros for exchanging competitive information in a single meeting, and in other cases, several companies were fined hundreds of millions of dollars for activities involving information exchange and anticompetitive agreements.
- When it comes to light that a company has engaged in conduct that inhibits competition, it may be excluded from doing business with the government, negatively impact its reputation, Loss of trust from customers and suppliers, and other serious negative effects on business.

5. appropriate response to problems

To avoid risk to ourselves and to FICT, we, the employees, will

- Never agree to any pricing or terms of sale with a competitor (except in the case of legitimate collaborations that have been reviewed and approved by the
- (except in the case of legitimate collaborations that have been reviewed and approved by a legal department or other entity).
- Never provide competitors with sensitive commercial information regarding products, prices, sales, sales discounts, or customers.
- If we receive or are asked to exchange any of the above information from a competitor, we will immediately notify the Legal Department.
- If we receive information about a competitor from a non-legal source, such as a dealer or customer, we will always identify the source of that information.
- Never confirm or cross-check publicly disclosed information or information obtained from customers with competitors.
- Be aware of meetings in which competitors are present and leave if any questionable discussions occur.

If you become aware of a violation or potential violation of competition laws, it is extremely important that you proactively contact the department or other relevant department in charge of legal affairs. Many countries have established "amnesty" or "leniency" schemes, whereby sanctions are reduced or waived for companies that are the first to report a potential problem. If a problem arises, this system can be used to reduce the impact on the company by immediately reporting the situation. If you do not report it, it is more likely that a competitor will do so instead.

Revision history

Version	When	Note
V1.0	December 2022	First edition