

# Basic Policy on Anti-Corruption

## Article 1 (Purpose)

The purpose of this Basic Policy is to promote the anti-corruption efforts of the entire ValueCommerce Group (the Company and its subsidiaries) in the spirit of fair play by clarifying the policies on which the Group and all its executive officers and employees (hereinafter referred to as "Directors and Employees") should base their anti-corruption efforts, as well as to secure the trust of stakeholders and society in general.

## Article 2 (Scope of Application)

This Basic Policy applies to the ValueCommerce Group and all of its executives and employees, regardless of the country or region in which they operate.

## Article 3 (Compliance with Laws and Regulations Related to Anti-Corruption)

All Directors and Employees shall comply with all applicable anti-corruption laws and regulations in each country or region, as well as internal rules, including these Basic Policies and internal regulations (collectively, the "Related Rules, etc.").

## Article 4 (Prohibition of Bribery)

Except as permitted by Related Rules, etc., Directors and Employees shall not provide or offer or promise to offer any money or other benefits, directly or indirectly, to public officials, private customers, suppliers or other business partners ("Business partners, etc."), with the intent to defraud such persons.

Directors and Employees will not direct bribery through third parties such as agents, consultants, distributors, or subcontractors, nor will they tolerate or condone bribery by such persons.

## Article 5 (Prohibition of Accepting Bribery)

In connection with their duties, Directors and Employees will not directly or indirectly receive, request or promise to receive any improper or unjustified benefits.

## Article 6 (Thorough Record Keeping and Storage)

All Directors and Employees shall comply with the procedures for financial reporting, accurately record all transactions in the accounting books, and properly store related documents.

#### Article 7 (Lawful Entertainment, Gifts, etc.)

The ValueCommerce Group will appropriately manage entertainment, gifts, travel expenses, donations, support, and sponsorship with public officials and Business partners, etc. that have legitimate business purposes and are provided legally, in accordance with the Related Rules, etc.

The ValueCommerce Group will operate with special attention to the provision of entertainment or gifts, political contributions, and political funds to public officials, etc., by establishing separate internal rules for such matters.

#### Article 8 (Audits)

The ValueCommerce Group shall appropriately operate a system of self-inspections and internal audits of the status of compliance with this Basic Policy and internal rules established based on this Basic Policy, in accordance with the degree of risk.

#### Article 9 (System and Response)

In order to ensure compliance with this Basic Policy, the ValueCommerce Group shall maintain an internal reporting contact that allows Directors and Employees to report general compliance issues, including anti-corruption issues.

In the event that the ValueCommerce Group discovers any conduct that violates or may violate the Related Rules, etc., it will conduct a rigorous internal investigation and cooperate fully with investigations by the relevant authorities.

In addition to the possibility of personal liability for violations of the Related Rules, etc., Directors and Employees will be subject to strict disciplinary action in accordance with the internal rules of the company to which they belong or their employment/delegation contract.

#### Article 10 (Revision or Abolition)

The Board of Directors of ValueCommerce may revise or abolish this Basic Policy.

Established on September 26, 2022