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**THINKWARE**

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## Ethical Management Practice Guidelines

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	Date: 2020. 04. 10.

## Ethical Management Practice Guidelines

### Article 1 (fair performance of duties)

#### 1. Handling of unfair business orders

- 1) When a supervisor gives a compulsory business instruction to seek unfair interests for himself or others, he may explain the reason to his supervisor and refuse to follow the instruction.
- 2) When the supervisor gives the same instruction again, he or she may seek advice or report to the HR department.

#### 2. Handling negligence of work and negligence of supervision

- 1) We must clearly recognize our role in our work and actively carry out our work to fulfill our responsibilities.
- 2) If it is judged that the company does not do what it is supposed to be done or that it is causing loss to the company due to negligence, the head of the department may give a caution or warning, and the loss to the company is large or there is no room for improvement. In this case, it may be referred to the personnel committee.
- 3) As the head of the department, in the case of neglect of supervision of the affiliated employee and causing damage to the company, the head of the department may refer to the HR Committee for discipline.

#### 3. Fair execution of the budget

- 1) We must not cause property damage to the company by using the budget for business performance for purposes other than the purpose.
- 2) If the budget is used for a purpose other than business performance for an unavoidable reason, the reason must be submitted to the HR department.

#### 4. Prohibition of requesting personnel

- 1) We do not make requests that unfairly influence personnel affairs, such as promotions or telegrams of ourselves and others.
- 2) Employees working in the HR department are obligated to perform fair personnel management.

Ethical Management Practice Guidelines	
	Date: 2020. 04. 10.

## Article 2 (property and information protection)

### 1. Prohibition of private use and profit of company resources

- 1) We do not use company-owned assets such as company vehicles in private without justifiable reasons.
- 2) We do not engage in activities that use company resources to obtain profits or inflict property damage to the company.

### 2. Prohibition of information leakage

- 1) We must endeavor to maintain thorough security so that internal company information and customer information acquired in relation to business performance are not leaked to the outside, and must not be leaked without prior approval from the company.
- 2) Information leakage includes leakage of documented information as well as leakage using communication media (telephone, fax, Internet, etc.).
- 3) Information leakage also applies to retirees, and violations of this may result in criminal liability.

### 3. Protection of intellectual property rights

- 1) We must never use illegal software in-house, and you must purchase and use genuine software. Responsibility for problems arising out of violation of this lies with employees who have used illegal software.
- 2) When we acquire intellectual property rights such as inventions related to the performance of the company's business, we must immediately report the facts to the head of the department, the executive in charge, and the manager. Failure to do so may result in disadvantages to the relevant employees. .
- 3) We must not violate cyber ethics such as the use of the Internet.

## Article 3 (Prohibition of receiving unfair gains, etc.)

### 1. Prohibition of receiving and providing money or other items

- 1) We shall not receive or provide money or other money or other money or other money (including flowers and various gifts) from employees related to our duties. However, this is not the case in the following cases:

Ethical Management Practice Guidelines	
	Date: 2020. 04. 10.

- ① If you are a relative
- ② Free gift with company logo provided publicly
- ③ A small gift for the purpose of consolation, encouragement, or reward from a superior to a subordinate
- ④ A small gift for the purpose of consolation, encouragement, and reward at the fair burden of department members
- ⑤ Money and goods within the company regulations that are paid for the employee's welfare
- ⑥ Other cases deemed necessary by the company for smooth job performance

2) We must not receive or provide money or other gifts (including Japanese and various gifts) from stakeholders. However, this is not the case in the following cases:

- ① If you are a relative
- ② Other cases deemed necessary by the company for smooth job performance

3) We shall not receive or provide conveniences such as entertainment such as food, golf, transportation, and lodging from stakeholders, and shall pay a fair price if conveniences such as entertainment are provided for the public purpose of the company. However, this is not the case in the following cases:

- ① After approval of the affiliated institution head, golf, etc.
- ② Other cases deemed necessary by the company for smooth job performance

4) Action in case of violation

Anyone who has violated the provisions on the prohibition of receiving and providing money or other goods must fill out a report on entertainment, entertainment, and receipt of money, and report it to the head of the relevant department and HR department within one week from the date of the occurrence. Violation of this may result in disciplinary action.

## 2. Restrictions on transactions using job-related information

We must not conduct property transactions, such as stock investment, using information inside the company that we have learned while conducting business.

## 3. Prohibition of Intervention in Interest

Ethical Management Practice Guidelines	
	Date: 2020. 04. 10.

We must not use our position to make ourselves or others unfairly profitable.

#### **4. Prohibition of monetary transactions**

All monetary transactions, such as loans, joint guarantees, and mutual guarantees between executives and employees, or between employees and stakeholders are prohibited.

#### **Article 4 (creating a sound organizational climate)**

##### **1. Prohibition of discrimination based on blood ties, school ties, delays, sex, etc.**

We shall not give preference to or discriminate against a specific individual or group in the performance of our business on the grounds of blood ties, school ties, delays, sex, etc.

##### **2. Prohibition of formation of private organizations**

We do not have an organization in the workplace that can form factions related to blood ties, school ties, or delays. However, small groups for the purpose of hobbies or religion are not subject to prohibition.

##### **3. Prohibition of sexual harassment**

Regardless of the workplace, employees must not engage in any behavior that may cause sexual temptation or sexual shame.

- 1) unnecessary physical contact
- 2) Making obscene jokes or posting obscene pictures
- 3) Sexual evaluation or analogy of the other person's appearance
- 4) Forced to drink or dance at a meeting such as a dinner party
- 5) Other acts that may cause sexual shame

#### **Article 5 (measures in case of violation)**

##### **1. Responsibilities of each department manager**

Each department head should provide training and consultation on this ethical management practice guideline so that the staff members can fully understand and practice this guideline.

##### **2. Reporting and handling of violations**

Ethical Management Practice Guidelines	
	Date: 2020. 04. 10.

- 1) When an employee becomes aware of a violation of this ethical management practice guideline, he/she may report it to the HR department at any time by completing a general report or a report on entertainment, entertainment, and receipt of money, depending on the case.
- 2) In the case of reporting to the HR department, the reporter must indicate the violator and the details of the violation. In addition, if the content of the reporter's report is not specifically verified, the responsibility to verify the content of the report rests with the reporter.

### **3. Handling when receiving prohibited gifts**

- 1) In the event of receipt of money or goods prohibited in this ethical management practice guideline, the money or goods shall be immediately returned to the person who provided them.
- 2) If the money or goods to be returned pursuant to the above regulations are subject to loss, corruption, or deterioration, or if it is difficult to return the provider or the provider's address, etc., the relevant money or goods must be reported to the HR department and deposited

## **Article 6 (protection of whistleblower and accused)**

### **1. Protection of whistleblowers**

With respect to whistleblowers who reported violations, the head of HR department must make every effort to prevent any information from leaking to the outside.

### **2. Protection of the accused**

The accused is presumed to be innocent until the allegations of the accused are fully proven.