
SEWON AMERICA 윤리헌장 및 실천규범

(Ethics Charter and Practicing guidelines)

[Revision History]

Authorized	Establishment	Revision	Details
Pres	2025. 06. 23	2025. 06. 23	New

Management Depart : HR Team

SEWON AMERICA , Inc.

SEWON AMERICA Ethics Charter and Practicing guidelines

Preface

Based on diligence and sincerity, harmony and unity, and creativity and development, Sewon America aims to deliver value to all stakeholders—shareholders, customers, employees, and local communities. As a company committed to social responsibility and ethical standards, we strive to become a trusted, leading company that pursues sustainable development through fairness and transparency.

【Purpose of Establishment】

Sewon America (hereinafter "the Company") enacts this Ethics Charter (the "Charter") and Practicing Guidelines (the "Guidelines") to instill in all employees the understanding that ethics are the foundation of corporate competitiveness. These principles aim to help employees make proper decisions and respect mutual values when dealing with all stakeholders.

【Scope of Application】

- ① These guidelines apply to all executives and employees (including temporary and contract workers) of the Company and its affiliates, both domestic and overseas.
- ② The Company also encourages its stakeholders—including investors, partners, distributors, consultants, agents, intermediaries, shareholders, customers, and local communities—to respect and adhere to the principles of this Charter and Guidelines.
- ③ All employees shall perform their duties in accordance with these standards and comply with the laws and regulations of the countries in which they operate.
- ④ If the content of this document conflicts with local laws, the local laws shall take precedence, and the Charter and Guidelines shall be revised to reflect those requirements.

Ethics Charter

[Compliance with Ethics Charter]

- ① All employees must sincerely comply with this Charter and are responsible for any violations.
- ② If an employee becomes aware of a violation or unethical act, they must report it to the management department.
- ③ The Company will analyze the root causes of such behavior and take appropriate measures, including disciplinary actions and preventive education.

[Sewon America's Five Ethical Principles]

1. We act with dignity and integrity, rejecting any unethical behavior in both personal life and work, while taking full responsibility in all areas of decision-making.
2. We comply with all applicable laws and company policies to foster a sound corporate culture based on principles and fundamentals.
3. We respect the human rights of all stakeholders, pursue fair business relationships, and strive for mutual cooperation while strictly protecting personal information.
4. We aim to fulfill customer needs by providing high-quality products and top-tier services.
5. We do not seek unfair advantages, fulfill our social responsibilities as corporate citizens, and commit to the sustainable development of society.

Practicing Guidelines

Article 1: Ethics for Officers and Employees

1.1 Ethical Corporate Culture

- ① All officers and employees of the company shall have clear and transparent decision-making standards in their internal and external business activities and fulfill their responsibilities based on the principles of good faith and sincerity, in compliance with ethical management standards.
- ② All officers and employees shall not abuse their authority or position to exert undue influence or pursue illegal gains for themselves or the company.

1.2 Transparency and Anti-Corruption (Bribery, Solicitation, Gifts, and Entertainment)

- ① Officers and employees shall not offer, promise, or provide any form of bribe—such as money, entertainment, or convenience—to public officials or employees of public institutions, nor engage in improper solicitation related to company business.
- ② Officers and employees shall not demand, receive, offer, or promise any form of money or benefit in relation to job duties, either among themselves or with stakeholders. However, reasonable gifts or entertainment may be exchanged within socially accepted customs (e.g., promotions, transfers, openings, or similar events and personal celebrations) to maintain sound relationships.
- ③ If the appropriateness of such exchanges is unclear, officers and employees shall consult their supervisor or the department responsible for ethics under official company procedures.

1.3 Conflict of Interest

- ① To promote transparency and fairness, employees shall avoid actions that create a conflict of interest [i.e., any conduct that pursues personal or related parties' (family, relatives, acquaintances, etc.) interests against the company's interests].
- ② In cases of conflict between the interests of the company and individuals or departments, actions should prioritize the interests of the company and its customers within legal boundaries.

1.4 Protection of Internal Information

- ① Employees must accurately acquire and manage all information obtained during their duties and shall not use it for personal gain.
- ② Important company secrets or business information must not be disclosed or provided to external parties. When external disclosure is necessary, it must comply with the company's information security policies and procedures.

1.5 Financial Responsibility (Accurate Records)

- ① Officers and employees must record and manage accounting information truthfully and accurately and must not conceal or monopolize important information.
- ② All transactions and fund executions must follow appropriate internal procedures, with ongoing tracking and management to prevent errors or omissions in accounting books.
- ③ The company shall comply with financial regulations such as the Capital Markets Act and IFRS, and disclose accounting and management information to enhance transparency and reliability.

1.6 Protection and Proper Use of Company Assets

- ① To maintain financial soundness and sustainable growth, officers and employees shall protect tangible and intangible assets, including intellectual property and trade secrets.
- ② These assets must not be used for personal purposes or private gain without company approval.
- ③ The company shall install and maintain systems (e.g., security cameras, control systems) to prevent theft, damage, or security threats to tangible assets.
- ④ To protect intangible assets, the company shall implement data encryption, access control, and security software.

1.7 Documentation and Reporting

- ① Officers and employees shall prepare, approve, store, and dispose of documents according to internal procedures.
 - ② Documents shall not contain concealed, exaggerated, or falsified information and must not be shared with stakeholders based on manipulated content.
-

Article 2: Fair Trade and Mutual Growth

2.1 Fair Competition and Win–Win Cooperation

- ① The company shall comply with fair trade laws and internal policies to promote healthy market competition and ensure fair opportunities for all participants.
- ② The company shall select partners based on fair and reasonable criteria relevant to the business.
- ③ The company pursues transparent and fair transactions based on mutual trust and respect with partners and supports their growth and competitiveness in the long term.

2.2 Anti–Monopoly and Collusion

- ① Neither the company nor its employees shall use a dominant position to impose unfair trade conditions or make unreasonable demands.
- ② The company shall not engage in any activity that may hinder fair competition, such as price

fixing, bid rigging, market allocation, or quantity restrictions.

2.3 Unfair Competition and Improper Acquisition

- ① The company shall not unlawfully acquire information from competitors, partners, or other entities and shall not use or disclose any such improperly obtained information.
- ② Employees shall not provide or promise bribes or other benefits to secure business opportunities.
- ③ Employees shall not receive or solicit gifts or benefits under the pretext of granting business opportunities to stakeholders.

2.4 Anti-Money Laundering

- ① The company and its employees must comply with all applicable laws and regulations in financial transactions and conduct transparent, responsible dealings.
- ② No employee shall disguise or conceal illegally obtained property for themselves or any stakeholder.
- ③ The company shall provide regular anti-money laundering training and reflect updates to relevant laws and regulations in a timely manner.

2.5 Intellectual Property

- ① The company and its employees shall respect others' intellectual property rights (IPRs) and trade secrets and comply with applicable laws to promote creativity and innovation.
- ② Unauthorized use, reproduction, distribution, or modification of third-party copyrights, trademarks, patents, designs, or trade secrets is strictly prohibited.

2.6 Tax Compliance and Cooperation

- ① The company shall strictly comply with tax laws and shall not engage in tax evasion or avoidance.
 - ② The company shall respond promptly and sincerely to information requests from tax authorities.
-

Article 3: Realization of Customer Value

3.1 Respect for Customers, Accurate Information, and Feedback

- ① The company places the highest priority on customer satisfaction and strives to deliver high-quality products and services.
- ② Accurate and useful information shall be provided, and customer feedback shall be heard and reasonably addressed.

3.2 Customer Safety and Data Protection

- ① The company values customer safety throughout the research, procurement, production, sales, and after-sales process and shall avoid any behavior that may harm it.
- ② The company shall comply with personal data protection laws and not unlawfully infringe customer privacy.

3.3 Quality Assurance and Product Safety

- ① A quality management system shall be implemented from design to sales based on international standards or customer requirements.
- ② Through strict quality control, the company shall continuously deliver high-quality products and prevent customer harm.

3.4 Product Liability

- ① All potential hazards in design and manufacturing shall be identified and controlled to prevent harmful substances.
- ② Regular inspections and testing shall ensure continued product safety.
- ③ The company shall comply with safety standards and acquire certifications from the early development stages.
- ④ Feedback and safety trends shall be continuously reflected in product improvement.

3.5 Prevention of Counterfeit Parts

The company shall not use or distribute any parts or products that were manufactured or circulated through unauthorized channels.

3.6 Compliance with Export Controls

- ① The company shall comply with all export control and sanction laws of relevant countries in the export and technology transfer of its products.
- ② If required, appropriate licenses or consents shall be obtained in accordance with legal procedures.

3.7 Responsible Material Procurement

- ① The company strictly complies with laws related to the use of minerals mined in conflict regions.
 - ② Special attention is paid to whether sourced materials originate from conflict zones or nearby areas.
 - ③ The company thoroughly monitors the supply chain for mineral origins and promotes responsible sourcing.
-

Article 4: Respect for Labor and Human Rights

4.1 Respect for Human Rights

- ① The company prioritizes the respect and protection of human rights in all its business activities and complies with internationally recognized human rights standards.
- ② The company respects the rights of all stakeholders related to its business and takes active measures to prevent and respond to any form of human rights violations.

4.2 Mutual Respect and Fair Treatment

- ① The company fosters a work environment where all employees are treated with respect based on their abilities and qualifications, free from unfair discrimination, and can freely express their opinions and perspectives.
- ② To this end, the company provides equal opportunities and applies fair and objective evaluation and compensation standards.

4.3 Prohibition of Discrimination

- ① The company prohibits discrimination based on nationality, race, place of origin, gender, religion, age, disability, education, political orientation, or social status.
- ② The company respects employee diversity and strives to create an inclusive work environment.

4.4 Prohibition of Child and Forced Labor

The company prohibits any form of inhumane treatment involving psychological or physical coercion, such as child labor or forced labor, in accordance with labor laws of the countries or regions in which it operates.

4.5 Prevention of Workplace Harassment

The company prohibits all acts that undermine human dignity or insult personal character, including verbal or physical abuse, sexual harassment or assault, bullying, and threats based on one's position or relationship within the workplace.

4.6 Safety and Health

- ① The company takes proactive measures to ensure that all employees can work in a safe and pleasant environment.
- ② The company maintains a safe working environment to prevent any job-related accidents, disasters, injuries, or illnesses.

4.7 Labor-Management Harmony

All officers and employees shall recognize that both labor and management are integral to the company and work together based on mutual trust and harmony for shared prosperity.

Article 5: Pursuit of Sustainability

5.1 Social Responsibility and Sustainability

- ① The company contributes to national and local economic development through job creation, faithful tax payments, and active participation in public interest activities.
- ② In its decision-making processes, the company strives to solve environmental and social issues and pursues sustainable development goals.

5.2 Environmental Protection and Climate Change Response

- ① The company endeavors to comply with environmental laws and international standards, taking responsibility to minimize and prevent negative environmental impacts throughout all business activities.
- ② To address climate change, the company continuously improves energy efficiency and actively researches and develops eco-friendly products to minimize environmental impacts.

5.3 Stakeholder Engagement

The company identifies stakeholders who may be affected by its management decisions and actively communicates with them to address key sustainability issues and seek rational mutual understanding.

5.4 Protection of Shareholders' Rights and Interests

- ① The company discloses financial and non-financial information in accordance with relevant laws and regulations and endeavors to protect shareholder rights and interests.
- ② The company respects legitimate shareholder demands and proposals, builds trust-based relationships, and pursues the enhancement of shareholder value.

Operation Code of Conduct

【Duties of Responsible Managers】

Managers responsible for enforcing this Charter and Code shall actively support and oversee that all employees and relevant stakeholders correctly implement the provisions of the Charter and Code.

【Monitoring】

To ensure proper implementation of the Charter and Code, the company operates systems for ethics training, violation reporting and sanctions, code interpretation inquiries, ethics counseling, and whistleblower mechanisms.

【Reporting Obligations】

① Organizations applying this Charter and Code shall continuously monitor ethical risks and, upon identifying violations, report them to the responsible ethics officer and management in accordance with company procedures.

② Employees have a duty to self-report any violations of the Code to their superior or the designated ethics officer. Anyone aware of another's violation must report the matter to the ethics officer.

【Internal Controls and Whistleblower Protection】

① The department responsible for applying this Charter and Code shall establish an internal reporting system accessible to both internal and external parties, and ensure periodic or ad hoc internal control.

② The company must protect the identity of informants and take necessary measures to ensure that whistleblowers are not subjected to disadvantage, discrimination, or retaliation.

【Training】

① Organizations applying and managing this Charter and Code shall provide appropriate training to help employees understand and practice ethical management as pursued by the company.

② The training in paragraph ① shall be conducted at least once a year. New employees must receive training upon their initial appointment.

【Sanctions for Violations】

① If an employee receives monetary or material benefits exceeding KRW 100,000 from a business partner or similar party without reporting it according to regulations, the matter shall be handled through established disciplinary procedures.

② The counterparty who offered the improper benefit in paragraph ① shall be dealt with according to relevant laws and company regulations. If the violation is severe, all business transactions with the party may be terminated.

【Rewards and Disciplinary Actions】

① The company may grant rewards, such as favorable performance evaluations, to employees who comply with the Code and contribute to the establishment of ethical management.

② Employees who commit acts in violation of this Code shall be subject to disciplinary actions as deemed necessary.

③ The types, procedures, and effects of disciplinary actions mentioned in paragraph ② shall follow the provisions of the relevant internal regulations.

【Disclosure of Ethics Activities and Information】

The company shall establish and operate an ethics management website to publicly disclose its ethical management system and activities, thereby enhancing the trust of stakeholders.

【Establishment of an Ethics Management Organization】

① To facilitate and embed ethical management and the practical application of this Charter and Code, the company shall establish an ethics management organization, which shall carry out the following duties:

1. Determining key policies for promoting ethical management
2. Establishing and amending ethics-related regulations
3. Interpreting important ethics regulations
4. Overseeing employees' compliance with the Charter and Code

② The composition, establishment, and operation of the ethics management organization may be stipulated in separate regulations.

③ The ethics management organization shall continuously improve and develop the contents of the Code in response to organizational development and environmental changes. Detailed procedures for the operation and handling of the Code may be separately defined and implemented as needed.

Appendix

【Ethics Counseling and Reporting Channels】

Online Reporting: <http://se-won.com>

Phone:

- +1-706-218-0890 (jaewon.yang@se-won.co.kr)
- +1-678-697-0944 (seunghoon.baek@se-won.co.kr)

Mail:

- 1000 SEWON EV Road, Rincon, GA 31326, USA
- 1000 SEWON Blvd, LaGrange, GA 30240, USA

This policy shall be amended and enforced effective **July 1, 2025**, and any matters not specified in this policy shall be governed by relevant laws, regulations, and company rules.