

# **EVERGREEN STEEL CORPORATION**

## **CODES OF ETHICAL CONDUCT**

### **Article 1**

To lead the staffs of the Company to act in line with our code of ethics and to allow the interested parties of the Company to have more understanding about our code of ethics, the present codes are hereby formulated for the purpose of compliance.

### **Article 2**

These codes are applicable to directors, managers (including President, Vice-President, General Manager or equivalent position, Financial Department Chief, Accounting Department Chief and other management staffs or authorized signatories) and other employees of the Company.

The applicable persons as set forth in the preceding paragraph are hereinafter referred to as “the Staffs of the Company”.

### **Article 3**

For the conduct of corporate management, the staffs of the Company shall observe the applicable regulations and these codes, complying with the code of ethics and the principle of honesty

### **Article 4**

The staffs of the Company shall avoid any conflict of interest resulted from the intervention of individual interest or from the possible intervention of overall interest of the company, including but without limitation when such staffs cannot deal with the public services objectively and effectively or when the staffs themselves, their spouses, parents, children or relatives within second degree of kinship gain any unjustified benefit because of the positions of such staffs in the Company.

Meanwhile, when the Company offers financial loans, provides guarantee, makes significant assets deals or buys(sells) goods with the affiliated companies of the parties referred to above, the staffs of the Company shall handle pursuant to the relevant operating procedure, automatically explaining whether or not there is any latent conflict of interest with the Company so as to prevent such conflict of interest.

## **Article 5**

In the event of any opportunity for earning profit for the Company, the staffs of the Company are responsible for increasing the legal profit to be obtained by the Company.

No staffs of the Company shall have any opportunity to make private profit or gain private profit by taking advantage of property or information of the Company or of their positions in the Company. Moreover, such staffs shall not have any competitive act with the Company, unless it is consented under Company Law or by the Company.

## **Article 6**

The staffs of the Company shall have confidential duty with regard to the affairs, confidential information or client's data obtained from execution of business, unless such information shall be disclosed under authorization or requirements by laws. Moreover, such confidential information shall include undisclosed information that may impair the Company or its clients after such information is used or divulged by any competitor.

## **Article 7**

The staffs of the Company shall fairly treat clients, competitors and employees of the Company and shall not try to control, conceal or abuse information obtained from execution of business in order to gain any unjustified benefit by making untrue statements for some important events or other unfair transactions.

## **Article 8**

The staffs of the Company all are obligated to protect and properly use the assets of the Company, assuring that such assets can be legally and effectively used on the public services. Any larceny, negligence or waste will directly affect the profitability of the Company.

## **Article 9**

The Company shall strengthen propaganda of ethical concept, and the staffs of the Company shall abide by the Securities and Exchange Act, all applicable regulations and the requirements of applicable by laws of the Company.

## **Article 10**

When doubting or finding that any matter has violated the applicable rules and

regulations or these codes, the staffs of the Company shall report to the audit committee, managers, internal audit chief or other competent officers in writing or orally and provide sufficient information to enable to the Company to deal with the subsequent matters properly.

As for name of reporter and details of report, the Company shall properly handle the relevant illegal information in confidential and responsible manner.

### **Article 11**

When any staff of the Company has violated these codes of ethical conduct, the Company shall handle pursuant to the applicable rules and regulations.

Any staff violated these codes of ethical conduct in the preceding paragraph may follow the regulations governing appeal of the Company as a remedy channel against the Company's administration sanctions.

### **Article 12**

Where it is necessary for any staff of the Company to exempt from abidance of the provisions of these codes, it shall be approved through resolution adopted by the board meeting and the relevant information will have been published pursuant to the applicable rules and regulations.

### **Article 13**

The Company shall disclose the details of these codes on the website, annual report, prospectus and Market Observation Post System (MOPS). This provision is also applicable to its amendment.

### **Article 14**

These codes shall be put into practice after approval by the Board of Directors and submitted to the shareholders meeting. This provision is also applicable to its amendment.

### **The History of “CODES OF ETHICAL CONDUCT”**

1. The Codes was made on March 16, 2020.