



# CJ CODE OF BUSINESS CONDUCT

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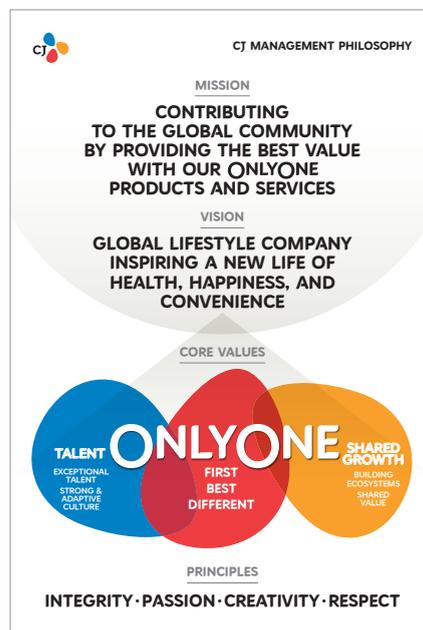
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# WHY DO WE NEED THE CODE OF CONDUCT?

The CJ Code of Business Conduct (the “Code of Conduct”) outlines CJ’s promise to our stakeholders to put CJ’s Management Philosophy into practice. The Code of Conduct helps us set the proper direction for conducting business and instills the sense of responsibility we must have as members of a respected and beloved corporation.

## CJ’S MANAGEMENT PHILOSOPHY

CJ’s Founding Philosophy consists of: ① **contributing to the national economy** (developing the national economy and improving people’s lives through our business); ② **valuing talent** (treating employees with respect and creating a business environment that allows them to maximize their abilities); and ③ **pursuing rational management** (pursuing profit and prosperity through rational management and technological innovation). The key concepts above have been passed down and integrated into CJ’s Management Philosophy as follows:



## WHY THE CODE OF CONDUCT IS NECESSARY

The Code of Conduct is based on CJ’s Management Philosophy and serves as a specific guideline for putting it into practice. The Code of Conduct clearly suggests the ethical and lawful behavior for dealing with all those who have an interest in CJ, namely our customers, shareholders, colleagues, competitors and business partners within our supply chain, as well as national and local communities.

The Code of Conduct requires us to abide by a standard that is higher than those set by applicable laws when dealing with stakeholders. In doing so, we will be able to nurture talented individuals to provide ONLYONE products and services and establish an industrial ecosystem built on mutual respect and shared growth, achieving our mission and vision in the process.

## HOW THE CODE OF CONDUCT IS ESTABLISHED

The Code of Conduct was established with the support of all CJ employees and the approval of the Board of Directors. The Code of Conduct may be amended to keep up with changes in CJ’s values and management philosophy, internal standards, domestic and foreign policies and regulations. Any amendment to the Code of Conduct will be made available to all employees and stakeholders.

# HOW CAN WE UTILIZE THE CODE OF CONDUCT?

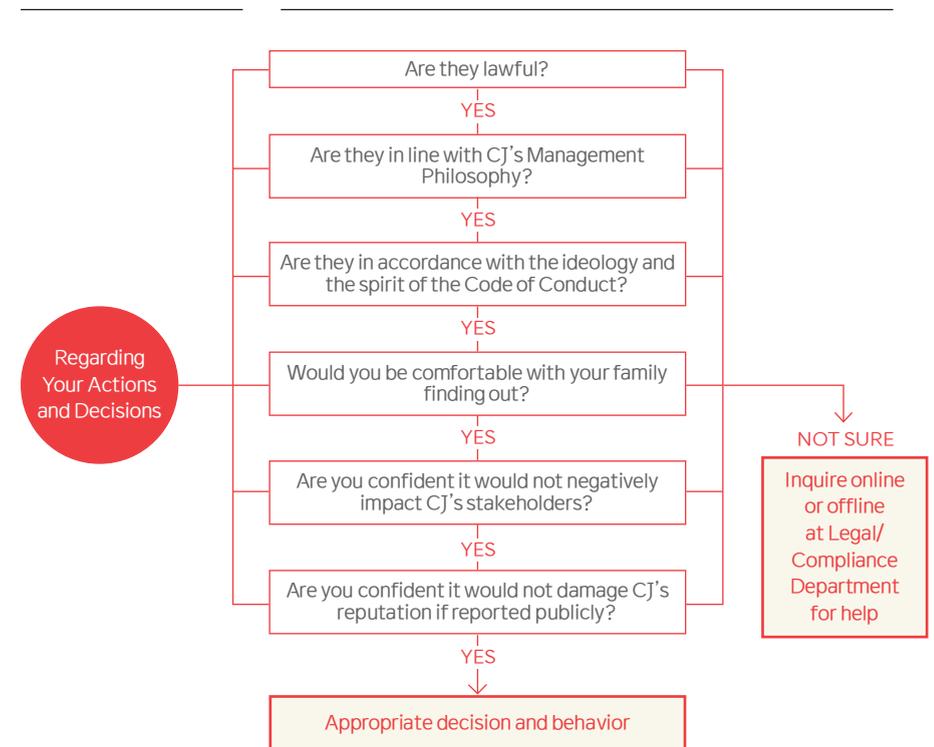
By understanding and adhering to the Code of Conduct, we can uphold CJ's reputation and protect ourselves and the Company from potential legal and social risks that may arise from violating it.

## CJ EMPLOYEES' RESPONSIBILITY

The Code of Conduct applies to all CJ employees worldwide. We must adhere to and comply with the Code of Conduct at all times when conducting the Company's business. Compliance with the Code of Conduct into practice shall never be subject to compromise, even for important business reasons such as sticking to the business plan or achieving profit targets. This is because the Founding Philosophy of contributing to the national economy through our business requires us to do the right thing when faced with legal or ethical dilemmas in the course of pursuing profit. In addition, we should encourage third parties acting on behalf of CJ, such as consultants, agents, and business partners, to understand and comply with the Code of Conduct as well.

## UTILIZING THE CODE OF CONDUCT

The Code of Conduct was designed to address the most common legal and ethical issues we face when we conduct business or make business decisions. In order to determine whether or not our actions and decisions are appropriate, we must first ask ourselves the following:



If you cannot answer affirmatively to all of the above questions with confidence, then you should not do it. If you cannot answer definitively, you should seek advice from those around you. You may consult the Legal/ Compliance Department, or you can also make inquiries about the Code of Conduct online.

We do business in many countries around the world. We must comply with the laws and regulations of every country where we do business, as well as the Code of Conduct. If something is permitted under the Code of Conduct but prohibited under local laws and regulations, or is permitted under local laws and regulations but prohibited by the Code of Conduct, you should refrain from such conduct.

## WHAT SHOULD I DO IF I DISCOVER A CODE OF CONDUCT VIOLATION?

Putting the Code of Conduct into practice includes the responsibility to actively raise issues and promptly resolve them, even for very minor suspicions or concerns. Active issue raising not only helps us prevent the violations in advance, but it also helps us deal with violations that have already occurred before they lead to more serious harm.

### VIOLATING THE CODE OF CONDUCT

Violating the Code of Conduct may subject you to internal discipline, as well as civil and criminal liability. All of the following constitutes a violation of the Code of Conduct:



- Making decisions or taking actions that are inconsistent with CJ's Management Philosophy and the Code of Conduct
- Asking someone else to violate the Code of Conduct
- Not immediately reporting a known or suspected violation of the Code of Conduct
- Failing to cooperate with internal investigations for a possible Code of Conduct violation
- Retaliating against someone who reports a Code of Conduct violation
- Sabotaging someone from reporting a Code of Conduct violation and coercing the reporter to withdraw the report

### REPORTING A CODE OF CONDUCT VIOLATION

If you discover a Code of Conduct violation, you may file a report either under your name or on an anonymous basis.

CJ operates the following channels for accepting reports on violations of the Code of Conduct, such as website, e-mail, facsimile, mail, as well as CJ Whistle, and please refer to the website for each CJ affiliate, as they operate individual channels for accepting reports.

### INVESTIGATING A REPORTED VIOLATION

All reports of Code of Conduct violations are investigated in strict compliance with internal standards and handled under heightened security. The reporter, the person being investigated, and any other persons involved must cooperate fully with the investigation. In addition, they must promptly provide all information and documentation related to the matter reported upon request.

The reporter is entitled to receive updates on the progress and result of his or her report. If the investigation finds that there was a Code of Conduct violation, the violator will be subject to severe disciplinary action. In addition, the Company will immediately rectify the violation and implement measures to prevent recurrence.

<https://www.cj.net/footer/cyber.asp>  
 [cjgroupaudit@cj.net](mailto:cjgroupaudit@cj.net) / [cjwhistle@cj.net](mailto:cjwhistle@cj.net)  
 (82) 2-726-8929 (Fax)  
 Audit Team, CJ THE CENTER 12 Sowol-ro  
2-gil Jung-gu, Seoul

## RESPONSIBILITIES FOR THE REPORTED AND THE REPORTER

**Q** I would like to report a suspected violation of the Code of Conduct, but I am worried that it might affect me negatively if it turns out not to be a violation after investigation. What should I do if I am hesitant to report for this reason?



**A** CJ protects everyone who reports a Code of Conduct violation in good faith based on reasonable suspicion. There will be no negative consequence of any kind to the reporter, even if investigation reveals facts different from what was reported. However, if you deliberately submit a false report, lie to investigators, or interfere with or refuse to cooperate with an investigation, you may be subject to discipline under internal standards, as they all constitute violations of the Code of Conduct.



## HOW CAN I BE PROTECTED AFTER REPORTING A CODE OF CONDUCT VIOLATION?

We support all efforts to put CJ's Management Philosophy into practice and to comply with the Code of Conduct. We ensure strict confidentiality for the reporter and protect the reporter and those who assist with the report from any harm because we believe in the need to establish a work culture in which employees can raise and report concerns freely and without fear.

### PROTECTING THE REPORTER

CJ protects those who report misconduct in order to enforce and adhere to the Code of Conduct at all costs. That includes anyone who has actually reported a perceived violation of the Code of Conduct, expressed an intention to report, helped a co-worker with a report, or participated in or assisted with an investigation.

### ENSURING CONFIDENTIALITY

Ensuring anonymity and confidentiality for the reporter is our top priority. Your report will only be shared with those responsible for resolving the issue raised, and we will never disclose your identity or allow any inference of your personal information without your consent. Any unconsented disclosure relating to a report will be subject to severe discipline.

### NO HARM OR RETALIATION

To encourage people to report violations of the Code of Conduct without fear, we do not allow any form of harm or retaliation to the reporter, including but not limited to the following:



- Any act that causes emotional or physical harm, such as bullying, assault, or verbal abuse
- Unfair HR moves or discrimination in evaluation

- 
- Reducing the available budget or personnel or taking away training or education opportunities available to other employees
  - Other forms of discrimination that negatively affect working conditions

If a reporter suffers harm and retaliation because his/her identity or what he/she reported is leaked, we will do our best to promptly restore or provide compensation commensurate with the harm. We also promise to severely discipline those who retaliate or cause harm.

## PROTECTING THE REPORTER

**Q** After reporting a Code of Conduct violation, my manager has been leaving me out of meetings and bullying me. What should I do in this situation?

**A** If you are experiencing harm or retaliation after reporting, you should immediately notify the Company and ask for protection. If harm is found after a comprehensive review of the circumstances, the Company will take immediate protective measures for the victim and disciplinary action against the retaliator.



# 1 OUR PROMISE TO CUSTOMERS

- We provide ONLYONE products and services to our customers.
- We promote and sell our products and services to customers ethically and honestly.
- We take our customers' feedback seriously, and customer satisfaction is our utmost priority.
- We protect our customers' personal information in a secure and responsible manner.

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The ONLYONE spirit is CJ's most important core value of striving to be the first, best, and different in every way.

Based on this, we are continuously creating new products, services, systems and businesses not tried by others.

CJ has been constantly creating new industries and expanding the market in its journey of creation.

We will become a global lifestyle company that brings health, happiness, and convenience to our customers by providing the best value with ONLYONE products and services.

”

## WE PROVIDE ONLYONE PRODUCTS AND SERVICES TO OUR CUSTOMERS.

If we do something, we must either be the first to do it or be the best at it. If we cannot be the first or the best, then we must be clearly different. The core ONLYONE values of being the first, best and different are the source of the competitive edge behind all of CJ's past, present and future businesses. We will create the best value for our customers by providing ONLYONE products and services because our customers' satisfaction and benefit is the most important foundation for sustainable growth.

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### INNOVATION FOR CUSTOMER SATISFACTION

We can maximize customer satisfaction when we provide them with products and services that they truly want. We want the new lifestyle proposed by CJ to make our customers' everyday lives healthier, happier and more convenient. In order to create customer-oriented products and services, we tackle new challenges and seek innovation in every step of the way, from development and planning of products and contents to sales, marketing and delivery of services.

### SUSTAINABLE PRODUCTION AND CONSUMPTION

Sustainable production and consumption means utilizing the environment and resources in a manner that meets the needs of the present without compromising the ability of future generations to meet their own needs. We strive to provide customers with products and services that are socially and environmentally friendly by aiming to use resources efficiently and minimizing the impact to the environment.

### QUALITY AND SAFETY MANAGEMENT

We comply with the laws and regulations on quality and safety in all countries where we do business, and we strive to provide safe products and services that meet standards that are even higher than those required. In addition, we establish a safety management system that prioritizes the health and safety of our customers, and we strictly adhere to our safety management standards.

## WE PROMOTE AND SELL OUR PRODUCTS AND SERVICES TO CUSTOMERS ETHICALLY AND HONESTLY.

The best products and services become even more valuable when they are sold and provided ethically. Providing accurate information and selling them ethically are essential to help customers make rational choices and increase their confidence in our products and services. This is also the best way to demonstrate integrity, one of CJ's four main principles.

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### ETHICAL MARKETING

We comply with all applicable laws and our corporate procedures regarding marketing and sales. Furthermore, we must carry out our marketing activities in a way that creates the social values pursued in the Code of Conduct, such as fair competition, respect for human rights and protection of the environment.

### PROVIDING ACCURATE INFORMATION

Information about our products and services provided in our packaging, labels, advertisements and sales and promotional materials have a significant influence on our customers. Therefore, all information about CJ's products and services must be displayed in a manner that is objective, reliable, accurate and specific enough for them to understand easily.

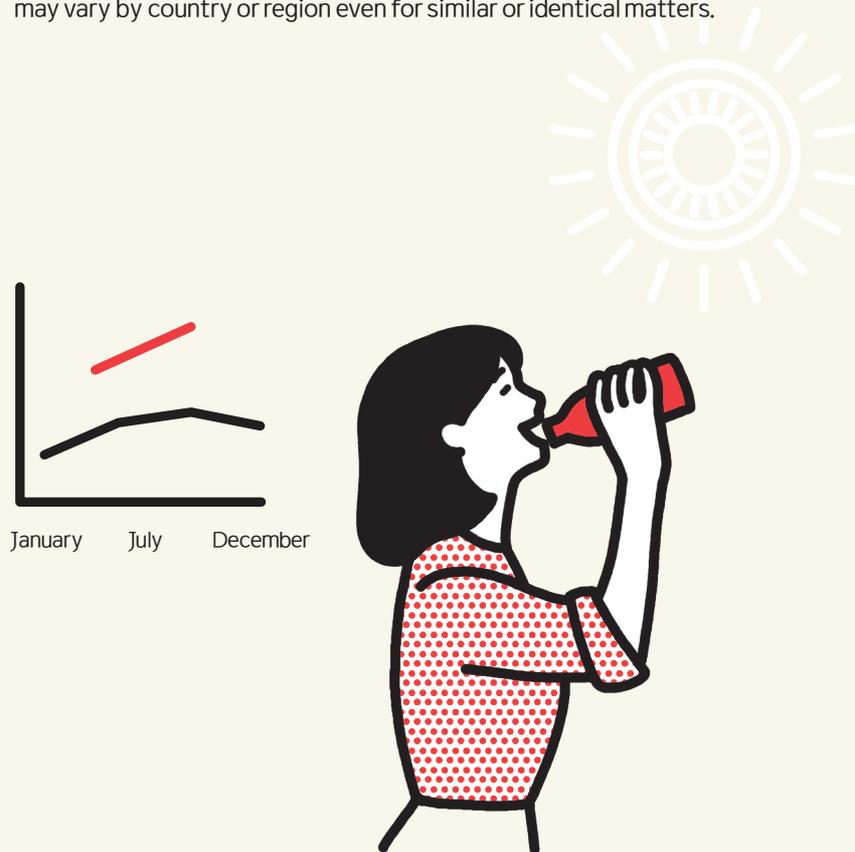
### HONEST SALES

We must not deceive our customers with false or exaggerated advertising. In particular, information about our competitors must be accurately stated based on objective grounds in order to prevent customer confusion.

## COMPARATIVE MARKETING WITH COMPETITORS

**Q** We want to advertise our new beverage by comparing its sales to a competitor's. If we include the peak season when calculating our sales volume and base the competitor's sales on a period that includes the slow season, our sales numbers will stand out and the ad will be more effective. Does this violate the Code of Conduct?

**A** Ads that compare sales volume to a competitor's should be based on the same period and duration of time. Ads that use incorrect facts about a competitor's products or services or compare them under different conditions not only violate the Code of Conduct, but they constitute illegal false and exaggerated advertising. However, you must determine whether or not a particular conduct is permitted based on the laws and regulations of the country where you are located because the applicable laws and regulations may vary by country or region even for similar or identical matters.



## WE TAKE OUR CUSTOMERS' FEEDBACK SERIOUSLY, AND CUSTOMER SATISFACTION IS OUR UTMOST PRIORITY.

A customer-centric approach begins with listening to our customers and taking their feedback seriously. We constantly communicate with our customers to identify their diverse tastes and individualities and provide products and services that they truly want.

### CONVENIENT ACCESS AND COMMUNICATION FOR CUSTOMERS

We communicate with our customers through a wide variety of channels, beginning in the planning phase for new products and services all the way to the sales, delivery and improvement phases, so that no customer demand ever goes unnoticed. Customer communication channels, such as the website and call centers, must be easy to access and use.

### COMPLIANCE WITH CUSTOMER COMMUNICATION PROCEDURES

We respond to all inquiries, complaints and claims from our customers in a friendly and prompt manner. We study and abide by our business process standard on communication with customers so that we can save their valuable time and prevent misunderstandings.

### REFLECTING CUSTOMER FEEDBACK

Rightful demands and reasonable suggestions from our customers help us improve our products and services from their perspective and give us a competitive edge. We will always respect and take our customers' feedback seriously and actively reflect them to improve customer satisfaction.

## RESPONDING TO CUSTOMERS

**Q** I received a complaint from a customer about a foreign object found in the popcorn he bought at the concessions in the movie theater. I am not responsible for making popcorn, but what should I do in order to comply with the Code of Conduct?

**A** Providing ONLYONE products and services is at the heart of CJ's Management Philosophy, and all CJ employees, not just those responsible for quality assurance, must strive for safe quality of our products and services. If a customer is not satisfied with CJ's products and services, you must respond promptly according to the customer communication manual and communicate these matters to your supervisors and managers for a fundamental solution of the problem per internal reporting protocol. It is also essential to operate an exhaustive recurrence prevention system. Lastly, if your supervisor does not take any action after receiving your report, you may report it as a Code of Conduct violation.



## WE PROTECT OUR CUSTOMERS' PERSONAL INFORMATION IN A SECURE AND RESPONSIBLE MANNER.

We collect, store and use our customers' personal information in a lawful manner to better understand their needs and provide products and services that can provide greater satisfaction for them. Because our customers have entrusted us with their valuable personal information, we must handle it with extra security and care.

### COMPLIANCE WITH PRIVACY LAWS

We comply with all applicable laws and regulations regarding privacy and data protection. Any information that can be used to identify an individual customer constitutes personal information. As privacy laws may differ from country to country, we must always check the latest regulations in the country where we are doing business.

**Q** Please refer to the "CJ Global Privacy Policy" for more details.

**Q** Please contact the Legal/Compliance Department for more information on the protection of personal information in various countries, such as the GDPR (European Union's General Data Protection Regulation) or China's Cybersecurity Law.

### LAWFUL PROCESSING OF PERSONAL INFORMATION

We obtain proper consent from our customers for the collection and use of their personal information and only use it within the scope of the specified purpose. In particular, we must not provide customers' personal information to third parties or process sensitive information (political ideology, religion, medical history, etc.) without their additional consent.

### SAFEKEEPING OF PERSONAL INFORMATION

Per the Company's internal standards, only a limited number of people from authorized departments can access customers' personal information. We are also committed to manage and oversee the secure handling of personal information when entrusted with personal information. We manage personal information received from our business partners or third parties using the same standard we use for information we collect ourselves.

## DEALING WITH PERSONAL INFORMATION LEAKS

If customers' personal information is leaked despite our efforts, we must act promptly and take all appropriate measures to protect their valuable personal information and minimize the damage. If you witness or suspect an accident related to personal information, you must report it immediately to your manager, the Privacy Officer or Information Security Officer.

🔍 Please refer to the "CJ Global Privacy Policy" for more details.

## PROPER USE OF CUSTOMER INFORMATION

- Q A new product that the Company has been preparing for several years will be launched soon, and I am think of ways to promote it. Is it okay to send promotional e-mails about the new product using a list of customers who entered the Company's giveaway event in the past?
- A Customers' personal information must be used within the scope they consented to. If consent was only obtained for the purpose of 'entering the giveaway event' and not for 'product advertisement', you cannot use the personal information to send promotional e-mails.



# 2 OUR PROMISE TO SHAREHOLDERS AND INVESTORS

- We keep all our records accurately and manage them rigorously.
- We comply with the public disclosure rules and strictly control insider information.
- We protect the Company's assets with care and use them properly.
- We comply with the Company's privacy policy and protect its confidential information.

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A company must constantly evolve and innovate itself in order to grow. Striving for continuous growth is synonymous with putting the philosophy of pursuing profit and prosperity through rational management and technological innovation into practice.

As a leading corporation equipped with core competencies, CJ will reciprocate the trust of our shareholders and investors by turning blameless profits through rational management and by establishing a system in line with the global standards.

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## WE KEEP ALL OUR RECORDS ACCURATELY AND MANAGE THEM RIGOROUSLY.

Our shareholders and investors have placed their confidence in us to engage in moral and responsible management. Not only are our records the foundation on which strategies are set and business objectives are met, but they are also an important asset that helps us explain the Company's decision-making process and business performance to our stakeholders, including shareholders and investors.

### KEEPING AND MANAGING RECORDS

When keeping the Company's records, we do not omit important matters or make false entries. Also, we must maintain, store and dispose of them in strict compliance with internal regulations. Records can be kept in a variety of formats besides paper, such as electronic files, audio and video, and below are some of the typical examples:



- Documents used to make and communicate business decisions, such as reports or requests for approval
- Transaction-related materials, such as receipts, invoices, contracts, etc.
- Documents recording facts, incidents and outcomes, such as work logs, research data, financial statements, etc.
- Data and documents submitted to government or public agencies

### TRANSPARENCY IN FINANCIAL RECORDS

The Company's financial records must be kept in a complete, accurate and timely manner. This is an important principle that all members of CJ, not just those responsible for financial affairs and accounting, must adhere to. We keep and store records of the Company's business performance and financial state, such as assets, liabilities and revenue, truthfully without any errors or omissions. In addition, financial information must be recorded in a timely manner within the appropriate accounting period, and the recorded information must be maintained accurately at all times.

### COMPLIANCE WITH ACCOUNTING PRINCIPLES AND REGULATIONS

We comply with generally accepted accounting principles, relevant laws and regulations, and internal controls. Because international accounting standards and the accounting standards and relevant laws and regulations for each country are all different and constantly amended, we must always check for the latest standards that are generally accepted in the countries where we do business.

## DEALING WITH INSTRUCTIONS FOR IMPROPER FINANCIAL RECORD KEEPING

**Q** The Company is performing poorly, so it will be difficult to achieve our business objectives. In this situation, I was instructed by my supervisor to exaggerate the inventory value or inflate the accounts receivable with false sales slips so that the Company's financial state looks better than it actually is. Should I follow such instructions?

**A** You must not follow your supervisor's instructions because not only they violate the Code of Conduct, but they are also illegal. While tampering with financial information and accounting books may make performance look good in the short term, it will ultimately destroy market confidence in the Company and cause serious repercussions for both individual employees and the Company. In this situation, you must report your supervisor's improper instructions to the head of your department. If it is difficult for you to report because you will suffer harm for whistleblowing or the improper instruction comes from the organization level, you should alert the Company of the risk of accounting fraud by reporting the Code of Conduct violation or notifying the Legal/Compliance Department.



## WE COMPLY WITH THE PUBLIC DISCLOSURE RULES AND STRICTLY CONTROL INSIDER INFORMATION.

We can solidify our shareholders' trust and provide fair investment opportunities to our investors by actively providing them with accurate management information. Releasing the Company's material information or trading with it before public disclosure not only violates the trust of our shareholders and investors but is also subject to serious punishment as a violation of the law.

### RULES ON PUBLIC DISCLOSURE OF BUSINESS INFORMATION

We publicly disclose important matters that have or may have significant impact on the decisions of shareholders and stakeholders in compliance with the applicable laws and regulations. In a public disclosure, we must provide accurate information fairly and faithfully in a timely and easily accessible manner, and information cannot be provided only to certain investors or selectively disclosed in parts. If you need to check whether or not public disclosure is required for a matter that could affect the Company's management or stock prices if released, you must immediately report it to the head of your department and consult with the Financial Affairs Department make such determination.

### SAFEGUARDING OF INSIDER INFORMATION

We rigorously safeguard the insider information of the Company (including affiliates), customers, business partners and clients. Insider information means information that may have a significant impact on a reasonable person's investment decision but is not yet publicly available, and it includes the following information, such as the Company's business activities and financial state:



- Business performance (or recent trend) and management reshuffle
- Matters relating to commencement of new business or termination of business relationship with major business partners, etc.

- Development of new products and acquisition of new patents
- Matters relating to business restructuring, such as mergers and acquisitions and establishment of JV
- Entering into contracts with a listed company or information relating to large-scale investments
- Investment plan in specific areas, establishment of new facilities, or expansion of existing facilities
- Acquisition of treasury stock, capital increases and reductions, and other significant changes in the Company's financial structure

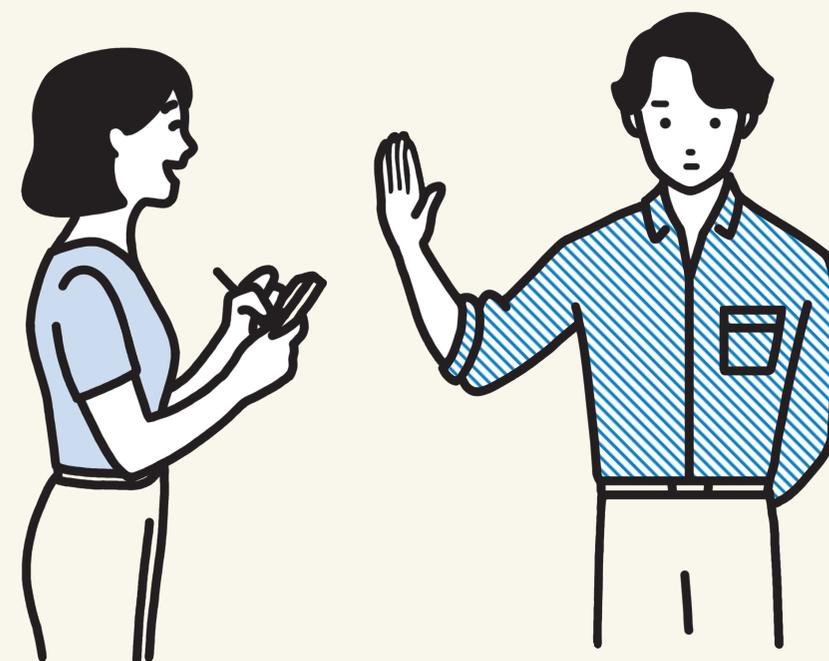
As a general rule, we cannot share insider information with others, and you can only discuss it in limited situations where it is absolutely necessary for work. If you need to share it with someone outside the Company, you must adhere to all applicable laws and regulations and internal procedures, such as obtaining the Company's prior approval.

## NO INSIDER TRADING

We must not trade the Company's stocks or make transactions involving real estate or other property rights using insider information. We cannot provide insider information to others and let them trade or make transactions using it either. This "no insider trading" rule also applies to trading the stocks of customers, business partners and clients who have a business relationship with CJ.

## DEALING WITH REQUESTS FOR MATERIAL NON-PUBLIC INFORMATION

- Q** While having a meal with a journalist friend, I was asked about the Company's large-scale business investment that has not been announced yet. While it is not directly related to my work, I heard people in my office talking about it a lot, and I think it will have a positive impact on the Company's stock price if this information is reported in the news. Can I share what I know with my friend?
- A** Even if it is just an informal request, you should not speak about information that has not been announced publicly by the Company. Your information may be inaccurate, and even if it is accurate, it must be provided in compliance with public disclosure rules. If you receive a request to provide or confirm undisclosed information from someone outside the Company, you must notify the person in charge of public disclosures and have that person handle the matter.



## NO STOCK TRADING WITH THE COMPANY'S INSIDER INFORMATION



Our Company is looking to enter into a new business by acquiring Company A. I am in charge of the acquisition, and I know that we will be acquiring Company A soon because we have finished the due diligence. Can I buy our Company's stock before the acquisition is publicly disclosed?



Employees are strictly prohibited from trading the Company's stock using information about the Company that is not publicly available, as it constitutes illegal insider trading. While those who trade the Company's stock before material information about the Company becomes available to the general public may make a profit or avoid a loss, ordinary shareholders who invest without such information may suffer huge losses. This eventually leads to shareholders and investors losing their trust in the Company.



## WE PROTECT THE COMPANY'S ASSETS WITH CARE AND USE THEM PROPERLY.

The Company's assets that we use daily for work are essential components of CJ's sustainable growth. Not only is misuse or waste of the Company's assets harmful to all of us, but it also violates the trust of our shareholders.

### PROPER USE OF THE COMPANY'S ASSETS

We use the Company's assets properly within our scope of work in furtherance of the Company's business and protect them with care. The Company's assets include tangible assets, such as physical workplace, records and computers, as well as intangible assets, such as intellectual property, including our key asset, the CJ brand, software and business systems (intranet, email, instant messenger, etc.).

You must not use the Company's assets for personal gain or for the benefit of anyone other than the Company. In particular, you must not engage in the following:



- Intentional destruction, misappropriation or theft of the Company's assets
- Exclusive and unauthorized use, lease, transfer or sale of the Company's assets
- Use of the Internet and corporate email accounts for personal gain
- Unauthorized removal or use of assets for work, such as cars, PCs, expensive consumable goods, office supplies, etc.
- Failure to comply with the Company's business expense processing guidelines or using corporate expenses and credit card with fraudulent reports
- Allowing improper use of the Company's assets and facilities by friends and family

## PROPER USE OF THE IT SYSTEM

All data transmitted, stored and received through the IT system must be regarded and protected as the Company's records and information assets. The IT system must be used in a way that respects the privacy and dignity of other CJ employees and in compliance with the Company's internal policies. You must not engage in the following:



- Posting defamatory messages about other individuals, departments or the Company or messages that slander others
- Disseminating contents that are rude and vulgar, relating to unfair discrimination or sexual harassment, or threatening or abusive
- Viewing material that is sexually explicit or offensive to others
- Activities that interfere with your work, such as online gambling, playing games, stock trading, etc.
- Downloading files and software that are from a questionable source or suspected to be illegal

The Company can monitor and keep records of how CJ employees are using the IT system for the purpose of preventing misuse of the Company's information assets or misconduct against the Company. If you think there may have been a security breach, such as a lost electronic device using the IT system or an account theft, or there is a confirmed leak of the Company's information, you must immediately report it to the head of your department and the Information Security Officer.

## PERSONAL USE OF THE COMPANY'S ASSETS

- Q** Can I briefly check my personal bank account with my work PC or make a doctor's appointment with my work telephone during work hours?
- A** You are allowed to use your work telephone or PC for brief personal use, as long as it does not interfere with your work. However, you must not engage in excessive and improper use of the Company's assets for your own benefit.



## WE COMPLY WITH THE COMPANY'S PRIVACY POLICY AND PROTECT ITS CONFIDENTIAL INFORMATION.

We strictly manage CJ's confidential information, including our trade secrets, which is the driving force behind our competitive edge and transformation into a global leading company. Disclosure of confidential information can cause irreparable harm for which no monetary compensation would be adequate and affect the very survival of the Company.

### SCOPE OF CONFIDENTIAL INFORMATION

Even if something is not marked as "secret" or "confidential", all information managed by the Company is technically confidential, unless it is expressly disclosed to the public. Confidential information includes not only information generated by the Company, but it also includes any non-public information relating to our customers, shareholders, co-workers and business partners kept by the Company. We rigorously protect the following types of confidential information:



- Management and business information, such as business strategies, development plans for new products, and pricing policies
- Product manufacturing process, research and technical data, and information relating to new inventions or technological innovations
- Information relating to business restructuring, such as M&A
- Information relating to customers, business partners and other third-parties that requires legal protection or confidentiality
- Internal organizational chart and personnel information
- Information that may be damaging to the Company if disclosed to competitors or third parties

### PROTECTING THE COMPANY'S CONFIDENTIAL INFORMATION

We must observe the Company's policies and regulations regarding the use, sharing and protection of confidential information during our employment and even after its termination. As a general rule, the Company's confidential information must be for internal use only, and it may be provided

or released externally only upon approval from the Company. If you discover unauthorized access to or disclosure of the Company's confidential information, you must immediately report it to your supervisor. In particular, you must be careful not to engage in the following activities that increase the risk of information leak:



- Sharing information with family, friends, and co-workers (including former coworkers)
- Discussing work in public places (including places where third parties can overhear, such as the cafeteria, hallways and lobby)
- Doing work using confidential information in public places
- Transmitting information through non-secure means
- Failing to restrict outside access to information posted on the Company's information and communication network
- Leaving documents containing the Company's confidential information unattended at meetings outside of the office
- Exporting out the Company's documents and information using unauthorized removable storage devices, cloud storage service, or personal e-mail
- Abusing the Company's approval to export out the Company's documents and information for personal use

# 3 OUR PROMISE TO FELLOW CJ EMPLOYEES

- We foster an environment where we can work with pride and have fun.
- We foster a healthy and safe working environment.
- We perform our work in an honest and lawful manner and with our best efforts.
- We try to find the right balance between protection of individual privacy and respect for our co-workers.

“

Based on our Founding Philosophy of valuing talent, we have been continuously investing into securing and grooming talented individuals and helping them grow.

CJ looks for people who could be described as “upright *hagojabis*” (passionate self-starters), and we will continue to foster an environment in which these “*hagojabis*” can work with pride and produce the best results, while also having fun.

In addition, we will act in line with our principles of integrity, passion, creativity and respect and make responsible decisions by setting the right direction for our business.

”

## WE FOSTER AN ENVIRONMENT WHERE WE CAN WORK WITH PRIDE AND HAVE FUN.

A pleasant work environment means an environment where you can get a sense of accomplishment from doing the kind of work that you want to do. We are confident that the “upright *hagojabis*” with passion and creativity will work with pride, have fun and produce the best results with our continued support, and get evaluated fairly based on their abilities and achievements.

### THE “*NIM* CULTURE” AND RESPECTING ONE ANOTHER

In order to communicate with each other freely yet respectfully, CJ became the first major corporation to introduce the “*Nim* Culture”, a system of addressing everyone the same way regardless of their seniority, rank, age, etc. Based on the “*Nim* Culture”, we try to be understanding and considerate of each other by thinking from the perspective of those we work with and taking what they have to say seriously. Going forward, we will strive to become a first-class company full of passion and creativity by continuing to uphold the “*Nim* Culture”, which is CJ’s unique cultural asset, and respecting one another.

### HIRING AND EVALUATING FAIRLY

We make our hiring decisions based solely on an individual’s ability (skills, performance, value and leadership) and other job-related criteria. We also conduct objective and impartial personnel evaluations based on the individual’s accomplishments and capabilities rather than personal feelings or relationships.

### PROVIDING EQUAL OPPORTUNITIES AND RESPECTING DIVERSITY

We strive to create an environment where all members are given equal opportunities and treated equally. We do not discriminate against anyone on the basis of personal characteristics when it comes to employment, promotion, placement, salary, compensation, benefits and training, as well as all other aspects related to work. Personal characteristics include race, color, religion, national and regional origin, gender, sexual orientation, age, disability, military service and any other individual characteristic protected by law.

### ENSURING WORK-LIFE BALANCE

CJ’s idea of work-life balance is to concentrate fully when working and to relax completely when resting. We produce results by immersing ourselves into work during work hours, and we strive to create a flexible work environment and a lifestyle unique to CJ with various programs that support relaxation and leisure activities.

## RESPECTING RELIGIOUS AND RACIAL DIVERSITY

**Q** When I did not eat certain foods due to religious reasons at a department get-together, my colleagues condemned me with scorn. They also call me names referring to my skin color. What should I do?

**A** We respect the different laws, regulations, customs and rules of decorum that exist for each country and region, and we must not discriminate against anyone based on religion, race or any other personal characteristics. If you were subject to unfair treatment or discriminatory remarks because of your religion or race, you should go through the reporting procedures to raise an issue or consult with the Human Resources, Legal/Compliance Department.



## PROVIDING AN EQUAL OPPORTUNITY WHEN RECOMMENDING EMPLOYEES FOR PROMOTION

**Q** After the end of the year employee evaluations, I was contacted by the HR Department to recommend an employee for promotion. For our department, there is one male candidate and one female candidate eligible for promotion to be a Manager this year, but I can only recommend one of them. The female candidate received much better performance evaluations for the past 3 years, but no female has ever been promoted to a Manager at our department. Higher positions are all held by male employees at other departments within the same business division as well. Who should I recommend for promotion in this case?

**A** You must recommend the person who, in your objective judgment, will do the best job for the promotion. In addition, the head of the department should actively support the person so that he or she may thrive in the new role. Assessment must be based on the individual's performance and ability, not on gender, academic background or hometown. If the current practice for recommending a candidate for promotion goes against the philosophy of valuing talent and the principle of non-discrimination, it must be abolished.



## WE FOSTER A HEALTHY AND SAFE WORKING ENVIRONMENT.

We foster a healthy and safe work environment so that all members can feel at ease and fully demonstrate their abilities. Healthy and safe work can only take place when we reduce the risk of accidents and injuries and the members are considerate and respectful of each other's character.

### PREVENTING ACCIDENTS

We comply with all applicable laws and our internal policies on health and safety. We also conduct periodic safety training and inspections to prevent accidents and minimize the damages. Active participation by CJ employees in these health and safety trainings is hugely helpful for responding in accordance with the internal safety regulations and guidelines when these accidents actually occur.

### NO WORKPLACE HARASSMENT

We do not take advantage of superiority in rank, relationship, etc. in the workplace to cause physical and emotional distress or deteriorate the work environment beyond a level appropriate for work for our colleagues. Harassment in the workplace is strictly prohibited in order to promote a healthy organizational culture and respect for one another.



- Abusing authority over personnel matters, such as evaluation and promotion, to force entertainment and favors or verbally abusing others
- Heads of departments making their subordinates run inappropriate personal tasks for them
- Habitually scheduling meetings right before close of business to cause overtime work
- Forcing employees to buy products to meet sales targets
- Pressuring someone to drink excessively at work get-togethers
- Verbally abusing temporary employees using contract extension as an excuse

### NO PHYSICAL OR VERBAL VIOLENCE

We do not engage in speech or conduct that is unpleasant to others or makes them feel out of place. You must always be careful not to hurt or cause a misunderstanding for others with your words or actions. In particular, you must keep in mind that it might be difficult for the other person to express his/her discomfort or displeasure if there is a gap in title, rank, age, etc. between the two of you.

### NO SEXUAL HARASSMENT

We do not condone sexual harassment in the workplace. You must not make your co-workers feel sexually humiliated or offended, or damage your healthy working relationship with them by engaging in any physical, verbal, visual language or conduct that causes them to feel that way. When there is an incident of sexual harassment, we must resolve the matter quickly and impartially, and we need to take the appropriate protective measures to prevent the victim from suffering secondary harm in the process of reporting and filing a complaint.

## WHAT CONSTITUTES SEXUAL HARASSMENT

Q

A few of my co-workers often make sexually offensive jokes. They often rate and criticize the appearance of other co-workers within my earshot as well. Although I could not outwardly express it, it was a very uncomfortable situation for me. Even if the target of the sexual speech or conduct was not offended, isn't it still sexual harassment if it is offensive to someone else?

A

For workplace harassment, including sexual harassment, we use a standard of whether or not the victim, or others in the victim's position, would generally feel sexually humiliated or offended in the situation, rather than the perpetrator's perception of it. Therefore, sexual harassment can occur even if the actual target of the sexual speech or conduct was not offended by it, if it was offensive to someone else. Even if a sexual remark was made without any particular person in mind, it can still constitute sexual harassment if it created a sexually humiliating or offensive environment. If you were offended in a sexual way or think there may have been sexual harassment, you may consult with your supervisor or contact the Human Resources, Legal/Compliance Department for assistance. You can also raise the issue by reporting it as a Code of Conduct violation.



## WE PERFORM OUR WORK IN AN HONEST AND LAWFUL MANNER AND WITH OUR BEST EFFORTS.

Integrity, which is one of CJ's principles of conduct, means not tolerating inefficiency and dishonesty. While inefficiency brings down a corporation gradually, dishonesty can destroy it overnight. In order to guard ourselves against inefficiency and dishonesty, we try our best to stick to the basics and principles faithfully.

### WORKING HONESTLY AND LAWFULLY

We perform our work honestly and lawfully by setting up procedures and standards. We do not condone any unlawful act that is against the law or violates the Company's standards, and we do not give or receive any economic benefits, such as money or other valuables, or entertainment or hospitality, in exchange for improper solicitation related to work. If you become aware of any unlawful or improper conduct, or if you are instructed to engage in one, you must ask your supervisor and co-worker to stop and notify the head of your department, and the Legal/Compliance Department.

### AVOIDING CONFLICT OF INTEREST

Conflict of interest arises when the interests of the Company and the individual (including those related to the individual, such as family members, relatives or friends) clash with each other and make it difficult to act objectively and in the best interests of the Company. We must avoid conflict of interest, and if there is any actual or potential conflict of interest, we must report it and prioritize the interests of the Company.

The following are some typical situations where conflicts of interest may arise:



- Becoming a business partner or competitor of the Company
- Investing directly in competitors and business partners
- Exploiting business or investment opportunities you learned about through work for personal gain
- Providing lectures or consulting services outside of work for the purpose of expanding your personal network without the Company's prior approval

## IMPROPER FINANCIAL TRANSACTIONS

- Having influence on the hiring of family members, relatives or acquaintances (interviews, evaluation, compensation, etc.)
- Having family members or relatives who work for competitors or business partners or have a financial interest in them

Financial transactions between fellow CJ employees can get in the way of performing your duties and damage your personal relationships, as well as the overall organizational atmosphere. You must not engage in transactions such as guaranties or loans within the Company under any circumstances. In particular, monetary transactions taking advantage of rank or hierarchy within the organization are strictly prohibited.

## CONFLICT OF INTEREST RELATED TO SUPPLIER SELECTION

Q

The Company has a huge print job, and my uncle happens to run a print shop. I am thinking about placing the order because I can negotiate the price with him, and it would be easy to communicate. Would this be okay?

A

While transactions with a company operated by an acquaintance or a relative are not illegal per se, they should be avoided if possible. This is because personal interests may get involved or make it difficult for you to make a rational decision during contract negotiations and course of dealing. If such deal is absolutely necessary, you must report it to your supervisor in advance and adjust your work scope so that you are not in charge of the transaction, and the new person in charge must also strive for a transparent and fair transaction to avoid any unnecessary misperception.



## WE TRY TO FIND THE RIGHT BALANCE BETWEEN PROTECTION OF INDIVIDUAL PRIVACY AND RESPECT FOR OUR CO-WORKERS.

We can be at ease and focus on work in an environment where we respect each other's privacy. However, failing to keep work and personal life separate during work hours can disturb your co-workers' work and ruin a positive organizational culture. Also, you must keep in mind that the Company's reputation may be damaged if the statements you make or actions you take are misunderstood as made on behalf of CJ.

### RESPECTING AND PROTECTING PRIVACY

We respect the privacy of our co-workers, and we do not collect or record any data related to their personal lives. Even if you come to know something about your co-worker's personal life by chance, you must not disclose it without his or her consent. Furthermore, we strictly manage our employees' sensitive personal information, such as personnel record, performance evaluation and salary.

### POLITICAL PARTICIPATION

We respect the political rights and views of each individual member of CJ. However, you must not allow your own political views and participation to be misunderstood as the Company's official position. In particular, you must not engage in political activities within the Company premises during work hours or use the Company's organizations, personnel or assets for political purposes.

### USING SOCIAL MEDIA

We respect and support CJ employees' use of social media to communicate with others and to spot the latest trends. However, because it is difficult to distinguish between business and personal life on social media and information has widespread ramifications, you must be extra cautious when it comes to the following to prevent any negative impact on the individual and the Company:



- Do not forget that you are a member of CJ when posting something on social media.
- Keep in mind that anything you say can be misinterpreted as an official statement from the Company.
- Do not post anything that tarnishes someone else's reputation, and always conduct yourself honestly, precisely and ethically.
- Be careful not to leak work-related information, such as information, events or rumors about the Company that have not been officially announced.
- Refrain from using social media excessively to the point of interfering with your work or your colleagues' work.

# 4 OUR PROMISE TO FELLOW PLAYERS IN THE MARKET

- We establish a sound transaction order by competing fairly.
- We create an industrial ecosystem of shared growth by dealing fairly with our business partners.

“

We establish the rules and systems in which we can compete fairly and freely with our competitors and grow together with our business partners.

When it comes to industrializing a particular business, growing the pie for the industry, and then globalizing it, it is very important for companies to have a genuine philosophy of shared growth.

We firmly believe that CJ will grow further and earn the respect of the global society when we keep our promise to our fellow players in the market and fulfill the value of shared growth.

”

## WE ESTABLISH A SOUND TRANSACTION ORDER BY COMPETING FAIRLY.

ONLYONE products and services are, have always been, and will continue to be, the source of the competitive edge for all of CJ's businesses. Engaging in free competition and pursuing fair profits have served as the basis for CJ's continuous innovation and growth, and it is essential for greater customer satisfaction and creative corporate activities.

### FAIR COMPETITION

Collusion (cartel) refers to two or more companies by agreeing to engage in any of the following anti-competitive activities:

 Please refer to the "CJ Global Fair Competition Policy" for more details on collusion.



- Setting, maintaining or changing prices
- Determining the terms of sale or payment for products
- Limiting the production, delivery, transport or sale of goods
- Restricting sales territory or sales partners
- Not allowing the construction or expansion of facilities or introduction of new equipment
- Limiting the types or standards for products
- Managing key parts of business jointly
- Bid rigging

Collusion is rigorously regulated by every country in the world. Both implicit conduct and explicit consent can be considered illegal. In particular, depending on the country, it may even be illegal to make business decisions by considering and anticipating the actions of competitors.

### COMMUNICATING WITH COMPETITORS

You should avoid communication with competitors that could be seen as violating fair trade regulations or limiting competition, if possible. You must always be cautious when communicating or meeting with competitors for work, and if there is even a tiny bit of doubt about the legality of your actions, you must inquire and get help from the Legal/Compliance Department in advance. When contacting competitors, you must always keep the following in mind:

### COLLECTING INFORMATION ON COMPETITORS

We gather market information, including information on competitors, lawfully from official sources. If someone offers to provide you with non-public information about a competitor, you must decline and notify the Legal/Compliance Department. You must be cautious because any of the following could constitute improper collection of information:

 Please refer to the "CJ Global Fair Competition Policy" for more details on information exchange with competitors.



- Receiving non-public information directly from competitors
- Collecting information through customers, business partners or former and current employees of competitors
- Asking market research agencies, consulting companies and other experts to share the information they have on competitors, or making a request for illegal collection of information
- Collecting information under false pretenses or by taking advantage of someone's mistake

## WHAT CONSTITUTES AN AGREEMENT IN COLLUSION



I was at a social get-together with working-level staff from our competitors. While talking about an ongoing bidding for a public institution, someone from Company A asked me how much we were on bidding so that they could outbid us, and I told them. Although it was not an outright rejection, we never intended to comply with Company A's request for cooperation from the beginning. We ended up winning the bid by submitting an amount that was different from what we told Company A and sufficient for us to win the bid. Would this be considered collusion?



It would be considered collusion. Even if we did not intend to follow through with the agreement from the outset, taking advantage of Company A's belief that we would honor the agreement to win the bid is ultimately an anti-competitive conduct. You must keep in mind that an agreement for collusion is established by overt acts, and it does not matter what your original intent was or if you actually performed as you had agreed.



## ACQUIRING INFORMATION PROPERLY



We are trying to figure out why sales are dropping for some of our products. Our supplier also happens to supply for Company A, a competitor of ours, and I am curious about Company A's sales volume. Can I ask for that information?



You must not ask for that information. It would be considered either improper management intervention or improper request for management information prohibited by fair trade regulations. For information that is not disclosed by the party in question or through the media, you must check the source of the information and make sure not to violate any applicable laws and regulations.



## WE CREATE AN INDUSTRIAL ECOSYSTEM OF SHARED GROWTH BY DEALING FAIRLY WITH OUR BUSINESS PARTNERS.

We acknowledge our business partners as important companions for business, and we communicate sincerely and deal fairly with them. Establishing a healthy industrial ecosystem where we can grow together with our business partners through fair distribution of responsibilities is synonymous with demonstrating the value of shared growth and will also increase CJ's competitiveness.

### COMPANIONSHIP WITH BUSINESS PARTNERS

We select our business partners in accordance with transparent and fair procedures and objective criteria, regardless of the type of business relationship or contract. We do not enter into contracts with business partners that try to do business with us using improper or expedient means, and we build and maintain companionship with our business partners with whom we can share our values and policies.

### UNFAIR TRANSACTIONS

Unfair transaction is defined as doing business with another party using unfair or improper means. The following unfair transactions are strictly prohibited:

 Please refer to the "CJ Global Fair Competition Policy" for more details on unfair transactions.



- Refusing to do business or suspending business with a particular business partner for no valid reason
- Discriminating against a specific trading partner in terms of price or other terms and conditions
- Pricing a particular product or service significantly lower than the usual price for the purpose of keeping a competitor out, or buying products or services at an unreasonably high price from a business partner
- Using unfair means such as tie-in sales and forcing employees to purchase the Company's products and services or sell them to others against their will to take away potential customers of competitors
- Abusing superior bargaining power to the detriment of the transaction partner
- Making transactions with conditions that unduly restrict a business partner's business activities, such as limiting the territory within which the business partner can do business or with whom the business partner can do business

### NO CORRUPTION AND GRAFT

We do not, directly or indirectly, give, receive or solicit improper benefits from employees of our business partners, nor engage in private transactions with them. You must not engage in any of the following key examples:



- A manufacturer or seller of a particular product forcing or imposing other constraints on resellers of the product to sell it at a fixed price
- Requesting or receiving excessive gifts for family events, promotion, or holidays
- Getting wined and dined with meals, parties, golf, etc.
- Making financial transactions with or demanding a loan guarantee from employees of business partners
- Requesting accommodations (business expenses, supply of goods, support for events, sponsorships, etc.)

### PROTECTING OUR BUSINESS PARTNERS' INFORMATION

We respect the intellectual property rights and trade secrets of our business partners, and we do not ask for their technical data or the use of their intellectual property without a justifiable reason in the course of dealing, nor arbitrarily provide it to third parties or exploit it unjustly.

## COMPANIONSHIP WITH BUSINESS PARTNERS

**Q** We are currently in the process of selecting a business partner for a new project. Based on their experience and capabilities, it makes the most sense to give this project to Company A. However, I happened to find out that Company A is engaging in illegal subcontracting. Can we work with Company A given this information?

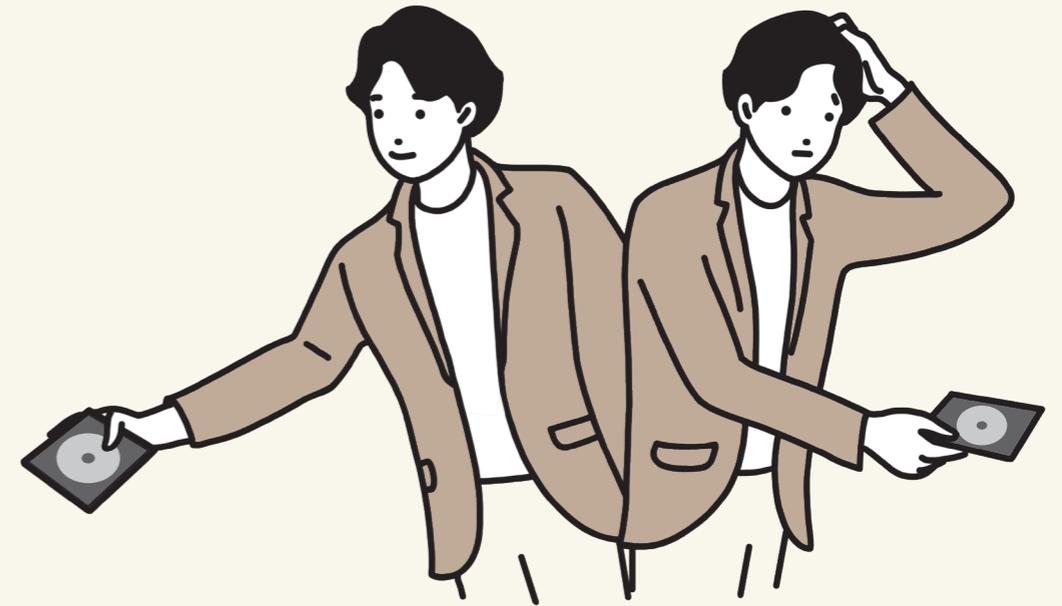
**A** You cannot work with Company A. We must select business partners with whom we can practice the values pursued by CJ, and even after selecting them, we must encourage them to comply with CJ's Management Philosophy and Code of Conduct and continuously monitor them. We must remember that our efforts with regard to our business partners ultimately help eliminating direct and indirect risks for CJ in advance.



## PROTECTING OUR BUSINESS PARTNER'S TECHNICAL KNOW-HOWS

**Q** I received the source code for maintenance from the developer of our website. Now that the contract term is up with this developer, we are thinking about entering into a maintenance contract with another company. Can I provide the source code to the new company?

**A** In principle, you should not provide it. A source code is an intellectual property right, just like patents, utility models, designs and copyrights, and it cannot be provided to third parties without the proper right to do, which means you were granted permission from the owner of the right by contract or other means.



# 5 OUR PROMISE TO THE GLOBAL COMMUNITY

- We create shared value and fulfill our corporate social responsibility.
- We realize social values by respecting human rights and protecting the environment.
- We comply with the anti-corruption and anti-bribery laws from all over the world.
- We respect the international trade order and abide by the laws and regulations of each country.

“ CJ is doing business all over the world with the goal of becoming the No.1 global lifestyle company that sets the lifestyle trends for people around the globe and is loved and respected by the global community.

We can truly contribute to the national economy and co-exist with those living in the region where we do business when we respect their culture, traditions, laws and regulations and contribute to their society.

”

## WE CREATE SHARED VALUE AND FULFILL OUR CORPORATE SOCIAL RESPONSIBILITY.

Based on our Founding Philosophy of contributing to the national economy and the value of sharing, CJ wishes to fulfill its responsibilities as a member of the national society and create a society of co-existence through its business. To this end, we are constantly striving to create shared values and foster a healthy industrial ecosystem through all our businesses and management activities.

### CJ CSV

Through our ONLYONE core values of "Guardian of Dreaming Youth" and "Coexisting Industrial Ecosystem," CJ CSV aims to achieve harmonious growth and to contribute to sustainable social development with diverse members of our society.



- Guardian of Dreaming Youth
  - We strive to cultivate future talents by linking systems and business infrastructure as our corporate social responsibility to help young people grow up healthy with dreams and hopes.
  - Top projects: Donors' Camp, Tune Up, Stage Up, and Story Up
- Coexisting Industrial Ecosystem
  - As an industrial ecosystem leader, we will create an ecosystem where stakeholders grow together to firmly establish the industrial structure and expand the foundation of the ecosystem.
  - Top projects: Senior Parcel Delivery Service, O'PEN, and Joyful Company

### RESPECTING AND SERVING THE LOCAL COMMUNITY

As a member of various local communities, we respect the laws, culture and values of the countries and regions where we do business and strive to improve the quality of life for everyone. We also actively encourage CJ employees to engage in community service activities. We can all play a positive role in social development through a wide array of public interest activities that enrich the human society.

### CREATING JOBS AND PAYING TAXES FAITHFULLY

Not only are we exporting ONLYONE products and services all over the world, we are also continuously expanding our global business with aggressive investments. Contributing to economic growth by creating jobs steadily and paying taxes faithfully in the countries and communities where we do business is the epitome of contributing to the national economy.

## WE REALIZE SOCIAL VALUES BY RESPECTING HUMAN RIGHTS AND PROTECTING THE ENVIRONMENT.

In the past, financial performance was the key measure for valuation of a company. Nowadays, companies that contribute to the public good and development of the global community by realizing social values are more popular and highly regarded. We vow to become the No.1 global lifestyle company that respects human rights, protects the environment and leads the way for the pursuit of social value.

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### RESPECTING HUMAN RIGHTS

We are against human rights violations, and we support and honor the international human rights norms, including the Universal Declaration of Human Rights. In order to prevent human rights violations, we have in place a human rights management system with dedicated teams, and we manage and regularly conduct due diligence on action items for human rights management. If any human rights violations take place, we do our best to aid the victims.

### PROTECTING CHILDREN AND NO FORCED LABOR

We comply with the minimum age requirement for employment set by each country. Even for children who are legally eligible to work, we do not subject them to dangerous working conditions that may negatively affect their physical, psychological and social development. We respect our employees' dignity and do not force labor against their free will by means of assault, intimidation, imprisonment or other improper restraints.

### PROTECTING THE ENVIRONMENT

We strictly abide by the environmental laws and regulations to minimize pollution and prevent accidents. We also strive to utilize resources efficiently, provide environment-friendly products and services, and operate organized management systems. In addition, we actively participate in conservation efforts by the local communities to solve environmental problems, and we also stay committed to and participate in international conservation activities, such as responding to climate change, managing water resources, minimizing waste, etc.

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### CREATING SOCIAL VALUES TOGETHER

As the global business environment expands, so does our supply chain consisting of suppliers, agents, joint venture partners, business partners, vendors, etc. with whom CJ has a business relationship. To improve the overall capacity of the industrial ecosystem, we make sure everyone within our global supply chain meets CJ's principles and standards with regard to compliance with the laws, anti-corruption, respecting human rights, prohibition of child and forced labor, adherence to health and safety obligations for employees, and protection of the environment, etc. with constant support and monitoring.

## WE COMPLY WITH THE ANTI-CORRUPTION AND ANTI-BRIBERY LAWS FROM ALL OVER THE WORLD.

There is a growing interest in anti-corruption and ethical management around the world. As a global provider of products and services, CJ puts a lot of effort into preventing corruption. In order to advance honestly and fairly in the global market, CJ must keep its promise to do business ethically and with integrity.

### COMPLYING WITH ANTI-CORRUPTION LAWS AND REGULATIONS

We strictly comply with the anti-corruption laws from all over the world, including the United States Foreign Corrupt Practices Act (FCPA), as well as the Korean anti-corruption laws and our internal policy. We must keep in mind that violating anti-corruption laws can lead to penalties for individuals as well as companies and can result in serious financial losses.

🔍 Please contact the Legal/Compliance Department for more details on the FCPA and other anti-corruption laws and regulations.

🔍 Please refer to the "CJ Global Anti-Corruption Policy" for more details.

### NO IMPROPER SOLICITATIONS

We do not engage in any form of improper solicitation for business profits or any other unfair benefits. Improper solicitations include both direct requests and requests through third-parties. Also, we must not oblige with improper requests from stakeholders.

🔍 Please refer to the "CJ Global Anti-Corruption Policy" for more details.

### NO BRIBERY

We do not exchange, demand or promise any improper money or anything of value to employees of government agencies, public state-owned companies, public institutions, international organizations, regardless of the local business practices. This applies to both your own conduct and those involving third parties (including dealers, customs agents or other people acting on your behalf).

### GIFTS AND HOSPITALITY FOR BUSINESS



Money or anything of value include money, goods and other proprietary benefits, as well as all other tangible and intangible benefits that provide convenience and satisfy the desires of a person. There are following specific types of money or other valuables:

Proprietary Benefits	Money, securities, real estate, goods, accommodation vouchers, memberships, admission tickets, discount tickets, invitation tickets, land use rights, etc.
Provision of Convenience	Providing entertainment with food, liquor, golf, etc., transportation and lodging accommodations, etc.
Economic Benefits	Debt forgiveness, employment offer, grant of rights and privileges, etc.

Gifts and hospitality for business must be for the purpose of forming and maintaining a healthy working relationship, and you must not provide gifts and hospitality that may affect your ability to conduct business fairly. Each country has its own laws and regulations, culture and practice when it comes to gifts and hospitality, but you must exchange them within a lawful and appropriate scope under any circumstances. If you are not sure whether or not providing gifts and entertainment would be appropriate, you should report it to your supervisor and contact the Legal/Compliance Department.

## HIRING THIRD PARTIES TO WORK ON OUR BEHALF



The raw materials sent to the Vietnamese worksite have been held at customs for several weeks. The customs officer in Vietnam is not explaining why, and the official in charge seems to be taking his time on purpose. At this time, someone calling himself a “customs consultant” approached us claiming that we can get customs clearance right away through him. Can we hire this consultant to clear customs quickly?



When hiring a third party, such as outside agents, consultants, etc., to deal with government official on behalf of the Company in a particular region, you must make sure that no improper methods, such as bribery, are used. Besides direct bribes, providing improper gifts to third parties for the purpose of bribing someone else can also be subject to punishment. If you need to hire a third party, you must consult with the Legal/Compliance Department.



## WE RESPECT THE INTERNATIONAL TRADE ORDER AND ABIDE BY THE LAWS AND REGULATIONS OF EACH COUNTRY.

Our business activities affect customers, nations and communities around the world. We comply with all relevant laws and regulations in the countries and communities where CJ does business, and we try our best to understand their commercial practices and cultures. We will become a true global No. 1 lifestyle company when we observe the international trade order and respect the different cultures of each country.

### COMPLYING WITH GLOBAL COMPETITION LAWS

Competition laws of each country protect the competition order of both domestic and overseas markets and create a foundation on which we can compete fairly against our competitors with our products and services. We understand precisely how the diverse and complex obligations required by the competition laws of each country where we do business are applicable to our work and comply with them diligently.

### COMPLYING WITH INTERNATIONAL TRADE REGULATIONS

We figure out in advance how the legal and economic sanctions, such as import and export controls, trade restrictions and commercial embargos, enforced by each country affect us and comply with those applicable to us. When it comes to complying with international trade regulations, we must be especially cautious with the following:



- Transferring strategic materials or discussing/transmitting confidential information to non-nationals when it is prohibited
- Filling out import and export clearance documentation accurately (indication of origin of goods, classification of items and proper entry of reported prices, etc.)
- Complying with trade bans and economic sanctions that prohibit trade with certain nations or businesses in certain nations
- Checking for the requisite application procedures and applying in advance if a separate license is required for export
- Exporting at a price lower than the normal price or receiving inappropriate government aids to promote export when it is prohibited

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## **NO MONEY LAUNDERING**

We use legitimate funds to operate our business lawfully. You must not engage in money laundering that conceals the source or use of funds involving tax evasion, drug trafficking, terrorism and bribery, or any other unlawful economic activities. We must be especially cautious with the following, as they are very likely to be illegal financial transactions:



- Splitting a high-value transaction into multiple small transactions below the reporting threshold to avoid the reporting requirement, or engaging in abnormally complicated transactions
- Transactions that take place in or are related to a tax haven or a region notorious for terrorism, drug trafficking or money laundering activities
- Using a payment method associated with money laundering, such as bulk purchases of prepaid items like money orders and gift certificates, or large cash transactions
- Unusual domestic or foreign fund transfers that may be viewed as fraudulent or unlawful