

CJ GLOBAL SUPPLY CHAIN ETHICS POLICY



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1. INTRODUCTION

OVERVIEW

CJ (hereinafter referred to as “CJ,” “we,” or “our”) is dedicated to achieving its vision of being a “global lifestyle company that creates health, joy, and convenience” by upholding the core values of Integrity, Passion, Creativity, and Respect. This vision cannot be achieved by CJ alone; this vision can only be achieved through the collaboration of CJ and its Business Partners (as defined in the Definitions section). To pursue this joint pursuit, we have established the CJ Global Supply Chain Ethics Policy (hereinafter referred to as the “Policy”).

This Policy outlines the principles and standards that CJ expects its Business Partners to follow in order to promote mutual growth and proactively mitigate legal and ethical risks within the supply chain.

CJ encourages and expects Business Partners to thoroughly review and comply with this Policy and to take its own responsible actions to prevent any violations.

STANDARDS AND PRINCIPLES

CJ has developed (CJ Business Code of Conduct) along with global compliance policies such as the CJ Global Anti-Corruption Policy, CJ Global Fair Competition Policy, CJ Global Economic Sanctions Compliance Policy, and CJ Global Privacy Policy, all founded on the principles outlined in (CJ Business Code of Conduct). Through these efforts, CJ is committed to clearly communicating its values and vision both internally and externally, and to upholding them within our sphere of influence.

CJ also supports internationally recognized ethical, social, and environmental values and best practices, including the UN Global Compact (UNGC), the UN Guiding Principles on Business and Human Rights (UNGPs), and the OECD Guidelines for Multinational Enterprises, in addition to complying with the applicable laws and regulations of various countries where CJ conducts business. We are continuously striving to adhere to these standards.

This Policy is intended to assist Business Partners in understanding and following the principles and standards outlined in (CJ Business Code of Conduct) as well as our global compliance policies, and applicable laws, regulations, and international guidelines. Our goal is to establish a compliance baseline and encourage all Business Partners to align with these standards and consistently comply with all applicable laws and regulations.

SCOPE AND WORLDWIDE APPLICATION

This Policy applies to all CJ Business Partners worldwide.

"Business Partner(s)" refers to any individual or entity involved in providing or purchasing products or services, delivering, distributing, or engaging in business relations with CJ (e.g., participants in CJ's or CJ-related supply chains, value chains, collaborators, suppliers, venture partners, agents, representatives, contractors, vendors, consultants, sales agents, distributors, external legal advisors, or joint venture partners).

CJ expects all Business Partners to develop and follow policies, guidelines, and procedures that are either equivalent to this Policy or of a similar standard, as permitted by applicable law. Furthermore, Business Partners should actively ensure that their business associates adopt and follow guidelines comparable to those in this Policy and implement appropriate measures to verify compliance.

In certain situations, this Policy may impose higher standards than those required by local regulations or international norms. When this Policy differs from or conflicts with local laws, regulations, or international standards, Business Partners should follow the more stringent requirements and comply with all applicable laws.

Additionally, Business Partners are encouraged to ensure compliance with their internal policies, and local regulations and international standards by implementing management systems that promote supply chain transparency and providing regular or as-needed employee training.

2. DEFINITIONS

- A. **"CJ"** refers to the CJ Corporation, its subsidiaries, and its affiliates domestically and internationally.
- B. **"CJ Alert Line"** refers to all channels for compliance alerts including violations of this Policy such as website, e-mail, telephone, facsimile, mail, CJ Whistle or any other channels designated or operated by each of CJ.
- C. **"Confidential Information"** refers to non-public information that includes, but is not limited to, business plans and performance, pricing of products and services, costs (including cost of goods), internal financial data, research and development, technology, intellectual property, marketing, sales networks, personal information about employees, customers, and business partners, information classified as confidential under confidentiality agreements signed by the company, and other sensitive business information of a similar or equivalent nature.
- D. **"Intellectual Property Right"** refers to all rights related to intellectual property that may be recognized or protected under laws or treaties such as, without limitation, the Patent Act, Utility Model Act, Design Protection Act, Trademark Act, Copyright Act, and laws concerning unfair competition and trade secrets.

3. ETHICS

Business Partners are encouraged to follow below ethical standards (but not limited to) in partnership with CJ to foster sustainable growth.

CONFLICT OF INTEREST

Business Partners should promptly inform CJ if a conflict of interest arises or is likely to arise. Business Partners should transparently disclose all potential conflicts of interest and cooperate with CJ to take appropriate measures to address the issue.

Business Partners should conduct their business in an open and transparent manner to avoid conflicts of interest that could impair CJ's objective and fair decision-making. Business Partners are expected to refrain from engaging in inappropriate transactions or seeking unfair advantages and should take steps to proactively prevent and manage conflicts of interest in their operations, pursuant to applicable law.

Conflict of Interest?

A conflict of interest refers to a situation where an individual's or an organization's private interests may interfere with or undermine the fair and transparent execution of their duties. For example, a conflict of interest can arise if someone selects a company in which they have a direct or indirect investment, or a company with which they have familial ties, as a business partner without following a reasonable and transparent process, such as competitive bidding. In these instances, pursuing personal gain may undermine the fairness and impartiality of their job performance, making it essential to avoid such situations.

ANTI-CORRUPTION

CJ is dedicated to complying with anti-corruption laws and regulations in every country where it operates or where its business activities have an effect. CJ expects Business Partners to uphold the same standards.

Business Partners should comply with anti-corruption guidelines issued by multinational and international organizations, as well as all relevant laws and regulations in their respective countries or regions, to ensure integrity and transparency.

Business Partners should avoid any involvement, whether direct or indirect, in bribery, kickbacks, or other unethical practices related to business decisions or efforts to gain unfair advantages, pursuant to all relevant applicable laws and regulations.

To prevent bribery and corruption, Business Partners are expected to implement effective robust internal controls. Business Partners should also maintain accurate and transparent financial and accounting records to prevent improper payments or bribes from being concealed or disguised as legitimate business expenses.

GIFT, HOSPITALITY, ENTERTAINMENT

CJ is dedicated to complying with all applicable laws, regulations, company policies, and procedures related to gifts, favors, and entertainment in every country where it operates or where its business activities have an effect, with the goal of building mutually beneficial business relationships.

Business Partners should avoid offering, receiving, requesting, or promising any gifts, favors, entertainment, or other benefits to or on behalf of CJ that could improperly affect business decisions or compromise the fairness and objectivity of transactions, considering relevant laws and local practices.

If gifts or favors from Business Partners could be perceived as potentially undermining the integrity of CJ or its employees, or if they are considered inappropriate under applicable laws, Business Partners should not offer or promise such items.

FAIR COMPETITION

CJ is dedicated to complying with fair competition and antitrust laws and regulations in every country where it conducts business or where its business activities have an effect. CJ expects Business Partners to uphold the same standards.

Business Partners are expected to conduct their operations based on the principles of fair and open competition. This includes eliminating practices such as price-fixing, bid rigging, market allocation, boycotts, illegal information exchanges, and other unfair trade practices. By adhering to these standards and all applicable laws, Business Partners contribute to maintaining a fair and competitive marketplace.

INFORMATION SECURITY

Business Partners are expected to safeguard Confidential Information, personal information, and Intellectual Property Rights of CJ and other Business Partners during their business activities. Business Partners should ensure that this information is obtained legally and utilized only within the bounds of any permissions granted.

CONFIDENTIAL INFORMATION

Business Partners should protect CJ's and other Business Partners' Confidential Information, ensuring it is not misused at any time during or after their engagement. Unauthorized disclosure of the Confidential Information is strictly prohibited. Additionally, even if Confidential Information is obtained lawfully, using it for insider trading—such as trading CJ-related securities directly or through intermediaries—is not allowed.

PERSONAL DATA

Business Partners should comply with personal data protection laws and regulations applicable in their respective countries. Business Partners should fulfill obligations related to the collection, use, provision, and international transfer of personal data. Business Partners should implement appropriate technical and administrative measures to ensure data security, regularly monitor and enhance these measures, and respond promptly to data breaches, following relevant reporting procedures and all applicable laws.

INTELLECTUAL PROPERTY

Business Partners should legally and fairly use the Intellectual Property Rights of CJ and third parties. Business Partners should comply with applicable laws and regulations, prevent any infringement of these intellectual property rights, and ensure that these rights are used strictly within the agreed-upon boundaries and not in any unauthorized manner.

INFORMATION SECURITY MANAGEMENT SYSTEM

To safeguard CJ's and third parties' Confidential Information, personal data, and intellectual property, Business Partners are expected to establish and maintain an effective information security management system and should comply with applicable law. This includes implementing access control policies, data protection policies, and management systems, and conducting regular employee training. The system should prevent breaches and ensure a swift and effective response to any incidents.

INTERNATIONAL TRADE SANCTIONS AND EXPORT/IMPORT CONTROL

CJ is dedicated to complying with global trade laws and regulations established by individual countries, international organizations such as the UN, and other relevant authorities, including those in South Korea, the European Union, and the United States. CJ expects Business Partners to uphold the same standards. Global trade laws and regulations refer to those related to economic sanctions, embargoes, and other trade and export-import restrictions.

Business Partners should comply with export and import regulations that apply to the movement of products and technologies across borders and are expected obtain and manage necessary documentation, such as certificates of origin, in accordance with relevant laws and regulations.

Pre-transaction Screening

Business Partners must conduct screening to ensure that they do not engage in prohibited transactions with individuals or entities subject to trade and export/import restrictions. This applies to both transactions and the supply chain.

Business Partners are expected to ensure that their employees, agents, and subcontractors are not subject to economic sanctions or listed on sanctions lists. Business Partners are also expected to ensure that individuals or entities on sanctions lists do not have direct or indirect ownership or control over them. Additionally, Business Partners should commit to refraining from engaging in any sanctioned or prohibited activities, whether directly or indirectly, without prior authorization from the relevant authorities.

Please note that if a violation of this section occurs, CJ reserves the right to immediately suspend its business relationship with Business Partners and, in certain cases, pursue legal action.

4. LABOR

CJ supports the UN Guiding Principles on Business and Human Rights (UNGPs) and is dedicated to comply with human rights and labor-related laws and regulations in every country where it conducts business or where its business activities have an effect. CJ expects Business Partners to uphold the same standards.

HUMAN RIGHTS

Business Partners are expected to uphold human rights and to reasonably and diligently address any abuses, and to also perform human rights due diligence as outlined in the UNGPs to identify and mitigate negative impacts and take proactive measures to address these issues effectively.

Due diligence on human rights according to the UN's Guiding Principles on Business and Human Rights

Human rights due diligence

17. In order to identify, prevent, mitigate and account for how they address their adverse human rights impacts, business enterprises should carry out human rights due diligence. The process should include assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed.

Human rights due diligence:

- (a) Should cover adverse human rights impacts that the business enterprise may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships;
- (b) Will vary in complexity with the size of the business enterprise, the risk of severe human rights impacts, and the nature and context of its operations;
- (c) Should be ongoing, recognizing that the human rights risks may change over time as the business enterprise's operations and operating context evolve.

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WORKPLACE ENVIRONMENT

Business Partners should comply with labor laws in each country, including regulations on working hours and minimum wage.

Business Partners are expected to foster a work environment where employees are treated with respect, fairness, and dignity. This includes maintaining a workplace free from harassment, stalking, gender discrimination, sexual harassment, sexual abuse, mental or physical coercion, and verbal abuse. Business Partners are expected to ensure that their work environments do not tolerate hostile conditions or threats of any kind.

PREVENTION OF FORCED LABOR AND HUMAN TRAFFICKING

Business Partners should not engage in or support any form of involuntary labor or human trafficking, including, but not limited to, forced labor, bonded labor or slavery. Participation in or support of such activities is explicitly prohibited.

CHILD LABOR

Business Partners should comply with the legal minimum employment age requirements and conditions for minors set by each country and adhere to international standards. Business Partners should not interfere with the legally mandated education of minors and should not employ children or minors in work that could negatively impact their health, safety, or moral well-being due to the nature of the work or working conditions, in accordance with applicable law.

DISCRIMINATION

Business Partners are expected to make every effort to provide equal opportunities and create an environment where all employees are treated fairly. Business Partners should ensure that employees are not discriminated against on the basis of race, skin color, religion, nationality and region, gender, sexual orientation, age, disability, military service, or other protected characteristics under applicable laws and regulations.

5. HEALTH AND SAFETY

CJ is dedicated to complying with all health and safety regulations in every country where it conducts business or where its business activities have an effect. CJ expects Business Partners to uphold the same standards.

WORKPLACE SAFETY

Business Partners are expected to take proactive measures to minimize potential hazards in the workplace and prevent accidents and injuries. Additionally, Business Partners are expected to provide regular training and education to ensure that employees understand environmental, health, and safety issues, thereby supporting a safe working environment.

Business Partners are expected to establish emergency plans and response procedures to prepare for natural disasters, infectious diseases, wars, workplace accidents, and other emergencies. It is recommended that Business Partners conduct regular training and drills to ensure that employees are well-prepared to handle these situations safely and effectively, thereby minimizing potential damage and ensuring a safe working environment.

QUALITY AND SAFETY

Business Partners should comply with all safety laws and regulations related to the provision of products and services, as well as follow all standards, procedures and guideline set forth or required by CJ.

Business Partners are expected to regularly assess and enhance their quality management processes to improve the safety of products and services, minimize defects, and uphold the highest industry standards while complying with the latest quality and safety regulations.

6. ENVIRONMENT

CJ supports international environmental treaties, such as the United Nations Framework Convention on Climate Change (UNFCCC) and is dedicated to complying with the environmental protection laws and regulations in all countries where it conducts business or where its business activities have an effect. CJ expects Business Partners to uphold the same standards.

COMPLIANCE WITH ENVIRONMENTAL LAWS

Business Partners should comply with environmental laws and regulations and are expected continuously monitor for changes and respond appropriately. This includes obtaining and maintaining all required environmental permits and licenses in accordance with environmental regulations and adhering to specified conditions. Business Partners are expected to keep their environmental permits and licenses up to date and renew them in a timely manner to avoid non-compliance.

MINIMIZING ENVIRONMENTAL POLLUTION, RESOURCE EFFICIENCY, AND MANAGING ENERGY USAGE AND GREENHOUSE GAS EMISSIONS

Business Partners should comply with environmental regulations at every stage of their operations, including production, distribution, and service delivery, and should take a proactive role in environmental protection.

Business Partners are expected to rigorously manage environmental pollution, hazardous substances, waste, and wastewater according to environmental laws and minimize risks. Emissions that could negatively impact air, soil, or water quality must be properly handled, with proactive efforts made to reduce harmful emissions. Business Partners are expected to accurately measure and energy consumption and greenhouse gas emissions and take steps to minimize them.

Additionally, Business Partners are expected to reduce the consumption of natural resources by utilizing alternative resources, recycling, and reusing materials. This necessitates ongoing improvement initiatives that involve adopting efficient technologies to lower energy consumption and implement resource-saving strategies

7. CO-OPERATION WITH CJ

DUE DILIGENCE, MONITOR, CONSEQUENCE OF NON-COMPLIANCE

CJ is committed to working alongside Business Partners to create sustainable value, address ethical, social, and environmental challenges, and find solutions to related issues.

To support this goal, CJ may conduct regular or ad-hoc reviews and assessments to ensure compliance with this Policy. CJ expects Business Partners to promptly provide any necessary information and collaborate effectively to address and resolve any identified issues.

If Business Partners fail to comply with this Policy, CJ may suspend or terminate the business relationship. Additionally, if CJ suffers any damages as a result of the Policy violations, CJ may exercise its rights as provided by applicable laws and regulations.

REPORTING TO CJ

If a Business Partner suspects or discovers any action(s) that could potentially violate this Policy, the Business Partner is encouraged to notify a CJ representative or report the matter through the CJ Alert Line. The CJ Alert Line is an online reporting platform available 24/7, 365 days a year.