

LG CNS Supplier Code of Conduct

Preamble

LG CNS Co., Ltd. and its subsidiaries (hereinafter referred to as "LG CNS") aim to create sustainable value together with customers, suppliers, and society across diverse industry sectors, including digital transformation (DX), IT services, system integration (SI), cloud, artificial intelligence (AI), data, smart factories, and smart cities.

As a global company, LG CNS adopts respect for human rights, ethical management, environmental protection, information security, and compliance management as its core management principles. These principles shall equally apply to all transactions and business relationships with suppliers.

Accordingly, LG CNS has established 「**LG CNS Supplier Code of Conduct**」 (hereinafter referred to as the "Code") based on international standards, applicable domestic and foreign laws and regulations, industry standards, and LG Group policies. All suppliers conducting business with LG CNS shall comply with this Code and are responsible for introducing and implementing equivalent standards within their own supply chains.

Where this Code conflicts with relevant laws, regulations, or contractual terms, the more stringent standard shall prevail. LG CNS or a third party designated by LG CNS may conduct written assessments, request relevant documentation, or perform on-site audits to verify compliance with this Code. Suppliers shall cooperate with such assessments.

1. Human Rights and Labor

Child Labor and Protection of Young Workers

Suppliers shall not employ individuals below the minimum working age as defined by applicable laws and regulations in each country or region. For young workers, suppliers shall strictly comply with all applicable legal requirements regarding working hours, working conditions, and restrictions on night or hazardous work.

Prohibition of Forced Labor and Human Trafficking

All forms of forced labor, debt bondage, confiscation of visas or identification documents, human trafficking, or any labor performed against a worker's free will are strictly prohibited. Employment relationships shall be based on the voluntary consent of workers.

Employment Contracts and Wages

Suppliers shall provide workers with written employment contracts in a language understandable to them. Wages, allowances, and overtime compensation shall be paid accurately and in a timely manner in accordance with applicable legal standards in each country.

Non-Discrimination and Respect for Diversity

Suppliers shall not discriminate employees on the basis of gender, age, nationality, race, ethnicity, religion, political belief, disability, medical condition, sexual orientation, gender identity, marital or pregnancy status, union membership, or any other reason. Equal opportunity shall be provided in all employment practices, including recruitment, placement, promotion, compensation, and training.

Prohibition of Workplace Harassment and Inhumane Treatment

Sexual harassment, verbal abuse, threats, corporal punishment, mental or physical coercion, and any other inhumane treatment are strictly prohibited. Suppliers shall establish internal policies and reporting procedures to prevent such conduct.

Working Hours, Rest, and Holidays

Working hours, rest periods, and holidays shall comply with applicable laws and regulations in each country. Where overtime is unavoidable, compensation shall be provided in accordance with legal requirements. Workers shall be granted regular rest periods.

Freedom of Association and Collective Bargaining

Suppliers shall respect workers' rights to freedom of association and collective

bargaining. No discrimination, retaliation, or disadvantage shall result from the exercise of such rights.

2. Business Ethics and Compliance Management

Principles of Ethical Management

Suppliers shall comply with all applicable laws and international standards in conducting business and shall establish internal standards and procedures to ensure ethical decision-making based on integrity and transparency.

Prohibition of Corruption, Bribery, and Improper Conduct

Suppliers shall not, directly or through third parties, offer, provide, solicit, promise, or accept bribes, gifts, entertainment, hospitality, favors, or any improper benefits. This prohibition includes all forms of conduct intended to obtain or retain business or secure undue advantages.

Prevention of Money Laundering and Illegal Financial Transactions

Suppliers shall not engage in money laundering, tax evasion, illegal fundraising, or similar activities and shall establish and operate appropriate internal control procedures in accordance with applicable laws.

Management of Conflicts of Interest

Suppliers shall identify and manage situations where personal interests of employees may conflict with the interests of the company or LG CNS. Any actual or potential conflict of interest shall be disclosed and addressed through appropriate procedures.

Fair Trade and Competition Law Compliance

Suppliers shall prohibit collusion, price manipulation, abuse of market dominance, and unfair trade restrictions, and shall respect fair and free competition.

Accounting Transparency and Accuracy of Records

All transactions, expenses, and assets shall be accurately and completely recorded in accounting books and internal systems. Falsification, alteration, misleading entries, or provision of inaccurate information are strictly prohibited.

Reliable Disclosure and Reporting

Information related to labor, occupational health and safety, environmental matters, business activities, financial condition, and compliance management shall be properly managed and reported in accordance with applicable laws and industry practices. False or misleading disclosures are prohibited.

Compliance with Export Controls and Economic Sanctions

Suppliers shall comply with export control and economic sanctions laws and regulations applicable under the United Nations (UN), the United States, the European Union (EU), and other relevant countries and regions. Suppliers shall not engage, directly or indirectly, in unlawful transactions with sanctioned countries, entities, or individuals.

Internal Controls and Training

Suppliers shall establish and operate internal control systems to prevent ethical and compliance risks and provide regular training and awareness programs for employees.

3. Health and Safety

Safe Working Environment

Suppliers shall identify and assess potential health and safety risks arising from workplaces and project execution processes and implement preventive measures to eliminate or minimize such risks, ensuring a safe and healthy working environment.

Legal Compliance and Management Systems

Suppliers shall comply with applicable occupational health and safety laws and regulations and establish management systems that include defined responsibilities, procedures, training, and inspection activities.

Education and Training

Suppliers shall provide regular job-related health and safety training to workers. Pre-assignment training shall be provided to new hires, reassigned employees, and personnel deployed to project sites.

Accident Prevention and Emergency Response

Suppliers shall establish emergency response procedures to enable prompt and effective action in the event of industrial accidents or emergencies and maintain their effectiveness through regular inspections and drills.

Work Environment and Equipment Safety

Facilities, equipment, and personal protective equipment used in data centers, installation sites, maintenance operations, smart factory and smart city projects, and other relevant environments shall comply with applicable standards. Additional protective measures shall be taken for hazardous work.

Safety of Housing and Welfare Facilities (Where Applicable)

Where housing or dormitories are provided to workers, such facilities shall meet applicable safety and hygiene standards.

4. Information Security and Personal Data Protection

Establishment of Information Security Management Systems

Suppliers shall establish, operate, and continuously improve information security policies, organizations, and procedures.

Protection of Information Assets

Suppliers shall protect information assets of LG CNS and its customers, including systems, data, and source code, from unauthorized access, leakage, or damage.

Personal Data Protection

Suppliers shall comply with applicable personal data protection laws and implement data minimization, purpose limitation, and secure disposal practices.

Incident Response and Reporting

In the event of an information security incident, suppliers shall take immediate action and notify LG CNS without delay.

Protection of Intellectual Property Rights

Suppliers shall respect intellectual property rights related to software, documents, and deliverables and shall prohibit unauthorized use.

5. Environmental Protection

Compliance with Environmental Laws and Permits

Suppliers shall comply with all applicable environmental laws, regulations, and permitting requirements.

Management of Environmental Impacts

Suppliers shall assess and manage environmental impacts, including energy use, greenhouse gas emissions, electronic waste, wastewater, and waste management.

Promotion of Environmentally Friendly Activities

Suppliers shall make reasonable efforts to utilize environmentally friendly technologies and improve environmental performance.

6. Responsible Procurement

Principles of Responsible Procurement

Suppliers shall establish and implement responsible procurement principles to prevent adverse impacts related to human rights, labor, ethics, environment, health and safety, and information security throughout procurement activities.

Scope of Procurement

Responsible procurement applies to all goods and services provided for the execution of LG CNS business activities, including IT services, system integration (SI), software development and maintenance, cloud and data center operations, consulting, infrastructure construction and installation, equipment leasing, outsourcing services, and dispatched or subcontracted personnel services.

Human Rights and Labor Risk Management

Suppliers shall make reasonable efforts to prevent violations of human rights and labor laws and international standards, including forced labor, child labor, discrimination, and workplace harassment, in relation to procured services and supplier operations.

Ethics and Compliance Risk Management

Suppliers shall establish appropriate procedures and controls to prevent bribery, corruption, improper solicitation, conflicts of interest, money laundering, and other ethical and compliance violations in procurement processes.

Information Security and Confidentiality

Suppliers shall implement contractual, technical, and administrative measures to protect LG CNS and customer information assets, personal data, and trade secrets accessed or acquired in the course of procuring IT services and outsourced services.

Management of Sub-suppliers

Where sub-suppliers are engaged, suppliers shall share the responsible procurement principles set forth in this Code and make reasonable efforts to ensure compliance.

Risk Identification, Mitigation, and Remediation

Where risks related to human rights, ethics, environment, or information security are identified in procurement activities, suppliers shall review and implement mitigation measures and, where necessary, take corrective actions within a reasonable scope.

Due Diligence and Cooperation

Where LG CNS conducts reviews, inspections, or due diligence related to responsible procurement pursuant to applicable laws or contracts, suppliers shall cooperate.

7. Grievance Mechanism

Establishment and Operation of Reporting Channels

Suppliers shall establish and operate grievance reporting channels accessible to all stakeholders, including workers, sub-suppliers, and local communities, regarding risks or actual or potential adverse impacts related to human rights, labor, ethics, environment, health and safety, and information security arising from the implementation of this Code. Such channels shall ensure confidentiality and anonymity and be designed in accordance with relevant international standards, including the UN Guiding Principles on Business and Human Rights.

Anonymity and Non-Retaliation

Reporters shall be permitted to submit reports anonymously or under their real names. Retaliation in any form, including dismissal, disciplinary disadvantage, discrimination, threats, or harassment, against individuals who raise concerns is strictly prohibited. Suppliers shall establish, disclose, and effectively implement non-retaliation policies.

Receipt and Investigation of Grievances

Suppliers shall promptly and fairly verify the facts related to received grievances and protect the rights and personal data of all parties involved during investigations.

Corrective Actions and Remedy

Where investigations confirm adverse human rights or environmental impacts, suppliers shall implement corrective actions within a reasonable period to cease or mitigate such impacts. Where harm to stakeholders is identified, appropriate remedies, including monetary or non-monetary compensation, shall be provided to support restoration to the extent possible.

Cooperation with LG CNS Investigations and Measures

Suppliers shall cooperate with fact-finding, investigations, and corrective actions related to matters received through LG CNS grievance procedures.

Pledge of Compliance with the LG CNS Supplier Code of Conduct

We hereby confirm that we have thoroughly reviewed and understood the **LG CNS Supplier Code of Conduct** (the "Code") and pledge to faithfully comply with its requirements.

We acknowledge that this Code serves as an important standard in our business relationship with LG CNS and its subsidiaries and understand that compliance with this Code constitutes part of our contractual obligations. We further acknowledge and agree that violations of this Code may constitute a material breach of contract with LG CNS, and that if such violations are not remedied within a reasonable period, LG CNS may take necessary measures in accordance with applicable laws and contracts, including restriction of transactions or termination of the relevant agreement.

We agree to cooperate, within the reasonable scope permitted by applicable laws and contracts, with written assessments, document requests, or on-site audits conducted by LG CNS or a third party designated by LG CNS to verify compliance with this Code.

We agree to provide access to relevant materials, information, and personnel reasonably required in connection with this Code, and acknowledge that such materials may be used solely for purposes permitted by applicable laws, regulatory requirements, or LG CNS supply chain management and risk response activities.

We shall make reasonable efforts to share the principles of this Code with our employees and sub-suppliers and to ensure compliance.

Where violations of this Code are identified, we shall take reasonable corrective measures. Where violations by sub-suppliers persist, we shall review and consider necessary measures, including adjustment of the business relationship within a reasonable scope.

We acknowledge that this Code may be amended or supplemented by LG CNS in response to changes in applicable laws, policies, or business environments. In the event of any conflict between this Code and a contract entered between LG CNS and us, we agree that this Code may prevail to the extent permitted by applicable laws and contracts.

We shall retain documents and records related to key risks identified in connection with this Code and subsequent measures for the period required by applicable laws and contracts and shall notify LG CNS if we become aware of any material violation of this Code.

Date: []

Company Name:

Representative: (Signature)