

ETHICAL MANAGEMENT

INNOSPACE Conduct Policy

: Honesty, Fair, Ethical Value

INNOSPACE has established an Ethical Management Conduct Policy that makes decisions based on Honesty, Fair, and Ethical Values.

In business activities, INNOSPACE consider Ethics and Social Responsibility as the priority values.

INNOSPACE will establish an Ethical Culture by conducting business Fairly and Reasonably as the standard for all business activities.

ETHICAL MANAGEMENT SYSTEM

INNOSPACE carries out ethics management through the Investor Relations (IR) Team within the Investment Strategy Division. The IR Team supports the establishment and implementation of ethics management policies, operates the compliance management system, and manages the reporting of unethical conduct as part of the Company's ethics practices.

The Human Resources Team is responsible for administering employees' ethics pledges and operating the Personnel Committee.



ETHICAL STANDARDS AND GUIDELINES

INNOSPACE's Ethical Standards and Guidelines includes the INNOSPACE Conduct Policy, code of ethics, Guidelines of ethics conduct, code of conduct for reporting unethical behavior, code of personnel management, and employment rules.

REPORT UNETHICAL BEHAVIOR

- 01.** Violation of the company's Ethical Standards and Guidelines, leaking or using the company's confidential information for personal gain,

- 02.** Unlawful acts related to work (embezzlement, abuse of trust, fraud, theft, bribery, etc.),

- 03.** Unlawful or unfair instructions (Bribery, Influence peddling, etc.) to company members or external stakeholders by using one's position,

- 04.** Any other matters that are judged to have a risk of occurring are defined as unethical acts and are being reported. INNOSPACE ensures that violations of ethics are punished appropriately.

Code of Ethics

Established: February 6, 2023

Revised: July 10, 2026

INNOSPACE Co., Ltd. is committed to creating value through ethical management and delivering the highest quality products and services by leveraging its exceptional human resources and advanced technologies. Driven by respect, fairness, and transparent ethical practices within the framework of a free market economy, we aspire to grow as a world-class company. To uphold these principles, we have established the following Code of Ethics as the foundation for our actions and decision-making.

Chapter 1. General Provisions

Article 1 (Purpose)

This Code is intended to define the ethical decision-making and judgment standards necessary for implementing ethical management at INNOSPACE Co., Ltd. (hereinafter referred to as “the Company”), and to promote management transparency and sustainable growth.

Article 2 (Definition of Terms)

“Ethical management” in this Code refers to the act of prioritizing ethics and social responsibility in business operations and performing all tasks fairly and rationally based on such values.

Article 3 (Scope of Application)

Unless otherwise specified by law, the Articles of Incorporation, or other regulations, this Code shall apply to all employees and executives of the Company.

Chapter 2. Basic Ethics of Employees

All employees shall fully align themselves with the Company’s management philosophy, objectives, and core values. They shall perform their assigned duties with the utmost integrity and fairness, and shall consistently endeavor toward self-development in order to cultivate a sound moral compass.

Furthermore, they shall strive to promote cohesive interpersonal relationships and contribute to the creation of a harmonious and productive work environment.

Article 4 (Basic Ethics)

1. Employees shall take pride and self-esteem toward the Company, always maintaining an attitude of honesty and sincerity.
2. Employees shall share the Company’s management philosophy and vision, and fulfill their assigned responsibilities with creativity and diligence to achieve the Company’s goals and values.

3. Employees shall respect the fundamental value of human dignity and strive to maintain and enhance personal integrity as well as the Company's reputation with high ethical standards.
4. In performing their duties, employees shall comply with all applicable laws and regulations while acting in a manner consistent with their conscience.

Article 5 (Duty of Due Diligence)

1. Employees shall strive to avoid unnecessary expenditure and waste when consuming or utilizing Company resources.
2. Employees shall not engage in any actions that undermine their duty of due care, even in cases where laws or regulations are incomplete or insufficient.
3. Employees shall carry out their duties in a manner that maximizes the effectiveness relative to the costs incurred.

Article 6 (Healthy Organizational Culture)

1. Employees shall observe basic workplace etiquette in their interactions and shall not engage in disrespectful language or behavior, acts of defamation or actions that infringe upon the personal dignity against other employees.
2. Employees shall build a cooperative organizational culture based on mutual trust and respect.
3. Employees shall not form factions or private groups based on familial ties, regional connections, or academic affiliations that create discord within the organization or undermine a healthy organizational culture.
4. Employees shall not engage in improper solicitations, excessive gift-giving, or monetary transactions with one another beyond socially accepted norms. However, acts of mutual assistance or gift exchanges within the socially acceptable limits may be exceptions.
5. Supervisors shall not issue unreasonable instructions to subordinates. Subordinates shall strive to carry out their supervisors' work-related directives to the best of their ability but must refuse any unlawful or unjust instructions.

Article 7 (Self-Development)

Employees shall establish an ideal model of a desirable talent for themselves and continuously strive to align with it through ongoing self-development.

Article 8 (Fair Performance of Duties)

1. Employees shall perform their duties fairly in accordance with applicable laws and regulations.
2. Employees shall not engage in unethical or illegal acts, such as issuing unreasonable instructions, making solicitations or requests, granting undue favors, or any other actions that may hinder their own or others' fair performance of duties.

Article 8-2 (Prohibition of Illegal and Unjust Acts)

Employees shall not engage in the following acts related to their duties that exceed the scope of socially accepted conventions:

1. Receiving compensation from stakeholders: monetary gifts, entertainment and hospitality, loans, debt repayment or guarantees, monetary transactions, or future assurances.
2. Unfair equity participation in partner companies: receiving or investing in listed or unlisted shares, joint investments, or joint acquisition of assets.
3. Granting unfair opportunities that lack transparency in the selection of partner companies, engaging in unfair trade practices, or leaking supplier information.
4. Illegal or unjust use of Company assets: using tangible or intangible assets for purposes other than intended, embezzlement, or misappropriation of funds.
5. Manipulating or falsifying documents and figures, creating false documents, altering figures, or making false reports.
6. Other acts such as negligence of duty, lack of supervision and oversight, abuse of authority, or actions that damage dignity.

Article 9 (Avoidance of Conflicts of Interest)

1. Employees shall avoid any actions or interests that conflict with the Company's interests in the course of performing their duties.
2. In cases where the interests of the Company conflict with those of an individual or department, employees shall prioritize the Company's interests.
3. Employees shall not engage in actions that result in personal compensation or benefits unless prior approval or authorization has been obtained from the Company.

Article 10 (Distinction Between Public and Private Matters)

1. Employees shall clearly distinguish between public and private matters in the performance of their duties and shall not use their position or authority to pursue personal gain.
2. Employees shall not use Company assets for personal purposes or utilize budgets for purposes other than their intended use without the Company's approval or authorization, causing financial damage to the Company.
3. Employees shall not engage in profit-oriented activities unrelated to their duties or hold concurrent positions without the Company's prior approval or authorization.
4. Employees shall not allocate time to personal matters during working hours, thereby hindering their job performance, nor use the Company's information and communication systems for inappropriate purposes unrelated to work.

Article 11 (Information Management and Protection of Intellectual Property Rights)

1. Employees shall not disclose or provide to third parties with any information or confidential matters of the Company, its customers, or business partners acquired in the course of performing their duties without prior authorization or approval from the Company. Employees shall comply with applicable laws and Company regulations when using or managing intellectual property, including trade secrets.

2. Employees shall exercise due care in managing materials containing information or confidential matters of the Company, its customers, or business partners to prevent any unauthorized disclosure of third parties and shall make every effort to prevent theft or related incidents.
3. Employees shall not infringe upon or misuse the intellectual property rights of others in a manner that may cause legal or ethical issues for the Company.

Article 12 (Transparent Information and Accounting Management)

1. Employees shall acquire and manage all information in a lawful and transparent manner, and accounting records and related information shall be accurately and honestly documented and maintained.
2. Employees shall not submit false or exaggerated reports, nor conceal or monopolize critical information for the benefit of specific individuals or departments.
3. The Company shall disclose management information in accordance with laws to ensure transparency and reliability in its operations.

Chapter 3. Ethics Toward Customers

We prioritize respect for customers and the protection of their interests as our highest value. Through continuous innovation and research and development, we strive to create value that maximizes customer benefits. By conducting business activities from the customer's perspective, we endeavor to earn their unwavering trust and always meet their needs and expectations.

Article 13 (Respect for Customers)

1. With the belief that "INNOSPACE exists because of its customers," the Company shall always respect its customers and consider them as the core value in all judgments and actions related to business activities.
2. The Company shall treat all customers fairly and equally, while respecting their rights.

Article 14 (Providing Value to Customers)

1. The Company shall strive to become a world-class enterprise by continuously developing technologies and improving quality to deliver the highest quality products and services, thereby creating value that meets the needs and expectations of customers.
2. Employees shall consistently listen to and humbly accept customer opinions and suggestions, respond promptly and accurately to legitimate customer demands, and ensure that all commitments made to customers are faithfully honored.

Article 15 (Protection of Customer Interests)

1. Employees shall not disclose customer-related information to any third party or use it for purposes other than its intended use without the prior consent of the customer. Employees shall make their utmost efforts to safeguard the customer's property and reputation.

2. Employees shall carefully and strictly protect customers' information, assets, trade secrets and intellectual property rights. Employees shall not infringe upon customer interests through unethical or unlawful acts.
3. Employees shall promptly and accurately provide customers with any facts they are entitled to know or that should be rightfully disclosed to them.

Chapter 4. Ethics Toward Competitors and Business Partners

We secure competitive advantages through legitimate means by respecting the principles of a market economy, economic freedom, and creativity, in accordance with the principles of free competition and fair trade. We build mutual trust and cooperative relationships through fair and transparent transactions and comply with all applicable laws and the fundamental values of society.

Article 16 (Compliance with Trade Regulations)

Employees shall comply with all applicable laws and regulations of the respective countries and regions in conducting business and commercial activities, and shall respect domestic and international trade practices.

Article 17 (Pursuit of Free and Fair Competition)

Employees shall respect the principles of a market economy and pursue fair and legitimate competition with competitors based on mutual respect, in accordance with the principles of free and fair competition.

Article 18 (Fair Transactions)

1. All transactions conducted by employees shall be carried out in a fair and transparent manner, ensuring equality between the parties involved.
2. Employees shall not abuse a superior position in business relationships to demand money or valuables, impose unfair trade terms, interfere with management, or make any other improper demands.

Chapter 5. Ethics Toward Employees

The Company shall respect the human dignity and fundamental rights of all employees to the fullest extent, ensure fair treatment based on individual competence and performance, and promote an environment that encourages creative thinking and autonomous actions.

Article 19 (Respect for Employees)

The Company shall treat employees as dignified individuals with trust and confidence, and shall respect their personal religious and political beliefs as well as their privacy.

Article 20 (Fair Treatment)

1. The Company shall grant equal opportunities to employees based on their individual abilities and qualifications, and shall evaluate and reward their performance and achievements fairly, fostering a culture of mutual growth through healthy competition.
2. The Company shall not discriminate in employment, placement, evaluation, or compensation based on academic background, age, gender, religion, family ties, place of origin, physical disability, or any other unreasonable grounds.

Article 21 (Fostering Talent Development and Creativity)

1. The Company actively supports the development of employees' capabilities and fosters them into professional and creative talents
2. The Company shall create an environment that encourages all employees to freely make suggestions and express their opinions, in order to promote original thinking and autonomous behavior.

Article 22 (Sharing of Management Vision and Philosophy)

1. The Company shall clearly present its management philosophy, vision, and objectives to ensure that all employees can share and put them into practice.
2. The Company shall establish a smooth and efficient communication system to disclose appropriate information to employees and strive to provide necessary information in a timely manner.

Article 23 (Enhancement of Quality of Life)

1. The Company shall establish systems to enable employees to perform their duties by legitimate means and shall strive to ensure that employees can achieve pride and fulfillment through their work.
2. The Company shall endeavor to create a pleasant and safe working environment, and to enhance employees' quality of life by promoting health, education, and welfare.

Chapter 6. Ethics Toward Society

As part of its social responsibilities, the Company faithfully fulfills the roles and obligations required by society and pursues harmony, cooperation, and mutual prosperity with the local community.

Article 24 (Social Contribution)

1. The Company shall fulfill its social responsibilities as a corporate citizen by complying with laws and ethical standards, creating employment through sustainable business activities, and faithfully paying taxes.
2. Employees shall contribute to the development of the nation and society by fostering the Company's growth and soundness through reasonable and responsible performance of their duties, thereby creating social value.

3. As members of the local community, employees shall endeavor to participate faithfully in social contribution activities with continuous interest and dedication, and the Company shall actively support such activities to promote the development of the local community.

Article 25 (Prohibition of Improper Political Activity)

1. The Company and its employees shall not be improperly involved in political activities and shall not directly or indirectly provide illegal donations or expenses to political parties, politicians, or election candidates.
2. The Company shall respect the political views of individual employees; however, employees shall not engage in political activities in their capacity as employees so that their personal political views are not misconstrued as the Company's political position.
3. Employees shall not use the Company's organization, personnel, or assets for political purposes.

Article 26 (Environmentally Friendly Management)

1. Employees shall comply with environmental laws and regulations and shall endeavor to protect the environment and prevent pollution.
2. In all business activities, including research and development and production, employees shall give priority to the preservation of the environment.

Article 27 (Safety and Risk Prevention)

1. Employees shall comply with all domestic and international laws and standards related to safety, and shall endeavor to manage and prevent accidents and risks.
2. In the event of fire, disaster, or any other emergency, employees shall actively cooperate with response measures to ensure prompt recovery and minimize damage.

Article 28 (Labor-Management Harmony)

1. The Company and its employees, as joint stakeholders, shall pursue a mutually beneficial and cooperative labor-management relationship based on mutual trust and understanding.
2. The Company and its employees shall work together to create a happy workplace by fostering an organizational culture of labor-management harmony.

Article 29 (Compliance with International Norms)

Employees shall comply with international conventions and regulations in the course of international transactions, respect the laws and cultures of the host country, and contribute to the economic development of the local community.

Chapter 7. Ethics Toward Shareholders

The Company protects shareholders' investment returns by realizing stable profits through sound management activities and establishes a relationship of mutual trust with shareholders by faithfully disclosing management information.

Article 30 (Disclosure of Management Information)

The Company shall faithfully disclose management information, including business activities, at an appropriate time and in an appropriate manner in accordance with relevant laws and regulations. The processing and reporting of accounting data shall comply with the accounting regulations of the respective country or with international accounting standards.

Article 31 (Management of Internal Information)

1. Employees shall strictly manage internal information obtained in the course of their duties and shall not disclose such information within or outside the Company except when necessary for business purposes.
2. Employees shall strictly manage material non-public information and other internal information obtained in the course of their duties, and shall not use such information for trading in stocks or other securities, nor disclose it within or outside the Company.

Article 32 (Protection of Shareholder Interests)

1. The Company shall protect shareholders' investment returns by realizing stable profits through sound management activities.
2. The Company shall respect shareholders' right to information and legitimate demands, and shall establish a relationship of mutual trust with shareholders through ethical management.

Chapter 8. Duty of Compliance

All employees shall comply with the Code of Ethics and Executives and managers shall be responsible for educating and supervising their staff to ensure compliance with the Code.

Article 33 (Compliance Obligation and Responsibility)

1. Employees shall comply with the Code of Ethics and the Ethical Management Guidelines set forth in Annex 1, and shall be held accountable for any violations thereof.
2. Executives and department heads shall be responsible for supervising their staff to ensure compliance with the Code of Ethics.

Article 34 (Reward and Disciplinary Action)

1. The Company may grant appropriate rewards to employees who contribute to the establishment of ethical management.
2. The Company may take disciplinary or other necessary actions against employees who violate the Code of Ethics.

Chapter 9. Supplementary Provisions

Article 35 (Operation of the Code)

1. The Company shall continuously revise, develop, and implement the provisions of these regulations in accordance with changes in management conditions and the business environment.
2. Matters not specified in these regulations shall be governed by the Company's other internal regulations, relevant laws and regulations, and generally accepted social norms.

Addendum

Addendum (Established February 6, 2023)

This Code shall be effective from February 6, 2023.

Addendum (Revised December 6, 2024)

This revised Code shall be effective from December 6, 2024.

Addendum (Revised July 10, 2026)

This revised Code shall be effective from July 10, 2026.