

PLATEER Ethics Charter

We at PLATEER shall think, judge, and act in a just and fair manner, fulfill our social responsibilities, and pursue to share benefits with our stakeholders, the country, and mankind through efforts made for ceaseless development as a leading business always working with customers. Accordingly, we hereby enact our Rules for Ethical Behavior to be observed by all members concerned. We shall strive to maintain the Company's honor and individual employees' dignity by observing the law, social norms, and generally accepted ethical values based on customer-oriented ways of thinking and the attitude of pursuing a fair and clean corporate culture and putting emphasis on the importance of customer value. We shall duly fulfill our duties in earnest, respect other members, and strive to contribute to the Company's development with an active and creative stance.

[Observance of Norms]

We shall not engage in misconduct violating the law, Company regulations, basic social values, and our moral conscience.

We shall conduct ourselves as follows:

- ① Observe the law and avoid unlawful misconduct so as not to be punished under the criminal law.
- ② Carry out the Company's business in a fair and proper way, observing internal regulations and relevant laws.
- ③ Refrain from engaging in an unethical conduct that may be blamed by others in connection with our daily lives and company work.
- ④ Refrain from accepting bribes of economic value such as money, gift or entertainment that may lead to impairment of fairness in connection with our Company work unless it is a case acceptable under the social norms.
- ⑤ Refrain from engaging in conduct that may put a burden on people including those of a subcontractor such as notifying them of a congratulatory/ bereavement occasion.
- ⑥ Refrain from using company property for a private purpose, nor disclosing company-related secret information to an outsider.
- ⑦ Keep well aware of the Company's social responsibilities, use opportunities and cope with risks proactively, carry out acts according to international criteria on business management, and strive to set an example for others to follow.
- ⑧ Hold a mandatory training session for prevention of workplace sexual harassment in the workplace at least once a year, and punish violators severely, with the session informing employees of the following prohibitions.
 1. Refrain from engaging in conduct that may make another employee feel sexually humiliated, in vulgar language, or in discriminatory behavior forcing traditional gender roles on another employee.

2. Refrain from making vulgar jokes or forcing a female employee to drink alcohol and dance, etc.
 3. Refrain from viewing obscene material through the internet, computer communications or other media at work.
 4. Refrain from making a sexual lewd comment on another employee's appearance.
 5. Refrain from making intentional or unnecessary physical contact with another employee.
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- ⑨ We shall not use illegal computer software.
 - ⑩ We shall not engage in conduct objectively judged to be unethical.

[Faithfulness]

We shall make every effort to carry out our duties in earnest with integrity and fairness, while keeping the following in mind:

- ① Strive to duly abide by the Company's management philosophy.
- ② Strive to predict and prevent risks that may occur in relation to decisions made and actions taken, and to solve problems with a due sense of responsibility.
- ③ Strive to work closely with colleagues and those of other departments.
- ④ Refrain from offering money or gift except in the following cases:
 1. A supervisor spending money for or offering a gift to his/her subordinates without a reciprocal condition;
 2. Members of a department offering gifts to someone on his/her birthday;
 3. Offering a gift as a pure expression of gratitude not being in return for a reciprocal favor
- ⑤ Money gifts offered between employees for a joyous or sad occasion shall be voluntary and be acceptable under generally accepted social practices.
- ⑥ Employees shall not lend or borrow money to/from each other. When a such case is inevitable, they shall obtain permission from his/her superior.
- ⑦ An employee shall not engage in joint and several liabilities or a mutual guarantee with another employee except for offering a guarantee with the approval of one's supervisor for an in-house loan for the sake of the employees' welfare.
- ⑧ An economic benefit such as money/valuable/entertainment shall not be offered to another employee in return for an illicit/ personal favor.
- ⑨ Employees shall prioritize the common good of the Company above oneself when their personal interest is in conflict with that of the Company.

[Mutual Respect]

We shall recognize each individual as a valuable and dignified person. We shall make every effort to work as employees with a positive mindset and sound mind, keeping the following in mind:

- ① Refrain from engaging in an act that may be regarded as discourteous.
- ② Refrain from using vulgar language to another employee.
- ③ Be mindful to adopt a neat and dignified stance at all times; refrain from engaging in conduct that may make another person feel uneasy.
- ④ Refrain from discriminating people on the basis of their academic status, gender, religion, age or regional origin.

[Fairness in Transactions]

We shall strive to build trust in a relationship with our business partners by maintaining transparency and fairness in transactions and to pursue mutual development, keeping the following in mind:

- ① Strive to guarantee an equal opportunity for participation to all in a business deal based on the principle of free competition, and provide relevant information equally to all participants in a business deal.
- ② Strive to ensure that all transactions go through sufficient discussions so that they may proceed fairly based on mutual benefit.
- ③ Refrain from changing transaction-related conditions or procedures unilaterally without prior discussion with subcontractors.
- ④ Refrain from engaging in conduct prohibited in the laws related to fair transactions.

[Pursuit of Mutual Development]

- ① We shall maintain order in matters concerning contracts signed with subcontractors on an equal footing, regarding them as our partners, and shall work to promote mutual cooperation with them.
- ② We shall help subcontractors build their competitiveness, and pursue mutual development with them.
- ③ We shall work with subcontractors to well internalize with our Ethics Code and Rules for Ethical Behavior, and incentivize them to abide by them.

[Refrain from unethical conduct against subcontractors]

- ① We shall not accept money/valuables, entertainment or convenience provided by a subcontractor in connection with the business except for those acceptable under social norms.
- ② We shall not engage in unethical conduct including the following in carrying out the Company's business activities.
 1. An attempt to take benefits of personal interest, especially illicit benefits associated with cashable intangible assets that we can access in the course of building or operating a website.
 2. Borrowing money from a subcontractor.
 3. Borrowing or leasing an asset from/to a subcontractor for personal convenience or benefit or having a subcontractor provide collateral for a purpose of personal interest, exploiting the relationship between the Company and a subcontractor.
 4. Committing unethical conduct against a subcontractor, exploiting the relationship between the Company and a subcontractor.