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제정일자	2024. 7. 1.
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Ethics & Compliance Policy

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SHINHWA LOGISTICS SERVICE CO., LTD

제/개정이력

개정 번호	개정일자	개정사유	비고
1	2024. 7. 1	신화로직스 윤리경영 규범	
2	2026. 6.22	신화로직스 윤리경영 규범 개정	
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	직책			
	성명			
	서명			
	일자			

Chapter 1. General Provisions

Article 1 (Purpose)

The purpose of this Policy is to establish the principles and standards of conduct required for all employees of Shinhwa Logics Co., Ltd. (hereinafter referred to as the "Company") and its business-related stakeholders to conduct business based on ethical management and compliance management, in accordance with applicable laws, international standards, and social responsibility requirements

Article 2 (Scope of Application)

This Policy applies to all employees of the Company as well as all stakeholders engaged in business relationships with the Company, including suppliers, distributors, agents, and service providers.

Article 3 (Principles of Ethical Management)

The Company establishes and commits to implementing standards of conduct and value judgment that all employees shall observe in order to promote ethical and compliant management.

1. The Company complies with all applicable domestic and international laws and regulations, as well as international standards.
2. The Company conducts transparent and fair business activities and pursues mutual growth with local communities.
3. The Company builds transparent and trustworthy relationships with business partners and relevant institutions and pursues shared prosperity with all stakeholders.
4. The Company respects human rights, prohibits discrimination and unfair treatment, and provides a safe and healthy working environment.
5. The Company promotes cooperative labor-management relations based on trust and mutual respect.
6. The Company pursues environmental protection and sustainable management and complies with applicable environmental laws and

regulations.

7. The Company does not permit child labor below the legally established minimum working age.

8. The Company complies with occupational health and safety laws and implements preventive measures and training to protect the safety and health of employees.

Chapter 2. Fundamental Ethics of Employees

Article 4 (Workplace Ethics)

1. Employees shall perform their duties faithfully in accordance with Company policies and regulations.
2. Employees shall comply with applicable laws and internal regulations when performing their duties.
3. Employees shall protect Company assets and information and shall not disclose confidential information obtained in the course of work to external parties.
4. All decision-making processes and business records shall be accurately prepared and maintained, and any unauthorized destruction, concealment, or falsification is prohibited.
5. Employees shall act with dignity and professionalism, recognizing that they represent the Company.

Article 5 (Separation of Public and Private Interests)

1. Employees shall not use Company assets for personal purposes or for purposes other than those intended.
2. Abuse of position for improper requests, solicitations, or coercive acts is prohibited.
3. Employees shall not use information obtained through their duties for personal gain.
4. All transactions and business activities shall be conducted transparently and fairly.

Article 6 (Prevention of Conflicts of Interest)

1. In the event of an actual or potential conflict of interest, employees shall immediately report the matter to their supervisor or the audit department.
2. Any improper promise, provision, or acceptance of benefits for personal gain is prohibited.
3. Employees shall not engage in outside employment for profit without prior approval from the Company.

Article 7 (Compliance with International Standards)

1. All domestic and international business activities shall comply with applicable laws and regulations of the relevant countries and respect customary business practices.
2. The Company pursues fair transactions and does not engage in monopolistic or anti-competitive practices.
3. The Company does not engage in or facilitate illegal fund creation or money laundering.
4. The Company complies with export controls, regulations, sanctions, and embargo measures stipulated by treaties or agreements between countries.
5. The Company strictly protects personal information, does not infringe intellectual property rights, and does not produce counterfeit products or parts.

Article 8 (Employee Relations)

1. Employees shall not engage in factionalism or discrimination based on educational background, gender, age, nationality, race, religion, disability, or region of origin.
2. Employees shall not engage in excessive gift-giving or financial transactions with one another.
3. Employees shall comply with legitimate instructions from supervisors but shall refuse improper solicitations or unlawful directives.

4. If an employee determines that a supervisor’ s instruction interferes with fair job performance, the employee shall explain the impropriety and, if unresolved or if disadvantages occur, consult a supervisor or the audit department.
5. Employees shall not engage in conduct that causes sexual humiliation or violates the dignity of others.

Article 9 (Transparent Accounting Management)

1. The Company complies with the tax laws of each country where it operates and does not evade legitimate tax obligations.
2. Employees shall acquire and manage information lawfully and transparently, and accounting records shall be accurately and honestly prepared and maintained.
3. The Company discloses management information in accordance with applicable laws and regulations to enhance transparency and credibility.
4. Employees shall not disclose or improperly use job-related information without prior approval from the Company’ s representative.

Chapter 3. Ethics Related to Business Partners

Article 10 (Transparent Management and Anti-Corruption)

1. Employees shall comply with domestic and international anti-corruption conventions.
2. Employees shall not engage in illegal fund creation or money laundering.
3. A zero-tolerance principle applies to all forms of bribery, corruption, improper benefits, and embezzlement.
4. Employees shall not engage in improper instructions or grant undue preferential treatment that interferes with fair performance of duties.
5. The provisions of this Article apply to both the Company and its business partners.

Article 11 (Fair Trade and Anti-Monopoly)

1. The Company provides equal opportunities to all qualified individuals and entities in bidding and contract processes for construction, services, and procurement.
2. All transactions shall be conducted fairly on an equal footing and carried out transparently in open and customary business settings.
3. Employees shall not demand money, valuables, or make improper demands such as management interference toward business partners.
4. The Company respects market competition and engages in fair competition based on mutual respect.
5. The Company pursues fair and cooperative relationships with business partners and does not engage in unfair trade practices.
6. The Company does not abuse market dominance or transactional position in a manner that undermines fair competition.
7. The provisions of this Article apply to both the Company and its business partners.

Article 12 (Whistleblower Protection and Non-Retaliation)

1. The identity of whistleblowers shall be strictly protected.
2. Any person who discloses the identity of a whistleblower shall be subject to disciplinary action in accordance with Company regulations.
3. Whistleblowing procedures shall be publicly communicated to ensure that concerns may be raised without fear of retaliation.
4. The Company does not permit any disadvantage or retaliation against whistleblowers acting in good faith.

Article 13 (Prevention of Counterfeit Products)

1. The Company manages its supply chain to prevent the use of unauthorized or counterfeit parts.
2. The Company requires and manages business partners to periodically verify that counterfeit materials or parts are not used or produced at their facilities.

Article 14 (Responsible Raw Material Management)

1. The Company ensures the identification of minerals and smelters from specific regions associated with serious human rights or environmental concerns.
2. Raw materials derived from illegally logged timber shall not be used within the Company’s supply chain.
3. The Company ensures that raw materials and parts manufactured using forced labor, directly or indirectly, are not supplied within its supply chain.

Article 15 (Information Security)

1. The Company endeavors to protect personal information of all individuals involved in its business, including employees, customers, consumers, and business partners.
2. Confidential or security-sensitive information of customers shall not be disclosed without authorization.
3. Individuals handling personal information shall receive regular training.

Article 16 (Protection of Intellectual Property)

1. The Company protects the trade secrets of business partners under contractual relationships and does not infringe upon the intellectual property rights of others.
2. The Company protects intellectual property owned by business partners and periodically verifies whether such rights are being infringed.

Article 17 (Compliance with Export Controls and Economic Sanctions)

1. The Company complies with international trade restriction regulations and applicable laws.
2. The Company shall not engage in transactions with countries, regions, corporations, organizations, or individuals subject to export controls or economic sanctions.
3. The Company manages related documents, including certificates of

origin, in accordance with established procedures and cooperates with status verification activities when required.

Article 18 (Disclosure of Corporate Management Information)

1. The Company records and discloses information related to management activities, financial structure, and business performance in accordance with applicable disclosure laws and regulations.

Chapter 4. Handling of Violations

Article 19 (Reporting of Violations)

1. Employees shall report any violation of this Policy to the Company, and reported matters shall be handled by the audit department.
2. The Company shall maintain confidentiality for whistleblowers and shall not impose any personnel-related disadvantages.
3. Any person who retaliates against a whistleblower shall be subject to aggravated disciplinary action in accordance with Company regulations.

Article 20 (Handling of Violators)

1. When a violation of this Policy is identified, the head of the relevant department shall prepare written documentation of the matter and immediately notify the audit department.
2. The audit department shall review the reported matter and determine appropriate actions in accordance with the Disciplinary Committee regulations.
3. Appropriate measures, including suspension of transactions, shall be taken against involved business partners depending on the severity of the case, and compensation for Company losses shall be pursued.
4. With respect to employees of business partners, corrective actions shall be requested from the relevant partner, and compensation for losses may be pursued against the responsible party or business partner.

Article 21 (Disciplinary Measures)

1. Disciplinary measures for violations of this Policy shall be handled in accordance with the Company's Disciplinary Committee regulations.
2. Matters not specifically stipulated in the Disciplinary Committee regulations shall be handled in accordance with this Policy.

Article 22 (Disciplinary Measures)

1. Disciplinary measures for violations of this Policy shall be handled in accordance with the Company's Disciplinary Committee regulations.
2. Matters not specifically stipulated in the Disciplinary Committee regulations shall be handled in accordance with this Policy.

Article 23 (Details of Disciplinary Actions)

1. Acceptance of money or valuables from business partners: disciplinary action against the employee and suspension of transactions with the business partner.
2. Solicitation of money or valuables through abuse of authority: disciplinary action against the employee.
3. Improper solicitation or exertion of undue influence: determination of disciplinary action following deliberation by the Disciplinary Committee.

Article 24 (Rewards for Reporting Violations)

1. Whistleblowers who report violations of this Policy may be rewarded with cash equivalent to up to 10% of the confirmed amount, subject to verification of facts.
2. The Company strictly protects the confidentiality of whistleblowers.