SAMSUNG SDS Code of Conduct Guidelines 2021, 7.



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E S G

Compliance and Ethics Clean Organizational Culture

Respect Customers/ Shareholders/Employees

Caring for Environment/Safety/Health

Fulfill Social Responsibility

Samsung SDS has established the 'Samsung SDS Code of Conduct' which is the standard for employees' behavior and value judgment to comply with laws and ethics and fulfill corporate social responsibilities.

Today, the world demands more from businesses to fulfill their social responsibilities in regards to the environment, society and governance. In active response to such demand, we have adopted 'Samsung SDS Code of Conduct Guidelines' to act on the principles of the company.

All of us at Samsung SDS will strive for sustainable business by fully understanding and actively practicing the Code of Conduct Guidelines.

Preface

- Our Commitments and Policies
- Risk Management Using the Guidelines
 - Scope of the Guidelines
 - Reporting Violations



Preface

01 Our Commitments And Policies

• We at Samsung SDS strive to drive positive change and contribute to a better world through our innovative products and services. Our core values, [people, excellence, change, integrity and co-prosperity] demonstrate our dedication toward a brighter future for mankind, and are at the heart of every decision we make. 'Samsung SDS Code of Conduct Guidelines'("Code of Conduct Guidelines") is founded on five 'Samsung Business Principles' and ensure that we are holding ourselves to the highest standards in complying with laws and ethics.

Samsung Business Principles				
1. We comply with laws and ethical standards.	2. We maintain a clean organizational culture.	3. We respect customers, shareholders and employees.	4. We care about the environment, health and safety.	5. We are a socially responsible corporate citizen.

• All Samsung SDS employees, mindful that we are the representation of the corporate value and reputation of the company, shall comply with the law and maintain high ethical standards. These 'Code of Conduct Guidelines' were written based on our 'Samsung SDS Code of Conduct' to guide all employees to make the proper judgments. Samsung SDS respects and protects the fundamental human rights taking into account international human rights principles and standards set forth in the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the Organization for Economic Co-operation and Development's guidelines for multinational enterprises, the UN Convention on the Rights of the Child, the ILO Declaration on Fundamental Principles and Rights at Work, and the laws of the countries in which we operate.

02

Risk Management

• The societal and environmental challenges our world is facing bring about an uncertain business environment and the risks in our business often pertain to consequences in business performance or corporate reputation as well. Samsung SDS approaches these risks in an effort to effectively minimize any harm to our employees and the environment, and to our global business. Samsung SDS assesses the various factors that may become a risk to the company in an uncertain business environment and establishes countermeasures to manage risks effectively.

• In the course of business activities at Samsung SDS, there will inevitably be risks that arise from the ever-changing global society. All employees should be prepared to face such risks swiftly and appropriately, according to their roles and responsibilities. It is an employee's right and responsibility to be well-informed, using guidance from the 'Samsung SDS Code of Conduct' and 'Code of Conduct Guidelines'. Samsung SDS relies on the employees' collective effort to prevent and minimize corporate risks.

Preface	03 Scope of The Guidelines	 The guidelines apply to all employees at Samsung SDS. Employees whose job description entails purchasing, taxation, marketing, sales and environment-related activities are also expected to work in compliance with additional policies applicable to their job. For suppliers of Samsung SDS, we strongly advise that they consider and implement the contents of the 'Code of Conduct Guidelines' applicable to their business management, while enforcing the mandatory 'Samsung SDS Suppliers' Code of Conduct.'
	04	 Samsung SDS expects all employees to make the right decisions based on sufficient information. When making business decisions for Samsung SDS, all employees are expected to conduct a self-diagnosis via the
		'Code of Conduct Guidelines' to review whether the problems and outcomes involved in the decision have been adequately considered.Along with the guidelines, employees are recommended to refer to our 'Samsung SDS Code of Conduct' and other
	05	detailed policies when seeking guidance in making decision.
	Violations	 Samsung SDS has dedicated channels through which our employees can report ethical violations and/or non- compliance. Employees may call, mail, send a fax or submit an online report on the website. The reports are carefully reviewed and handled discreetly.
		 If and when an employee detects instances of non-compliance, or possible non-compliance of 'Code of Conduct Guidelines' the employee is responsible for reporting his or her respective concerns to Samsung SDS website, company system (ethical management, CPMS), and audit team (audit.sds@samsung.com) and compliance team (compliance.sds@samsung.com) via email. If an employee becomes subject to illegal, immoral and/or prohibited actions, the employee is required to report the situation.
		 We want our employees to feel reassured in communicating with us openly and honestly, without the threat of consequences. Samsung SDS does not, under any circumstance, tolerate retaliation against any employee who makes a good faith report and/or refuses to partake in acts in violation of these guidelines.

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Compliance and Ethics

- Respect dignity and diversity of individuals
- Compete fairly and comply with the law and business ethics
- Ensure transparency in accounting with accurate accounting and disclosure
- Remain politically neutral Protect information of individuals and business partners



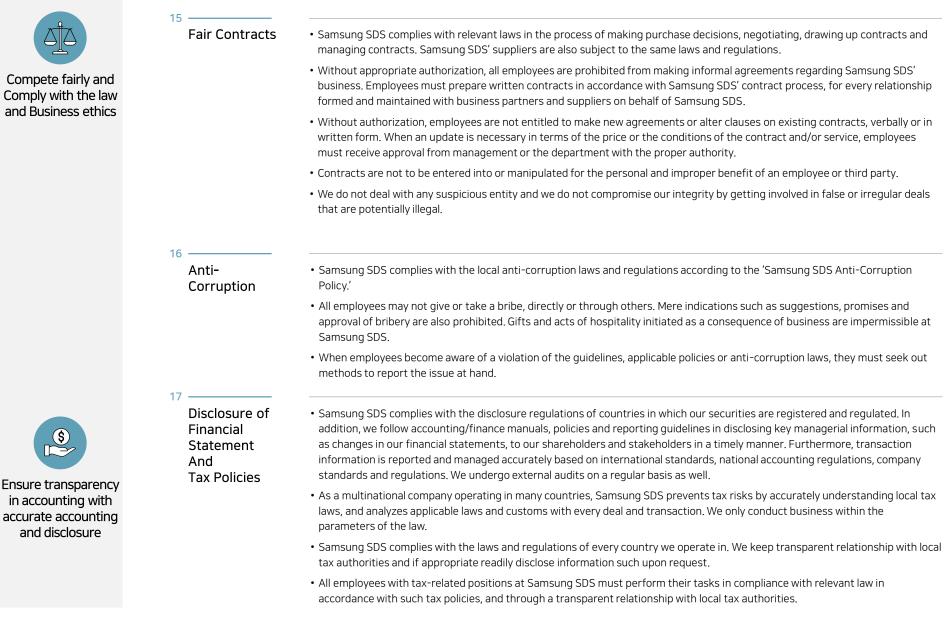
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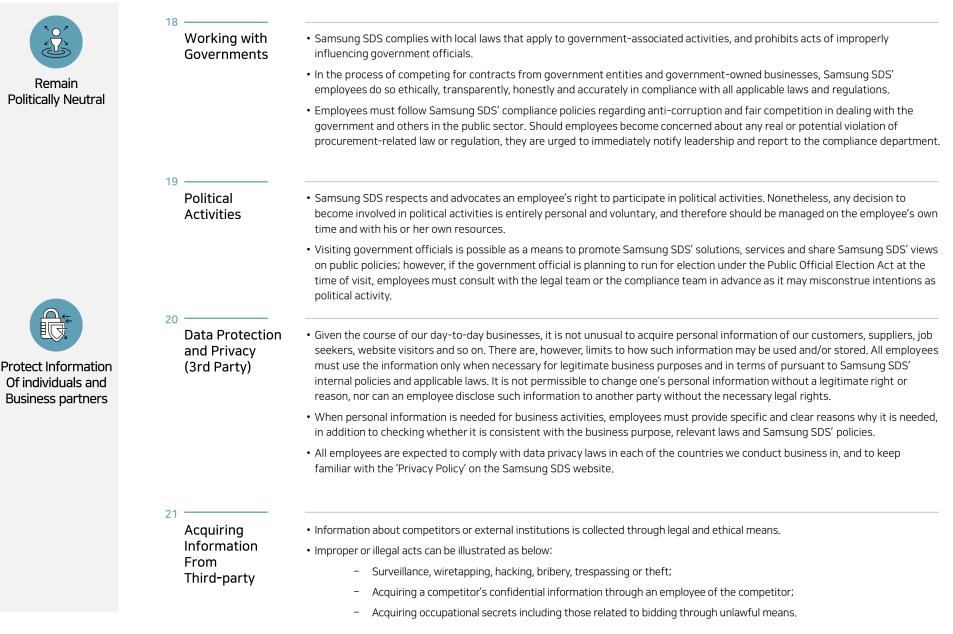
Work Samsung SDS strives to foster a creative, culturally diverse and collaborative work environment in which rights of all employees Environment are always respected. Samsung SDS does not and will not tolerate discrimination based on race, culture, religion, age and any other grounds pursuant to local law, or any harassment or offensive behaviors of employees that may disrupt the workplace or Respect dignity interfere with works of other employees. and diversity Samsung SDS provides various employee benefit systems and programs (telecommuting, maternity/paternity leave, infertility of individuals treatment leave, child care facilities and more) in order to improve the quality of our employees' lives. Our work spaces are designed to allow our employees with disabilities to work comfortably. · When giving instructions, supervisors shall not direct subordinates to carry out work that either violates applicable laws as well as Samsung SDS policies and procedures, or is irrelevant to business itself. Involuntary conduct of business, whether driven by physical or mental coercion, is also prohibited. 07 Employment • Working hours are decided according to the characteristics of each work area and the related regulations in each country. Wages Conditions are determined reasonably and fairly in accordance with relevant laws and standards. Samsung SDS' internal Compensation on Salaries and Benefits complies with applicable labor laws and regulations concerning wage, overtime allowance, social insurance, and vacation. • We adopt globally recognized standards on performance evaluation to ensure that our employees are treated fairly according to their competence and achievement thereby providing talented individuals with a better chance to excel as professionals. 08 Listening to • Samsung SDS endeavors to create the best work environment for our employees. We regularly listen to employee concerns Our employees through company communication channels. Moreover, the management attentively listens to employees on the basis of an open communication culture. Our objective is to maintain and develop a mutually cooperative and coexisting employer-employee relationship based on faith and trust. To this end, we recognize and respect our employees' right to freedom of association in accordance with local laws. When experiencing discomfort during work, our employees may use the company grievance resolution channel. Samsung SDS guarantees the anonymity of employees using the grievance resolution channel and the secrecy of the information collected through the channel.



II. Compliance and Ethics

8	09 <u> </u>	Samsung respects the privacy of current and former employees and treats all information with confidentiality and integrity.
	Data Protection and Privacy (Employee)	• With the exception of the following three occasions, employee consent shall always be required prior to disclosure of personal information:
Respect dignity	(p.c/cc)	 When required due to a particular legal regulation or obligation;
and diversity of individuals		 When required in performing tasks decided upon by a public authority;
		 When a legal representative cannot express intention or give prior consent, and when the information is deemed necessary for the imminent benefit of one's life and property.
	10 — Equality And Diversity	 To respect each individual's human rights, Samsung SDS provides equal opportunities to all qualified employees and applicants. We do not discriminate on the basis of gender, skin color, race, ethnicity, nationality, religion, age, marital status, sexual
		preference, sexual identity, social status, disability, pregnancy, military status, protected genetic information, or political affiliation in all processes such as work, promotion, compensation and disciplinary measures.
	11 Prevention of Child Labor	• Samsung SDS prohibits child labor as per the UN Convention on the Rights of the Child, The Children's Rights and Business Principles, and ILO Convention; and all our sites at home and abroad comply with them.
	12 Prevention of Forced Labor	• Samsung SDS strongly supports the right of voluntary labor and is committed to banning participation in, or imposition of, forced labor by means of mental or physical bondage.
Compete fairly and	13 — Fair Competition	 Samsung SDS complies with all laws and regulations that promote sound and healthy competition, which are commonly known as competition laws, monopoly and fair trade laws. Our 'Samsung SDS Fair Competition Policy' prohibits wrongful collaboration (settling price and contract terms, bid rigging, etc.) and unfair trading practices (abuse of power in trade, forced trade, etc.).
Comply with the law and Business ethics		 Not only Samsung SDS employees, but also business partners and suppliers are subject to applicable laws and regulations on fair competition. There is a strict zero tolerance policy in regard to bid rigging and similar conflicts.
	14	
	International Trade	• Samsung SDS abides by the related laws and regulations of each country when engaging in international trade. In order to export our products, solutions, services and technology, we comply with the export controls of each country.
	Compliance	 Our customers and business partners are included and excluded or otherwise updated according to the list of trade embargoes and governmental restrictions. Samsung SDS encourages all of our suppliers and business partners to follow regulations.







Protect Information

Of individuals and

Business partners

22 Handling Information

- Samsung SDS recognizes the importance of customer privacy and information assets of our customers, and we strive to be clear and transparent about how we collect, use, disclose, transfer and store information. Our 'Privacy Policy' comply with information management procedures and applies to Samsung SDS products, solutions, IT systems, website or online applications.
- Samsung SDS classifies information assets by their importance in order to protect such information assets from various security threats including damaging, forgery, theft and leakage, and regularly conducts risk assessments to manage the assets systematically.
- When inspections or inquiries by regulatory authorities take place, we expect our employees to notify our legal department and fully cooperate with authorities with the help of relevant departments.

III

Clean Organizational Culture

- Keep public and private matters separate
- Protect and respect the intellectual properties of the company and others
- Maintain dignity in activities outside of work





23 -

Keep public and private matters separate

nd	23	Conflicts of Interest	 When an employee's personal interest clashes with Samsung SDS' and creates a conflict of interest, the employee is expected to act in the best interests of Samsung SDS as opposed to pursuing personal interests or become divided in loyalty. In such a situation, the employee should first disclose and seek guidance where necessary from his or her manager or the human resources department. 				
rs	24		 A conflict of interest can arise in a situation related to activities outside of work. In some cases, an employee may be permitted to engage in the activity if he or she obtains approval of the manager and take steps to address the conflict. Also, we do not work for an organization that has interests in or with Samsung SDS. 				
	24	Using Assets and Premises	 Samsung SDS' assets and premi We do not allow theft, damage of Samsung SDS' assets and premi 	SDS' assets and premises. We als			
			• Samsung SDS' assets and premises include physical, financial, intellectual and human resource assets; communication systems; equipment; corporate charge cards; and other supplies.				
			• Employees shall not use Samsung SDS' assets and premises for personal reasons.				
	25	Insider Trading	 Using undisclosed material information about Samsung SDS or a third party for personal advantage (financial or otherwise) and/or share such information with others is strictly prohibited. 				
			 'Undisclosed material information' refers to information yet to be disclosed to the public or that has already been disclosed to the public but still within the period or time for each means of disclosure specified by the law, that may have significant influence on an investor's decision to trade in the public securities of a company. 				
				Types of Materi	al Information		
			Samsung SDS' financial performances such as revenue and dividend	Organizational changes such as acquisitions and mergers	The release of new products and services, breakthroughs in research etc.	Announcement of starting new businesses, etc.	
			 We do not tolerate unjust use of 	undisclosed material informatic	on in any of the countries where v	ve conduct business.	
			 We are prohibited to trade securities the establishment of a new facil facility. 		rial information. On the same not sting facility, we will not invest in		



Protect and respect the intellectual properties of the company and others

Maintain dignity

In activities

Outside of work

- Samsung SDS respects and complies with the laws and/or regulations that govern both the rights to, and protection of intellectual property.
- All employees are urged to protect Samsung SDS' intellectual property and trade secrets according to the 'Guidelines on Intellectual Properties.'
- Employees must disclose all intellectual property created in a business capacity. If an employee wishes to file for intellectual property rights other than through Samsung SDS, we advise him or her to seek advice and direction from the department in charge of intellectual property prior to filing the application.
- Prior to installing software from any source onto any computer or digital device provided by Samsung SDS, or prior to use for Samsung SDS business purposes, employees are advised to follow the applicable procedure of the department in charge. Also, through the Samsung SDS Software License Guidelines, we protect our customers, employees and company from illegal software. When using the Internet, employees shall refrain from actions that may violate IT security or make their device more susceptible to viruses.
- In case where an employee is excused from his or her employment at Samsung, the employee is to return all properties holding information regarding Samsung and avoid disclosing or using the information at all costs.
- Samsung has ownership of the intellectual property created during an employee's time as a Samsung employee, even after he or she leaves the position.

27 Proprietary Information

26

Intellectual

Property

- It is paramount that all employees follow the information security policies for managing and protecting proprietary information. We only use and disclose sensitive information when deemed necessary (need-to-know basis).
- We take cautionary measures against inadvertent or intentional disclosure of proprietary information. If an employee ceases to work for Samsung for any reason, the employee must continue to maintain confidentiality on information gained during his or her employment.
- The proprietary information of others shall not be obtained through illegitimate means. Any deeds that may instigate or encourage illegal acts are strictly prohibited.

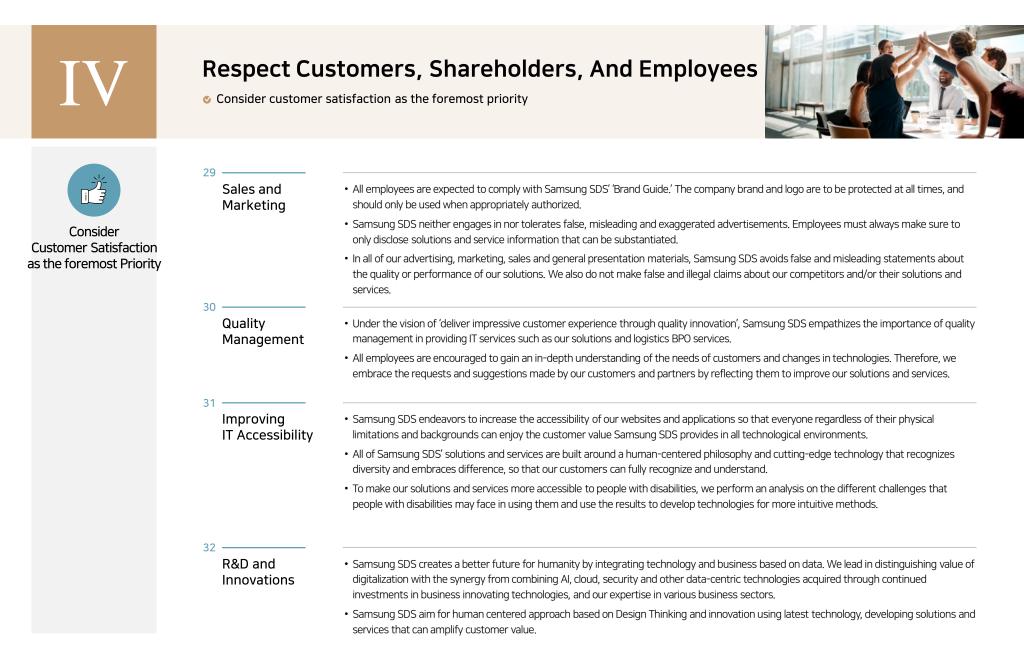
• All employees maintain confidentiality on sensitive information pertaining to customers, business partners, and suppliers.

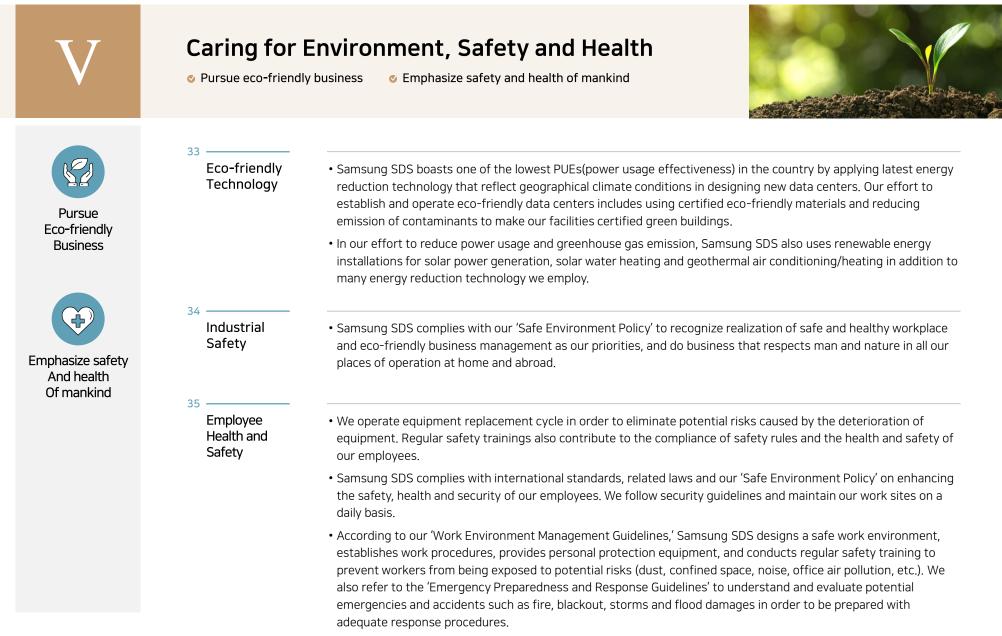
a	Proprietary Information	 Includes: earnings and other financial data, business plans and projections, information about current and future products and services, software in object or source code form, personnel information including executive and organizational changes etc.
Example	 Cautionary Cases of Information Leakage 	 We do not share proprietary information with friends, family, or former Samsung employees. We do not discuss proprietary information in public places (offline) or on social networks (online). We do not work on documents containing proprietary information in public places. We do not leak business activities that have not been publically announced. We do not leak photographed images and/or location information of key facilities of the company and our customers.

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Public Statements and Social Media Usage

- When employees must disclose their affiliation with Samsung SDS, or disclose any other information regarding Samsung SDS at a public event such as a seminar or an interview, they are always expected to receive prior authorization from the related department.
- The opinions that an employee voices in a public forum or post on social media belong only to the individual employee. We advise employees to not give the appearance that they are speaking or acting on behalf of Samsung SDS and other employees as a whole.
- Especially when using social media sites and blogs, we take extra care to follow the 'Employee Guidelines for Using Social Media' in order to prevent the leakage of confidential corporate information.





VI	 Respect local commu 	Onsibility As Global Corporate Citizen unity and cultural characteristics and mutually beneficial cooperative relationship with business partners
Respect Local community	nunity ural istics 37 Creating Shared Value 38 Co-prosperity Activities	 We see it as our responsibility to help enhance the quality of life for the people we serve and the local communities in which we operate. By creating employment opportunities in these areas and providing employee training opportunities through business activities, Samsung SDS contributes to the development of the talent in local communities, resulting in greater long-term impact.
and cultural Characteristics		 Samsung SDS employees, wherever they are located, are expected to carry out their duties and responsibilities as a member of the local community. Samsung SDS continuously develops and implements programs that are custom-fit to each community. Our technologies, services and experts provide local youth with the necessary skills and job training needed to build a better future. We actively encourage employees to participate in community service projects in the form of volunteer work, disaster relief and more.
Establish Co-existing		 Samsung SDS endeavors to mutually strengthen competitiveness through the support of our suppliers. We therefore establish action plans for co-prosperity, establish a healthy co-prosperity system and ultimately create shared value among Samsung SDS and stakeholders.
and Mutually Beneficial Cooperative Relationship	Supplier Management	 Samsung SDS mandates that suppliers with whom we do business must adhere to 'Samsung SDS Suppliers' Code of Conduct' published on our website and referenced in our suppliers' portal. Under the Suppliers' Code of Conduct, our suppliers are required to comply with international standards and local laws related to human
with Business partners		rights, child labor, working hours, forced labor, discrimination and environment.
		 Samsung SDS incorporates compliance management into our comprehensive supplier evaluation, along with other basic competencies such as technology, quality, and on-time delivery. Samsung SDS includes environment and human rights in the comprehensive supplier evaluations to ensure strict compliance to our policies and related laws and international standards are in place. We also monitor continuous compliance through supplier self-check sheets and assessments from internal and third party experts.
		 In the case of a violation by a supplier, Samsung SDS responds immediately and helps establish measures to prevent reoccurrence. Moreover, our employees are required to evaluate compliance management of new suppliers and are permitted to do business with suppliers operating with the same high standards that we expect of ourselves.
		 Samsung SDS recognizes our suppliers and business partners as strategic allies pursuing the shared value of customer satisfaction. Therefore, our employees shall not exert or attempt to exert influence to obtain special treatment.

SAMSUNG SDS