

# Fair Competition Policy

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Samsung SDS Co., Ltd.

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## I . Introduction

### 1 Objective

Samsung SDS Co., Ltd. (including its overseas entities and subsidiaries, hereinafter referred to as “SDS”) complies with applicable domestic and international competition laws and conducts its business in a fair manner in accordance with its management principles. This Policy, together with its detailed guidelines for fair competition, serves as the standard for the conduct and value judgment of employees in relation to fair competition across all business activities of SDS.

### 2 Scope and Application

This Policy applies to all employees of SDS (including regular, temporary, contract, advisory, and other personnel). Overseas entities and subsidiaries may, where necessary, establish separate policies. In such cases, such policies must be consistent with this Policy, and where there is any conflict, the stricter standard shall prevail.

### 3 Definitions

“Competitor” means any company that provides or may provide products or services that are in competition with the products or services of SDS.

“Agreement” means any form of arrangement, without limitation as to form, including both explicit and implicit methods.

“Market dominant position” means a position in which an entity has the ability to act independently of competitors or consumers in the relevant market, or to control price, quantity, or other terms.

## II . Basic Principles

### 1 Compliance with Competition Laws, Policies, and Guidelines

All employees of SDS comply with applicable competition laws, policies, and detailed guidelines. Violation of applicable competition laws may result in very serious consequences for both the Company and its employees.

In most countries, employees involved in such violations may be subject to fines or imprisonment, and the Company may also be subject to substantial financial liabilities, including administrative fines, penalties, and punitive damages, as well as loss of business opportunities due to debarment and reputational damage.

### 2 Detailed Principles

Employees of SDS do not jointly determine or agree on prices, quantities, or sales territories with competitors.

- Employees do not determine or agree with competitors on prices or other competitive terms for products or services.
- Employees do not agree in advance with other bidders on the winning bidder, bid price, winning bid price, or bidding conditions in the bidding process.
- Employees do not exchange sensitive information related to competition, such as prices, costs, or production volumes, with competitors directly or indirectly.
- Employees do not exchange sensitive information with competitors or set prices using Artificial Intelligence (AI) or algorithms.

Employees of SDS comply with applicable competition laws in the course of performing their duties through contracts with business partners.

- Employees do not unfairly refuse transactions or discriminate against business partners.
- Employees do not unfairly exclude competitors through practices such as purchasing at unreasonably high prices without justifiable grounds.

Employees of SDS do not engage in conduct that interferes with the market through the abuse of their economic position or capabilities in order to eliminate or restrict competition.

- Employees do not discriminate against customers without reasonable grounds.
- Employees do not force business partners to purchase SDS's products or services or to provide other economic benefits in the course of transactions.

Employees of SDS do not engage in transactions with any business partner on terms that are significantly more favorable than normal trade practices without reasonable grounds.

- Employees do not engage in transactions on terms that are significantly more favorable than normal trade practices.



### III . Risk Due Diligence Process

SDS operates and continuously improves a compliance program as part of its risk due diligence process to implement this Policy.

#### 1 Risk Identification

SDS identifies risks that may arise in the course of employees' performance of their duties through regulatory sensing, compliance inquiries, and self-assessments. SDS provides policies and guidelines for the identified risks and carries out preventive activities through employee training.

#### 2 Risk Assessment

SDS conducts legal risk assessments at least once a year under the supervision of the Compliance Team to evaluate risks associated with competition laws. Where necessary, SDS conducts on-site inspections and internal and external audits, responds to identified issues, and monitors their progress.

#### 3 Mitigation Measures and Monitoring

SDS analyzes and evaluates the results of responses to issues related to fair competition, reviews implementation status, and takes measures to prevent the spread of risks. Where necessary, SDS takes actions against employees who violate the standards.

### IV . Mergers and Acquisitions

SDS conducts an appropriate level of due diligence prior to the acquisition of another company in order to identify and address legal risks.

SDS also establishes internal control and compliance programs in the acquired company at an early stage, including employee compliance training, inspections, and monitoring.



## V . Inquiries, Reporting, and Cooperation in Investigations

### 1 Inquiries

Any questions regarding this Policy or compliance may be directed to the Compliance Team through the inquiry section of the Compliance Portal.

### 2 Reporting

Employees of SDS report any actual or suspected violation of this Policy or applicable competition laws. Reports may be made through the Compliance Portal, by email (compliance.sds@samsung.com), or through the “Report” section on the SDS website. The identity of the reporting person and the content of the report are treated as confidential and their confidentiality is guaranteed. Retaliation against a reporting person acting in good faith is prohibited, and any person who attempts or engages in such retaliation is subject to disciplinary action.

### 3 Cooperation in Investigations

Any act that obstructs government investigations or destroys evidence is subject to strict penalties and may adversely affect the Company during the investigation and legal proceedings. Accordingly, investigations must not be delayed or obstructed. In addition, related information or documents must not be deleted, concealed, damaged, or destroyed.

President & CEO of Samsung SDS Co., Ltd.

Junehee Lee 