# **Compliance Policy**

The Valuence Group (hereinafter, the "Group"), as a contributor to the sound development of the reuse industry and as a public institution of society, we have a responsibility to create a fair and transparent reuse market where customers can do business with peace of mind.

All of our corporate activities are based on the spirit of compliance, which each of our officers and employees must practice independently. Practicing compliance does not simply mean not violating "laws, regulations, or rules" but also means "acting in accordance with high ethical standards."

In order to carry out exemplary corporate activities as a reuse company, we have established the Compliance Code of Conduct, which is a common standard of judgment for each officer and employee, ensuring that compliance is a top priority.

#### 1. Action Guidelines

- · Gain the trust of society by acting with integrity based on high ethical standards.
- · Strictly comply with laws and regulations and carry out corporate activities fairly and honestly.
- · Strive to put the customer first.
- · Respect human rights and strive to create a favorable work environment.

### 2. Monitoring and Education

- Based on an elevated level of ethical awareness, we consider situations that violate social norms as risks to the entire business and have established a system to ensure thorough compliance in accordance with internal rules.
- In order to gain the trust of society, we have established a training and education system and thoroughly disseminated the knowledge and information necessary to practice compliance.

### 3. Compliance with Laws and Regulations

- · In order to contribute to the sound development of the reuse industry, we will correctly understand relevant laws and regulations such as the Secondhand Articles Dealer Act and thoroughly comply with rules.
- In order to reduce the damage caused by crimes such as theft as much as possible, we will actively cooperate with requests from the police and other investigative agencies. To prepare for the unlikely event that stolen, copied, or otherwise illegal products are brought into the company, we have

established a system to report the incident to the investigating agencies promptly and strive to limit the spread of damage from criminal activity.

#### 4. Promotion of Fair Transactions

- · We will establish a sound business environment and conduct fair and transparent transactions so that all stakeholders, including shareholders and customers, can feel secure in dealing with us.
- · In order to maintain a sound business environment, we will correctly understand the intentions of the Anti-Monopoly Act, the Subcontract Act, the Unfair Competition Prevention Act, and other laws and regulations that regulate unfair transactions, and respond to them in good faith.

# 5. Prohibition of Gifts, Entertainment, and Profit Sharing

- · We do not accept improper or inappropriate gifts, entertainment, or other benefits from any of our business partners. If there is a possibility of profit sharing, we will act sensibly within the scope permitted by laws, regulations, and internal rules.
- We do not provide improper or inappropriate gifts, entertainment, or other benefits to any of our business partners. Regarding providing or receiving entertainment or gifts to or from our business partners, we will act in accordance with sound social common sense.
- · We do not demand improper or antisocial monetary kickbacks or similar benefits from our business partners.
- · We do not demand preferential treatment for ourselves or our related parties.
- We do not provide any entertainment or gifts to public officials in violation of the National Public Service Ethics Act, the National Public Service Ethics Code, or other similar regulations stipulated by government agencies, as well as overseas public officials.

#### 6. Efforts to Prevent Bribery and Corruption

- · Take strict measures to prevent corruption in all forms.
- · With regard to "facilitation payments" overseas, after analyzing regions and business activities with a substantial risk of occurrence, we will ensure that local employees are aware of the prohibition of facilitation payments and take this into consideration when selecting business partners.
- Maintain sound and normal relationships with political, administrative, and regulatory authorities, and will not make improper or inappropriate donations or contributions in violation of laws, regulations, or internal rules.

### 7. Money Laundering

- · We will not provide funds to anti-social forces.
- In accordance with the Act on Prevention of Transfer of Criminal Proceeds, we will not be involved in transactions involving proceeds from illegal activities, transactions that provide funds to terrorists, or transactions with parties prohibited by governments, etc. If there is a possibility that a transaction may fall under the category of suspicious transactions, we will provide appropriate notifications to the authorities.

# 8. Response to Anti-social Forces

· In accordance with the Declaration of Elimination of Antisocial Forces and the Rules for Dealing with Anti-social Forces, we will firmly maintain our corporate stance of not having any relationships with antisocial forces and will take a resolute stance in dealing with them.

# 9. Information Management

- · Strictly manage the company's confidential information, customer information, and personal information, and will not leak such information to any third party or use such information for any purpose other than the company's business.
- · Handle confidential information disclosed by a third party in the same manner as the company's confidential information.
- · In order to protect investors, we will actively and fairly disclose corporate information in a timely manner as required by laws and regulations or stock exchange rules.
- In the event that we become aware of undisclosed material facts about our company or our business partners, we will not buy or sell their shares (insider trading) until such facts are made public.
- · We will not engage in unfair competition, including the improper acquisition or use of trade secrets of others.

### 10. Accounting Reports and Fulfillment of Tax Obligations

- · Properly manage the company's funds and assets and use them only for legitimate business purposes, and do not hold off-the-books funds or assets.
- · We will always ensure the accuracy of our accounting reports and conduct them in a timely and appropriate manner in order to live up to the trust of stakeholders such as shareholders and investors. We will not make any false or misleading entries in our books.
- · Comply with the tax laws of each country and fulfill our tax obligations appropriately and fairly.

#### 11. Personal Information Protection

- · Based on the company's Personal Information Protection Policy and Basic Rules for Personal Information Protection, we will strive to establish a system to ensure that all officers and employees are fully aware of the protection of personal information.
- · We will also act appropriately to comply with regulations related to the protection of personal information overseas.

## 12. Internal Reporting System

- The Group has established internal and external contact points for reporting (consulting) on compliance issues, such as violation of laws, regulations, and internal rules. The privacy of those who consult or report to these contact points is strictly protected, and the system is designed to prevent any disadvantage treatment to those who report or consult. Currently, there are two contact points: the Internal Audit Office and an external law firm.
- The department in charge investigates and responds to the reported cases, takes necessary measures such as implementing measures to prevent recurrence, and reports the results to the Risk Management Committee and the Board of Directors.