

## Fair Competition Policy

### ■ Purpose

Classys (hereinafter referred to as “Company”) has established this policy to stipulate the standards and procedures that officers and employees must abide by for fair trade with business partners and anti-monopoly in carrying out tasks related to business activities of Company.

### ■ Scope of Application

This policy applies to Classys officers and employees. Classys shall encourage its business partners and their officers and employees to comply with this policy or a similar level of policy.

### ■ Code of Conduct

1. We shall comply with fair trade-related laws and regulations and the matters set forth in this policy when handling fair trade-related business.
2. We shall comply with fair trade-related laws and Company regulations in performing tasks and attend relevant compliance training.
3. Anyone who discovers or recognizes any violation of fair trade shall immediately report to the Head of the Business Management Division.
4. If any officers and employees violate fair trade-related laws and Company regulations, there may be subject to personnel disadvantages, and civil and criminal liability, and administrative sanctions.
5. We shall not engage in sabotage (deletion, modification, or destruction of information) when requested by relevant agencies, such as a written fact-finding investigation by the Korea Fair Trade Commission. We shall immediately provide the relevant materials to the Business Management Division and actively cooperate with it.

### ■ Prohibition of Unfair Trade Practices

Officers and employees shall not engage in any act that may undermine fair trade, which is an act falling under any of the following numbers, or allow an affiliate or other business operator to do so without a justifiable reason.

1. An act of unfairly refusing a transaction or discriminating against a counterparty of a transaction
2. An act of unfairly excluding competitors
3. An act of unfairly inducing or forcing a competitor's customers to do business with Company
4. An act of unfairly using one's trading position to trade with counterparties
5. An act of imposing conditions that unfairly restrict business activities of counterparties or obstruct other business operators
6. Any acts other than those in No. 1 to 5 that may undermine fair trade

### ■ Prohibition of Unfair Support for Interested person

- ① The Company shall not unreasonably provide funds, assets, products, and personnel support to interested persons or other corporations, organizations, and individuals or engage in transactions under considerably favorable conditions.
- ② The Company shall not conduct transactions through interested person or others that does not have a substantial role in the transaction, even though it is considerably advantageous to trade products or services with other business operators directly.
- ③ The Company shall not confer undue benefits to the same person and relatives of the same per-

son (hereinafter referred to as "identical person, etc.") among interested person through transactions with an affiliate company where the identical person, etc. holds shares at a percentage equal to or higher than the ratio prescribed by Presidential Decree.

#### ■ **Observances When Dealing with Suppliers**

① We shall not enter into contracts with non-competitive companies (hereinafter referred to as "suppliers"), such as business partners and other product/service-related suppliers, with content that restricts competition. Anyone who implements an act following numbers shall consult with the Business Management Division in advance.

1. An act of restricting the freedom of suppliers to do business with other customers
2. An act of demanding suppliers not to do business with other competitors or refusing to do business with a supplier if the supplier does not comply with the demand or deals with a competitor
3. An act of requesting confidential or competitively sensitive information of other customers from suppliers.
4. An act of agreeing to purchase another product as a condition for Company to purchase one product from the supplier

#### ■ **Prohibition of Inappropriate Interactions with Competitors**

① We shall not agree on prices or exchange information in performing tasks related to competitors and shall comply with the following items in performing tasks related to competitors:

1. In the event that Officers/employees attend a meeting with a competitor, participants shall check the agenda or subject of the meeting. If there is any possibility of violating clause ①, participants shall consult with the Business Management Division in advance.
2. In the event that a conversation about price or transaction conditions starts at a meeting, which is not the scheduled topic, participants shall express objection explicitly, request the organizer to record your objection, and immediately notify the Business Management Division.
3. If a competitor attempts or proposes an act violating this Article, one should express one's objection, leave it as a record (e-mail, fax, etc.), and immediately notify the Business Management Division.

② In the event that Company establishes and operates a joint venture with a competitor, employees shall comply with the matters in each of the following numbers:

1. Communication with the competitor in relation to the joint venture shall be limited to topics related to the joint venture's business.
2. Relevant information shall be provided only to persons in charge of the joint venture's business, and a sufficient level of security measures shall be taken.

#### ■ **Prohibition of Abuse of Market Dominant Position**

① We shall not engage in any of the following acts that may be deemed harmful to competition in the field where the Company has a dominant market share.

1. An act of unfairly determining, maintaining, or changing the price of a product or the cost of a service without justifiable grounds
2. An act of unreasonably adjusting the provision of goods or services without justifiable reasons
3. An act of directly or indirectly interfering with the purchase of raw materials necessary for other business operators' production activities or refusing, suspending, or restricting the use or access to other essential elements without justifiable grounds
4. Any act prohibited by laws related to fair trade

■ **Compliance with the Fair Transactions in Subcontracting Act**

We shall not abuse their trading position when subcontracting and shall comply with the items of the following numbers:

1. We shall not make a contract by oral and pre-orders without a written agreement. Contracts on important transaction conditions shall be concluded in advance and delivered to the counterparty. In addition, relevant documents shall be preserved as stipulated in the Fair Transactions in Subcontracting Act.
2. We shall not arbitrarily cancel, change, or delay the acceptance or receiving of the delivery of the goods without justifiable reasons.
3. We shall not return or reduce the subcontract price the goods without justifiable reasons.
4. We shall comply with the Fair Transactions in Subcontracting Act and its subordinate statutes, contracts, and guidelines for task.