

[Code of Conduct]

Code of Conduct

Preamble

Doosan aspires to achieve continued growth of both its people and businesses under the Doosan Credo, whose core values are People, Integrity and Transparency, Inhwa, Passion for Excellence, and Social Responsibility. The Doosan Code of Conduct consists of specific obligations related to the ethical and legal conduct required of Doosan employees when putting the core values of the Doosan Credo into practice. All Doosan employees must perform their responsibilities and obligations in achieving the management goals of the Doosan Credo by proactively putting into practice the Doosan Code of Conduct.

Doosan employees shall abide by the principles of integrity and transparency.

- ◆ Doosan employees must comply with relevant laws and regulations as members of State and local communities; with the laws and regulations applicable to the jurisdiction in which they engage in business operations; and with all applicable laws, regulations, and treaties in general usage as members of the global community. In addition, Doosan employees must comply with all Company policies.

- ◆ Doosan employees must comply with the anti-corruption and anti-bribery laws and applicable international standards.
- ◆ Doosan employees must keep and administer accurate business materials and financial records, consistent with applicable laws, accounting principles, and internal rules.
- ◆ Doosan employees must make timely and accurate disclosures of information such as corporate activities and major management developments, consistent with the applicable disclosure laws and standards.
- ◆ Doosan employees must compete fairly in keeping with the principle of free competition and compliance with fair-trade laws.
- ◆ Doosan employees must avoid activities that may cause a conflict of interest with the Company.
- ◆ Doosan employees must protect the Company's assets and use them exclusively for lawful business purposes and as required under Company policies.
- ◆ Doosan employees must make transparent and appropriate donations in accordance with the resolutions of the Company's internal deliberative bodies and shall not spend or use the Company's assets to make donations or sponsorships for political purposes.
- ◆ Doosan employees must comply with all applicable labor laws, regulations, and must not tolerate child or forced labor under any circumstances.

Doosan employees shall act according to the principle of *Inhwa*.

- ◆ Doosan employees must recognize and respect individual rights and diversity based on the prevailing international human rights standards and norms.
- ◆ Doosan employees must not discriminate based on non-job-related protected characteristics.
- ◆ Doosan employees may not tolerate any inappropriate language or conduct - such as verbal abuse, acts of physical violence, and sexual harassment.
- ◆ Doosan employees must recruit, hire, place, evaluate, and nurture talents according to reasonable and fair standards and principles.
- ◆ Doosan employees must seek both personal and corporate growth as part of the effort to strike a healthy work-life balance.

Doosan employees shall fulfill their social responsibilities.

- ◆ Doosan employees must comply with domestic laws around the world, international treaties on the environment, health, and safety, and seek environmentally friendly growth.
- ◆ Doosan employees must maintain safe workplace environments and protect the safety of customers and local communities.

- ♦ Doosan employees must respect the opinions of Doosan's customers and provide them with true and accurate information on its products and services.
- ♦ Doosan employees must make efforts to increase both corporate and shareholder value through rational investment and efficient management activities and shall respect the lawful rights of Doosan shareholders.
- ♦ Doosan employees must recognize partner companies as partners in shared growth and shall pursue mutual advancement through fair and transparent transactions.

Integrity and Transparency Policy

Article 1. Purpose

The purpose of this Policy is to set forth specific matters concerning the honest and transparent performance of one's job and related duties as required by the Code of Conduct.

Article 2. Definitions

The terms used in this Policy shall have the meanings set forth below:

1. "Interested Persons" means individuals or entities that may be affected by the Company's business operations or decisions, including those who are directly or indirectly advantaged or disadvantaged, or who do, seek to do, or may potentially do business with the Company.
2. "Interested Employees" means the Company's employees who receive work orders from other employees or who may be, directly or indirectly, advantaged or disadvantaged by their actions or decisions.

3. “Gifts” means goods, securities, lodgings, memberships, event tickets or any other items having tangible or intangible economic value that are provided free of charge (including items offered with large discounts in comparison to market prices or trade practice).
4. “Entertainment” means tangible or intangible economic interest in an offer of hospitality, such as meals and golf, or conveniences such as transportation and lodgings.
5. “Code of Conduct Department” means the department responsible for implementing the Code of Conduct and its detailed rules, such as responding to inquiries, propagation, and providing education. The CEO must designate the Code of Conduct Department and to notify employees thereof in a convenient and accessible format.

Article 3. Scope of Application

This Policy applies to all domestic and overseas employees of the Company; third parties such as partner companies and other parties working with the Company are also encouraged to comply with this Code.

Article 4. Prohibition of Influence Peddling, Arrangement, and Solicitation

- ① Employees may not use their work-related authority, influence, or job-related information to obtain any private interest or improper benefits or cause any other persons to obtain improper benefits that may conflict with the Company's interests or be detrimental to the Company.
- ② Employees may not engage in any form of arrangement or solicitation that interferes with the fair work performance of other employees for their own or other persons' personal benefit.

Article 5. Duties with Conflict-of-Interest Implications

- ① Employees whose duties fall under any of the following must consult with their direct supervisors or departmental heads about whether to perform duties with implications for a conflict of interest and how to proceed:
 - 1. When the work directly concerns the financial interests of the employee concerned, the employee's direct ascendant or descendant, spouse, or spouse's direct ascendant;
 - 2. When the interested person is a family member or a close relative;
 - 3. When the interested person is a company or organization with which the employee has previously been employed, or the representative of such company or organization; or

4. When the employee is otherwise in a relationship with an interested person, that may affect their ability to perform their work impartially.
- ② A direct supervisor or head of department who receives a consultation request under paragraph ① shall take appropriate measures to ensure impartial job performance.
- ③ Employees in executive officer or team leader positions or higher shall, at the start of each year, submit to the Code of Conduct Department a Conflict of Interest Report listing the individuals, companies, and individuals falling under the subparagraphs of paragraph ①.

Article 6. Prohibition of Personnel Solicitations

- ① Employees may not solicit evaluation authorities such as departmental heads or HR managers to improperly influence their personnel matters, including such matters as promotion, transfer, evaluation, or compensation, nor cause any other person to make such solicitations.
- ② Employees may not use their positions to improperly interfere with the personnel matters of other employees, including such matters as promotion, transfer, evaluation, or compensation.

Article 7. Prohibition on the Improper Receipt of Valuables

- ① Employees may not receive money, real estate, Gifts, Entertainment, or other economic benefits (“Valuables”) from any Interested Persons.

However, this prohibition does not apply if such Valuables are:

1. Provided based on lawful rights such as debt obligations;
2. Socially acceptable transportation, lodging, or meals uniformly provided to the participants of work-related official events;
3. Souvenirs or promotional goods for distribution to the general public; or
4. Consistent with customary and generally accepted business practices.

- ② Employees may not receive Valuables from Interested Employees. However, this prohibition does not apply if such Valuables:

1. Fall under any of the subparagraphs of the foregoing paragraph ①;
2. Are Gifts of nominal value provided within the scope of generally accepted customs and practices.

- ③ Employees must prevent their spouses, direct ascendants, and direct descendants from receiving valuables whose receipt is prohibited under the foregoing paragraphs ① and ②.

- ④ Employees who have any uncertainties or doubts as to whether they may attend an event or receive certain Valuables under paragraphs ① and ② must consult the Code of Conduct Department via their departmental head on how to proceed. Employees who receive unsolicited Valuables - such as by unilateral delivery - in violation of paragraph ① or ② must submit the attached Report on Entertainment or Valuables Received to the Code of Conduct Department via their departmental head and consult on how to proceed.

Article 8. Prohibition on the Improper Provision of Valuables

Employees may not offer or provide Valuables to other employees who are forbidden to receive Valuables from themselves under Article 7 ② or ③, nor to such employees' spouses, direct ascendants, or direct descendants. However, this prohibition shall not apply in the case of the subparagraphs of Article 7 ②.

Article 9. Prohibition of Loans

Employees may not borrow money or receive loan guarantees from any interested persons or interested employees.

Article 10. Special Personal Events

- ① Employees may not receive monetary gifts for their Special Personal Events from Interested Persons. “Special Personal Events” is defined as events of personal significance, such as marriage, the death of a family member, or the birth of a child.
- ② Employees may not receive gifts from any other employee or Interested Persons where such gifts may be deemed excessive by social standards.
- ③ Employees must report to their supervisor and discuss with the Code of Conduct Department, (i) when they receive monetary gifts for the Special Personal Events from Interested Persons or (ii) when they receive monetary gifts for the Special Personal Events from other employees where such gifts may be deemed excessive by social standards.

Article 11. Compliance Obligation and Responsibility

- ① All employees are required to familiarize themselves with this Policy. An employee in violation of this Policy may be subject to the Company’s disciplinary actions and other necessary measures pursuant to Company rules.
- ② Employees who become aware of any violation of this Policy shall report it to the Company by means such as whistleblowing.

Article 12. Inquiries and Consultations

Employees who have any questions about the meaning of this Policy, its construction, the permissibility of certain actions, or have any other inquiries, should inquire or consult with the Code of Conduct Department.

Addendum

1. This Policy shall enter into effect on July 8, 2014.

Addendum

1. This Policy shall enter into effect on September 7, 2026.

Anti-Bribery Policy

Article 1. Purpose

The purpose of this Policy is to prescribe specific matters pertaining to anti-bribery as set forth in the Code of Conduct.

Article 2. Definition and Scope of Public Officials

In this Policy, the term “public official” means any of the following:

1. A person who is appointed under the State Public Officials Act, Local Public Officials Act, and the related statutes and is engaged in public functions;
2. A public official in political service who takes office by election, such as a member of the National Assembly or a local council member;
3. An executive officer of a government agency or organization (meaning a person prescribed in Article 4 of the Act on the Aggravated Punishment of Specific Crimes);
4. A candidate in an election for public office; or
5. Any other person who is considered a public official in a statute or who performs official functions under power of law.

Article 3. Definition and Scope of Foreign Public Officials

In this Policy, the term “foreign public officials” means a persons prescribed in Article 2 of the Act on Combating Bribery of Foreign Public Officials in International Business Transactions, as follows:

1. Any person engaged in the legislative, administrative, or judicial duties of a foreign government (including government at all levels, from central to local), whether in an appointed or an elected position;
2. Any person exercising a public function for a foreign state and:
 - a. Any person performing public duties delegated by a foreign government;
 - b. Any person performing the duties of a public organization or public agency established by law to carry out specific public duties; or
 - c. Any executives or employee of an enterprise for which more than 50% of its paid-in capital has been invested by a foreign government, or over whose overall operations - including major business decisions and the appointment and dismissal or removal of executive officers - a foreign government has substantive control; however, enterprises that do not receive

discriminative subsidies or other privileges and engage in business in equal competitive positions as ordinary private business entities are excluded; or

3. Any person acting for a public international organization.

Article 4. Definition of a Bribe

- ① In this Policy, the term “bribe” means money, goods, and other financial benefits, as well as anything that entails tangible or intangible benefits. It also includes anything that has the character of bribery in substance regardless of form, and anything that violates any political finance law.
- ② Leading examples of bribes include - but are not limited to - the following:
 1. Cash, gift certificates, and securities;
 2. Travel, meals and alcoholic beverages, sports (including golf), and entertainment such as deliberate losses in gambling;
 3. Travel and accommodation assistance;
 4. Employment assistance; and
 5. Investment opportunities, including the wrongful sale of apartments, expected to rise in market value.

Article 5. Prohibition of Bribery

- ① Employees may not provide, promise, or make any declaration regarding the provision of bribes or other wrongful benefits to any public official or foreign public official in relation to any business operation (which includes, but is not limited to, obtaining business opportunities, requesting favors, or mitigating or obtaining exemptions from unfavorable measures).
- ② Employees who perform duties related to any foreign public official must understand and comply with this Policy, the relevant international standards(Reference), and applicable local laws.

Article 6. Prohibition of Bribery through Agents

- ① Employees may not provide, promise, or make any declaration regarding the provision of bribes or other wrongful benefits to any public official or foreign public official through agents or consultants (“Agents”) in relation to any business operation.
- ② Employees may not appoint or hire an Agent who is reasonably suspected of posing a significant risk of engaging in bribery. Such risk may be identified through appropriate means, including objective due diligence or confirmed red flags.

Article 7. Obligation and Responsibility to Comply

- ① All employees are required to familiarize themselves with this Policy and comply with it fully. An employee who violates this Policy may be subject to disciplinary action and other necessary measures pursuant to the Company's rules.
- ② Employees who become aware of any violation of this Policy shall report it to the Company by means such as whistleblowing. The reporting address is Doosan.ethicspoint.com.

Article 8. Inquiries and Consultations

- ① Employees who have any questions about the meaning of this Policy, its construction, the permissibility of certain actions, or have any other inquiries, should inquire or consult with the Code of Conduct Department.
- ② "Code of Conduct Department" means the department responsible for implementing the Code of Conduct and its detailed rules, such as responding to inquiries, propagation and providing education. The CEO must designate a Code of Conduct Department and to notify employees thereof in a convenient and accessible format.

Addendum

1. This Policy shall enter into effect on July 8, 2014.

Addendum

1. This Policy shall enter into effect on January 1, 2020.

Addendum

1. This Policy shall enter into effect on September 7, 2026.

Corporate Culture Policy

Article 1. Purpose

The purpose of this Policy is to prescribe specific actions regarding offensive comments and conduct, including discrimination, sexual harassment, and verbal and physical abuse as prohibited by the Code of Conduct.

Article 2. Scope of Application

- ① This Policy applies not only to interactions between the Company's employees but also to interactions between the Company's employees and the employees of partner companies that do business with the Company or are contacted for business purposes.
- ② This Policy applies to all situations in which duties are being performed for the Company, and to situations considered to be connected to such duties.
- ③ This Policy also applies to participation in events directly or indirectly connected to the Company, such as those hosted or sponsored by the Company.

- ④ The Company must also explain the contents of this Policy to third parties, such as partner companies with which it is engaged in business relationships and encourage them to comply with it.

Article 3. Prohibition of Sexual Harassment

- ① Employees may not engage in sexual harassment, which includes unwelcome sexual advances, requests for sexual favors, and other verbal, physical, or visual conduct of sexual nature, including offensive remarks about a person's sex. This prohibition covers, without limitation: (i) any such conduct that causes another person to feel sexual humiliation or disgust, including where an employee abuses their position or acts in connection with their duties; and (ii) disadvantaging any person with regard to any personnel matters, such as employment, promotion, evaluation, compensation or other terms and conditions of employment because that person rejected or did not comply with sexual advances, conduct, or requests (collectively, "sexual harassment").
- ② Sexual harassment determinations are made by considering the totality of the following circumstances:
 - 1. The victim's subjective impressions;

2. The expected feelings and perspectives of a reasonable, objective person in response to the behavior at issue; and
3. Whether the behavior at issue may create a threatening and hostile work environment, thereby decreasing work efficiency and productivity.

Article 4. Prohibition of Harassment

- ① Employees may not engage in the harassment of another person in the following ways (“workplace harassment”), or commit acts or behaviors that may be mistaken as such:
 1. Any discrimination on an improper basis, including on the grounds of sex, religion, disability, age, social status, region of origin, nationality, ethnicity, physical condition, marital status, pregnancy or childbirth, family formation or circumstance, race, skin color, ideology or political opinion, sexual orientation, education, medical history, or any other status protected under applicable law;
 2. Verbal abuse or offensive words or behaviors which may violate another person’s dignity;

3. Repeated and consistent ostracizing of an individual from normal work interactions or bullying of an individual or a small group of employees; or
 4. Ordering or requesting personal matters that are not part of the Company's duties.
- ② Constructive criticism as well as legitimate supervisory or coaching actions made in response to employees' performance deficiencies or other workplace issues do not constitute harassment.

Article 5. Violation Response and Report

- ① ① Employees who become aware of any violation of Articles 3 and 4 of the Policy shall report it to the Company by means such as whistleblowing.
- ② The Company may investigate violations of this Policy and take necessary measures such as disciplinary action under the Company's rules when the Company becomes aware of incidents of harassment, even if no formal report has been filed.

Article 6. Inquiries and Consultations

- ① Employees who have any questions about the meaning of this Policy, its construction, the permissibility of certain actions, or have any other inquiries, should inquire or consult with the Code of Conduct Department.
- ② “Code of Conduct Department” means the department in charge of the implementation of the Code of Conduct and its detailed rules, such as responding to inquiries, propagation, and providing the relevant education. The CEO must designate a Code of Conduct Department to notify employees thereof in a convenient and accessible format.

Addendum

1. This Policy shall enter into effect on July 8, 2014.

Addendum

1. This policy shall enter into effect on September 7, 2026.

Conflicts of Interest Policy

Article 1. Purpose

The purpose of this Policy is to set forth specific matters regarding the following: activities that may give rise to conflicts of interest with the Company, such as competition with the company or the acceptance of external employment; and the wrongful use of non-public Company information.

Article 2. Scope of Application

This Policy applies to all domestic and overseas offices and employees. Third parties such as suppliers and subcontractors that do business with the Company are also encouraged to comply with this Policy.

Article 3. Non-Competition and Prohibition of External Employment

Employees may not engage in any of the following acts without obtaining the Company's prior approval:

1. Establish or open a business such as a company or partnership and become involved directly or indirectly in its management, receive pecuniary benefits such as wages from an entity or individual, or do

business within the Company's business classification on the employee's own account or that of a third party; or

2. Allow the use of the employee's name or position at the Company for the sales and marketing activities of any external company or entity covered by subparagraph 1.

Article 4. Usurpation of Corporate Opportunity

Under any of the following circumstances, employees shall not use a business opportunity for their personal benefit or that of any third party in cases where such opportunity may be beneficial to the Company presently or in the future:

1. Where an employee is able to receive a business offer because of his or her duties or position at the Company;
2. Where an employee receives a business offer from a transaction partner or competitor;
3. Where an employee becomes aware of a business opportunity in the course of performing his or her job or using Company information; or
4. Where a business opportunity is closely related to the Company's current or future business.

Article 5. Selection of Transaction Partners

- ① The selection of transaction partners and the conclusion of contract decisions shall be based on rational and objective criteria, such as quality, price, and reliable compliance with delivery periods and shipping schedules, rather than on personal financial interests or personal relationships such as regionalism, family relations, school ties, or religion.
- ② Employees may not engage in any investment activities, such as trade in stock or real estate, that may adversely influence any decisions on the selection of transaction partners etc. as prescribed in paragraph ①.

Article 6. Misuse of Non-public Information

- ① Employees may not take advantage of material non-public information (information about the Company which may be material to investors' investment decisions and has not yet been disclosed to the general public), acquired in relation to job performance, to trade securities or real estate; nor may they otherwise seek pecuniary benefit or provide any other person with such material nonpublic information for pecuniary benefit.
- ② Material nonpublic information under paragraph ① includes not only information about the Company but also information about other companies obtained in connection with job performance, such as

information on subsidiaries and other affiliate companies, suppliers, subcontractors, and partner companies.

- ③ The foregoing paragraph ① does not apply to information that is disclosed to financial authorities or made publicly available to the general public via such media as newspapers and broadcasting as recognized by law.

Article 7. Limitations on Outside Speaking Engagements and Publications

- ① Employees seeking to lecture, present, debate, deliberate, advise, or make resolutions in external seminars, discussions, presentations, training courses, and meetings (“external speaking engagements”) shall report such matters in advance to their departmental head or supervisor and consult with them. The report of external speaking engagements shall include such matters as the identity of the person who has requested the external speaking engagement, the reason for and location of the requested engagement, the date and time thereof, and whether such engagement will be compensated.
- ② A head of department who receives a report under paragraph ① may restrict the employee’s participation in the external speaking engagement upon determining that it may divulge the Company’s trade secrets, damage the Company’s reputation, or interfere with job performance.

- ③ Compensation for outside speaking engagements must be disclosed and may not exceed the socially acceptable and customary amounts from the sponsor of the engagement..
- ④ Employees seeking to publish books or articles involving professional expertise which they have accumulated through their work shall consult with their departmental head on such matters, including the substance and dates of such publications, and shall respond in good faith to the feedback given by their departmental head, such as postponement of publication or revision of the content.

Article 8. Obligation and Responsibility to Comply

- ① All employees are required to familiarize themselves with this Policy and comply with it. An employee who violates this Policy may be subject to disciplinary action and other necessary measures pursuant to the Company's rules.
- ② Employees who become aware of any violation of this Policy must report it to the Company by means such as whistleblowing.

Article 9. Inquiries and Consultations

- ① Employees who have any questions about the meaning of this Policy, its construction, the permissibility of certain actions, or any other inquiries, must inquire or consult with the Code of Conduct Department.
- ② “Code of Conduct Department” means the department responsible for implementing the Code of Conduct and its detailed rules, such as responding to inquiries, propagation, and providing education. (The CEO must designate a Code of Conduct Department and to notify employees thereof in a convenient and accessible format.)

Addendum

1. This Policy shall enter into effect on July 8, 2014.

Addendum

1. This Policy shall enter into effect on September 7, 2026.

Fair Competition Policy

Article 1. Purpose

The purpose of this Fair Competition Policy (the “Policy”) is to establish standards employees must follow to promote fair competition as required by the Company’s Code of Conduct.

Article 2. Definitions

The terms used in this Policy will have the meanings set forth below:

1. Code of Conduct Department: The department designated by the Company to be in charge of the implementation of the Code of Conduct, including responding to inquiries and providing employee education.
2. Fair Trade Compliance Officer: An executive officer in charge of monitoring, supervising, and training to ensure the Company’s compliance with the applicable fair trade laws.
3. Company’s Fair Trade Department: The department that supports the duties of the Fair Trade Compliance Officer.

Article 3. Scope

This Policy applies to all Company employees, and is recommended that business partners and other third parties doing business with the Company comply with this Policy.

Article 4. Contact with Competitors' Employees

- ① Employees shall refrain from any contact with the employees of competitors, including through private gatherings, emails, phone calls, and mails. In the event such contact cannot be avoided due to personal relationships, employees shall not exchange information or opinions on prices, conditions of transactions, future product development plans, marketing plans, and other sales policies.
- ② In the event employees plan to attend formal events such as business association meetings where the employees of competitors will be present, employees shall obtain prior approval from Company's Code of Conduct Department.
- ③ The Code of Conduct Department shall consult with the Company's Fair Trade Compliance Officer or the Company's Fair Trade Department, and refer to their opinion when making decisions on whether to approve.

Article 5. Sales and Marketing Activities

When performing sales and marketing activities, employees shall comply with the following:

1. Employees shall not give or offer to give illegal rebates to customers purchasing goods or services.
2. Employees shall not make unsupported and damaging statements about competitors to attract customers. Nor shall employees provide customers with false information about competitors, including their business situation, product functions, and technology.
3. Employees shall not force employees of the Company, its affiliates, or business partners to purchase or use goods and services of the Company or its affiliates.

Article 6. Employee Responsibility to Comply with this Policy

- ① Each employee is required to understand and comply with this Policy. Any employee in violation of this Policy may be subject to disciplinary actions and other necessary sanctions.
- ② Employees who are aware of a violation of this Policy shall report it to the Company; they may report the violation through the Company's whistleblowing system. The reporting address is [Doosan.ethicspoint.com](https://doosan.ethicspoint.com).

Article 7. Questions

- ① Employees should consult with the Company's Code of Conduct Department for any questions regarding this Policy and whether a specific act may be allowed or prohibited.
- ② The Code of Conduct Department may consult with the Company's Fair Trade Compliance Officer or the Company's Fair Trade Department, and refer to their opinion when replying to inquiries.

Addendum

1. This Policy shall enter into effect on July 8, 2014.

Addendum

1. This Policy shall enter into effect on September 7, 2026.

Safeguarding Company Assets Policy

Article 1. Purpose

The purpose of this Policy is to set forth specific matters concerning the safeguarding of the Company's assets as required by the Code of Conduct.

Article 2. Scope of Application

This Policy applies to all domestic and overseas employees.

Article 3. Basic Principles

- ① Employees must safeguard the Company's assets and use them exclusively for the Company's prescribed business purposes.
- ② Employees may not use the Company's assets for their own personal benefit or that of any third parties.

Article 4. Proper Use of Company Funds and Expenses

- ① Employees must use Company's funds exclusively for the Company's business purposes, and shall not misappropriate funds by means such as embezzlement or the submission of false documentation.

- ② Employees must use corporate credit cards only to the extent necessary for the performance of their job, and may not:
1. Make unlawful withdrawals of cash with corporate credit cards;
 2. Misuse corporate credit cards through sham merchants; or
 3. Use corporate credit cards for personal purposes.

Article 5. Safeguarding Tangible Assets

- ① Employees must comply with the prevailing safety and environmental standards to prevent soil contamination and depreciation of the value of factories and buildings. Employees shall also comply with the manuals of equipment and facilities, such as machinery, to prevent malfunction, failure, and damage.
- ② Employees must use computers, printers, fax machines, and other office equipment only to the extent relevant to and necessary for their job performance. Employees shall not use, install, or store copyright- and other intellectual property right-protected software without the proper licenses or in a way that falls outside the scope of such licenses; nor shall they interfere with the operation of the Company's information system in any way.

- ③ Employees must use office supplies and consumables exclusively for the purposes of their job, and shall not remove them without authorization for their personal use.

Article 6. Safeguarding Intangible Assets and Informational Assets

- ① Employees may not wrongfully remove the Company's informational assets, including trade secrets, from the Company's premises, nor use the Company's informational assets for their personal benefit.
- ② Employees must use the information of the Company, customers, and partner companies exclusively for purposes related to their job performance. Employees shall not access, peruse, or collect the aforementioned information without due authorization, nor shall they share, without the advance approval of their department head, such information with employees who have no connection with the duties relevant to the information, or with employees who are unauthorized to access, peruse, or collect the information.
- ③ Employees must comply with all the Company's information security standards and prevent the divulgence of information assets due to security incidents.

Article 7. Obligation and Responsibility to Comply

- ① All employees are required to familiarize themselves with this Policy and comply with it. An employee who violates this Policy may be subject to disciplinary action and other necessary measures pursuant to the Company's rules.
- ② Employees who become aware of any violation of this Policy must report it to the Company by means such as whistleblowing.

Article 8. Inquiries and Consultations

- ① Employees who have any questions about the meaning of this Policy, its construction, the permissibility of certain actions, or any other inquiries, should inquire or consult with the Code of Conduct Department.
- ② "Code of Conduct Department" means the department responsible for implementing the Code of Conduct and its detailed rules, such as responding to inquiries, propagation, and providing education. The CEO must designate a Code of Conduct Department and to notify employees thereof in a convenient and accessible format.

Addendum

1. This Policy shall enter into effect on July 8, 2014.

Addendum

1. This Policy shall enter into effect on September 7, 2026.

Internet Use Policy

Article 1. Purpose

The purpose of this Policy is to set forth specific matters regarding Employees' Internet usage in relation to the safeguarding of Company assets as required by the Code of Conduct.

Article 2. Definitions

The terms used in this Policy shall have the meanings set forth below:

1. "Information System means systems that support employees' work activities, including the entirety of hardware, software, and communication networks used for the collection, production, processing, storage, search, and communication of information.
2. "Work Equipment" means all laptops, desktop computers, mobile devices, removable storage media, and office equipment that enable employees to use the Company's Information System in the performance of their work.
3. "Code of Conduct Department" means the department responsible for implementing the Code of Conduct and its detailed rules, such as

responding to inquiries, propagation, and providing education. The CEO must designate a Code of Conduct Department and to notify employees thereof in a convenient and accessible format.

Article 3. Scope of Application

This Policy applies to all domestic and overseas employees.

Article 4. Basic Principles

- ① Internet usage during work hours is limited to the extent necessary for job performance. Nevertheless, exceptions may be made to the rules on Internet usage within reasonable and socially acceptable bounds for such purposes as writing and sending personal emails, for brief simple Web surfing, etc.
- ② In using the Internet for personal purposes under the proviso of paragraph 1, employees may not:
 - 1. Interfere with their own job performance or that of other employees;
 - 2. Engage in prohibited acts as provided under the subparagraphs of Article 5;
 - 3. Otherwise cause tangible or intangible damage to the Company.

Article 5. Prohibitions

In their use of the Internet, employees shall not commit any of the following acts:

1. Divulge, leak, or publicize the Company's confidential informational assets such as trade secrets;
2. Access or attempt to access the Company's informational assets or third-party information without due authorization;
3. Transmit or publicize posts that may damage or tarnish the Company's credibility or image;
4. Do anything that may propagate falsehoods or damage another person's reputation or personal information;
5. Infringe on another person's personal information or privacy;
6. Use the Company's Information System or Work Equipment to log on to or search for content on harmful or illegal websites which show or promote obscene material, acts of violence, criminal or terrorist activities, or discrimination based on race, gender, or age, etc.;
7. Use, install, store, publicize or transfer on the open Internet copyright- and other intellectual property right-protected software or works on the Company's Information System or Work Equipment without the proper licenses or in a way that falls outside the scope of such licenses; or

8. Otherwise violate any laws or act in an improper manner by social standards.

Article 6. Security

- ① Employees must exercise due care and diligence when using the Company's Information System and Work Equipment to ensure the security of the Company's confidential informational assets.
- ② Employees must take appropriate protective measures to prevent malware infections on the Company's Information System and Work Equipment.
- ③ Employees must use the Information System and Work Equipment in compliance with the Company's policies, and comply with all security requirements including password protection.

Article 7. Obligation and Responsibility to Comply

- ① All employees are responsible for familiarizing themselves with this Policy and complying with it. An employee who violates this Policy may be subject to necessary measures pursuant to the Company's rules.
- ② Employees who become aware of any violation of this Policy shall report it to the Company by means such as whistleblowing.

Article 8. Inquiries and Consultations

Employees who have any questions about the meaning of this Policy, its construction, the permissibility of certain actions, or any other inquiries, should inquire or consult with the Code of Conduct Department.

Addendum

1. This Policy shall enter into effect on July 8, 2014.

Code of Conduct Compliance Pledge

I hereby pledge, as stated below, to comply with the Doosan Code of Conduct:

1. I will understand and comply with the substance and meaning of the Code and its detailed rules.
2. I will inquire with the Code of Conduct Department about any questions I may have about the Code and its detailed rules.
3. On becoming aware of violations of the Code and its detailed rules, I shall report them to my supervisor or inform the Company by such means as whistleblowing.

_____, _____

Department:

Position:

Name:

Signature: _____

Conflict of Interest Report

I hereby submit this Conflict of Interest Report pursuant to Article 5. ③. of the [Integrity and Transparency Policy].

Article 1. I will consult with my direct supervisor or departmental head on whether to perform certain duties and how to proceed if any of the following is true of my duties:

- 1) When the duties directly concern my own financial interests or those of my direct ascendant(s) or descendant(s), my spouse, or my spouse's direct ascendant(s);
- 2) When the interested person is a family member or a close relative;
- 3) When a company or organization with which I have previously been employed, or the representative of such company or organization, is an interested person; or
- 4) When I am otherwise engaged in a relationship with an interested person that may affect the impartiality of my job performance.

Article 2. I will respond in good faith and proceed impartially regarding requests for consultation from an employee about any work that may raise a conflict of interest.

Article 3. I hereby list the individuals and companies falling under Article 1 as provided in the chart below:

Name [name of company or organization]	Details of conflict of interest

_____ , _____

Department:

Position:

Name: Signature: _____

Report of Entertainment or Valuables Received

I hereby submit this Report pursuant to Article 7 ④ of the [Integrity and
Transparency Policy].

Date/time	Location	Interested Person, etc.		Participants	Item	Amount	Cause of receipt
		Name [name of business]	Relationship				

** Interested Person: Any of the following individuals or entities connected to the employee's job:*

- 1. Any individual or entity that is directly or indirectly advantaged or disadvantaged by the Company's business or policy decisions or operations;*
- 2. Any individual or entity that has entered into or seeks to enter into an agreement with the Company.*

* *Interested Employee*: An employee who receives work orders from other employees or who may be, directly or indirectly, advantaged or disadvantaged by their actions or decisions.

_____ , _____

Department:

Position:

Name:

Signature: _____

[References]

- ♦ UN Universal Declaration of Human Rights
- ♦ UN International Covenant on Economic, Social and Cultural Rights
- ♦ UN International Covenant on Civil and Political Rights
- ♦ UN Convention against Corruption
- ♦ UN Convention on the Rights of the Child
- ♦ UN Guiding Principles on Business and Human Rights: Implementation of the UN "Protect, Respect and Remedy" Framework
- ♦ UN Sustainable Development Goals
- ♦ The Ten Principles of the UN Global Compact
- ♦ The Paris Agreement
- ♦ ILO Conventions Nos. 29 and 105 Forced Labor
- ♦ ILO Conventions Nos. 87 and 98 Right to Organize and Collective Bargaining
- ♦ ILO Conventions Nos. 100 and 111 Sex Discrimination
- ♦ ILO Convention No. 131 Minimum Wage Fixing Convention
- ♦ ILO Conventions Nos. 138 and 182 Child Labor
- ♦ OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions
- ♦ OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- ♦ ISO 26000 Social Responsibility Guidelines