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Ethics Charter and Code of Conduct

Document No.: SWS-B-003

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1. Preamble


A. Purpose of Establishment

Sweco strives to become a global company that contributes to the aspirations of humanity by creating a new future through creative thinking and continuous challenges. The practice of ethical management forms the foundation of this vision. Accordingly, SWECO has revised its Ethics Charter and Code of Conduct to become a trusted partner for diverse stakeholders and to enhance customer value. All members of SWECO are required to comply with this Ethics Charter and Code of Conduct.

B. Scope of Application


The Ethics Charter and Code of Conduct apply to all employees of SWECO, including those at the headquarters, the Gumi plant, and the Busan office. Employees must also act in accordance with this Charter and Code when dealing with suppliers, distributors, and service organizations. All employees within the organizations covered by this Charter are expected to comply with the laws and regulations of their respective countries while conducting their duties in line with the Ethics Charter and Code of Conduct. Furthermore, SWECO encourages all stakeholders engaged in business relationships with the company to respect this Ethics Charter and Code of Conduct.

Organizations subject to this Ethics Charter and Code of Conduct must perform their duties in accordance with the rules, policies, and guidelines based on it. In cases where this Charter and related regulations, policies, or guidelines conflict with local laws, the local laws shall take precedence. The Charter may be adapted to reflect the specific legal requirements and industry characteristics of each country, and additional detailed policies may be established when necessary.

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2. [Sweco Charter of Five Ethical Principles]


- 1) We conduct our business with clear and transparent standards, fulfilling our responsibilities with integrity and our best efforts.
- 2) We compete fairly in the marketplace and engage in equitable transactions with our contractual partners.
- 3) We provide safe products, the highest quality services, and accurate information to realize customer value, while ensuring the strict protection of personal data.
- 4) We respect each member as an independent individual and provide fair working conditions and a safe workplace.
- 5) As a global corporate citizen, we contribute to sustainable development by fulfilling our social responsibilities, enabling shared prosperity with diverse stakeholders.

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A. Employee Ethics

We conduct our work with clear and transparent standards, fulfilling our responsibilities with integrity and our best efforts.

- **Bribery**
Employees shall neither solicit, accept, offer, nor promise any form of illegal or unethical benefit, whether monetary or non-monetary, from or to stakeholders.
- **Improper Solicitation**
Employees are prohibited from engaging in any improper solicitation, either with stakeholders or among colleagues within the company.
- **Conflict of Interest**
In situations where conflicts of interest between the company and individuals are unavoidable, employees shall act within legal boundaries and prioritize the interests of the company and its customers.
- **Insider Trading**
Employees shall not disclose, misuse, or exploit confidential information, knowledge, or data obtained through their duties for personal gain.
- **Workplace Ethics**
Employees must fulfill their responsibilities during the performance of their duties, regardless of time or place, and company assets and facilities shall be used solely for business purposes.
- **Abuse of Authority**
Employees shall not abuse their position or authority to exert undue influence or pursue illegal benefits for the company or themselves.
- **Documentation and Reporting**
Employees shall not prepare or report documents, nor share them with internal or external stakeholders, if such documents are based on concealment, understatement, exaggeration, falsification, or any other manipulation of facts.

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B. Fair Competition and Transactions

We compete fairly in the marketplace and conduct business with contractual partners on the basis of fairness.

- **Antitrust**
We do not engage in practices that may hinder fair competition, such as abusing a dominant market position or abusing transactional advantages.
- **Collusion**
We do not enter into agreements with other businesses to unfairly restrict competition regarding product or service prices, supply volumes, sales territories, or transaction terms.
- **Unfair Competition**
We do not obtain information from competitors, partners, or other organizations through improper means, nor do we use or disclose information improperly acquired by the company or third parties.
- **Money Laundering**
We do not engage in any activities related to money laundering by customers, partners, suppliers, or any other organizations or individuals.
- **Intellectual Property Rights**
We protect the trade secrets of our business partners and do not infringe upon the intellectual property rights of other companies or individuals.
- **Taxation**
We comply with the tax laws of each country in which we operate, ensure transparent and fair tax practices, and do not evade legitimate tax obligations.
- **Procurement**
We pursue fair and mutually beneficial relationships with our suppliers and do not engage in unfair trading practices.

C. Realization of Customer Value

We provide safe products, the highest quality services, accurate information, and ensure thorough protection of personal data in order to realize customer value.


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- **Customer Safety**
We do not make decisions that compromise customer safety in any stage of research and development, raw material procurement, production, sales and distribution, or after-sales service.
- **Quality**
We refrain from any actions that undermine the quality standards necessary to ensure the reliable supply of the best products and services to our customers.
- **Complete Information Provision**
We provide customers with accurate and useful information regarding our products and services to support sound decision-making, and we do not provide false or exaggerated information.
- **Protection of Personal Data**
We comply with applicable laws and regulations to safeguard customers' personal data and do not engage in any actions that may unlawfully infringe upon their privacy.
- **Customer Feedback**
We listen carefully to customers' opinions on our products and services and actively accept legitimate demands and reasonable suggestions.
- **Customer Accessibility**
We take necessary measures to ensure that no customer is unfairly restricted from using our products and services on the basis of gender, age, disability, language, or other factors.
- **Product Liability**
We responsibly provide necessary information to prevent harm or risk to customers and implement measures to secure the safety and quality of our products and services.

D. Respect for Employees

We respect each member as an independent individual and provide fair working conditions and a safe workplace.

- **Human Rights**
We respect each employee as an individual and take proactive measures to ensure that universally recognized human rights are protected.


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- **Child Labor and Forced Labor**
We comply with the labor laws of the countries where our operations are located and prohibit child labor and forced labor in our workplaces.
- **Non-Discrimination**
We do not discriminate against employees based on nationality, place of origin, race, gender, age, culture, religion, disability, educational background, political views, or personal preferences.
- **Equal Opportunity**
We provide employees with equal opportunities for training and growth based on their abilities and qualifications, and we evaluate and reward performance fairly.
- **Workplace Harassment**
We prohibit all forms of verbal or physical abuse, sexual harassment, bullying, intimidation, and any online or offline behavior that undermines human dignity or disrespects individuals.
- **Safety and Health**
We take proactive measures to ensure employee safety and maintain a work environment protected from occupational accidents, injuries, disasters, diseases, and infections.
- **Work-Life Balance**
We strive to provide a work environment that supports a harmonious balance between employees' professional and personal lives.

E. Pursuit of Sustainability

As a global corporate citizen, we contribute to sustainable development that enables diverse stakeholders to prosper together through the fulfillment of our social responsibilities.

- **Sustainable Development**
In our decision-making processes, we take responsibility for contributing to the achievement of the Sustainable Development Goals (SDGs), addressing environmental and social challenges faced by humanity.
- **Environment**
Recognizing the environment as a valuable asset to be preserved for future generations, we actively fulfill our responsibility to minimize negative environmental impacts across


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all areas of our business.

- **Social Contribution**
We actively identify social issues faced by our communities and humanity at large and seek effective solutions to address them.
- **Stakeholder Engagement**
We identify stakeholders who are affected by, or who can affect, our business and engage in active communication and actions on material sustainability issues.
- **Donations and Sponsorships**
Charitable donations and sponsorships are carried out fairly in accordance with internal standards and procedures, and we strictly prohibit contributions for political purposes.
- **Shareholder Value**
Through sustainable management, we pursue the enhancement of both corporate and shareholder value.
- **Information Disclosure**
We disclose financial and non-financial information in a timely manner in accordance with applicable laws and regulations.

3. Management System

- **Responsibilities of Organizational Leaders**
Leaders of organizations to which this Ethics Charter and Code of Conduct apply shall actively support and manage their employees and relevant stakeholders to ensure proper implementation of the Charter and Code.
- **Organization and Reporting**
Organizations subject to this Charter and Code shall establish appropriate structures and reporting systems for the prevention of ethical risks and due diligence, clearly defining responsibilities and roles.
- **Monitoring and Due Diligence**
Organizations shall continuously monitor ethical risks and establish systems that enable effective due diligence.


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- Internal Controls
Organizations shall implement appropriate internal control mechanisms, including a 24-hour reporting system accessible both internally and externally, and conduct regular or ad-hoc audits.
- Protection of Whistleblowers
Organizations shall protect the identity and safety of whistleblowers and take necessary measures to ensure they are not subject to unfair treatment, discrimination, or retaliation.
- Amendments
This Ethics Charter and Code of Conduct shall be reviewed regularly and revised as necessary.
- Training
Organizations shall provide appropriate training to ensure that employees respect and practice the principles and values pursued by this Charter and Code.
- Handling of Violations
Organizations shall take immediate actions in accordance with company regulations when violations of this Charter and Code are identified.
- Disclosure of Violations
To prevent recurrence, organizations shall disclose information on violations through appropriate channels.

4. Appendix

A. Reporting and Counseling Channels

- Online report : <https://swecomica.net>
- Tel.: +82-31-227-2900
- Fax.: +82-31-227-2910
- Mail.:
SWECO Inc.
HR & General Affairs Team
92 Nangnaegi-gil, Bongdam-eup, Hwaseong-si, Gyeonggi-do, 18298, Republic of Korea

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B. References

This Code of Ethics and Code of Practice upholds the spirit and values enshrined in various international human rights standards and relevant laws and regulations, and has been established based on the following declarations and conventions.

- ① UN, Universal Declaration of Human Rights (1948)
- ② The Ten Principles of the UN Global Compact, UN Global Compact
- ③ International Labour Organization's Declaration on Fundamental Principles and Rights at Work, ILO (1998)
- ④ Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, OECD (2019)
- ⑤ United Nations Convention Against Corruption, UN General Assembly (2013)
- ⑥ Paris Agreement, UNFCCC (2015)
- ⑦ The OECD Guidelines for Multinational Enterprises, OECD (2011)
- ⑧ Global Automotive Sustainability Practical Guidance, Drive Sustainability (2017)
- ⑨ Guiding Principles on Business and Human Rights, UNGC (2011)
- ⑩ Guidance on social responsibility, ISO (2010)
- ⑪ UN SDGs ([https:// sustainabledevelopment.un.org/](https://sustainabledevelopment.un.org/))
- ⑫ CDP (<https://www.cdp.net/en>)