

Regulation on Management of Disclosure Information

Chapter I. General Provisions

Article 1 (Purpose)

The purpose of **this Regulation on Management of Disclosure Information** (this “**Regulation**”) is to set forth necessary matters on the duties and procedures related to disclosure, the management of disclosure information, etc. in order to ensure that all disclosure information of TeraView Limited (the “**Company**”) may be disclosed correctly, perfectly, fairly and in a timely manner under the relevant laws and to prevent unfair transaction of officers and employees of the Company.

Article 2 (Scope of Application)

Matters on the performance of duties of disclosure and the management of disclosure information shall be determined by this Regulation except for those prescribed in the laws and decrees, the relevant regulations or the constitution of the Company.

Article 3 (Definition of Terms)

- (1) “**Disclosure Information**” means the matters that may affect the investment decision of investors concerning the Company’s management, properties, etc. and the matters subject to disclosure and related information as determined in the Act on Capital Markets and Financial Investment Business (the “**Act**”), its Enforcement Decree (the “**Enforcement Decree**”), the Regulations on Issuance, Disclosure, etc. of Securities (the “**Regulations on Issuance and Disclosure**”) of the Financial Services Commission (the “**FSC**”), the KOSPI Market Disclosure Regulation (the “**Disclosure Regulation**”) of the Korea Exchange (the “**KRX**”), etc.
- (2) “**Disclosure Documents**” mean the report and reported documents (including electronic documents) filed for the disclosure of the Disclosure Information together with their supplementary documents.

- (3) “**Disclosure Control System**” means various business activities that manage the Disclosure Information pursuant to certain control procedure by a related organization within the Company.
- (4) “**Disclosure Control Organization**” means the managing director, Disclosure Officer and Disclosure Department that are engaged in the duties related to the disclosure, such as creation, collection and review of the Disclosure Information, the preparation, approval, etc. of the Disclosure Documents as set forth in this Regulation, and the business department related to the creation of the Disclosure Information.
- (5) “**Disclosure Officer**” means a person who actually has overall control of the disclosure business of the Company as a nominee of the managing director and who has been reported to the KRX as a person in charge of the disclosure as set forth in Articles 26 (3) and 88 (1) of the Disclosure Regulation.
- (6) “**Disclosure Department**” means the department that is in charge of the disclosure business of the Company. In this case, Disclosure Department shall have no less than two (2) staff members responsible for disclosure registered with the KRX as set forth in Articles 26 (1) and 88 (2) of the Disclosure Regulation
- (7) “**Business Department**” means the department that is engaged in the duties related to the occurrence of the Disclosure Information of the Company.
- (8) “**Periodic Disclosure**” means the act of filing an annual report, semi-annual report and quarterly report of the entire details of the Company, such as its business, financial status, management performance, etc. as set forth in Articles 159, 160 and 165 of the Act, Articles 168 and 170 of the Enforcement Decree, Article 4-3 of the Regulations on Issuance and Disclosure, and Article 21 of the Disclosure Regulation, to the FSC or the KRX.
- (9) “**Timely Disclosure**” means the disclosure of matters in relation to material management and an act of reporting or disclosing any major facts that affect the

decision-making of investment related to the management activities of the Company or any decisions to the KRX as set forth in Article 7 of the Disclosure Regulation.

- (10) “**Fair Disclosure**” means the disclosure of information, etc., which is not subject to disclosure obligation or before the due date for disclosure under the relevant laws, to the KRX so that general investors may be aware of such information simultaneously (or prior to preferentially providing information to certain persons) as set forth in Articles 15 and 16 of the Disclosure Regulation and the Operational Guidelines on Fair Disclosure of the KRX as the Company’s preferential provision of such information to certain persons.
- (11) “**Inquired Disclosure**” means the disclosure upon receipt of the request from the KRX under Article 12 of the Disclosure Regulation in order to verify any rumor or news related to the Company or whether there is any material information.
- (12) “**Voluntary Disclosure**” means the disclosure to the KRX of any information as set forth in Article 28 of the Disclosure Regulation and Article 8 of its detailed rules when the Company deems that such information may have a material effect on the Company’s management, properties and the investor’s decision of investment except for the matters subject to the Timely Disclosure as set forth in paragraph (9) or deems it necessary to disclose any information that is not subject to disclosure obligation.
- (13) “**Disclosure of Issuance and Report on Material Facts**” means the act of filing the relevant report to the FSC of the matters on the offering and sale of securities, corporate reorganization of the Company such as consolidation, split, sales and purchase of business, etc. or matters on the acquisition, disposal, etc. of its own shares as set forth in Articles 119, 121 through 123, 130, and 161 of the Act, Articles 120 through 122, 137, and 171 of the Enforcement Decree, Articles 2-4, 2-6, 2-14, 2-17, 4-5, 5-8 through 5-10 and 5-15 of the Regulations on Issuance and Disclosure.
- (14) Terms used herein shall have the same meanings as used in the relevant laws and decrees and regulations unless specifically defined herein.

Chapter II. Basic Powers and Responsibilities of Disclosure Control Organization

Article 4 (Managing Director)

- (1) The managing director shall have control over various business related to the Disclosure Control System.
- (2) The managing director shall perform the following duties for an efficient operation of the Disclosure Control System:
 1. Establishment of policy on the design and operation of the Disclosure Control System;
 2. Establishment of powers, responsibilities and reporting system of the Disclosure Control System;
 3. Final examination of operational status and final evaluation of operational performance of the Disclosure Control System;
 4. Approval of various regulations related to the Disclosure Control System; and
 5. Other necessary matters.

Article 5 (Disclosure Officer)

- (1) Disclosure Officer shall be one of the directors, as nominated by the managing director.
- (2) Disclosure Officer shall exert overall control over matters related to the design and operation of the Disclosure Control System and shall perform the following duties:
 1. Review, approve and implement the Disclosure Information and Disclosure Documents (including related documents; hereinafter the same shall apply);
 2. Take necessary measures so that the officers and employees shall comply with the disclosure-related laws (provision of related education, preparation of guideline, etc.);
 3. Identify risk factors associated with disclosure and establish and perform countermeasures;

4. Regularly monitor and examine the operational status of the Disclosure Control System and evaluate the operational performance on a periodic basis;
 5. Decide whether the matters not specified to be disclosed by the relevant laws need to be disclosed and the scope of the disclosure;
 6. Direct and supervise the Disclosure Department;
 7. Establish and implement an education plan for officers and employees related to matters on disclosure;
 8. Approve detailed guidelines, etc. for the enforcement of various regulations related to the design and operation of the Disclosure Control System; and
 9. Perform any other matters deemed necessary by the managing director related to the Disclosure Control System.
- (3) Disclosure Officer shall have the following powers where it is necessary in performing his or her duties:
1. Right to request submission of various books and records related to the matters for disclosure and to have access thereto; and
 2. Right to listen to the opinions of any officer and employee of the department in charge of finance or audit and the department related to the creation of Disclosure Information and Disclosure Documents.
- (4) Disclosure Officer may consult with the officer in charge or auditor (or a member of the audit committee) if deemed necessary in performing his or her duties and obtain opinions of independent experts.

Article 6 (Disclosure Department)

- (1) The managing director shall set up the Disclosure Department, including persons with professional knowledge in matters relating to disclosure, two of whom shall be nominated as the staff members responsible for disclosure as set forth in Article 88 (2) of the Disclosure Regulation.
- (2) The Disclosure Department shall be under direction of the Disclosure Officer in relation

to matters on disclosure and perform the following duties:

1. Collect and review Information;
2. Prepare Disclosure Documents and disclose Disclosure Information;
3. Establish annual disclosure plan and examine progress of such plan;
4. Examine necessary measures for the compliance with the laws, such as frequent inspection of enacted or amended laws related to disclosure and report to the Disclosure Officer thereof;
5. Identify, examine, evaluate and manage risks associated with disclosure with regards to the Company as a whole; and
6. Perform any other matters deemed necessary by the managing director or the Disclosure Officer.

Article 7 (Business Department)

- (1) On the occurrence of any of the following events, the head of each Business Department shall deliver the information thereof to the Disclosure Department in a timely manner:
 1. In case any event subject to disclosure as prescribed in the disclosure-related laws occurs or is likely to occur;
 2. In case it is unclear whether disclosure is required with respect to certain matters that have material effect on the management of the Company;
 3. In case any event occurs, or is likely to occur, rendering it necessary to cancel or amend information which have already been disclosed; or
 4. Upon the request of the Disclosure Officer or the head of the Disclosure Department.
- (2) In delivering the Disclosure Information set forth in paragraph (1), the relevant details, and copies of necessary evidence and reference data shall be delivered to the Disclosure Department and the original copies thereof shall be kept. Provided, that if there is any urgency or inevitable cause, they shall be delivered by an appropriate method other than delivery of the documents and the copies of related details may be delivered in the form of document at a later date.

Chapter III. Activities and Operation of Disclosure Control

Section 1. Periodic Disclosure

Article 8 (Periodic Disclosure)

The Company shall prepare the Periodic Disclosure Documents and submit them to the FSC and the KRX before the due date for disclosure.

Article 9 (Disclosure Department)

- (1) The head of the Disclosure Department shall confirm the matters for disclosure, schedule, etc. for the performance of the disclosure, establish the annual disclosure plan, obtain the approval thereof from the Disclosure Officer and then perform such plan.
- (2) Where it is necessary for the Periodic Disclosure, the head of the Disclosure Department may request the head of each Business Department to submit any information related to the preparation of the Periodic Disclosure Documents, supporting documents, etc and the relevant Business Department shall comply with such request. Provided, however, that if it is deemed that certain matters are confidential or need greater security in their treatment, the head of the Business Department shall report the matters to the Disclosure Officer and follow the instructions of the Disclosure Officer.
- (3) The head of the Disclosure Department shall prepare the Periodic Disclosure Documents in a prescribed form and as required in the relevant laws and submit them to the Disclosure Officer by the due date as determined in the annual disclosure plan. In case there is any concern that the due date for filing may not be met, the head shall report such concern to the Disclosure Officer and take necessary measures as instructed by the Disclosure Officer.
- (4) The head of the Disclosure Department shall obtain the approval from the Disclosure Officer and the managing director and perform the Periodic Disclosure before the prescribed due date for filing. In case the certification of the managing director, etc. is

necessary as prescribed in the applicable laws, such certification shall be attached.

Article 10 (Disclosure Officer and Managing Director)

- (1) The Disclosure Officer shall examine the status of the duties performed which are necessary for the performance of the Periodic Disclosure and where there is any concern that the prescribed due date for filing may not be met, he or she shall take necessary measures.
- (2) The Disclosure Officer shall examine whether the Periodic Disclosure Documents received from the head of the Disclosure Department have been properly prepared under the applicable laws and the accuracy, perfection, etc. of any information to be disclosed through the relevant Periodic Disclosure Documents, report the results of such examination to the managing director, obtain the approval from the managing director and head of the Disclosure Department shall make the disclosure.
- (3) The managing director shall directly confirm and examine the appropriateness, etc. of the Periodic Disclosure Documents reported from the Disclosure Officer and make necessary certification thereof as set forth in the applicable laws.

Article 11 (Post Examination of Disclosure Details)

- (1) The head of the Business Department related to the preparation of the Periodic Disclosure Documents and the head of the Disclosure Department shall immediately examine the appropriateness of the disclosed details concerned after disclosure.
- (2) If there is any error or omission as the result of the examination, the head of the Disclosure Department shall take necessary measures, such as immediate correction of such error or omission.

Section 2. Timely Disclosure

Article 12 (Timely Disclosure)

The Company shall prepare the Timely Disclosure Documents and file them with the KRX before the due date for disclosure.

Article 13 (Business Department)

- (1) If any event subject to the Timely Disclosure, or event, the occurrence of which requires cancellation of or changes in information already disclosed on a timely basis, has occurred or is likely to occur, each Business Department shall immediately deliver any relevant information thereof to the Disclosure Department.
- (2) When the Business Department is requested to supplement information set forth in paragraph (1) or to submit additional data from the head of the Disclosure Department, it shall immediately comply with such request. Provided, however, that if it is deemed that certain matters are confidential or need greater security in their treatment, the head of the Business Department shall report the matters to the Disclosure Officer, and follow the instructions of the Disclosure Officer.

Article 14 (Disclosure Department)

- (1) When the Disclosure Department is delivered information on the matters subject to the Timely Disclosure from the Business Department, it shall immediately examine whether or not it is subject to disclosure and the accuracy, perfection, etc. of such information. The head of the Disclosure Department may request the relevant Business Department to supplement information or submit additional data if necessary.
- (2) If any information falls under the matters subject to the Timely Disclosure as a result of the examination as set forth in paragraph (1), the head of the Disclosure Department shall prepare the details of examination of the relevant information and the Timely Disclosure Documents, report them to the Disclosure Officer, obtain the approval thereof from the Disclosure Officer and then disclose such information by a method prescribed in the applicable laws. Provided, that if it is difficult to obtain the approval of the Disclosure Officer due to his or her absence, the head of the Disclosure

Department may disclose the relevant information and he or she shall report such fact to the Disclosure Officer later.

- (3) If any information does not fall under the matters subject to the Timely Disclosure as a result of the examination as set forth in paragraph (1), the head of the Disclosure Department shall prepare a document explaining the reasons and the details of his or her examination of such relevant information in writing and report it to the Disclosure Officer.

Article 15 (Disclosure Officer)

- (1) Disclosure Officer shall examine whether the details examined and the Disclosure Documents, etc. set forth in Article 14 (2) and (3) have been properly prepared under the applicable laws and approve whether to make the disclosure.
- (2) Disclosure Officer shall report to the managing director concerning important matters related to the Timely Disclosure.

Article 16 (Post Examination of Disclosure Details)

The provisions of Article 11 shall apply *mutatis mutandis* to the Timely Disclosure. In this case, the “Periodic Disclosure Documents” shall be read as the “Timely Disclosure Documents.”

Section 3. Fair Disclosure

Article 17 (Fair Disclosure)

The Company shall prepare the Fair Disclosure Documents and file them with the KRX before the due date for disclosure.

Article 18 (Prohibition of Indirect Provision of Information subject to Fair Disclosure)

A Fair Disclosure Information Provider (referring to a person as set forth in Article 15 (2) of the Disclosure Regulation) shall not indirectly provide the information subject to the Fair Disclosure to a Receiver of Fair Disclosure Information (referring to a person as set forth in Article 15 (3) of the Disclosure Regulation) prior to disclosure by way of various ratios, volume of increase or decrease, etc.

Article 19 (Matters to be Attended)

- (1) In making the Fair Disclosure, the Disclosure Officer, the staff members responsible for disclosure, the Business Department related to information subject to the Fair Disclosure and their contact information shall be indicated so that investors who wish to obtain detailed information related to the details of the Fair Disclosure may inquire with ease.
- (2) If there is any request from the KRX, the disclosure shall be made to the KRX by stating the summary of the details of the Fair Disclosure and the website address and the original of such summary shall be posted on the website of the Company.

Article 20 (Application *Mutatis Mutandis*)

The provisions of Articles 11, 13 through 15 shall apply *mutatis mutandis* to the Fair Disclosure. In this case, the “Periodic Disclosure Documents” as set forth in Article 11 shall be read as the “Fair Disclosure Documents” and “Timely Disclosure” as set forth in Articles 13 through 15 shall be read as “Fair Disclosure.”

Section 4. Inquired Disclosure

Article 21 (Inquired Disclosure)

The Company shall prepare the Inquired Disclosure Documents and submit them to the KRX before the due date for disclosure.

Article 22 (Disclosure Department)

- (1) When the head of the Disclosure Department is requested to make the Inquired Disclosure from the KRX, he or she shall immediately confirm whether there is any material information, prepare the Disclosure Documents, obtain the approval thereof from the Disclosure Officer and then make the Inquired Disclosure.
- (2) The head of the Disclosure Department may request each Business Department to submit data or state opinions in order to confirm whether a matter inquired set forth in paragraph (1) is true or whether there is any material information. In this case, the relevant Business Department shall comply with such request. Provided, however, that if it is deemed that certain matters are confidential or need greater security in their treatment, the head of the Business Department shall report the matters to the Disclosure Officer and follow the instruction.
- (3) In case the head of the Disclosure Department has been requested to make the Inquired Disclosure and has disclosed that the Company is in the process of making a decision on a matter inquired (the “**Interim Disclosure**”), he or she shall endeavor to confirm the details of status of the matters for disclosure, obtain the approval thereof from the Disclosure Officer and re-disclose them within one (1) month from the date of concerned Interim Disclosure. In this case, when it is deemed that re-disclosure thereof is practically impossible within one (1) month from the date of such Interim Disclosure, he or she shall specify the re-disclosure deadline and make the disclosure accordingly.

Article 23 (Application *Mutatis Mutandis*)

The provisions of Article 11, the proviso to Article 14 (2) and Article 15 shall apply *mutatis mutandis* to the Inquired Disclosure. In this case, the “Periodic Disclosure” as set forth in Article 11 shall be read as “Inquired Disclosure”, “Timely Disclosure” as set forth in Article 15 shall be read as “Inquired Disclosure” and “the details examined and the Disclosure Documents, etc. set forth in Article 14 (2) and (3)” as set forth in Article 15 (1) shall be read as the “the details confirmed and Disclosure Documents set forth in paragraph (1)”.

Section 5. Voluntary Disclosure

Article 24 (Voluntary Disclosure)

The Company may prepare the Voluntary Disclosure Documents and submit the documents to the KRX before the due date for disclosure.

Article 25 (Decision on Matters for Voluntary Disclosure and Information Collection)

- (1) If the matters are deemed to be subject to the Voluntary Disclosure, or any event which renders it necessary to cancel or amend the information which have already been disclosed has occurred or is likely to occur, the Disclosure Officer may instruct the head of the Disclosure Department to collect necessary information and to prepare the Disclosure Documents.
- (2) If the matters are deemed to be subject to the Voluntary Disclosure, or any event which renders it necessary to cancel or amend the information which have already been disclosed has occurred or is likely to occur, or instruction from the Disclosure Officer is given as set forth in the above paragraph, the head of the Disclosure Department may request the head of a Business Department to provide the necessary information or to submit the documents.
- (3) If the matters are deemed to be subject to the Voluntary Disclosure, or any event which renders it necessary to cancel or amend the information which have already been disclosed has occurred or is likely to occur, or provision of necessary information and submission of documents is requested by the head of the Disclosure Department in accordance with the above paragraph, the head of the Business Department shall deliver the requested information and document in writing to the head of the Disclosure Department in the manner specified in Article 7 (2).
- (4) In case where the head of the Business Department is requested to submit any supplementary or additional documents for the foregoing notice by the head of the Disclosure Department, he or she shall respond to such request immediately. Provided,

however, that if it is deemed that certain matters are confidential or need greater security in their treatment, the head of the Business Department shall report the matters to the Disclosure Officer, and follow the instructions of the Disclosure Officer.

Article 26 (Application *Mutatis Mutandis*)

The provisions of Articles 11, 14 and 15 shall apply *mutatis mutandis* to the Voluntary Disclosure. In this case, the “Periodic Disclosure” as set forth in Article 11 shall be read as “Voluntary Disclosure”, “examine whether or not it is subject to disclosure” as set forth in Article 14 (1) shall be read as “examine whether or not disclosure is necessary”, “If any information falls under the matters subject to the Timely Disclosure” as set forth in Article 14 (2) shall be read as “If the matters are read to be subject to disclosure”, “If any information does not fall under the matters subject to the Timely Disclosure” as set forth in Article 14 (3) shall be read as “If the disclosure is deemed unnecessary” and “Timely Disclosure” as set forth in Articles 14 and 15 shall be read as “Voluntary Disclosure”.

Section 6. Disclosure of Issuance and Report on Material Facts

Article 27 (Disclosure of Issuance and Report on Material Facts)

The Company shall prepare the documents for Disclosure of Issuance and Report on Material Facts, and submit the documents to the FSC before the due date for disclosure.

Article 28 (Establishment of Business Progress Plan)

In case any event subject to the Disclosure of Issuance and the Report on Material Facts as set forth in Article 161 (1) 6 through 8 of the Act has occurred or is likely to occur, the head of the Disclosure Department shall confirm the matters to be disclosed and its scheduled period, establish the business progress plan for Disclosure of Issuance and Report on Material Facts, obtain the approval from the Disclosure Officer, and deliver the written documents to each Business Department.

Article 29 (Application *Mutatis Mutandis*)

- (1) The provisions of Articles 9 (2) through (4), 10 and 11 shall apply *mutatis mutandis* to the Disclosure of Issuance and Report on Material Facts of the foregoing Article. In this case, “annual disclosure plan” as set forth in Article 9 (3) shall be read as “business progress plan for Disclosure of Issuance and Report on Material Facts” and “Periodic Disclosure Documents” as set forth in Articles 9 (3), 10 and 11 shall be read as “documents for Disclosure of Issuance and Report on Material Facts”.
- (2) Articles 13 through 16 shall apply *mutatis mutandis* to the Disclosure of Issuance and Report on Material Facts of the foregoing paragraph set forth in Article 161 (1) through 5 and 9. In this case, “Timely Disclosure” and “Timely Disclosure Documents” shall be read as “documents for Report on Material Facts”.

Chapter IV. Management of Information and Disclosure Risk

Article 30 (Collection, Maintenance and Management of Information)

Each Disclosure Control Organization shall collect, maintain and manage the internal and external information and the relevant documents relating to their works for the purpose of securing the accuracy, integrity, impartiality and timeliness of the disclosed information.

Article 31 (Management of Disclosure Risk)

- (1) The managing director and Disclosure Officer shall ensure that the risks of disclosure on the following items which may have adverse influence on the accuracy, integrity, impartiality and timeliness of the disclosed information shall be verified in a timely manner, and managed on a consistent basis:
 1. Error in financial information: risk of disclosure caused by the discordance between actual financial status and disclosed contents generated by accounting errors or miscommunication between the persons in charge.
 2. Error in form and lack of details: risk of disclosure caused by omission or error in preparing documents as required by the form due to lack of understanding and

typographical errors, etc.

3. Ambiguity, insufficiency and inaccuracy of the disclosed contents: risk of disclosure caused by the discordance between the facts and disclosed contents generated by the use of jargon and abbreviation which are difficult for the general public to understand, and provision of insufficient explanation on the related matters.
 4. Non-compliance with due date for disclosure under applicable laws: risk of disclosure caused by non-compliance with due dates for disclosure resulting from incorrect knowledge and delay in information transfer and approval.
 5. Omission, concealment and reduction of the scope of disclosed matters: risk of disclosure caused by the omission of the disclosure due to lack of understanding on disclosure obligation, and concealment and reduction of the scope of the information which may have negative impact on the Company.
 6. Risk accompanied with disclosing information based on prediction: risk of disclosure caused by information based on predictions made on unreasonable grounds, or intentional entry of false information and the omission of the material facts.
 7. Release of non-public information: risk of disclosure caused by release of non-public information through unusual means in which the non-public information is preferentially provided to certain persons by officers and employees.
 8. Risks accompanied with changes in Disclosure System: risk of disclosure which may be caused by changes in the laws related to the disclosure, governmental policies, the exchange market on which the Company is listed, a person in charge or his or her duties at the relevant supervising authorities and organizations in charge of market operation.
 9. Change of the staff members responsible for disclosure: risks of disclosure which may be caused by the severance in information transfer, and inconsistent performance of the disclosure obligation due to the change of the staff members responsible for disclosure.
 10. Other disclosure risks which may cause adverse effect on the Disclosure Information.
- (2) Under the instruction of the Disclosure Officer, the head of the Disclosure Department shall make a list of factors associated with risk of disclosure, and shall consistently verify and manage the factors.

Chapter V. Prohibition of Unfair Trade Acts by Officers and Employees

Article 32 (General Principles)

The officers and employees shall not use any material non-public information (the “**Material Non-public Information**”) related to the duties specified in Article 174 (1) of the Act for the purpose of trading specific securities, etc. (the “**Specific Securities, etc.**”) as specified in Article 172 (1) of the Act, and of other trades, or shall not use the Material Non-public Information to the other person.

Article 33 (Trade of Specific Securities, etc. by the Officers and employees)

- (1) In case where the officers and employees intend to be involved in the trade of the Specific Securities, etc. and other trades, regardless of use of the Material Non-public Information, the officers and employees shall give prior notice to the officers in charge of internal audit or the legal affairs of such trades.
- (2) The officers in charge of internal audit or the legal affairs, upon receiving such notice of the above paragraph, may prohibit the trading activities in case where he or she deems that such trade and other trades are likely to be considered as trades using the Material Non-public Information.
- (3) If the officers and employees are involved in the trade of the Specific Securities, etc. and other trades, the officers and employees shall report the details of such trades (types of the Specific Securities, etc. trade volume, date of trade) to the officers in charge of internal audit or the legal affairs within ten (10) days from the end of the quarter in which the trading occurred.

Article 34 (Management of Material Non-public Information)

- (1) The managing director or Disclosure Officer shall take necessary measures to ensure that the Material Non-public Information is managed in accordance with the following:

1. Documents containing the Material Non-public Information shall be kept in a safe place where only authorized officers and employees may have access;
 2. Officers and employees shall not discuss the Material Non-public Information at places such as elevators and hallways, etc. where other people can hear the conversation;
 3. Documents containing the Material Non-public Information shall not be disclosed to the public, and the documents shall be disposed by way of shredding etc. so that the content of the documents become illegible;
 4. Officers and employees shall keep the confidentiality of the Material Non-public Information both in and out of the Company;
 5. Transmission of the documents related to the Material Non-public Information via electronic transmission including fax and computer, etc. shall be made under circumstances where security is guaranteed;
 6. If possible, unnecessary copying of the documents containing the Material Non-public Information shall be refrained, and the documents shall be quickly removed from the meeting rooms or working areas; and
 7. Extra copies of the documents containing the Material Non-public Information shall be completely disposed of by safe means such as shredding.
- (2) Officers and employees of the Company shall not disclose the Material Non-public Information to the general public. Provided, however, that in case it is necessary to share the Material Non-public Information with their counterparty, legal representative and external auditor, the officers and employees shall make a prior inquiry to the Disclosure Officer or the head of the Disclosure Department, and share or disclose the information only to the extent it is necessary.
- (3) In case the officers and employees have disclosed the Material Non-public Information unintentionally, such officers and employees shall notify the head of the Disclosure Department of the fact without delay.
- (4) The head of the Disclosure Department, upon receiving the above notice, shall report such fact to the Disclosure Officer, and shall take necessary measures, such as the Fair

Disclosure, etc. under the instruction of the Disclosure Officer.

Article 35 (Material Non-public Information of Affiliates)

The provisions of Articles 32 through 34 shall apply *mutatis mutandis* to prohibition on officers and employees from using the Material Non-public Information of the Company's Affiliates.

Article 36 (Return of Short-Swing Profit)

- (1) If an officer or an employee who works for a department in charge of finance, accounting, planning, research and development, and disclosure derives profit by selling the Specific Securities, etc. within six (6) months from the date of the purchase of such Specific Securities, or vice versa, the officer or the employee shall return the profit to the Company pursuant to Article 172 of the Act.
- (2) If the head of the Disclosure Department is requested from the shareholders of the Company (including owners of any equity securities or depositary receipts other than shares; hereafter the same shall apply in this Article) to make a claim for return of short swing profits against a person who has derived such profits, he or she shall report such fact to the Disclosure Officer.
- (3) The Disclosure Officer shall take necessary steps including legal proceedings against the concerned officers or employees so that they shall return such profit within two (2) months upon receipt of the request in foregoing paragraph.
- (4) The Disclosure Officer shall disclose matters falling under any of the following subparagraphs to the general public on its website for a period of two (2) years after receiving notice of accrual of short-swing profits from the Securities and Futures Commission of Korea (the "SFC") without delay. Provided that it shall not apply to cases in which such short-swing profits have been returned:

1. Position of the person who shall return the short-swing profit;

2. The amount of the short-swing profit (it refers to the total amount of such profit by officers and employees or by shareholders);
3. The date of receipt of the notice from the SFC with respect to the accrual of short-swing profits;
4. The relevant legal entity's plan to make a claim for the return of such short-swing profit; and
5. Explanation that a shareholder (including owners of any equity securities or depositary receipts other than shares; hereafter the same shall apply in this Article) of the relevant corporation may demand that the corporation makes a claim for return of short swing profits against a person who has derived such profits, and the shareholder may also make such claim on behalf of the corporation, if the corporation does not make such claim within two months upon receipt of request from the shareholder.

Chapter VI. Other Disclosure Control

Section 1. Media Contact including Distribution of Press Release

Article 37 (Distribution of Press Release)

- (1) If the head of Business Department intends to distribute press release to the media, he or she shall deliver his or her intention to the Disclosure Department prior to distribution and obtain approval from the Disclosure Officer. In this case, if the Disclosure Officer deems it necessary, he or she shall report the fact to the managing director, and shall follow his or her instruction.
- (2) In case any information in the press release falls under the matters for Fair Disclosure as set forth in Article 17, the head of the Disclosure Department shall prepare the Fair Disclosure Documents, and obtain approval from the Disclosure Officer and make the Fair Disclosure pursuant to Articles 19 and 20.

Article 38 (Hearing of Opinion)

The Disclosure Officer may, if necessary, obtain the opinion of officers and employees or

external experts with expertise on the information to be contained in the press release.

Article 39 (Post Review of Media Coverage)

The head of the Business Department who has prepared the press release and the head of the Disclosure Department shall conduct a post review of the media coverage after the distribution of the press release, and in case there is any misleading information, the heads shall report it to the Disclosure Officer and take necessary measures following the instruction of Disclosure Officer.

Article 40 (Media Coverage, etc.)

(1) If the media requests any information from the Company for the purpose of news reporting, the person falling under any of the following subparagraphs may respond to the request. Provided, that in case it is unavoidable, the Disclosure Officer may designate a person who will respond to such request from the media:

1. Managing Director
2. Disclosure Officer
3. IR Officer
4. Financial Officer

(2) In case the Company receives any request for information mentioned in the foregoing paragraph, the head of the Disclosure Department shall request the relevant media to send them questions beforehand, or prepare expected questions and answers, and shall deliver them to the person who will respond to the media after having it reviewed by the Disclosure Officer.

(3) Where there is any misrepresentation of information in media coverage, the head of the Disclosure Department shall report such misrepresentation to the Disclosure Officer and take necessary measures following the instruction of the Disclosure Officer.

Section 2. Rumors in the Market, etc.

Article 41 (Rumors in the Market)

- (1) In principle, the Company shall not make any comments on rumors in the market.
- (2) The Disclosure Officer or the head of the Disclosure Department shall verify whether the rumors in the market reflect any undisclosed material information by making inquiries to the relevant Business Departments, and shall take necessary measures to ensure the related information is disclosed if the rumors reflect undisclosed material information.
- (3) Even if the rumors does not reflect undisclosed material information, if the rumors are deemed to have adverse influence on the interest of the Company, the Disclosure Officer or the head of the Disclosure Department shall establish and enforce appropriate measures.

Article 42 (Request for Information)

- (1) If shareholders and a person who has special interest in the Company demand disclosure of information relating to the Company, the Disclosure Officer shall examine the legality of such demand, and shall decide whether the related information needs to be disclosed.
- (2) If the information is to be disclosed in accordance with the decision of the foregoing paragraph, the Disclosure Officer may obtain opinion from the legal department or external legal experts on whether the information to be provided may have material influence on the decisions of investors and on the share price. If the information to be provided may fall under the information subject to the Fair Disclosure or may have material influence on the decisions of investors and on the share price, the Disclosure Officer shall provide the information to the person who requests the information, and at the same time (or prior to the provision of the information), shall take necessary measures to disclose such information to the general public.

Article 43 (Company Presentation)

- (1) If company presentations, including road show, analyst conference, etc. (the “**Company Presentation**”) are held, the head of the department in charge of the presentation of the Company shall make a prior report on the details of the materials to be distributed and predictable questions and answers to the Disclosure Officer in writing, and shall obtain approval from the Disclosure Officer.
- (2) When intending to organize the Company Presentation, the head of the department in charge shall notify the head of the Disclosure Department of the time, place and details of such presentation, and the head of the Disclosure Department shall disclose the details of the Company Presentation prior to the opening of the presentation.
- (3) In case non-public information is distributed during the question and answer session at Company Presentation, the head of the Disclosure Department shall take necessary measures to disclose such information to the public without delay.

Article 44 (Disclosure of Information via Internet Homepage and E-mail, etc)

- (1) In case information related to the Company is to be disclosed on its website or via e-mail, the head of the Business Department shall deliver such information to the Disclosure Department prior to such disclosure and disclose the information upon obtaining approval from the Disclosure Officer.
- (2) The provisions of Articles 37 (2), 38 and 39 shall apply *mutatis mutandis* to this Article. In this case, the “press release” and the “any information in the press release” shall be read as the “information to be disclosed on its website and via e-mail.”

Chapter VII. Supplementary Provisions

Article 45 (Training)

- (1) The Disclosure Officer shall establish and enforce annual training program for all officer and employees of the Company to make them fully understand and perform his or her

duties relating to Disclosure Control System. In this case, the Business Department where the most frequent needs arise for disclosure of Disclosure Information and the Disclosure Department shall endeavor to complete professional education or training program.

- (2) The head of the Disclosure Department shall check and complete any compulsory training programs provided by the KRX and the Korea Listed Companies Association, and shall take necessary steps to disseminate the contents of the training to relevant officers and employees.

Article 46 (Penal Provisions)

The Company may impose penalties or sanctions on the officers and employees who violate this Regulation pursuant to the related regulations of the Company.

Article 47 (Amendment or Repeal of Regulation)

This Regulation shall be amended or repealed by the board of directors.

ADDENDUM

Article 1 (Effective Date) This Regulation shall become effective on 12. 12. 2024.