

Code of Conduct

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Samsung SDI

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『Preface to the Code of Conduct』

Samsung SDI seeks to become a company that is innovative and is loved and respected by our customers. We are continuously developing products and services by utilizing the latest technologies, top-of-the-line talents and resources so that we can all enjoy an improved livelihood.

We pledge to grow into a company that is loved and respected by our customers, shareholders, employees, business partners and community residents by establishing a guiding standard composed of the Samsung Values (People, Excellence, Change, Integrity, and Co-prosperity) and principles that concretize our core values.

This Code of Conduct contains principles that embody the Samsung Values. At every step and under any circumstances, the Code will serve as a moral compass that leads to wise decisions and actions.

Being guided by the compass suggests that we follow not only the written laws and policies but the implications embedded in them. Based on loyalty of the company and with the company's interests in mind, we make ethical and dignified decisions and take actions accordingly.

In other words, the Code of Conduct is a standard each employee of Samsung SDI should responsibly adhere to, and employees should carry out right-minded actions by following the provided guidelines.

If a guideline to a certain circumstance is not found on the Code of Conduct, it is important to adopt a law-abiding spirit embedded in the Samsung Values and the Code of Conduct, and take actions grounded on common sense and rational judgements within the boundary of relevant laws.

Each one of you is crucial to Samsung SDI. Your words and actions matter regardless of your position, environment, and your professional

responsibilities. We ask you to regard Samsung SDI's Code of Conduct as top priority and implement the principles that are included in the Samsung's Values day after day.

Principle 1: We comply with laws and ethical standards.

1-1 Samsung SDI upholds all related laws

- The company strives to uphold domestic laws and those of the countries that it operates in, and all employees are responsible for acquiring full knowledge of laws related to their tasks, company policies, and work procedures. Employees must act within the borders permitted by law. In addition to the laws and the company policies, their implications must also be observed.
- Regardless of their positions within the company, all employees shall not violate any laws related to the Code of Conduct and cannot instruct, authorize, aid and abet, or condone any violations by other employees. Instead, employees shall comply with the Code of Conduct and the company policy. Employees shall not condone matters perceived or suspected as violations of the Code of Conduct. An argument that a violation of the company's laws and the Code was inevitable due to the nature of work is unacceptable.

1-2 Samsung SDI respects dignity and diversity of each individual

- The company strives to protect each individual's basic human rights and treats workers with dignity and respect as agreed by the international community.
- During recruitment processes or task performances, the company does not discriminate against race, ethnicity, nationality, gender, religion, place of birth, disability, marriage status, pregnancy, maternity, political and sexual orientation, and membership in the union. The company provides equal opportunity by respecting diversity of each individual.
- To maintain and develop labor-management relations that co-prosperously cooperate based on mutual trust and integrity, the company respects the freedom of association, collective bargaining, and rights to collective actions in accordance with local labor laws in domestic and foreign countries in which it operates in.
- The company strictly prohibits child labor.
- The company does not discriminate against any workers including temporary workers, migrant workers, student workers, contract workers, directly hired workers, job applicants and other stakeholders. We comply with anti-discrimination laws by determining wages and recruitment conditions fairly.
- The company provides a healthy work environment and complies with labor-related laws, policies and standards such as preventing overtime of maximum working hours, guaranteeing minimum wage and providing social insurance.

1-3 Samsung SDI engages in fair and ethical competition within the borders of the law

- The company competes in a healthy manner by complying with each country's fair trade regulations and does not discuss with competitors prices, output limitations, bids, sales territories and conditions offered for unfair competition with competitors.
- The company complies with laws and policies related to international trade such as export controls, economic sanctions, etc.
- Employees cannot receive anything of financial value such as money, gifts and hospitality from external stakeholders such as customers, business partners, or anyone in a trading relationship with the company, and shall take a zero-tolerance approach to any acts that reflect adversely from fair trading relationships.
- Employees shall not solicit external stakeholders for fraudulent business interests, and shall not directly or indirectly offer, pledge, or provide goods for advantage.
- The company respects trade secrets of third parties and acquires information about third parties or information from third parties only through legal and ethical methods.
- The company does not encourage any acts on customers or business partners that places its competitors at a disadvantage.

1-4 Samsung SDI maintains transparency through accurate accounting practices and disclosure

- The company accurately records and manages all fact-based information on its trade operations in compliance with internationally recognized standards, accounting policies by country and company policies related to accounting practices. The company's records are regularly assessed by external auditing services.
- The company observes laws related to Anti-Money Laundering, Anti-Corruption, and support for terrorist groups. Moreover, we refrain from trading with partners with ambiguous identity and secretive trading practices. We only trade with business partners who engage in economic activities with lawful funds. We refuse to engage in or cooperate with illegal, false and anomalous transactions.
- The company complies with publicly disclosed regulations of the country it is listed on, and discloses major economic information as required by related laws.

1-5 Samsung SDI remains politically neutral and does not intervene in politics

- The company respects its employees' political opinions and the right to freedom of expression through practices such as voting. However, the company does not allow its employees to engage in political activities while on duty without the company's permission. Employees must ensure that their political views or activities will not affect their work-related tasks.
- The company respects the rights of its employees to engage in politics but each employee shall practice their rights as private citizens. They shall do so outside of their work hours and with their own funds as to refrain from influencing their work-related tasks.
- The company respects the civil rights of employees and individuals. When an employee requests for hours to practice their civil rights in a fair manner, the company grants permission according to related laws.
- Employees shall not use the company's funds, human resources, facilities, etc. for political purposes.
- The company respects and complies with government-related laws of each country. When an employee engages in government-related activities, he or she shall not use corporate funds to make illegal contributions or engage in unfair trade practices.

1-6 Samsung SDI protects the information of individuals and business partners

- The company complies with relevant laws and established policies when handling personal information of customers, employees, business partners, and visitors.
- Company personnel that handles personal information is responsible for preventing loss, theft, leakage, forgery, alteration or tampering of the information and shall comply with relevant laws at all times.
- The company shall collect and use personal information only for the purpose of business operation. If there is a third-party with access to such information, he or she should manage the information according to the relevant laws and contracts so as to prevent unauthorized leakage.

Principle 2: We maintain a reputable corporate culture

2-1 Samsung SDI strictly distinguishes public and private affairs in All business activities

- As employees of Samsung SDI, you shall not engage in unlawful activities using your position and duties for personal advantage, such as using corporate funds or assets for appropriation, embezzlement, theft and modifying expenses.
- Employees cannot directly trade shares, securities, and real estate through a third-party by using non-disclosed information they were provided for the purpose of their duties. Non-disclosed information shall not be used for personal advantage or for activities that defile the reputation of the company.
- If there is a conflict of interest between the company and an employee, the employee shall consider the company's legal benefits first and foremost. All employees must ensure that the company's legal benefits are reflected in all task-related decisions and actions. Objective judgments considering the company's benefits shall also be made in relationships with customers, business partners, and competitors.
- The company's assets and facilities shall only be used for business operation or other approved purposes.

2-2 Samsung SDI respects the intellectual property rights of the company and others

- Employees shall protect the company's intellectual assets and confidential information from leakage.
- Employees shall accurately record and report significant information acquired while performing their duties and shall manage it as all other intellectual assets.
- Employees must report intellectual property acquired not only while working but also after retirement and must apply for a patent through the company.
- The company respects intellectual property rights such as patents, trademarks and copyrights, and does not practice unauthorized use or deliberate infringement.

2-3 Samsung SDI creates a healthy organizational atmosphere

- The company provides a healthy work environment to its employees and does not allow any direct or indirect behavior that can be seen as workplace harassment. Workplace harassment may include any kind of harassment such as sexual harassment, physical harm, insult, posting or sending of blatantly sensational or offensive material through email or text messages, misuse of personal information, establishment of a hostile or threatening environment, bullying, and dissemination of malicious rumors.
- The company strives to respect its employees and treat them equally by maintaining and refining an organizational atmosphere of integrity and co-prosperity based on loyalty.

2-4 Employees must preserve dignity as a member of Samsung SDI in all activities

- As a principle, employees shall not have additional jobs, duties and tasks while working for the company. However, there are exceptions if prior permission was received.
- The employee must receive official approval in the occasion that the company's financial information has to be disclosed.
- While employed for Samsung SDI, employees shall not serve as a member of another company with conflict of interest or is a competitor of this company.
- The company respects the personal views of its employees and the right to freedom of expression. However, when expressing their views such as through social media, employees shall clarify that the views are personal and that they do not represent the views of the company.

Principle 3: We respect our customers, shareholders and employees

3-1 Samsung SDI considers customer satisfaction the foremost priority in its management

- The company focuses on producing products and services and developing technology from the customer's perspective. Moreover, the company strives to accommodate the customer's needs and suggestions and reflects them in product design and service improvement.
- With the belief that 'Samsung SDI exists because of customers,' the company prizes customers and the relationships with them.
- The company competes on the basis of products and services. Employees shall actively engage in fair competition and refrain from using deception. Communication with customers shall be true and accurate.
- The company places customer satisfaction as its utmost priority and administers customer-oriented management. Customers' complaints must quickly and transparently be resolved based on customer respect.

3-2 Samsung SDI pursues management focused on shareholder value

- The company operates for its shareholders. By raising shareholder value through transparent and ethical management, we actively seek to heighten shareholder rights.
- The company is responsible for its shareholders. Timely disclosure of accurate information is a component of our responsibility. Employees must accurately and truthfully record information about the company's business operations so that key management information, including financial information, can be properly provided.
- The company values shareholders' opinions. Shareholders' legitimate statement of opinions will be carefully reviewed and considered according to relevant laws.

3-3 Samsung SDI strives to improve the employees' quality of life

- The company provides equal opportunities to all employees and treats them fairly according to individual qualifications, expertise, competencies, performance in recruitment and career advancement.
- The company actively encourages employees to engage in various activities for development of competencies needed to fulfill their duties.
- The company creates a work environment where employees can work autonomously and creatively.
- The company complies with the labor laws of the countries that it operates in and respects the individual rights of all types of workers such as temporary, migrant, student and dispatched.

Principle 4: We care about the Environment, Safety and Health

4-1 Samsung SDI pursues environment-friendly management

- The company complies with laws and regulations, international standards, and internal policies related to the environment. Employees must also comply with all applicable laws and regulations regarding environment, safety, and health.
- The company strives to develop cleaner, safer, more convenient, and eco-friendly products and technologies. We make strenuous efforts to minimize harmful impacts on the environment during the overall operational process including product planning, design, development, production, sales, and disposal to provide various eco-friendly products.
- The company is striving to implement solid environment-friendly management activities by pursuing fewer use of harmful substances, efficient use of resources, and reuse of wastes.
- The company introduces a cleaner production technology that minimizes greenhouse gases, emission of pollutants and chemical substances, energy and water resources to establish a production process that is environment-friendly.

4-2 Samsung SDI values health and safety of our employees and customers

- The company aims to provide a safe environment to its employees and visitors of the company's operating sites including members of its business partners and customers. To this end, the company observes health and safety related laws and regulations, international standards, internal policies.
- The company creates a culture of safety in which all employees engage in. We advise our employees to create a safe work environment by actively following the company's guidelines established to minimize and eliminate risk factors.
- In case of natural disasters, fire, epidemics and other external risk factors, the company establishes emergency response procedures to maintain business continuity and manages accordingly.
- The company places health and safety of its customers first in the overall operational process of product planning, design, development, production, sales, and disposal.
- The company clearly provides customers with information about safe use and management of its products and services.

Principle 5: We fulfill our social responsibility as a global corporate citizen

5-1 Samsung SDI diligently performs its foundational duties as a corporate citizen

- The company strives for a better future for the company, as well as its customers, shareholders, business partners, local communities, and the global society.
- The company puts effort into creating stable jobs and diligently carries out its tax responsibilities and legal obligations within the community.
- Employees who work on behalf of the company shall act in a sound manner. The company's employees shall carry out their tasks based on healthy and rational judgments, and understand that each action is directly associated with the company's reputation of a responsible and trusted corporate citizen.
- The company asks that its employees instill trust in the local community by taking actions in an ethical and honorable manner based on loyalty and honesty.

5-2 Samsung SDI respects the social and cultural values of local communities and operates on the idea of mutual development

- The company strictly complies with the laws of the community and respects its culture and values. The company contributes to improving the local residents' quality of life, and employees are also encouraged to participate in the established internal policies.
- The company creates employment opportunities in the country that it operates in and contributes to the local community through the development of human resources in the region.
- The company contributes to the development of academics, arts and sports in the local communities through contribution activities, fulfilling its role as a corporate citizen.
- As a member of the community, the company actively seeks and engages in social contribution activities such as volunteering and disaster relief. The company asks its employees to engage in the company's social contribution activities and also proactively take part in each of their own volunteer services.

5-3 Samsung SDI builds relationships of coexistence and co-prosperity with its business partners

- As the company grows with the help of its business partners, Samsung SDI promises to strive for collective development. The company recognizes its business partners as strategic partners seeking mutual value of customer satisfaction on the basis of trust, and builds a healthy system of cooperation.
- The company applies fair standards without discrimination during the process of selecting a business partner.
- The company ensures that its partners comply with laws related to human rights, child labor, work hours, forced labor, discrimination, environmental regulations and international standards and the results are reflected in the comprehensive assessment.

5-4 Samsung SDI pursues the expansion of technology innovation and IT accessibility

- The company is committed to developing innovative products that contribute to the human society through ongoing investments in R&D.
- The company pursues improved accessibility so that anyone can have access to Samsung SDI's cutting-edge technology regardless of the social status.
- The company recognizes that improving accessibility signifies providing more convenient opportunities to users with physical constraints. Therefore, the company strives to reflect this idea throughout the stages of product planning, design, and development.

5-5 Samsung SDI pursues superior quality for customer value and happiness

- The company places its customers' first in its business operations, and each employee shall strive to produce products of superior quality in order to optimize the value of customers.
- To achieve customer satisfaction, the company strictly adheres to regulations, international standards and internal policies related to product quality and develops products with the highest standard of product management. Employees shall refrain from performing any actions that goes against these regulations.
- The company aims for quality innovation and works closely with its business partners to develop a quality product system of flawless components.

[Appendix] Compliance Obligations of the Code of Conduct

Employees of Samsung SDI must be aware and comply with applicable laws and regulations regarding their tasks. Employees must always act within the borders of the related laws and regulations, and observe their implications in addition to what is stated.

If acquiring complete knowledge of regulations applicable to their tasks is unmanageable, they must have a thorough understanding of the major regulations that serve as the foundation of their tasks. If questions arise regarding the laws and regulations in application and interpretation, employees shall contact the Compliance Team or the Legal & IP Team for advice without hesitation.

[Scope of Coverage]

This Code of Conduct applies to Samsung SDI and its affiliated employees, as well as domestic and foreign companies holding the majority of the company's share and their employees.

Business partners working with and for Samsung SDI shall adhere to the Code of Conduct when carrying out tasks for the company.

[Reporting Violations]

Any violations or suspected violations of the Code of Conduct shall be immediately reported through Reporting Wrongful practices and Violation of Law in Samsung SDI Webpage, Anonymous Report in SDI's Compliance System, the Compliance Team's email(cp.sdi@samsung.com), Report on unethical activities in the Ethics Management system, the Audit Team's email(audit.sdi@samsung.com), etc.

We advise that you do not hesitate to report when violations or suspected violations of the Code of Conduct are found. The company operates a corporate-wide communication channel to address employee's grievances. To allow employees to report without fear of any retaliatory acts, the company guarantees anonymity of whistleblowers and also prohibits any actions of discrimination, harassments, and threats.

[Disciplinary Sanctions and Administrative Responsibilities for Violations]

Any employee that violates this Code of Conduct is subject to sanctions as determined by the characteristics of the matter and the employment policies.

Directors and officers should be aware of any possible violations of the Code of Conduct, internal policies, and work procedures. In case of violations or suspected violations, directors and officers are responsible for immediately resolving the matter or reporting it to the appropriate personnel.

Supplementary Provision

This Code will be effective as of December 7, 2010.

Supplementary Provision (July 1, 2020)

This Code will be effective as of July 1, 2010 and shall apply to the future after the effective Date.