

Code of Ethics

Hanmi Group aims to become a global corporation based on our creativity and challenging spirit according to our management philosophy of "Respect for Humanity and Value Creation". Although the Code of Ethics does not provide all answers to the question of "What is right?" it should serve as a basic guideline for helping employees to consistently make the right decision and to judge values by recognizing and reviewing problems. Our employees promise to maintain the dignity of the individual and the company's reputation by making compliance with laws and ethics a key element of their work.

Ch.1 | Basic Ethics of Employees

1. The Mission of Hanmi Group Employees

- (1) Hanmi Group employees shall always maintain their integrity and a fair attitude and take pride in being a Hanmi employee.
- (2) Hanmi Group employees shall always strive to maintain the dignity of the individual and the company's reputation and adhere to the highest ethical values.
- (3) Hanmi Group employees shall think about potential problems when performing their duties, decide what to do, and report to their superiors.
- (4) Hanmi Group employees shall faithfully fulfill each mission according to the company's vision and policy.
- (5) Hanmi Group employees shall raise work efficiency through active cooperation and smooth communication with their colleagues and the relevant departments.

2. Hanmi Group Employees' Commitment to Fair Business Practices

- (1) Avoid Conflicts of Interest
 - Hanmi Group employees shall avoid any behavior or relationship that causes conflict between the interests of the company and the individual.
 - Hanmi Group employees shall not mediate or solicit on behalf of others or themselves in a way that interferes with the fair performance of other employees.
- (2) Create a Healthy Organizational Atmosphere
 - Hanmi Group employees shall not commit any act in the workplace that causes sexual humiliation, discomfort, or disgust to other employees.
 - Hanmi Group employees shall not use their status or relationship superiority in the workplace to commit any act that inflicts physical or mental distress on others.
 - Hanmi supervisors shall not give their subordinates instructions designed to promote their own personal interests or those of any third parties, in violation of the company laws and regulations.

- Hanmi Group employees shall not use any word or commit any practice - such as financial transactions, violence, or discrimination - that may undermine healthy relationships between colleagues.
- Hanmi Group employees shall strive to create an organizational culture of coexistence and co-prosperity based on mutual trust and transparent communication.

3. Hanmi Group Employees' Commitment to Preventing Corruption

(1) Prohibition of the Private Use of, and Profiting off of, Company Properties

- Hanmi Group employees shall not use their position or authority directly to gain unfair profits for themselves or others.
- Hanmi Group employees shall not use company property without permission or for their own personal benefit, shall not inflict any damage on company property by using it, and shall not use money from company budgets for any other purpose than their intended one.

(2) Obligation to Protect Job-related Information

- Hanmi Group employees shall not engage in transactions of marketable securities or provide information to others using undisclosed information obtained in the course of performing their duties.
- Hanmi Group employees shall not inquire about or request other employees for information unless they are allowed to collect said information.
- The company's confidential information, and personal information acquired through work, shall be protected and managed in accordance with applicable laws and internal regulations.

(3) Prohibition of Bribery

- Hanmi Group employees shall not receive any money or bribes from a person related to their job, or a work-related colleague with regard to their work.
- Hanmi Group employees shall not receive or offer any money or bribes in relation to their jobs to or from overseas corporations or public officials and shall comply with overseas laws such as the *Foreign Corrupt Practices Act* (FCPA) and the UK *Bribery Act*.
- Hanmi Group employees shall not deviate from the usual customs regarding expenses for family occasions/events, gifts, and meals.

Ch.2 | Fair Competition & Trade

1. Hanmi Group Employees' Commitment to Fair Competition

(1) Pursuit of Free Competition

- Hanmi Group employees shall respect the market economy and pursue fair competition, in good faith, based on mutual respect for competitors, in accordance with the principles of free competition.

- Hanmi Group employees shall strive to contribute to the development of a fair society that is free from corruption by improving the fairness and reliability of the company's transactions according to the principles of anti-corruption and fair competition.

(2) Legal compliance

- Hanmi Group shall continuously strive to ensure that all employees voluntarily comply with relevant laws and regulations by running a Fair Trade Compliance Program.
- Hanmi Group shall strive to secure a fair order for medicine distribution by observing the Fair Competition Regulations and the *Pharmaceutical Affairs Act* and drug transactions, to avoid unfair means of attracting customers.
- Hanmi Group shall continuously pursue growth based on transparent, ethical management as well as our individual employees' compliance with the Fair Trade Compliance Program.

2. Hanmi Group Employees' Commitment to Fair Trade

(1) Legal compliance

- Hanmi Group employees shall not impose unfair trading conditions on the company's business partners or make unfair demands, such as business interference.
- Hanmi Group employees shall not use their position in a business transaction to obtain an unfair advantage or to provide convenience as a reward.
- Hanmi Group employees shall give equal opportunities for participation to all qualified business partners when entering a business contract.
- Hanmi Group employees shall fully discuss the terms and procedures of all transactions and comply with the confidentiality of mutual business.
- Hanmi Group employees shall respect the intellectual property of others and shall not commit any infringements, such as the unauthorized use, reproduction, distribution, or alteration of the intellectual properties of other parties.

(2) Establishment of Coexistence and Co-prosperity with Business Partners

- Hanmi Group employees shall build mutually beneficial relationships based on mutual trust with business partners and recognize them as strategic partners.
- Hanmi Group employees shall pursue mutual development with business partners and cooperate with them.

Ch.3 | Ethics for All Customers

1. Hanmi Group Employees' Commitment to Customers

- (1) Hanmi Group employees shall always strive for true value through the pursuit of innovation and creativity.
- (2) Hanmi Group employees shall strive to provide high-quality medicines and services and satisfy all customers through technology development and quality enhancement.

- (3) Hanmi Group employees shall always respect their customers, listen to them from their perspective, and handle complaints and suggestions promptly and fairly.

2. Hanmi Group Employees' Promise to Shareholders & Investors

(1) Profit Protection

- Hanmi Group shall do our best to protect the interests of shareholders and investors through the pursuit of continuous growth and development.

(2) Guarantee of Rights

- Hanmi Group shall respect the legitimate demands and suggestions of customers and actively reflect them in management.
- Hanmi Group shall disclose information transparently, as a matter of course, so that shareholders and investors can make reasonable judgments.

3. Hanmi Group Employees' Commitment to Transparency and Trust of Financial Management

(1) Transparency in Financial Management

- The company's financial information shall be accurately recorded and managed in accordance with relevant laws and internal controls.
- Hanmi Group employees shall not make false or exaggerated reports for the benefit of specific individuals or departments and shall not conceal or monopolize important information.

(2) Faithful provision of Information

- Hanmi Group employees shall not leak, divulge, or use financial information without obtaining the prior permission or approval of the supervisor in charge.
- Hanmi Group employees shall disclose reliable management information, including information about business activities, financial status, and performance, in accordance with the relevant laws and regulations.

Ch.4 | Bioethics

1. Hanmi Group Employees' Commitment to Protecting Human Dignity and Values

- (1) Hanmi Group employees shall respect people as their top priority and strive to achieve personal happiness and build the common good, based on humanist values.
- (2) Hanmi Group employees shall faithfully fulfill the duties of a pharmaceutical company that exists to improve human health and develop an innovative spirit of creation and challenge.
- (3) Hanmi Group shall not provide products or services that infringe human dignity and values, or cause harm to the human body, and shall do our best to promote bioethics and safety.

2. Hanmi Group Employees' Commitment to the Safety of Pharmaceutical Products

- (1) Hanmi Group employees shall thoroughly manage pharmaceutical raw materials and continuously inspect the manufacturing environment to ensure the highest standard of pharmaceutical safety.
- (2) Hanmi Group employees shall protect patient safety by continuously collecting, evaluating, managing, and reporting the safety data of pharmaceutical products.

Ch.5 | Supplementary Rules

1. Duties and Obligations

- (1) Hanmi Group employees shall familiarize themselves with and comply with the Code of Conduct and take responsibility for any violations.
- (2) The CEO, executives, and departmental heads shall be responsible for managing and supervising their employees' compliance with the Code of Conduct.
- (3) Hanmi Group shall conduct any necessary training on a regular basis and require our employees to pledge to comply with the Code of Conduct.

2. Rewards & Disciplinary Actions

- (1) The CEO may evaluate and reward employees who have observed the Code of Conduct and contributed significantly to establishing ethical management.
- (2) The CEO may take all necessary disciplinary actions according to the company's regulations against employees who are found to have violated the Code of Conduct.

3. Establishment of a Department and Committee for Ethical Management

- (1) The CEO shall be responsible for establishing a dedicated department or a committee to facilitate ethical management and implement the Code of Conduct.
- (2) The CEO shall establish and operate a dedicated department and committee to maintain Compliance Officers' ethical management.

4. Reporting Violations and Counseling

- (1) Anyone who discovers a violation of the Code of Conduct shall inform the Compliance Officer, without delay.
- (2) Hanmi Group shall guarantee the confidentiality of the contents of a report and the reporter's identity, and shall ensure that no disadvantages are suffered by anyone making such a report.
- (3) The Compliance Officers may provide counseling about violations of the Code of Conduct and take necessary measures to facilitate reporting and counseling.