CHAPTER 1 GENERAL PROVISIONS

Article 1 (Purpose) Hanyang Digitech (hereinafter referred to as "Company") shall establish and enforce the Compliance Standards to comply with the law, promote fair and transparent work fulfillment by realizing business ethics, and to secure sound development of the Company and trust of customers.

Article 2 (Definitions of Terms) The definitions of the major terms used in this Compliance Standards shall be as follows.

- 1. "Compliance" refers to entire process of policy establishment and control activity selected to prevent offenses in advance and respond systematically to various legal risks by systematically identifying the various law to be complied by the Company for business operation and self-inspecting the law observance of employees. 2. "Legal risk" refers to the risk of damages incurring from civil, criminal, or administrative liability or efficacy of contract not being recognized due to an employee's noncompliance with law.
- 3. "Compliance Manager" refers to a person appointed according to Compliance Standards to execute the compliance training program within the Company and fulfill affairs regarding compliance with Compliance Standards, etc.

Article 3 (Application Scope)

- (1) The Compliance Standards shall apply to all affairs of Company and subsidiary companies and all relevant activities of employees.
- (2) The various regulations of the Company related to the Compliance Standards shall be in accord with the Compliance Standards, and unless otherwise prescribed by relevant Acts or the Articles of Incorporation, the Compliance Standards shall take precedence.

Article 4 (Enactment and Revision) The establishment and revision of the Control Standards shall be executed by the Board of Directors.

CHAPTER 2 COMPLIANCE ORGANIZATION

Article 5 (Organization Composition and General Principle of Roles and Responsibilities) The organization composition and roles and responsibilities for compliance shall secure the efficiency of compliance affairs and independence of the compliance officers and clearly plan the role and responsibility relationships of relevant employees.

Article 6 (Roles)

(1) The Board of Directors shall decide on Compliance Standards and the related important matters.

Also, the Board of Directors shall supervise whether the Representative Director establishes and effectively operates a compliance system by faithfully reflecting the decision of the Board of Directors. (2) The Representative Director shall operate a compliance system that is in accord with the size of the Company and nature of business as prescribed by the Compliance Standards and the Board of Directors.

(3) The Compliance Manager shall generalize compliance affairs at the working-level, such as establishing and executing a compliance training program, inspecting whether the Compliance Standards are complied, and reporting to the Board of Directors or the Representative Director.

Article 7 (Appointment and Dismissal of Compliance Manager)

- (1) The Compliance Manager shall be appointed and dismissed by the Representative Director through resolution of the Board of Directors.
- (2) The Representative Director, in the event of a reason corresponding to any one of the following subparagraphs, may dismiss the corresponding Compliance Manager through resolution of the Board of Directors.
- 1. When the job cannot be fulfilled due to physical or mental disability
- 2. When an offense is committed or the law or the Articles of Incorporation is violated in relation to the job
- 3. When damages incur for the Company due to intention or gross negligence
- (3) The Compliance Manager shall not be dismissed during one's term without justifiable reason, and when one is dismissed during his or her term, the Representative Director shall present sufficient evidence that can prove the reason for dismissal of each subparagraph of Paragraph 2.
- (4) The Compliance Manager may testify one's opinion to the Board of Directors regarding the dismissal.
- (5) When the Compliance Manager is dismissed or retires due to termination of term or resignation, the Representative Director shall promptly appoint a new Compliance Manager and maintain the continuity of affairs.

Article 8 (Qualification, Term, and Position of Compliance Manager)

- (1) The Compliance Manager shall meet the following requirements.
- 1. A person that has at least a total of 5 years of experience as an Auditor of the Audit Committee or a relevant department, or a person that is a qualified attorney
- 2. Shall have completed the compliance training held by the Financial Supervisory Service, Korea

Exchange, or KOSDAQCA.

- 3. Shall be a full-time employee
- 4. Shall meet other requirements prescribed by the Board of Directors
- (2) An Auditor or an Audit Committee member cannot become the Compliance Manager.
- (3) While the term of the Compliance Manager shall be determined by the Board of Directors, at least 2 years.

Article 9 (Authority and Duty of Compliance Manager)

- (1) The Compliance Manager shall have the following occupational authority.
- 1. Execution of training program for compliance
- 2. Regular or constant inspection and report regarding compliance with the Compliance Standards
- 3. Regular or constant inspection and report regarding compliance with Internal Accounting Control Regulations
- 4. Collection and request for submission of necessary information and data and request for statement regarding the propriety of financial documents Collection and request for submission of necessary information and data and request for statement regarding affairs
- 6. Request for compliance regarding employees and request for suspension, improvement, or correction regarding matters determined to be illegal
- 7. Request for sanctions regarding employees violating the Compliance Standards, etc.
- 8. Attendance and statement of opinion at the Board of Directors fulfilled in relation to compliance affairs
- 9. Leading the compliance-supporting organization and recommendation of personnel for employees of relevant department Other matters prescribed as the authority of the Compliance Manager by the Board of Directors
- (2) When necessary, the Compliance Manager may seek advice and support of an external expert.
- (3) The Compliance Manager, in relation to one's affairs, may directly or in time report to the Board of Directors or the Representative Director, and when necessary for reporting, may request the Representative Director to convene the Board of Directors.
- (4) The Compliance Manager shall fulfill one's job with fiduciary duty, and during one's term and even after retirement, shall not divulge the Company's business secret acquired during one's job.

CHAPTER 3 COMPLIANCE ACTIVITIES

Article 10 (Assessment of Legal Risk)

(1) The Board of Directors shall establish and operate an integrated legal risk assessment and

management system that effectively operates under the entire risk management system of the Company.

(2) The Compliance Manager shall determine the probability by reviewing the size, frequency, etc. of legal risk and categorize the legal risk behaviors. When the Compliance Manager requests for cooperation to make such categorization, each relevant department and employees shall accede faithfully and promptly.

Article 11 (Management of Legal Risk)

- (1) Employees shall be fully aware of and comply with domestic and foreign law related to occupational legal risk, company regulations, etc.
- (2) Employees, when discovering offenses or violations of the Compliance Standards, shall immediately report according to the procedures prescribed by the Compliance Standards and shall not be involved or cooperate in such offenses.
- (3) Each relevant department and the compliance officers shall devise measures to prevent transfer or expansion of legal risk to other departments.
- (4) The compliance officers, based on legal risk assessment, shall ensure that employees accurately recognize and understand the duties pursuant to Paragraph 1 and Paragraph 2.

Article 12 (Operation of Compliance Training Program)

- (1) The Compliance Manager shall plan and execute a detailed and systematic compliance training program to ensure that employees in advance identify the legal risk related to handling affairs and take appropriate measures.
- (2) The Compliance Manager shall execute the training program at least once per year (at least 2 hours) for all employees. Special training may be executed as a separate program for departments predicted to have high legal risk.
- (3) The Compliance Manager shall assess the effectiveness and effect of the compliance training program, and when necessary, may execute a survey for improvement.
- (4) The Compliance Manger may operate a counseling system for employees highly exposed to occupational legal risk aside from the training program.

Article 13 (Employees' Self-Inspection of Compliance)

(1) Each department shall establish a self-inspection plan for compliance and assess the condition of self-inspection regularly. (2) The Compliance Manager shall supervise each department regarding the establishment of the self-inspection plan for compliance pursuant to Paragraph 1 and assess

the condition of self-inspection.

Article 14 (Compliance Support and Inspection)

- (1) The Compliance Manager shall establish and operate a compliance inspection system that inspects all of the employees' compliance with the Compliance Standards, etc.
- (2) The Compliance Manager shall fulfill legal counseling affairs at all times for employees, and employees may be required to discuss with the Compliance Manager in advance for fulfilling affairs closely related to legal risk, such as concluding contracts.
- (3) The compliance inspection fulfilled by the Compliance Manager includes the annual regular inspection and constant inspection executed for certain legal issues.
- (4) The Compliance Manager may specifically standardize report matters by department for efficient compliance inspection, and when necessary, may make reporting certain matters mandatory.
- (5) The Compliance Manager shall prepare the compliance inspection result as a document and report to the Board of Directors. Provided, that when necessary while inspecting compliance, one can report to or discuss with an Auditor.

The result shall be reported at least once per year to the Board of Directors. (5) The compliance officers, when necessary while inspecting compliance, may notify or discuss with the Audit Committee.

Article 15 (Internal Reporting)

- (1) The Representative, regarding the illegal or unfair work execution of employees, etc., may establish an internal reporting system in which the Compliance Manager may receive direct reports, and the subject of internal reporting shall be as follows.
- 1. Matters against the law or company regulations in relation to the affairs of the Company (including all company regulations, such as this Standards, Code of Ethics, Internal Accounting Control Regulations, etc.)
- 2. Offenses, illegal actions, or crimes regarding the jobs of employees (embezzlement, breach of trust, fraud, theft, provision or acceptance of money, valuables, or entertainment, accounting manipulation, etc.)
- 3. Illegal and unfair orders regarding the Company's employees or external interested persons using position in office (solicitation, arrangement, coercive conduct, etc.)
- 4. Other matters determined to likely cause the matters above
- (2) A person receiving or processing internal reports shall maintain the confidentiality of the personal information of the internal reporter and details of the report.

(3) When the internal reporter reports an offense or unfair practice related to oneself, the circumstances may be considered, and all internal reports shall not be disadvantaged in any way in terms of human resources due to the internal reporting.

Article 16 (Processing Violations)

- (1) The Compliance Manager, when violation of the Compliance Standards is discovered, may notify the head of the corresponding department or report to the Representative Director, request appropriate measures to be taken, such as suspension, improvement, correction, sanctions, etc., and when necessary, may establish comprehensive response measures by discussing with the relevant department and propose such measures to the Representative Director, etc. Provided, that when urgent, the Compliance Manager by one's own decision prior to reporting or proposal, may take necessary measures such as request for suspension, improvement, correction of the action to the corresponding employee.
- (2) The Company shall take appropriate disciplinary measures according to the matter of importance for the person that has violated the Compliance Standards, etc.
- (3) The Compliance Manager may establish measures to prevent recurrences of the same or r similar violations and propose to the Board of Directors or the Representative Director.
- (4) The Compliance Manager shall notify the corresponding department and relevant departments of the final measures to prevent recurrences and apply them for improvement of relevant programs and policies.

Article 17 (Delivery and Management of Information and Data)

- (1) The Compliance Manager shall request employees of the corresponding department to submit information and data required for compliance affairs in the form that is usable. Employees that receive the request of the Compliance Managers shall accede promptly and faithfully.
- (2) The Compliance Manager shall establish an integrated information management system that can safely store and systematically organize information and data related to compliance.
- (3) The information or data generated by the compliance system shall be managed and preserved in the form of written or electronic document for the retention period pursuant to the Company's document management regulations.

CHAPTER 4 VALIDITY ASSESSMENT

Chapter 18 (Standard and Procedures of Validity Assessment)

(1) The Board of Directors shall regularly review whether the Compliance Standards and relevant

systems are effectively planned and operated to seek improvement measures for matters that require supplement or improvement.

- (2) The Compliance Manager shall execute a self-assessment for the validity of the compliance support and inspection system and report the result to the Board of Directors.
- (3) The Board of Directors may execute a validity assessment for the compliance system of the entire Company every year aside from the self-assessment of the Compliance Manager.
- (4) In assessing validity, positive review of the propriety and validity of the sanctions for violations, independent work fulfillment system of the Compliance Manager, compliance inspection and report system, legal risk assessment and management system of the Compliance Standards shall be fulfilled.

Article 19 (Follow-Up Measures for Validity Assessment)

- (1) The Board of Directors shall establish improvement measures for defects or faults based on the result of the validity assessment.
- (2) In establishing the improvement measures of Paragraph 1, the Board of Directors shall receive the opinion of the Compliance Manager.
- (3) The Representative Director shall fulfill improvement measures according to the validity assessment.

CHAPTER 5 MISCELLANEOUS

Article 20 (Employee Rewards) The Compliance Manager may propose rewards or promotions for persons determined to have contributed to the prevention or reduction of damages for the Company by faithfully complying with the Compliance Standards.

Article 21 (Detailed Matters) The Compliance Manager may determine detailed matters required for the enforcement of the Compliance Standards.

Article 22 (Promulgation) The Company shall promulgate the Standards on the Company website when established. The same shall apply for revisions.