

Internal Reporting System Operation Regulations

- Enforcement date: 1 January 2022

- Chief manager: Head of Audit Department, GC Legal Audit Office

1. Purpose

The purpose of these Regulations is to set forth the details necessary for the efficient operation and vitalization of the internal reporting system in accordance with the internal accounting management regulations and ethical standards of Green Cross Holdings, its subsidiaries, and investee companies (hereinafter referred to as the "Company").

2. Definitions

The terms used in these Regulations are defined as follows:

The term "website for internal reporting" means a separate website installed and operated on the website and the Company Intranet for internal reporting.

The term "reporter, etc." means a reporter and a cooperator who makes a statement or provides materials in an investigation related to internal reporting.

The term "report, etc." means an anonymous report or an inquiry received through the website for internal reporting. When the Company's employees and directors, business partners, or other internally and externally interested persons become aware of, or are coerced or offered to do, violations of laws, corruption, embezzlement, or other acts against the Company's interests, they may report the content on the website for internal reporting.

3. Protection of a reporter, etc.

(1) Guarantee of status

The Company shall not take, for statements related to a report, etc., in accordance with these Regulations and the submission of other materials, any status, economic disadvantage, or other unjust personnel measures against the reporter, etc. (hereinafter referred to as a "disadvantageous measure") for matters other than those attributable to the reporter, etc.

If the head of audit department confirms that a disadvantageous measure has occurred, he/she can report it to an audit officer and the representative director and request disciplinary action against the person concerned.

(2) Confidentiality

The Company shall take all possible measures to ensure the confidentiality of a reporter, etc.

No one shall inform or disclose the personal information of a reporter, etc., or facts that may be known about the reporter, etc., to others. However, exceptions shall be made when the reporter, etc. agree.

If anyone violates the duty of confidentiality, the head of audit department may request necessary measures, such as an investigation and a referral for disciplinary action against such a person.

4. Operation of the Internal Reporting System

(1) Methods of a report, etc.

A reporter, etc. may make a report, etc. through the access window of the website for internal reporting posted on the Company's website, or groupware, and the subject and reason shall be described according to the relevant form.

The Company shall notify the methods of a report, etc., processing procedures and precautions via the website, groupware, e-mail, and so on, and provide access to them so that all interested persons inside and outside the

Company can check and understand the content. The authority to access and view a report, etc. on the website for internal reporting is granted only to the head of audit department, and some functions may be delegated upon approval of the head of audit department for efficient work performance.

(2) Processing procedures and standards

A report, etc. received through the website for internal reporting shall be handled by the head of audit department with approval from an audit officer according to [Attached Table 1: Standards for Handling Anonymous Reports]. Upon receipt of a report, etc., the head of audit department shall notify the reporter, etc. of whether or not the report has been received and the future handling procedure.

In the case where specific actual facts have been indicated in the report, etc., and at least one (1) of the following materials is attached, an investigation shall be initiated without delay unless there is an unavoidable reason.

(a) In the case where specific evidentiary materials, such as recordings and documents, are attached to the written disclosure; B. The written disclosure specifically specifies an eyewitness or person for reference;

C. In cases where a specific method for verification and securing evidence is presented.

If the above material is not attached to the written disclosure but the specific actual facts are indicated in the report, etc., and it is determined to be highly probable or to be verified, submission of additional materials through the website for internal reporting is requested of the reporter, etc., and facts that can be checked relatively easily are investigated. In the following cases, the start of the investigation is put on hold and the reporter, etc. is requested to submit evidentiary material by setting a deadline: in cases where the subject is not specified; in cases where specific actual facts are not indicated; in cases where the report, etc. is speculation or vague suspicion; in other cases where the details of the disclosure are unclear; in cases where some facts have been verified but it is impossible or difficult to verify additional details without the cooperation of the reporter, etc.; in cases where it is difficult to verify the facts due to internal agitation, being too time-consuming, or other reasons. In this case, if evidentiary material is submitted within the deadline, whether to initiate the investigation will be determined again, and if the material is not submitted within the deadline, the case will be terminated.

Simple civil complaints, complaints, reports of unkind behaviour, unilateral complaints, and duplicate reports on the same issue without justifiable reasons will be terminated immediately without verifying its actual facts. However, if it is deemed to be significantly related to the work of other departments, it can be referred to the relevant department.

In the case of obviously unfounded slander, malicious gossip, and abusive language, the case is immediately closed after giving a stern warning to the person concerned.

(3) Handling of a report, etc.

If the head of audit department decides to investigate the received report, etc., in principle, the result of the investigation shall be notified within 10 business days from the date of receipt (the date of receipt in the case of the submission of evidentiary material).

The processing deadline may be extended depending on the progress of the additional investigation or other circumstances, and the reporter, etc. shall be notified of the expected date of notification of the extended investigation result.

The head of audit department shall report the results of the investigation to the audit officer and the CEO, as well as any matters that have a significant impact on financial information to the auditor or the board of directors.

Considering the seriousness and content of the matter, the person concerned may be referred to the Personnel Committee.

If a reporter, etc. intentionally provides false information to defame or cause damage to employees and directors or other interested persons and the Company, the case may be referred to the Personnel Committee, and legal compensation for damages and civil or criminal proceedings may be pursued.

(4) Receipt and processing record management

The head of audit department or a person who is entrusted with affairs by the head of audit department and is in

charge of managing records of a report, etc. shall record and keep the report, etc. received.

4. Others

The establishment and amendment of these Regulations shall be made with the approval of the representative director.

Attached Table 1: Standards for Handling Anonymous Reports (1 January 2022) <End>

[Attached Table 1: Standards for Handling Anonymous Reports]

Type	Description	Information reliability	Handling standards
<p>Type 1 (Highly reliable)</p>	<p>If specific actual facts are indicated in the details of the disclosure (the fact that specific actual facts are indicated means that the misdeed is described to the extent that the subject and offense can be specified in the written disclosure) and one (1) or more of the following supplementary materials are attached:</p> <ol style="list-style-type: none"> 1) Specific evidentiary materials, such as recordings and documents, are attached to the written disclosure; 2) The written disclosure specifically specifies an eyewitness or person for reference; 3) A specific method for verification and securing evidence is presented. 	<p>High</p>	<p>Commencement of investigation</p>
<p>Type 2 (Somewhat reliable)</p>	<p>If it does not fall under Type 1, but specific actual facts are indicated in the details of the disclosure, and it is highly probable or it is determined that verification is necessary, and it can be verified relatively easily (this is a case in which no evidentiary material is attached, but the details of the written disclosure are specific, and the reported matter can be verified with only a few verifications)</p>	<p>Relatively high</p>	<p>Request for submission of evidentiary material and investigation of some matters</p>

<p>Type 3 (Unclear)</p>	<p>1) In cases where the subject is not specified (e.g. a duty general manager who works in the ◇◇ team, ◇◇ team members);</p> <p>2) In cases where specific actual facts are not indicated (e.g. Manager A often meets with the president of a contractor and receives entertainment);</p> <p>3) In cases where the report, etc. is speculation or vague suspicion (e.g. it seems that it was neglected because the person in charge was bribed);</p> <p>4) In other cases that do not fall under either Type 1 or Type 2;</p> <p>5) In the case where verification is initiated after being determined to be Type 1 or Type 2, but it is impossible or difficult to verify the actual facts without additional cooperation from the reporter, or in cases where additional verification is difficult due to internal agitation, being too time-consuming, or other reasons.</p>	<p>Normal</p>	<p>Pending processing (set a deadline, request the submitter to submit evidentiary materials, determine the case once again if materials are submitted, and automatically terminate if materials are not submitted within the deadline)</p>
<p>Type 4 (Not subject to report)</p>	<p>If it is not subject to reporting through the website for internal reporting, such as simple civil complaints, complaints, reports of unkind behaviour, unilateral complaints, and duplicate reports on the same issue without justifiable reasons</p>	<p>Insufficient</p>	<p>In principle, immediate termination (to be referred to the relevant department depending the matter)</p>
<p>Type 5 (Unfounded slander and gossip)</p>	<p>Obviously unfounded slander, malicious gossip, abusive language, etc.</p>	<p>Unreliable</p>	<p>Immediate termination and warning</p>