

SHI Group Basic Policy on Compliance with the Competition Laws

Promulgated: January 1, 2025

Effective date: January 1, 2025

SHI Group will, by establishing and adhering to the following basic policy on compliance with the Competition Laws, ensure thorough compliance with the Competition Laws by all companies within SHI Group, as well as by their executives and employees, and pursue fair competition and fair trades.

1. Compliance with Laws and Regulations

The executives and employees of SHI Group companies shall always be mindful of and comply with the Competition Laws of relevant countries in the course of their business activities.

2. Prohibition of Pursuing Performance Through Unjust Means

SHI Group shall not pursue any performance that can only be achieved without the aid of violations of the Competition Laws.

3. Training for Compliance with Competition Laws

SHI Group shall provide regular and ongoing training with the Competition Laws to its executives and employees, utilizing appropriate materials and methods.

4. Consultation System

SHI Group shall organize and operate a system that allows its executives and employees to consult about the Competition Laws at appropriate times.

5. Risk Assessment

SHI Group shall regularly conduct risk assessments regarding violations of the Competition Laws within SHI Group. Based on the results of the assessment, SHI Group shall continuously improve the efforts to ensure compliance with the Competition Laws.

6. Whistleblower System

SHI Group shall organize and operate a whistleblower system to prevent, detect early, and correct violations of the Competition Laws.

7. Monitoring and Auditing

SHI Group shall regularly conduct monitoring and auditing of the compliance with this basic policy

and related internal regulations in order to prevent, detect early, and correct violations of the Competition Laws. Additionally, based on the results of the monitoring and auditing, SHI Group shall improve the efforts to ensure compliance with the Competition Laws continuously.

8. Response to Violations

In the event of violations of the Competition Laws or suspicion thereof, SHI Group shall conduct an internal investigation. If a violation is confirmed, SHI Group will immediately cease the violating conduct and take appropriate actions, such as voluntary reporting to the relevant authorities and cooperation with their investigations.

9. Response to Violators

SHI Group shall take strict measures, including disciplinary actions, if any of its executives or employees violate the Competition Laws or internal regulations related to compliance of the Competition Laws.