

LG Energy Solution's Anti-Bribery Policy

April 2024

LG Energy Solution (hereinafter referred to as "the Company") prohibits all officers and employees of the Company (hereinafter "Employees") from bribery in any form, including offering or receiving money, goods, etc., improper solicitation to public officials, etc. directly or through a third party, or any activity that may result in conflict of interest. Any Employee who violates this Policy is subject to legal penalties and disciplinary action in accordance with relevant policies and regulations of the Company.

1. In performing duties, all Employees shall comply with applicable domestic and foreign anti-bribery and corruption laws and regulations including but not limited to 「Improper Solicitation and Graft Act」 and 「Criminal Act」 of Republic of Korea; 「Foreign Corrupt Practices Act」 of the United States (FCPA); and any other anti-bribery and corruption laws and regulations in relevant jurisdictions, and shall not assign or request subordinates or co-workers to perform in violation of such laws and regulations. Even when an act is performed in accordance with social or business practices, immunity is not granted for the violation of such laws.
2. An Employee misconduct can bring about significant financial and reputational damage, not only to the individual but also to the Company. For instance, the FCPA regulates that if an individual is found to be in violation, not only will the individual be subject to both civil and criminal penalties, but the employer will also be subject to penalty equivalent to the amount obtained through the Employee's misconduct.

Therefore, if any Employee becomes aware of any violation or attempted violation of this Policy, it shall immediately preserve evidence (i.e. documentary evidence in any format, as well as information or data stored digitally) that can substantiate the violation, and report it to the Compliance Office.

The confidentiality, anonymity and security of the informant and the report is rigorously safeguarded, ensuring no retaliation or adverse consequence for reporting. Furthermore, the contribution to addressing Employees misconduct may be reflected in performance evaluation and other assessment.

3. The Company may take appropriate disciplinary action in the event an Employee violates relevant laws and regulations and/or this Policy; or fails to take reasonable measures to prevent a violation.

If an Employee requests subordinates to perform their duties in violation of relevant laws and regulations and/or this Policy; or fails to report a violation by their subordinates to the Company immediately after it becomes aware of, the Employee is subject to disciplinary action.

Further, in case an Employee is charged with fines or penalties for violating anti-bribery and corruption laws and regulations, including 「Improper Solicitation and Graft Act」, the Company does not bear any liability for the violation, therefore, any fine, penalty or other damage will not be reimbursed by the Company.

4. All Employees are required to effectively inform the third parties, including the Company's suppliers, customers, and partners, of this Policy or the Company's requirements of anti-bribery and ethical behaviors. They shall ensure contractual commitment that the third party will comply with domestic and foreign anti-bribery and corruption laws and regulations and establish the Company's controls to conduct an investigation, terminate the agreement, and claim damages in the event of breaches. However, when there are reasonable grounds to consider bribery and corruption risk is low, given special circumstances such as the nature of the transaction, negotiation process, etc., such contractual terms and conditions can be deleted.
5. All Employees are required to avoid creating a conflict of interests or establishing any relationships that

may result in such conflicts. For instance, if an Employee becomes aware that a relative, including family members, holds a stake in the company, he or she must report this information to the company and seek approval in advance, in accordance with our Code of Ethics and other company policies. The employee should then take appropriate measures to prevent any potential conflicts of interest.

LG Energy Solution's Anti-Bribery Policy and relevant procedures and systems to manage bribery and corruption risk are developed based on ISO 37001 on anti-bribery management systems.