



WHISTLE BLOWING POLICY

DATE : 10TH May, 2024

REV No. : 1ST Revision

1. FORWARD

1.1 DAE YANG STRAPS is committed to maintaining the highest standards of honesty, openness and accountability both within the organisation and in all its business dealings. We must be able to trust one another to behave honestly and our customers must be able to have absolute confidence in us. The Company recognises that employees have an important role to play in achieving these goals.

1.2 This document sets out a procedure for whistleblowing and explains the rights of individuals who make disclosures in accordance with this policy. This procedure has been approved by the Board of Directors.

1.3 This policy applies to all employees (whether permanent, fixed term or temporary) working at all levels and grades, including senior managers, officers, directors, staffs, agency workers and nonemployees undergoing training or work experience as part of a training course, wherever located. It also applies to external consultants and advisors acting on behalf of the



Company. This policy does not form part of any such person's contract and may be amended from time to time.

2. WHAT IS WHISTLEBLOWING AND WHAT DOES THIS POLICY COVER?

2.1 Whistleblowing is the disclosure of information about suspected wrongdoing or dangers in relation to the Company's activities in accordance with this policy.

2.2 In order for a disclosure to fall within this policy, the whistleblower must have a reasonable belief that the information tends to show any of the following types of wrongdoing occurring:

- (a) that a criminal offence has been committed, is being committed or is likely to be committed;
- (b) that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject
- (c) that a miscarriage of justice has occurred, is occurring or is likely to occur;
- (d) that the health or safety of any individual has been, is being or is likely to be endangered;
- (e) that the environment has been, is being or is likely to be endangered; or
- (f) that information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

- 2.3 The Company will treat a disclosure which meets these criteria as a protected disclosure, even if the subsequent investigation finds no wrongdoing. However, any disclosure which is malicious, made in a deliberate attempt to harm others or the Company, not based on a reasonable interpretation of the facts or circumstances giving rise to the disclosure, or not made with a reasonable belief of acting in the public interest will not have the protections conferred by this policy, and the person making the disclosure may be subject to disciplinary action.
- 2.4 Those concerned by the reports shall fully enjoy their fundamental human rights, including the presumption of innocence, the right to an effective remedy and to a fair trial, and their rights of defence.
- 2.5 It will not always be clear that a particular action falls within one of the above categories of suspected wrongdoing, and you will need to use your own judgement. If you are unsure what to do in a particular situation or need guidance on this policy, please consult Compliance Team or Head of Legal Affairs Group. It is always better to obtain guidance before acting.
- 2.6 This policy should not be used for complaints relating solely to your own personal circumstances, terms and conditions of employment or the way you have been treated at work (i.e. allegations of discrimination, harassment or bullying). In those cases, you should use the Company's [Grievance Procedure].

3. HOW DO I MAKE A DISCLOSURE?

3.1 You can make a report orally or in writing (a standard report form is enclosed with this document). A report can be made to either:

(a) your team leader (or their superior); or

(b) Head of Legal Affairs Group; or

(c) Head of Audit Group

3.2 Whenever possible, employees should seek to resolve concerns by reporting issues to his or her manager or to the next level of management as needed until matters are satisfactorily resolved. However, if for any reason an employee is not comfortable speaking to a manager or does not believe the issue is being properly addressed, the employee may contact the Head of Legal Affairs Group or Audit Group.

3.3 Matters which cannot be resolved promptly will be investigated by the Audit Group to determine if the allegations are true, whether the issue is material and what actions are necessary to address the matters. When matters are related to possible criminal actions by the Company, the Head of the Audit Group will carry out further investigation with assistance of Legal Affairs Group. The Head of the Audit Group shall (i) report the outcome of investigation to Rewards & Punishment Committee; and (ii) ensure that detailed records and materials of the matter and investigation are to be documented and kept for a period of 10 years.

3.4 If you choose to make a report orally, you can bring a colleague with you if you wish.

3.5 You can also make a report via email. You may choose to report anonymously.

manager@dystap.co.kr

3.6 If you want to make a disclosure confidentially, please make this clear when you make the disclosure so that appropriate arrangements can be made. The Company will make every effort to keep the matter, including the identity of the person making the disclosure, confidential both within the Company and externally. There may be some circumstances where the Company is required by law to provide details of the disclosure (for example if your disclosure becomes the subject of a criminal investigation and you are needed as a witness). Should this be the case, the Company will seek to discuss the matter with you at the earliest opportunity.

3.7 No officer, director, employee or consultant acting for the Company who, in good faith, makes a disclosure under this policy or participates in good faith in any resulting investigation or proceeding, shall be threatened, discriminated against or otherwise subject to retaliation or, in the case of officer or an employee, adverse employment consequences as a result of such report. Moreover, an employee who retaliates against someone who has reported a

concern in good faith under this policy is subject to disciplinary action.

3.8 Whilst disclosures under this policy may be made anonymously, this can severely limit the Company's ability to investigate or take other action in relation to the disclosure. The Company encourages individuals making a disclosure to provide their name and contact details.

4. HOW WILL MY REPORT BE INVESTIGATED?

4.1 The Company will aim to acknowledge receipt of your report within 14 days.

The Company will need to make preliminary enquiries to decide whether a full investigation will be necessary. If such an investigation is necessary then, depending on the nature of the suspected misconduct, your concerns will be either:

- (a) investigated internally (by management, Audit Group, or Legal Affairs Group); or
- (b) referred to the appropriate external person (for example our external auditors or external lawyers) for investigation. The Company will (subject to any legal constraints) inform you in writing of the outcome of the preliminary enquiries, the full investigation and any further action that has been taken.

4.2 The Company will respect and heed any legitimate concerns about your own safety or career, and will seek not to disclose your identity without your

express consent.

5. WHAT CAN I DO IF I AM UNHAPPY WITH THE WAY THE COMPANY HAS DEALT WITH MY REPORT?

- 5.1 While the Company cannot guarantee that we will respond to your report in the way that you might wish, we will try to handle the matter fairly and properly. By using this procedure, you will help us to achieve this.
- 5.2 If you are unhappy with the outcome of the investigation, or with the way the investigation is handled, the Company would prefer that you submit another report explaining why this is the case. Your concerns will be investigated again if there is good reason to do so.
- 5.3 It may be that you do not think that this is appropriate however, and you may wish to raise your concerns with an external organisation instead, such as a regulator. It is of course open for you to do so, provided you have sufficient evidence to support your concerns. Disclosing allegations to third parties other than those that are authorised to review and investigate the matters reported will not be viewed as whistle-blowing protected under this policy and may be deemed as serious misconduct subject to disciplinary action.

6. WHAT IF I THINK MY OWN ACTIONS MAY BE JUDGED TO BE MISCONDUCT OR MALPRACTICE?

6.1 If you think that anything you have done, or anything you are about to do, may be judged to be malpractice or misconduct it is important that you consult your team leader, or Compliance Team or Head of Legal Affairs Group at the earliest possible opportunity. Again, you should do this even if you only have suspicions that this may be the case. Any concerns you have about this will be treated appropriately and with respect. To the extent that you self-report on a matter that would otherwise constitute a matter for which the Company could terminate your employment, any selfreporting will be taken into account and may mitigate any subsequent disciplinary action by the Company.

6.2 If you become aware of any existing or potential breach of this policy or are the subject of, or otherwise involved in, an investigation by the Company or an external body you must not:

- (a) deliberately destroy, falsify, alter or conceal evidence material to the investigation;
- (b) threaten, harass or intimidate any party to prevent it from disclosing its knowledge of matters relevant to the investigation or from pursuing the investigation; or

(c) impede the exercise of any external party's contractual rights of audit or access to information or the rights that any banking, regulatory or examining authority may have in accordance with any law, regulation or treaty or pursuant to any agreement into which has been entered into in order to implement such law, regulation or treaty.

DAE YANG STRAPS MISCONDUCT REPORT FORM

1. Name (성명):
2. Position (직위):
3. Date (일시):
4. Would you prefer to keep this confidential? (본 사안을 비공개로 처리하기를 원하십니까?)
5. Details of suspected wrongdoing (please continue on a separate sheet if necessary): (부정행위로 의심되는 사건에 대한 상세 내용, 필요 시 별도 페이지에 서술 가능)

