

kNock  
Integrity code \_ ENG

# Integrity code

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# Integrity code

Code of Conduct : **Healthy Organizational Culture**

Code of Conduct : Work Transparency

Code of Conduct : External Communication

Code of Conduct : Information Security

Code of Conduct : Partnership

## Healthy Organizational Culture

### Acknowledge diversity, and create a culture of fairness.

- Discrimination based on academic background, hometown/region, age, race, skin color, religion, nationality, pregnancy, sexual orientation, marital status, mental and physical disability and political orientation is not allowed. **Legal duty** **Compulsory for leaders**
- Employment opportunities are provided, based on occupational capabilities and relevant qualifications, and business opportunities are assigned fairly in accordance with achievements. **Compulsory for leaders**
- Do not ignore other person's opinions or act coercively just because of differing opinions. **Compulsory for leaders**

## Healthy Organizational Culture

### Create a stable and healthy working environment.

#### Bullying in the Workplace

- It is prohibited to cause other workers physical and mental distress or worsen the working environment beyond the proper range in business by using superiority in positions and relations in the workplace. **Legal duty** **Compulsory for leaders**
- Physical violence or intimidation is not allowed under no circumstances. **Legal duty**
- Words and deeds that could feel insulting, like invectives or belittlement, and verbal violence that could cause displeasing situations, albeit not directly, are not allowed.

#### Sexual Harassment in the Workplace

- Excessive mention about appearance and undesired sexual contact / sexual jokes / mentions and questions about sexual orientation are prohibited strictly. **Legal duty**
- Behaviors to make people feel insulted or sexual humiliation via email, phone, drawings, posters, cartoons and visual images without face-to-face contact are prohibited. **Legal duty**
- In case inadequate words and deeds between employees – no matter what their relations are – are witnessed, you must point out quickly to create an environment in which sexual harassment is not tolerated.

#### The others

- Avoid secondary damage by not spreading groundless malicious rumors in relation to the company and/or employees.

## Healthy Organizational Culture

### Do not abuse superior positions and the power of authority.

- Do not seek personal gains or make business-related pressures, instructions and/or requests contrary to the company's interests. Compulsory for leaders
- Do not ask for distorting or omitting the results of business and details about expenses. Compulsory for leaders
- Do not mention what can be the abuse of power, even in jest, like recalling the chance of dismissal for reasons unrelated to business affairs or threatening to give disadvantage in assessments. Compulsory for leaders
- In case problems such as verbal violence and sexual harassment are caused by a leader, he or she will be punished by applying stricter standards. Compulsory for leaders

# Integrity code

Code of Conduct : Healthy Organizational Culture

Code of Conduct : **Work Transparency**

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## Work Transparency

Do not abuse the company's corporate policy system, and do not make false performance reports.

- Do not abuse the company's corporate policy system which is created for executives and employees to work while holding themselves responsible.
- Do not exaggerate your and/or your department's performance, and downplay blunders by distorting KPIs and performance results dissimilar to factual evidence.
- Forging, falsifying and/or deleting data related to the company's performance and decisions are not permitted.
- Do not conceal the fact that your and/or your department's actions and/or decisions are in conflict with the company's overall interests, and this should be reported to the company in case it is difficult to judge.



## Work Transparency

### Use company's expenses and assets for business purposes only.

Do not use the company's expenses and assets illegally, such as by theft, embezzlement, and misappropriation. **Legal duty**

#### Use of Expenses

- Use the company's expenses properly within budget for business purposes only.
- Specify expenses clearly with respect to with whom and for what purposes they were used, and do not falsely bill or manipulate expenses.
- All expenses are being monitored and can be disclosed to employees.

#### Use of Business Assets

- The company's all assets, including company PC, servers and systems, are used for business purposes.
- All records of data creation, storage and transfers using assets provided by the company are kept by the company and can be monitored.

#### Use of Intellectual Property

- The rights to the company's intellectual properties—including logos and trademarks, and trade secrets including reports, source codes and ideas produced in connection with business affairs—lie with the company.
- Do not use intellectual property rights or trade secrets for personal purposes or disclose/release them to the public. **Legal duty**

## Work Transparency

### Personal relationships shall not hamper fair business environment.

- Personal relationships among in-house staff must not hamper the execution of fair business execution.  
Personal relationships unrelated to business affairs should not affect each other's employment, assessment, compensation, disciplinary action and department transfer.

#### Compulsory for leaders

- If two people are in marital status or are relatives, this should be notified to HR or a higher-ranking leader.
  - Employees are recommended to notify to the company if there is a chance of conflicts of interest from personal relationships.
  - The company can change business affairs or reassign departments if it is deemed that there are conflicts of interest.
  - This is because personal relationships can affect fair business and put other employees in relative disadvantage.
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- In case an employee recommends an acquaintance or is named as interviewer, he or she should inform HR or a higher-ranking leader, do not participate in the pertinent interview, and follow HR guidelines, if necessary.

## Work Transparency

### Avoid conflicts of interest arising from acquaintanceship.

- Business and trading opportunities with acquaintances as well as employee recommendations do not matter. However, in order to prevent employees from being misunderstood or abused because of inadequate favors, all dealings with acquaintances must be reported to the company and be proceeded after consultations. [Compulsory for leaders](#)
- In case an employee has discretionary authority or influence from his or her position on dealings involving acquaintances, he or she should not take part in the decision-making process; if he or she has to take part inevitably, a third party must participate in the decision-making process and ensure objectivity. [Compulsory for leaders](#)
- Reject other inadequate solicitations concerning acquaintances' business, trading opportunities, employment and services politely and resolutely. [Compulsory for leaders](#)

## Work Transparency

Do not invest, directly or indirectly, using information obtained in the company.

### Individual Investment Related to Our Company

- Do not deliver information the company has not disclosed to other people, or give advice on the trade timing of shares or specific securities. Compulsory for leaders
- Executives or persons in charge who can be aware of the company's important information that is undisclosed in relation to management should not deal with specific securities like the company's (or affiliates') shares or related financial investment instruments directly or via third parties, using the company's undisclosed information. Legal duty Compulsory for leaders
- In case an executive or a person in charge who can be aware of undisclosed information makes a profit by selling NAVER shares (or financial instruments) within six (6) months after buying them, and vice versa, for short-term gains, the company can ask for the return of the profit. Compulsory for leaders

### Individual Investment in Other Companies

- Do not make individual investment in other companies using information obtained in the company. Compulsory for leaders
- In case of owning or buying stakes of other companies related to business directly or indirectly, notify this to the company and do not take part in the decision-making. Compulsory for leaders
- In case you have to get involved in decisions related to other companies in which you have stakes, the decision-making process and the fairness of the decision must be written in official documents. Compulsory for leaders
- Even in case there was no business relevance at the time of investment but relationships have happened later, notify this to the company through the Accountability report. Compulsory for leaders

## Work Transparency

You must not engage in any profit-making activities without the company's permission.

- You must not engage in any external for-profit activities or hold another occupation without the permission of the company.
- The company may approve such activities on a limited basis only if it is determined that the company and the respective member can grow mutually from such activities.
- In the event of any change to the circumstances subsequent to the approval, such as a change in the responsible tasks and a transfer to another affiliate, the relevant member must obtain approval from the company once again within one month of such a change through the Accountability report.

## You must not engage in any of the following activities

- **Activities that raise concerns of reducing work efficiency of members**
  - All external activities that are performed during set working hours without any instruction or approval of the company
  - Other activities that the company determines may reduce the working efficiency of its members
- **Activities that raise concerns of causing wrongful impact on members' responsible tasks**
- **Activities that raise concerns of acquiring interests that conflict with the interests of the company**
- **Activities that raise concerns of causing negative impact on the company**
- **All external activities carried out by using tangible and intangible assets of the company**  
(all infrastructure provided by the company to its members to perform their work such as brand, intellectual property, work devices, working space)  
without any instruction or approval of the company

Detail operation guide

There is no need to discuss with the company to engage in the following activities

- Lectures, presentations, contributions (writing), publications, translations, compositions, interviews, content creation, etc. that are completely unrelated to your work .
- Real estate leasing that is completely unrelated to your work .

Detail operation guide

Please make sure to discuss with your organization's head of public relations before engaging in any of the following activities

- If you manage/operate online platform services and/or continue to create content with company and work relevance.  
(cafes, blogs, posts, NAVER TV, YouTube, AfreecaTV, Twitch, etc.)
- If you participate in external communication activities, such as lectures, screening, consultation, public presentations, media contributions/interviews, publications, etc., with company and work relevance.

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Company and work relevance means any case in which one's affiliation to NAVER or pertinent corporation is exposed, or the corresponding activity is related to the work, occupational group, etc. performed in the past and to date.

Information obtained during the course of employment must not be disclosed to the outside without the approval of the company under any circumstances.

All proceeds from activities performed as an extension of work shall be donated to NAVER Happybean.

Please refer to the Code of Conduct for details on external communication.



Please make sure to discuss with your organization's head or the HR department before engaging in any of the following activities

- If you have reached revenue generation requirements through operation, management and/or participation in on/offline platform services with company and work relevance and wish to continue to engage in the corresponding activity. (cafes, blogs, KnowledgeiN eXpert, posts, NAVER TV, YouTube, AfreecaTV, Twitch etc.)
- If you publish or sell book(s) with company and work relevance, or write such book(s) to receive payment for manuscript.
- If you engage in activities as a professor, lecturer, teacher, consultant (advisor), judge, etc.  
to receive payment for lectures or activities at your own discretion without any instruction of the company
- External profit-making activities of employees whose claims to reduce their working hours have been applied and their working hours reduced.

## Work Transparency

Communicate sincerely and transparently, holding yourself responsible for shareholders.

- Engage in trades that could raise the company's value in the long term rather than try to enhance the short-term financial performance.
- All accounting information and documents should be written accurately and perfectly in compliance with the International Financial Reporting Standards (IFRS). **Legal duty**
- It is not permitted to prepare and publish financial statements falsely in violation of accounting standards by omitting and distorting accounting information on purpose, and do not be deceived of following such instructions. **Legal duty**
- Faithfully carry out operational rules and guidelines of internal accounting to prepare trusted accounting information.
- In case you are aware of or question inaccurate records, falsification and/or omission of accounting information, you must make a report via the kNock channel.

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## External Communication

Keep neutral about issues such as specific interest groups and social issues.

- Conduct your business without bias toward specific interest groups and social issues/ideologies.
- Be careful that your personal opinions and activities toward specific interest groups and social issues/ideologies are not mistaken for the company's opinions and activity.
- In case you are requested to do illicit work or asked a favor, report to your higher-ranking leader or the company.
- Do not provide unjustified donations or expenses to specific interest groups, including politicians or political parties, with the company's assets and money. **Legal duty**

## External Communication

Feel free to consult with the external communication department in case of matters related to the company and business affairs or external communication revealing that you are the company's employee.

- Event presentations/contributions, writing, interview or publication is delivered as the company's official position, and it's even more difficult to correct what's untrue because it has already been known to unspecified individuals. Although it is the work you are dealing with in person, refrain from carrying out external communication about service openings/changes and major trends arbitrarily.
- Therefore, be sure to talk with your higher-ranking leader and the communication department in advance about whether the company's important matters are mentioned in the presentation, lecture, contribution and writing, whether there are disputable expressions and whether there are mistakes in data or messages. Even if it is a communication having nothing to do with your work, you had better receive the company's guidelines through the Accountability report in case you have to reveal that you are the company's employee.
- Using the company's CI, BI and/or logo personally is prohibited since they are the company's official symbols, and communication using them can be seen as the company's official position.
- Feel free to conduct external communication having nothing to do with the company's work.
- However, external communication such as online posting about the company's business affairs and company-related issues needs consultations with the external communication department.
- Considering that you can be confirmed as an employee of the company even in social media easily, be careful about mentioning the company or sensitive social issues. (Use caution when making posts using the company's network because IP can be exposed and your identity can be revealed, although you don't clarify if you are an employee of the company.)

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## Information Security

All executives and employees shall observe the Ten Commandments of Personal Information Protection.

- Be aware of the importance of personal information protection, and take part in protection activities. **Legal duty**
- Personal information must win consent from the principal agent of information or be collected legally in other ways. **Legal duty**
- Personal information is collected as minimally as need be. **Legal duty**
- Personal information is not used for other purposes than is needed. **Legal duty**
- Personal information is not provided to third parties without the consent of the principal agent of information or without legal grounds. **Legal duty**
- In principle, resident registration numbers are not collected except in legally defined cases. **Legal duty**
- Personal information is not processed in such a way as to go beyond the permitted authority. **Legal duty**
- Cope actively with the request for rights like reading, correcting and destroying of personal information from the principal agent of information. **Legal duty**
- Personal information whose purposes for collection are met is destroyed in a secure way without delay. **Legal duty**
- In case personal information breaches or leaks are confirmed or anticipated, report swiftly and accurately. **Legal duty**

## Information Security

### Customers' personal information and data are protected safely.

- Only essential parts of customers' personal information and data are collected in accordance with legitimate agreement procedures. **Legal duty**
- Customers' personal information and data are used within the scope of agreed purposes and personal information is destroyed once used. **Legal duty**
- Customers' personal information and data are not disclosed within the company as well as outside the company arbitrarily and be sure to win prior approval from the personal information protection department, when necessary. **Legal duty**
- The person in charge of personal information dealing with customers' personal information and data must be determined according to the principle of minimum authority and exercise his or her predetermined authority when gaining access to the personal information system. **Legal duty**
- Observe technical and administrative protection measures like access control, authority management and encryption under the company's privacy policy so that personal information is not lost, stolen, leaked, doctored and/or damaged. **Legal duty**
- In case information leaks occur or are in doubt while working, don't hesitate to report to the information protection department. **Legal duty**



## Information Security

### Do not leak company's unauthorized information.

- All information of the company must not be leaked to the outside except in already opened or approved cases like published data and open sources.
- The company's confidential information should not be leaked even to acquaintances like family, friends, relatives and/or retired colleagues as well as third parties arbitrarily after the closure of work or retirement.
- Information of other companies must not be obtained or utilized illicitly for protection.

## Information Security

For the sake of official communication related to work, tools (email, messenger, etc.) provided by the company are used.

- In case it is necessary to administer official communication records, use the official internal method of communication WORKS.
- In case it is necessary to use external communication tools and services, they are used for permitted purposes only with the consent of the information protection department.
- Observe the “communication tool use guidelines” to use communication tools for business use safely.
- The company’s information must be shared with none but those allowed to access in accordance with the disclosure scope of security level and is kept in secure business-use services, barred from being kept in and shared with services of other companies.
- When you mail important information and set the security level and expiry date, in case of mailing personal information and files with confidential/top secret levels, be sure to encrypt them before sending. When you send emails and messengers and share files, confirm those they are directed at accurately.
- Messages whose senders are not clear or which are suspected to have viruses and be spam mails must not be read and be reported to the internal department in charge of unsolicited, undesired, or illegal email messages (spam).
- Be sure to safely use PCs and mobile devices using communication tools for business use according to the security guidelines for user devices so that information leaks won’t happen owing to the malignant code, loss and theft.
- Services judged to be unsecure are blocked, and allowed only after security check when deemed necessary for business affairs.

Be careful about information security from the time of service until retirement.

### Familiarity with Security Regulations

- Confirm the company-wide common information protection regulations and the individual information protection regulations applied according to your business characteristics, and perform your duty within the scope of those regulations.
- In case you perform your duty which is against the information protection rules or whose application of the rules is unclear, confirm by inquiring of a department responsible for information protection and perform your duty.

### Secure Account and Password Management

- Accounts are issued individually in principle and management responsibility for accounts and passwords to access user devices and in-house systems lies with users.
- Passwords of the company's accounts should not use words other people can conjecture easily and be changed regularly. Passwords must not be saved or managed on post-its and notes near your desk or in the form of files on your PC.

### Reshuffles or Retirements

- Return other authority than is needed for access authority essential for changed tasks.
- Information related to your previous work should be cleared up before being transferred and unnecessary information must be destroyed.
- Return all assets and permissions to the company.
- Complete the retirement education for information protection and sign a written oath for information protection before submitting it to the company.

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## Partnership

Do not abuse your position and the power of authority accorded by the company.

- Do not use your position and authority accorded by the company for private interests like receiving individual favors and privileges or for individual business.

Compulsory for leaders

- Do not grant favors or privileges to partner companies, acquaintances and customers using your position and authority, or hint at chances of transaction or make a mistakable promise related to your work.

Compulsory for leaders

- Be careful in your speech and behavior that could burden partners like high-handed or impolite actions.

Compulsory for leaders

- Leave whatever is discussed with all partner companies having transactions or chances of transaction in writing and share it with your higher-ranking leader and participants.

Compulsory for leaders

## Partnership

Partner companies must be selected fairly in accordance with the purchase process.

- All partner companies are selected through competitive bidding in principle, in accordance with the purchase process.
- Around the time partner companies are selected, do not individually and separately meet companies taking part in proposals. Compulsory for leaders
- The process of partner selection and the results of assessment are made public to all companies taking part in proposals.
- Even when private contracts are needed because competitive bidding is impossible, guidelines of the purchase department are applied.
- In case of private contract, there could be monitoring and audit with respect to fairness.
- While selecting partners is under way, in case your acquaintances are included among partners in review, you must report to the company that there are acquaintances in advance and shall not take part in the assessment.
- Partner companies include individuals as well as corporations; they also include not only partners having money transactions but also those working together in such ways as alliance and agreement without money transactions.

## Partnership

### Do not demand unreasonable terms of business to partner companies.

- When you ask partner companies some business, what is written in the contract serves as the basis.
- Do not enforce sacrifices on partners or demand unreasonable terms of trade.
- Do not suspend and change trade unilaterally or suddenly for reasons not based on contracts.
- Do not change contracts arbitrarily or make a promise on new agreement.
- Do not demand partner companies' assets (trade secret, intellectual property, etc.) unreasonably and disclose information obtained in the course of work to the outside without agreement.
- Observe the laws enacted to prevent unfair trade (Monopoly Regulation and Fair Trade Act, Fair Transactions in Subcontracting Act, etc.). **Legal duty**

## Partnership

**Do not accept money and valuables, entertainment and conveniences from outsiders related to work, and be cautious when giving.**

In connection with partnership, be sure to use properly in consideration of business purposes and necessity within budget and judge whether partners are subject to the anti-corruption law and other acts and observe the standards.

### **General Partner Companies | When receiving**

Not receiving is a principle; and in unavoidable cases, inform the company of it through the Accountability report and comply with the guidelines.

#### Gift

Souvenirs except for public relations worth KRW 10,000 or less prepared for the majority are returned immediately.

#### Event

(In case of being invited) Participation at the company's expense is a principle and some conveniences (lodging, meals) that are not excessive can be received after approval from the leader.

#### Family Event

Your or co-worker's family events (birthday, wedding, first birthday, 60th birthday, funeral, etc.) are not to be notified to partners, and it is prohibited to receive money for congratulations and condolences.

#### Sample

Samples necessary for business are accepted after paying due compensation.

### **General Partner Companies | When giving**

Use expenses properly within budget. (Leader grants approval if payment is made later)



## Partnership

In case gifts are swapped with people subject to the anti-corruption law, the standards must be observed accurately. **Legal duty**

### People Subject to Anti-Corruption Law | When receiving

Not receiving is a principle; and in unavoidable cases, inform the company of it through the Accountability report and comply with the guidelines.

#### Gift

Souvenirs except for public relations worth KRW 10,000 or less prepared for the majority are returned immediately.

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(In case of being invited) Participation at the company's expense is a principle and some conveniences (lodging, meals) that are not excessive can be received after approval from the leader.

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#### Sample

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## Partnership

In case gifts are swapped with people subject to the anti-corruption law, the standards must be observed accurately. **Legal duty**

### People Subject to Anti-Corruption Law | When receiving

#### Gift

- Market items shall not exceed KRW 50,000 per person. (Farm and fisheries products worth up to KRW 100,000 permissible)
- Goods for public relations set by the company can be given.
- Giving money and securities is prohibited because they are not gifts.

#### Meals

- Going Dutch for meals is a principle, and the company shall pay in unavoidable cases.
- Expenses that include meals and refreshments should not exceed KRW 30,000 per person.

#### Event

- Some conveniences (lodging, meals, etc.) that are not excessive and are provided to all participants can be offered.

#### Family Event

- Only for funerals and weddings can articles for congratulations and condolences. (wreaths, funeral products, etc.)  
be sent under the company's name after approval from a higher-ranking leader.
- Up to KRW 50,000 in cash is permissible for congratulations and condolences. (Wreaths and condolence flowers worth up to KRW 100,000 permissible.)

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