

RENOVA Group Anti-Corruption Policy

The RENOVA Group (hereinafter also referred to as “we,” “our” and “us”) has established the following Anti-Corruption Policy in accordance with its corporate philosophy. We are committed to conducting business with integrity and transparency, striving to prevent any form of corruption, and to building and maintaining fair and sound long-term relationships with all of our stakeholders on the basis of mutual trust.

1. Prohibition of Corrupt Activities

The RENOVA Group strictly prohibits any act of corruption, including offering, promising, giving, accepting, or soliciting anything of value as an inducement for action, regardless of its form or intent. This includes the provision of gifts, entertainment, or other types of benefits in excess of what is considered socially acceptable.

2. Management Commitment

The RENOVA Group’s management team is keenly aware of the importance of corporate ethics and members will conduct themselves in an exemplary manner in day-to-day activities and take full responsibility for preventing acts of corruption.

3. Compliance with Laws and Regulations

The RENOVA Group complies with all applicable anti-corruption laws, regulations and international treaties in each of the countries and areas where we operate, ensuring adherence to both domestic and global standards. We also require our business partners and agents to comply with the laws.

4. Promotion Structure

The RENOVA Group has established and will maintain comprehensive internal rules and procedures to prevent corruption in accordance with the laws and regulations that apply to each of the countries and areas where we operate. This includes conducting regular

assessments of the effectiveness of these controls and the status of compliance with the internal rules through periodic monitoring and internal audits and implementing necessary revisions based on the findings.

5. Proper Accounting and Record-Keeping

The RENOVA Group will maintain reasonably detailed and accurate books and records of all transactions in order to fulfill its accountability concerning compliance with this policy as well as applicable laws and regulations regarding the prevention of acts of corruption that apply to the regions where it conducts business.

6. Education and Training

The RENOVA Group will provide education and training to its officers and employees to raise awareness of this policy and emphasize the importance of corruption prevention.

7. Establishment and Operation of “Whistleblower” Program

The RENOVA Group has established the Corporate Ethics Hotline to respond to grievances, consultation requests, and reports from officers and employees concerning any acts or suspected acts in violation of this policy in order to ensure prevention and early detection of corrupt activities. We will operate the Hotline program appropriately to prevent any retaliatory acts against those lodging grievances or complaints or any breach of required confidentiality concerning the reported and related matters.

8. Disciplinary Actions

The RENOVA Group imposes strict disciplinary measures in accordance with its Work Rules and other internal rules on any officer or employee who violates any applicable anti-corruption laws or regulations, or internal rules (including this policy) in each of the countries and areas where we operate. In addition to personal legal liability, such individuals will be subject to appropriate penalties as stipulated in our corporate policy.