

Responsibilities and Rules for Ethical Management

CODE OF CONDUCT



netmarble

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CODE OF CONDUCT

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- What is a Code of Conduct and why do we need it?
- Who does the Code of Conduct apply to?
- What should I do if the Code of Conduct does not align with local laws and policies?
- What should I do if I have questions about the Code, or if I suspect potential violations of the Code?
- What if someone who reports a violation is retaliated against?

Main Content

01. OUR MISSION

- Creating and Spreading Joy
- Providing Continuous and Stable Services
- Ensuring the Health and Safety of Customers

02. OUR PROMISE

- Celebrating Diversity and Standing Against Discrimination
- Providing Balance Between Privacy and Corporate Culture
- Providing a Healthy and Safe Work Environment
- Fostering Mutual Respect and Healthy Communication
- Providing a Bully-Free Workplace
- Providing Fair and Reasonable Working Conditions

03. PROTECTING CORPORATE VALUES

- Protection of Assets
- Accurate Accounting Records
- Accurate Business Records
- Clear and Concise Communication
- Separation of Personal Politics in the Workplace
- Prohibited Use of Confidential Information

04. PRACTICING FAIRNESS AND MUTUAL PROSPERITY

- Fairness in Selecting Business Partners
- Conducting Business with Legitimate and Ethical Partners
- Mutually Beneficial Business Relationships
- Prohibited Unauthorized or Forced Acquisition of Third-Party Information and Assets
- Guidelines for Regalement, Gifts, Accommodations, Etc

05. OUR GOAL



06. OUR APPROACH TO ETHICS

- Conflicts of Interest
 - External investments; outside employment and external paid projects; writings, lectures, and interviews; personal business transactions; gifts and regalement
- Compliance with the Law
- Prohibited Misconduct





NETMARBLE CODE OF CONDUCT

What is a Code of Conduct and why do we need it?

Netmarble is a global company that conducts business around the world. As such, it's natural for us to encounter different cultures, customs, laws, and policies. Acknowledging these differences and setting accommodating business standards is a challenging but crucial part of how we conduct business.

Our Code of Conduct is the foundation for how our business performs in diverse environments and circumstances. It's what we use to comply with applicable laws and regulations, and build cooperation within divergent standards. Furthermore, adhering to ethical standards has a positive impact that reaches beyond our Company to our partners and customers all around the world. It's our responsibility to become familiar with the Code and conduct ourselves with integrity.

Who does the Code of Conduct apply to?

The Code of Conduct applies to all Netmarble employees. Therefore, we must all be fully aware of and adhere to the Code of Conduct.

We expect our partners to understand and comply with the Code of Conduct. If a partner fails to comply or compromises the Code in any way, the partnership may be terminated.

What should I do if the Code of Conduct does not align with local laws and policies?

We must clearly understand the culture, laws, and policies of a region before engaging in business. These are important indicators for establishing the direction of our operations and play a key role in reducing the risk of cultural conflicts and legal violations. Abiding by the laws and policies of each region is one of our primary responsibilities.

When local laws and policies differ from our Code of Conduct, comply with local laws and policies. When local laws and policies are less strict than our Code of Conduct, comply with the Code. If it's not clear, please consult the legal department.

What should I do if I have questions about the Code, or if I suspect potential violations of the Code?

If you have any questions regarding the Code of Conduct, or if you need more information before making an ethical business decision, please contact the Ethics Compliance Team.

If it's difficult to discern whether we're in violation of the Code of Conduct, or whether we're facing a potential violation of the Code, please contact the Ethics Compliance Team. If our Company has violated the Code, with or without intention, please contact the Ethics Compliance Team.

If you're aware of an employee violation of the Code of Conduct, or you suspect a potential violation of the Code, please report to the Ethics Compliance Team. Our query reports help prevent the Company from losing reputation and becoming hindered in its development. This provides an opportunity to recognize and solve an issue before suffering a significant loss of human and economic resources. It also gives us an opportunity to correct our problems and secure the Company's legacy and reputation.

What if someone who reports a violation is retaliated against?

Netmarble protects employees who've reported a violation of the Code of Conduct, or who've participated in an investigation. We do not tolerate any type of retaliation against employees. If there's been retaliation, or if you're concerned about potential retaliation, please contact the Ethics Compliance Team. Those who report retaliation deserve to have their honesty and courage protected. We will conduct a thorough investigation on any report and execute actions according to Company bylaws based on the results.



01. OUR MISSION

Creating and Spreading Joy

Our mission is to go beyond mere entertainment. At Netmarble, we seek to use games as a conduit for creating and spreading joy throughout the world.

Games are great communication tools with the power to create bonds that transcend generations, cultures, and regions. People of all ages and cultures can connect through our games and become friends. Our hope is that our players share many memorable experiences together.

Games can be healthy recreations that enrich our lives, places where people can be legendary heroes and experience achievements beyond the limitations of reality. Games also provide the opportunity to learn and practice rules, and to go hands-on with some of the world's most advanced technology. The content of a game must be fun and entertaining. At the same time, it should be both creative and innovative.

This is not just our mission as a gaming company—it's our calling.

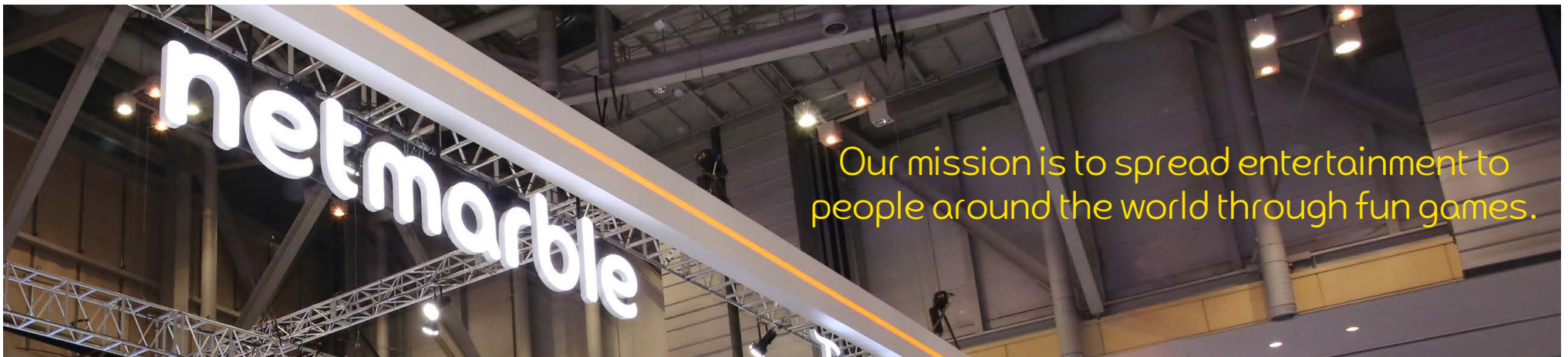
Providing Continuous and Stable Services

Netmarble provides continuous and steady game services, ensuring that our customers are able to access our services anywhere, anytime. It's the least we can do for those who use and support our games.

We're committed to providing advanced and accessible game services to all our customers, and we're constantly striving to innovate and improve our technology in order to provide stable services.

Ensuring the Health and Safety of Customers

Netmarble is committed to our customers' health and safety, and is dedicated to ensuring our content, products, spaces, and facilities are used in a healthy and wholesome manner. To this end, we strictly comply with the safety standards required by local law.



Our mission is to spread entertainment to people around the world through fun games.

02. OUR PROMISE

Celebrating Diversity and Standing Against Discrimination

Netmarble is committed to fostering a unified and diverse workplace free from harassment and discrimination. As an organization that prizes creativity and innovation, we value the unique contributions of a diverse workforce. We welcome people of various backgrounds to bring different perspectives and insights.

We acknowledge the power of diversity and do not tolerate negligence or discrimination against others just because they are different. This means we prohibit unfair treatment based on gender, education, origin, age, religion, race, and disability. Those who achieve more will go farther, while those with disadvantages will receive appropriate consideration. There will be fair, rational distinctions and an equality of opportunity with respect to the differences between people.

Providing Balance Between Privacy and Corporate Culture

Netmarble respects the privacy of its employees; however, employees shall not interfere with the work of colleagues or create conflict in order to preserve their own privacy. The privacy of coworkers and the Company must be mutually respected and protected.

Providing a Healthy and Safe Work Environment

Health and safety are important in all our lives. At Netmarble, we strive to provide a healthy and safe work environment. Employees are required to follow the health and safety regulations and maintain a clean and safe environment. If you find anything that poses a risk, please notify the safety control department.





Fostering Mutual Respect and Healthy Communication

Netmarble employees must respect one another. A respectful attitude is the foundation of harmonious and healthy growth. It facilitates better communication and fosters empathy, which leads to the sharing of knowledge and experience. It unites us, and in return strengthens our competitive edge. Mutual respect and healthy communication are basic courtesies in any relationship. We should strive to exude respect toward everyone in any given situation.

Providing a Bully-Free Workplace

Bullying harms the health and safety of colleagues and violates the principle of mutual respect. Employees should not engage in any verbal or physical harassment in the workplace.

There are several types of bullying: physical abuse, threats of blackmail, slander, and inappropriate interactions such as sexual harassment.

Sexual harassment is uninvited and unwelcome sexual advancement that includes assault and rape. Sexual harassment can occur between subordinates and superiors, or between employees of the same rank. Sexual harassment

can include intentional behavior with malicious purposes and unintentional harassment. Inappropriate physical contact, expressions of intimacy, and making sexual jokes toward colleagues all fall under sexual harassment.

Employees are expected to clearly understand the definition of sexual harassment and use good judgment and high ethical standards to guide their actions and decisions. Employees have a responsibility to follow common sense and show consideration to others.

Providing Fair and Reasonable Working Conditions

Netmarble is committed to providing opportunities based on individual merit and ability, as well as compensation based on the fulfillment of the responsibilities entrusted. The Company rejects the practice of overworking, and strives to build and foster an environment that allows employees to maintain a healthy work-life balance and excel in their contributions.



03. PROTECTING CORPORATE VALUES

Protection of Assets

Company assets are integral to corporate performance and growth, and must be safeguarded to ensure efficient and proper use.

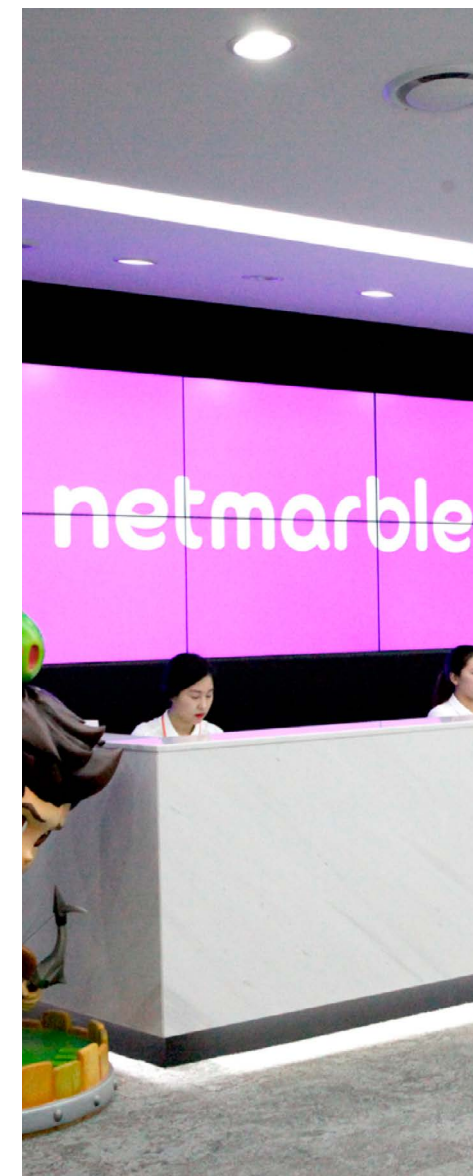
Corporate assets include tangible items such as inventory, property, cash and cash equivalents, information assets, human capital, etc. The effective protection of assets depends in large part on the unique details of each asset.

The Company as a collective has a responsibility to understand and protect its assets and resources.

- Netmarble depends on its corporate assets for its continued vitality. Corporate assets are owned by the Company, and legally by the shareholders. These assets are provided by the Company and its shareholders to conduct business. Thus, all Company assets should be used only for Company business.
- Assets of the Company may only be used for legitimate business purposes. Corporate assets are to be used appropriately. The misuse and waste of assets have a direct impact on the Company's profitability and may be subject to legal proceedings if warranted.

Company assets should never be wasted. This includes safeguarding corporate assets from waste and misuse as well as implementing strategies in job execution to maximizing efficiency and minimize the risk of failure.

- We are trusted with and responsible for protecting Company assets under our control. We have an obligation to prevent the Company's assets from loss, damage, theft, embezzlement, and destruction. Information is one of our most valuable corporate assets. This includes trade secrets, patents, trademarks, copyrights, designs, databases, records; as well as business, marketing, and service plans. It also includes salary information, any unpublished financial data and reports, and other information about the Company, its joint venture partners, suppliers, and customers. Confidential information such as this is critical to the success of the Company, and if disclosed may be of use to competitors or harmful to the Company or our customers. The protection of such information is of the highest importance. Employees must maintain the confidentiality of such information and take special care to prevent situations that could result in inadvertent disclosure of such information.



Accurate Accounting Records

The Company acts on behalf of its own interests and those of its stockholders. The responsibilities in performing this function include ensuring that the Company's financial reports are completed honestly and in a timely manner. These disclosures must accurately and fairly reflect the Company's transactions and events. Making false or misleading entries, records, or documentation is strictly prohibited.

The Company's system of internal controls must be guided, operated, and maintained strictly in accordance with relevant laws and accounting principles. Violating, circumventing, or failing to implement internal accounting controls may constitute a violation of law.

The following are examples of activities that employees are expected to understand and comply with to ensure the Company keeps and maintains accurate books and records.

- We must understand and comply with the policies, procedures, and internal controls that apply to the Company's accounting and finances.
- No employee may make an unethical or illegal transaction.
- Materials to prove and confirm financial activities must be secured and archived.
- We must verify all proof materials match the actual transaction details and contract.
- All transaction details must be recorded in full and cannot be edited, omitted, or modified arbitrarily.
- All original records must be kept whole without being selectively modified or destroyed.

Please contact the finance department for more detailed information.



Accurate Business Records

All business records, including accounting records, should be accurate. The following emphasize why accurate business records are important:

- Business records contain important and crucial information relied on to make decisions. Errors in business records can cause bad decision-making, which can lead to the Company losing profitability.
- Many people, both within and outside the Company, depend upon corporate records to be accurate and truthful for a variety of reasons. These people include our employees, governmental agencies, auditors, and the communities in which we operate. At times corporate records may be released to the public regardless of the Company's will or intent due to lawsuits, administrative orders, governmental investigations, and media reports. Even minor errors, once publicized, may have a critical impact to the Company's reputation.

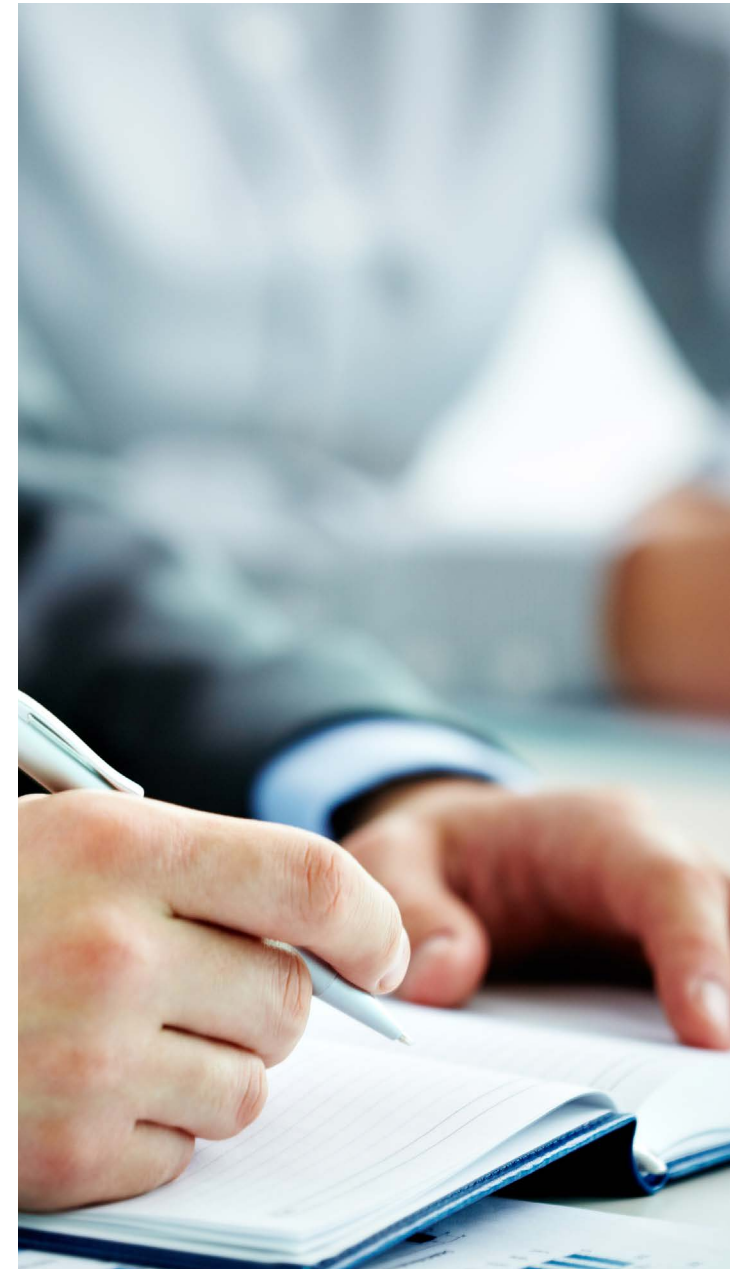
Therefore, it is necessary to outline clear standards for business records.

- Business records include all information created and maintained for the Company's business. Approval requests, reports, account books, and official documents for public release, as well as emails, message logs from a messenger, and recorded voice messages are all considered business records.

It is critical that business records be maintained in accordance with the following criteria.

- Records must be kept accurately and concisely.
- Records must be fact-checked and confirmed.
- Records must fairly and accurately reflect transactions and not personal assumptions or opinions.
- Records must be kept in a timely manner so that they can be referenced to when necessary.
- Records must be logged, maintained, and preserved diligently and under no circumstances be concealed or destroyed.
- Errors or possible errors within records may not be modified or edited without the proper authorization.

As the Company relies on its business records for making business decisions, asserting its legal rights, and making representations to the government, investors, and media, it is critical that these records be accurate and complete.



Clear and Concise Communication

Public trust is the basis on which a company operates, and building public trust and goodwill is a crucial part of doing business. A company must first and foremost earn the trust of the public by providing quality products and services and observing corporate ethics. It is imperative that the Company provides timely, accurate, and open communication. Inaccurate and untimely information may damage the trust and reputation of the Company and result in a loss of investors and partners.

We must proceed with the utmost care when communicating with the public. All data and information, including corporate plans, achievements, policies, and positions regarding public and social issues, must be disclosed under the supervision of the department responsible with respect to the relevant expertise and authority. The same applies to customer, investor, partner, and media inquiries. We must adhere to the relevant department's authority and direction when responding to inquiries regarding the Company. We may not respond on behalf of the Company with personal opinions or judgment. The Company's and employees' opinions must be unified in the public eye.

Separation of Personal Politics in the Workplace

Employees must be prudent when engaging in personal political activities.

The Company respects the rights of individual employees to engage in political activities. However, the funds, resources, time, and reputation of the Company may not be used directly or indirectly by an employee for such political activities. Engaging in political activities during work hours, or in the workplace, and making contributions to political campaigns using Company funds is prohibited. When involved in such political activities, employees must make clear that their views, actions, and opinions are their own and not those of the Company.

The Company may express its official views within the scope of the law, and such views will be determined by the Company's main decision makers. Any official announcements will be made by an approved spokesperson. Employees may not engage in political activities on behalf of the Company unless approved or authorized to do so by the Company.



Prohibited Use of Confidential Information

Employees have access to many types of confidential information while employed at the Company. Confidential information includes all non-public information that may have a significant impact on the decision-making of investors if disclosed. Such confidential information may regard competitors, partners, and non-public information of other companies. The following is included in confidential non-public information.

- Information on the acquisitions and mergers of companies.
- Information on signing or canceling major contracts.
- Information on major lawsuits.
- Information on business plans and performance (sales plans and performance by project, management information which hasn't been disclosed by legal processes, and the status of properties).
- Information on new projects (progress on game development, and launch plans such as dates and regions).
- Information on project improvement plans (update schedules and new game content).

Non-public confidential information contains valuable insights regarding investment projections. The disclosure and use of confidential Company information that may positively or negatively affect the value of the Company's publicly traded securities has a critical impact on the fairness and equity of the investment market. The use and disclosure of "inside" or non-public information in connection to the trading or sale of securities is unethical and prohibited by law.

Employees have a responsibility to protect confidential information, even outside the work environment.

- We must not trade stocks using undisclosed confidential information. If undisclosed confidential information contains the information of another company, we must not trade that company's stocks.
- We must not share undisclosed confidential information with outsiders or employees who are not authorized to access to that information. We cannot allow these people to use undisclosed confidential information to trade the stocks of our Company or other companies.

If an employee violates this rule, both the Company and the person responsible may face legal punishment. Improper use of undisclosed confidential information for personal interest is irresponsible behavior that compromises the trust relationship between the Company, its customers, and its investors. It can also cause enormous economic loss.

This doesn't mean employees can't hold the Company's stocks. Owning Company stocks can be a motivational factor that makes employees work with more responsibility and diligence. In this regard, the Company supports owning stocks in the Company. However, employees must observe relevant laws when trading Company stocks. This allows both the Company and its employees to grow and benefit together.

If you are not sure about the legitimacy of the Company stock trading, please consult with and follow the guidelines set by the stock department.



04. PRACTICING FAIRNESS AND MUTUAL PROSPERITY

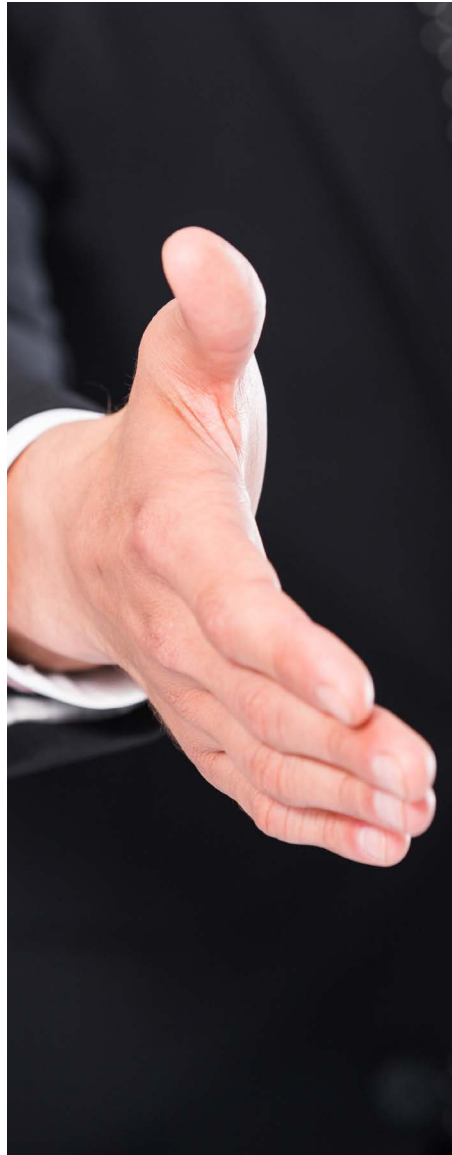
Fairness in Selecting Business Partners

We choose our partners with impartiality, meaning we select partners based on rationality and viability.

Fairness in partner selection allows us to make the most of our business arrangements. It's also a way for us to show appreciation to both our partners and customers.

This principle helps us keep the conditions of our contracts competitive, and prevents partners from focusing on bribery and regalement. It also hinders the ability of bribery and regalement to drive up costs, which enables us to provide high-quality services at more affordable prices.

Netmarble is dedicated to rooting out social vices such as unethical practices and dog-eat-dog mentalities. We wish to provide fair competition and growth among start-ups and small-scale companies. This will ensure the combined growth of our Company, our partners, and society as a whole.



Conducting Business with Legitimate and Ethical Partners

We only work with legitimate and ethical business partners.

Our partners are cooperative and share our goals. They are also agents who work for us, which means their actions and judgments are often reflected as our own. If our partners make illegal or unethical decisions or actions, it disadvantages us. For example, if our partners cut employee wages by a significant amount to save on costs in order to pay us, or if they bribe a public official to gain favor with us, we will also suffer the social stigma and legal penalties involved.

Therefore, we must examine potential partners to ensure they follow laws and ethics before deciding to work with them. Even after a partnership has been established, we must pay continuous attention to whether our partners are conducting themselves legally and ethically.

If a current or potential partner falls under any of the following, please report it to Company executives immediately so that the necessary actions to halt business can begin.

- An illegal organization or an organization which practices illegal activities.
- An organization that operates on or trades illegal and suspicious funds (e.g. funded by criminal activities).
- An organization which performs illegal transactions.



Mutually Beneficial Business Relationships

Netmarble stands by its partners. No company can move forward without the cooperation of its partner. Maintaining long-standing and productive relationships requires the efforts of everyone involved.

We must endeavor to satisfy our partners through how we conduct business, thereby both increasing our profits and guaranteeing the growth of our partners.

This kind of structure ensures all parties respect one another and allows for universal growth. Respect begets respect, and in return allows relationships with our partners to remain positive and productive.

Prohibited Unauthorized or Forced Acquisition of Third-Party Information and Assets

We produce information through our successes and failures that becomes a valuable asset. The Company protects this information from being leaked to and used by competitors and outsiders.

Likewise, information created by third-parties such as partners, competitors, etc. are valuable and privileged assets and must be handled and processed with the utmost care. The source of such information and the process of which it was obtained must be documented and confirmed and must only be used within the scope authorized by the legal owner of such information.

An information owner's rights must be respected. We are forbidden to force an owner to disclose information or allow us to use information, and we must not penalize a business because they didn't disclose or allow us to use information.

If we use information assets through unauthorized force, the Company's reputation will be lost and we may suffer legal penalty.

Guidelines for Regalement, Gifts, Accommodations, Etc

Expressing goodwill and gratitude is important business etiquette. However, inappropriate gifts or regalement may cause a conflict of interest. We must be cautious when giving gifts or partaking in regalement because it may be misunderstood as an act of corruption or bribery.

Customs and regulations involving gifts and regalement vary between cultures and regions. It's important we adhere to the following when offering or accepting gifts or regalement while conducting global business.

- There should never be purpose or intent to generate an inappropriate influence on business decisions.
- The content of gifts or regalement should correspond to the local customs.
- The content of gifts or regalement should comply with the local laws and regulations of the organization that both the donor and recipient belong.
- Gifts and regalement should not be too extravagant.

If it's difficult to judge the adequacy of gifts or regalement, ask yourself the following:

- When offering gifts and regalement: "Would I offer this even if the recipient was not an employee of this company?"
- When receiving gifts and regalement: "Would I be offered this even if I was not an employee of this company?"

If you'd answer no to either question, you should not offer or accept the gift or regalement. If you're still unsure, please contact the Ethics Compliance Team.



05. OUR GOAL

Netmarble is a stage for talented people to achieve their dreams.

Netmarble wants to be a stage where talented people can achieve their dreams, a place that attracts talented, innovative people with a diverse range of talents who love a good challenge. Our employees have a strong sense of responsibility, excellent sense of empathy, and a focus on community. We aim to be a place overflowing with opportunity that talented people hunger for. This can only be achieved by looking beyond the self-interests of the Company and fulfilling our social and ethical responsibilities as a company. Along with providing high-quality products and services, we must seek to revitalize the local economy through job creation and tax payments, as well as making ethically valuable contributions to society.



We strive to create happiness for people around the globe.

We ultimately seek to create happiness for people around the globe, and pledge to strive tirelessly in aim of this goal. We are committed to focusing on our calling to meet this end, which involves creating innovative content and bringing joy and entertainment to customers everywhere. Our goal to create joy and entertainment is not limited to just our Company, but shared with our partners and competitors. As long as there are customers out there who derive happiness from our content, we will extend an invitation to our partners and competitors to help us in maintaining our goal. We pledge to consider the views and opinions of our customers equal to that of our colleagues, and to support the development and growth of our competitors. We believe that any who've experienced joy and happiness are capable of helping us achieve our goal. We support the creativity and efforts of those who share our vision and seek to accomplish it with them.



06. OUR ATTITUDE IN PRACTICING ETHICS

Conflicts of Interest

Employees have the responsibility to act in the best interests of the Company.

A conflict of interest exists when an employee's private interest interferes in any way with the interests of the Company. However, a conflict is not limited to the pursuit of personal gain or benefit. Conflicts may arise when an employee takes actions or has interests that may make it difficult to perform their duties. Neglecting the interest of the Company in favor of family, friends, or another company or organization may also be considered a conflict of interest.

Any and all circumstances in which transactions or activities could result in, or give the appearance of, a conflict between personal interests and those of the Company is prohibited. Any such incidences may weaken corporate morale or jeopardize the objectivity and order of the Company.

Thus, all employees should never conduct themselves in any manner that, directly or indirectly, would be detrimental to the best interests of the Company. The following are examples of situations that could reasonably give rise to a conflict of interest.

(1) External Investments

Conflicts of interest regarding personal investment activities must be avoided. Though personal investment activities in general are not problematic, any investment decisions that may damage the best interests of the Company must be avoided.

Conflicts of interest can arise in investment situations despite one's best efforts to avoid them, and depend on the investor's circumstance, purpose, scale, and method. Therefore, the following must be considered:

- Whether you have the authority or are in a position to influence a company's decision-making regarding the company you are investing in.
- The level of control you can acquire over the management or business of the company you are investing in.
- Your proportion of shares in an invested company.
- The personal significance of the investment (investment-to-net asset ratio, investment proportion of an investment in your portfolio).

If you're considering an investment, please consult with the stock department and follow their guidelines to before investing.



(2) Other Employment and Part-Time Jobs

Working for another company or organization has a high potential for conflict of interest, such as in the case your secondary job renders you too fatigued to competently perform your primary job. But this is especially true if your secondary employer is a competitor or workplace with competing interests.

Therefore, the Company prohibits employees from serving as executive members, board members, and consultants for other companies or organizations. If any activities could give rise to or be reasonably perceived as a conflict of interest, they must be reported to the human resources department for approval.

(3) Writings, Lectures, and Interviews

External activities based on experience or a career with the Company may also potentially give rise to a conflict of interest.

The publication of books, media interviews, lectures,

and presentations typically fall within the scope of freedom of expression and are unlikely to pose a conflict of interest against the Company. However, such activities based on experience or a career at the Company may pose a risk of disclosing corporate information. The disclosure of such sensitive and confidential Company information may negatively impact the Company.

If presented with the opportunity to engage in such external activities, please contact the human resources department and proceed according to their guidelines.

(4) Business with Acquaintances

Particular care must be given when conducting business with companies affiliated with people you have personal relationships with, such as relatives, friends, significant others, etc. It is critical all employees avoid even the appearance of impropriety or favoritism.

Upon discovering an acquaintance or anyone you share financial interests with is involved with a current or

potential partner company, it must be disclosed to the Ethics Compliance Team and the given guidelines must be followed.

(5) Gifts and Regalement

Gifts, meals, and regalement offered by a third party, including partners and competitors, may unduly influence employees from acting in the best interest of the Company. On the occasion you become the recipient of gifts or regalement from a third party, please refer to the "Guidelines for Regalement, Gifts, Accommodations, Etc" section in Chapter 4, "Practicing Fairness and Mutual Prosperity."

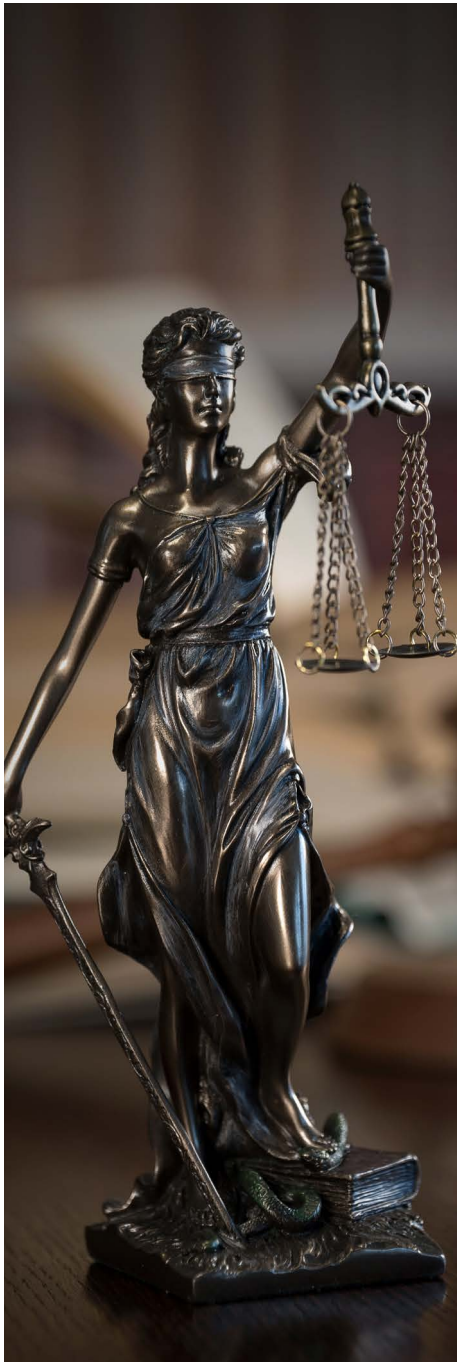
If faced with a situation you're concerned may pose a conflict of interest, please ask yourself the following questions:

- "Would my decision or action benefit me, my friends and family, or another company at the expense of the Company's interests?" And: "Could my decision or action possibly be perceived as a conflict of interest by others?"

- "If my decision or action were portrayed in the news, would it pose any difficulties to the Company?"

If you'd answer yes to any of these questions, the necessary steps must be taken to avoid a conflict of interest. If you're still uncertain as to whether or not there's a conflict of interest, please contact the Ethics Compliance Team. If your current circumstance poses a conflict but is unavoidable, please contact the Ethics Compliance Team for assistance.





Compliance with the Law

The first obligation of responsible corporate citizenship is to comply with the laws of the countries and communities in which we do business. The Company has an obligation to observe and adhere to the relevant local laws and policies.

There are diverse laws, regulations, and rules applicable to the Company's various business operations and in the various locations in which we operate those businesses. It's our responsibility to do our due diligence in researching and complying with laws and regulations we are subject to prior to embarking on a company venture. Not only does this entail the research of applicable laws and policies, but also the handling and elimination of possible risks. If there are any doubts about whether a course of action is lawful, please consult and seek the advice of the legal department.

Any violation of the law by an employee will be subject to disciplinary action from the Company regardless of the legal penalties. Employees are required to observe and comply with any Company or legal policies.

Prohibited Misconduct

Misconduct refers to any type of behavior that violates Company policies, regulations, or laws. Misconduct may vary, but in most cases involves the theft or embezzlement of Company assets, or the manipulation of Company documents and records.

Most motives for company misconduct are profit-driven. Therefore, it stands to reason that maintaining a healthy and reasonable financial life is the most efficient way of preventing corporate misconduct. Personal activities that pose a risk to financial health and increase the likelihood of misconduct include gambling, living in luxury, unreasonable investments, excessive debt, etc. A healthy and responsible financial lifestyle not only benefits yourself and your family, but also your company.

As covered above, most cases of corporate misconduct are driven by profit. However, in some instances they may result from misguided attempts to help the Company. Examples of this include the manipulation of Company performance and the concealment of infractions with the purpose of protecting the Company's reputation. Regardless of motivation, such actions can damage the Company's reputation and lead to a loss via legal penalties or other means. Employees may not involve themselves in any type of misconduct for any reason.

The Company has several precautions in place to prevent corporate misconduct. This includes the equilateral distribution of authority to various personnel and the establishment and implementation of procedures and policies by department and task. Abandoning our responsibilities or leaving a gap within our work processes may facilitate the misconduct of our colleagues, therefore it is of the utmost importance that employees fully understand their duties and adhere to the established procedures and policies to ensure the integrity and transparency of the Company.



CLOSING REMARKS

This Code of Conduct was established as a guide and resource to help the Company in practicing ethical management. The Code is not intended to address every ethical issue that an employee may face. Ultimately, it is our personal responsibility to adhere to a higher ethical standard than required by common commercial practice. It's imperative that employees use their best judgment.

CONTACT INFORMATION

· If you have any questions or inquiries regarding this Code of Conduct, please contact the Netmarble Ethics Compliance Team.

* **Contact Information for the Netmarble Ethics Compliance Team** Email
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