

## Compliance Policy

### 1. Compliance First

Compliance is not somebody else's responsibility, rather a responsibility each and every officer and employee practices every day. Compliance shall be our fundamental rule which protects our company as well as all officers and employees. Our operations and performance are built on top of this foundation.

### 2. Definition of "Compliance"

SMFL defines "Compliance" as follows: We comply with laws, regulations and internal rules, and meet social norms and expectations from society and customers.

### 3. Seven Compliance Policies

We have established the following seven main policies:

- 1) Compliance with Laws and Regulations
- 2) Sincere Actions
- 3) Proper Management and Usage of Information
- 4) Fair Business Operations
- 5) Anti-Bribery and Anti-Corruption
- 6) Respect for Human Rights and Prevention of Discrimination and Harassment
- 7) Cutting Off Relations with Antisocial Forces, and Anti-Money Laundering/Combating the Financing of Terrorism

### 4. Compliance Policies

#### 1) Compliance with Laws and Regulations

- We understand and comply with laws and regulations applicable to our business.

#### 2) Sincere Actions

- We will always consider social norms and expectations that change from time to time and respond fully.
- We will maintain our dignity as SMFL officers employees and act in good manners.

#### 3) Proper Management and Usage of Information

- We will properly manage and use any information received as part of our work.
- We will properly handle intellectual property rights/ confidential information of third parties.

#### 4) Fair Business Operations

- We comply with internal rules, accurately report and record facts and information related to our business, and do not conceal or alter them.
- We will promptly report and take appropriate measures in the event of adverse situation.
- If we become aware of or discover any adverse situation even if it is not directly related to us, we will not let it pass. We will raise our voice immediately to seek improvement.

#### 5) Anti-Bribery and Anti-Corruption

- We will comply with anti-bribery laws and regulations and will not engage in any acts which may invite suspicion or distrust from society.
- We will not accept business entertainments or gifts that exceed social norms or business practices.
- We will not use our position or authority as an officer or employee of the Company, or sacrifice the Company's assets or profits to benefit ourselves or a third party.

#### 6) Respect for Human Rights and Prevention of Discrimination and Harassment

- We respect all people and do not discriminate or harass anyone.

#### 7) Cutting Off Relations with Antisocial Forces, and Anti-Money Laundering/Combating the Financing of Terrorism

- We will maintain a resolute attitude toward antisocial forces and strive to prevent transactions and break off relations with them.
- Regarding anti-money laundering and combating the financing of terrorism (AML/CFT), we will strengthen and continue AML/CFT by implementing measures and responses in accordance with laws and regulations as well as regulatory guidelines.