

BNK Financial Group

ESG Policy Book

Anti-Corruption & Anti-Bribery Policy

TOUCH  *Your Heart,* BNL

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Anti-Corruption & Anti-Bribery Policy

1. Objective

- BNK Financial Group aims to become a trusted financial group for stakeholders by establishing a fair and transparent corporate culture. We will practice ethical management through the implementation of this policy, which is based on domestic and international anti-corruption laws, code of ethics, and the group's internal control regulations.

2. Application Scope

- This policy applies to all employees of BNK Financial Group and all its subsidiaries, including contract and part-time employees.

3. Basic Principles

3.1 Fair Business Conduct

3.1.1 Responsibilities and Duties of Employees

- Employees of BNK Financial Group shall perform all tasks with the diligence of a good manager, accurately understanding and complying with the laws, supervisory regulations, and internal regulations necessary for their duties to establish a fair financial order.
- BNK Financial Group shall reject any misconduct that hinders sound corporate activities, such as monopolistic or anti-competitive practices, ensuring customer's right to choose and providing necessary information to shareholders equally and fairly.

3.1.2 Fair Competition

- BNK Financial Group shall not engage in activities that unfairly infringe on the interests of competitors and shall not use unfair competitive means that disrupt the competitive order.
- BNK Financial Group shall respect the order of the capitalist economy and compete fairly with other financial institutions based on the principles of free competition, striving to develop together with various stakeholders such as customers, shareholders, employees, partners, and suppliers.

3.1.3 Prohibition of Unsound Business Practices

BNK Financial Group shall not engage in unsound business practices that disrupt sound financial order, such as unfairly increasing customers' financial costs or infringing on their rights by exploiting a superior position in transactions with customers, or through false or exaggerated representations and advertisements.

3.2 Prevention of Conflicts of Interest

3.2.1 Prohibition of Conflicts of Interest

- Employees of BNK Financial Group shall prioritize the protection of the company's or customers' interests over personal gains when performing their duties and strive to avoid situations where conflicts of interest with the company or customers may arise.
- Employees of BNK Financial Group shall not use or disclose non-public information acquired during their duties to benefit themselves or third parties.
- Employees of BNK Financial Group shall not engage in false or exaggerated reporting, or intentionally omit, conceal, or monopolize important information for the benefit of specific individuals or departments.

3.2.2 Prohibition of Pursuing Personal Interests

- Employees of BNK Financial Group shall not engage in business activities for profit or hold concurrent positions without the company's approval.
- Employees of BNK Financial Group shall not impose undue costs on customers or partners for personal gain, nor do they broker business related to the group or its subsidiaries.

3.3 Prohibition of Receipt of Money, Goods and Entertainment (Anti-Corruption and Anti-Bribery)

- Employees of BNK Financial Group shall comply with various domestic and international laws and agreements, including the 'Improper Solicitation and Graft Act', and shall not offer or promise or express their intent to offer money, goods, travel expenses for entertainment, jobs, or any other benefits to public officials or others.
- Employees of BNK Financial Group shall not accept money, goods, entertainment, golf outings, or equivalent preferential treatment from customers, business partners, or colleagues, nor shall they offer improper benefits.
- Any act of receiving money, goods or other benefits from stakeholders through the family, relatives, or acquaintances of employees of BNK Financial Group shall be considered as an act of the employees themselves.

3.4 Prohibition of Unfair Business Practices

- Employees of BNK Financial Group shall not use or provide undisclosed information obtained in the course of work to third parties, nor shall they spread false information or cause misunderstandings to manipulate market prices of securities for unjust gains.
- BNK Financial Group shall provide necessary information to shareholders in a timely and fair manner in accordance with relevant laws and regulations, and ensures accurate and complete accounting records in accordance with generally accepted accounting principles.

3.5 Integrity Contracts

- BNK Financial Group shall conduct transparent and fair transactions with partners without using its superior position to impose transaction conditions, transfer costs, exert undue influence, or demand and accept money, goods or entertainment directly or indirectly.
- BNK Financial Group shall perform all processes of announcement, bidding, evaluation, contract conclusion, and execution with partners transparently and fairly in accordance with related laws and regulations.
- BNK Financial Group shall consider compliance with the group's code of ethics when selecting partners and maintaining transactions with them.

3.6 Donations

- BNK Financial Group shall not engage in activities that violate political neutrality by expressing opinions or providing support to specific parties or candidates. We shall adhere to the 'Political Funds Act' and prohibit political donations executed with company resources.
- BNK Financial Group has established and operated donation management regulations that define major standards and procedures related to donations to ensure efficient operation of donations.

3.7 Training and Education

- BNK Financial Group provides regular anti-corruption and anti-bribery training to its employees.
- The contents of anti-corruption and anti-bribery trainings are periodically updated to reflect changes in related cases.

3.8 Procedures for Handling Violations

3.8.1 Reporting of Violations

- BNK Financial Group operates an internal whistleblower system that guarantees the anonymity of reporters. The reported violations are submitted either to the Compliance Officer or to an independent external organization, depending on the reporting channel.
- In unavoidable cases where money, gifts, or other gratitude are received, it must be immediately returned and a "Report on Returned Money or Gifts" must be completed and submitted to the Compliance Officer of the relevant department within three (3) business days.
- Whistleblower information is kept confidential. Retaliation against whistleblowers will not be tolerated and disciplinary action will be taken against the engaged employees in accordance with the Group's Zero-Tolerance Policy.

3.8.2 Corrective and Disciplinary Action

- Violation of BNK Financial Group's Anti-Corruption and Anti-Bribery Policy may lead to disciplinary measures, including warnings, salary reductions, and termination of employment.
- For any other reasons, if returning money, gifts or gratuities is not feasible, employees must report the situation to the Compliance Officer and the head of the relevant department, division, or branch. Such items received shall be used for social contribution purposes.

4. Others

4.1 Reference

- The 'Improper Solicitation and Graft Act'
- Relevant laws, including the 'Political Funds Act'

4.2 Enactment and Revision History

- June 27, 2024. Policy enacted and implemented
- August 18, 2025. Policy revision

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