NAVER Anti-Corruption and Compliance Management Policy

NAVER Corporation (hereinafter referred to as “NAVER”) establishes an anti-corruption and compliance management system, and builds ethical management and compliance management to fulfill social roles and responsibilities while growing healthy in diverse relationships. To this end, NAVER establishes and discloses the anti-corruption and compliance management policy as the following.

• NAVER complies with all the compliance obligations, including domestic and foreign laws and internal regulations applied to business activities.

• NAVER strictly prohibits all acts of corruption, including receiving or demanding money and goods from business stakeholders, giving bribes, or making improper solicitation.

• NAVER continuously manages and improves the level of anti-corruption and compliance management through the establishment, implementation and monitoring of the anti-corruption and compliance management system.

• All members of NAVER should comply with all internal regulations currently in operation under this policy and the anti-corruption and compliance management system. All members of NAVER will strictly abide by and regularly sign an anti-corruption and compliance management pledge.

• NAVER appoints an anti-corruption and compliance officer to ensure independent authority and grant necessary rights and responsibilities.

• NAVER establishes and encourages the use of a reporting system for corruption prevention and compliance management in times of suspected
or actual compliance violations, including acts of corruption. NAVER will also provide protection measures for reporters acting in good faith to allow members to participate in corruption prevention and compliance activities without any burden.

- NAVER takes measures such as disciplinary actions under company regulations when members of NAVER violate compliance obligations, including acts of corruption, or fail to take reasonable measures to prevent such acts even after recognizing the possibility of a violation.

- All members of NAVER’s management fully support the efficient operation of the anti-corruption and compliance management system.

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NAVER Corporation