

Implementing a Trade Compliance Program

Samsung Electronics Co., Ltd.

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Samsung Electronics is fulfilling its corporate responsibilities for compliance program adherence and maintaining international security and world peace.

In addition to complying with the Foreign Trade Act, it faithfully implements the self-compliance trader (Appendix 1) system, closely monitors global export control trends in line with the international situation, and reflects them in its internal management process.

It also does its best to ensure safe exports through strategic items / catch-all items export controls and managing customers of concern, and spreads a culture of compliance by conducting self-inspections, external audits, and training for employees.

Trade Compliance Regulations

Article 1 (Purpose) The purpose of this regulation is to prescribe matters necessary for the composition and operation of a self-compliance system related to strategic items implemented by Samsung Electronics (hereinafter referred to as "the

Company") under the Foreign Trade Act, etc., in order to prevent harm to national security and international peace.

Article 2 (Scope of Application) The export transactions from overseas to overseas through our company's export customs clearance or headquarters relocation transaction and technology transfer are subject to trade-related laws such as Korea's Foreign Trade Act.

Article 3 (Definitions) The terms 'Foreign Trade Act', 'strategic items', 'export license', 'catch-all license', 'export', 're-export', 'import', and 'intangible transfer of technology' shall be defined in accordance with the definitions set forth in the Act.

Article 4 (Basic Policy) The company does not engage in any act contrary to relevant laws and regulations such as the Foreign Trade Act when exporting strategic items and catch-all items, and forms and operates a committee to ensure that the principles of independence and accountability are implemented for effective export management.

Article 5 (Compliance Will of CEO) The Chief Executive Officer (CEO) contributes to spreading awareness about the importance of strategic items management by declaring it both internally and

externally through the Declaration on Implementation of Export Control for Strategic items (Appendix 2).

Article 6 (Committee and Secretariat) The company operates an 'Trade Compliance Committee' (hereinafter referred to as the committee), which oversees the export management of strategic items across the company, and a 'Secretariat', consisting of working-level officials in charge of development, sales, and purchase in the business unit that actually executes export contracts for strategic items.

Article 7 (Determination of Strategic Items and Acquisition of Export Licenses) Export transactions for manufactured and developed products are operated in accordance with the order of Appendix 3.

Article 8 (Domestic Transaction Process) The customer is notified of whether or not it is a strategic item, so that when the customer sells or exports the corresponding strategic items, they will follow the notification and export license procedures.

Article 9 (Identification of Sanctioned Parties) When discovering new customers, it is necessary to check whether they are concerned traders through the Strategic Items Management System of the Ministry of Trade, Industry and Energy. If a customer is

identified as a sanctioned parties, it should be reported to the committee and the contract process should be stopped.

Article 10 (Audit) The audit on the operation of the committee is conducted once every designated period for self-compliance traders through an external specialized institution.

Article 11 (Education) In accordance with the annual education operation plan, it is conducted for working-level organization managers in the business division. Education is conducted in the form of basic and professional practice at the KOSTI, self-compliance courses, and in-house collective training.

Article 12 (Reporting) If any strategic items issue or violation of regulations has occurred or is expected to occur, it should be reported immediately to the Chairman of the Strategic Items Trade Compliance Committee and detailed in writing for follow-up measures.

Article 13 (Information and Communication Security Management)
The company controls and manages the transfer of strategic technologies to outside through information and communication security management systems, etc. It also prevents illegal outflow by controlling entrance and exit within the company.

※ Appendix 1. Designation of Self-Compliance Trade Dealers



※ Annex 2. Declaration of Compliance with Strategic Items Self-Export Control

Declaration of Compliance with Strategic Items Self-Export Control

We recognize that export control of strategic items are important for enhancing corporate credibility and sustainable growth. Therefore, we declare as follows:

We will make every effort to ensure that all employees are aware that proper implementation of the strategic item export control system is a social responsibility of companies for maintaining international security and world peace.

We actively strive to establish necessary organizations and operating systems for self-management of strategic items, and all departments actively cooperate for efficient and systematic operation of the Trade Compliance Committee.

We actively cooperate with the government's policy on export control of strategic items and do our best to prevent any violations of the Foreign Trade Act such as illegal exports of strategic items.

※ Annex 3. Export Transactions

