

Management Division – Human Resources

INTERNAL INFORMATION MANAGEMENT POLICY

I. PURPOSE

This internal information management policy (this “**Policy**”) specifies certain matters concerning the general management and appropriate disclosure of the Company’s internal information in order to (i) make a prompt and accurate disclosure in compliance with the laws and regulations of the Republic of Korea (“**Korea**”) and (ii) prevent insider trading by any executive officer and/or employee of the Company while the Company is listed on the Korea Exchange.

II. POLICY

- a. **(Management of Internal Information)** The executive officers and employees shall manage the internal information of the Company that they have acquired while performing their duties in a strict manner, and shall not disclose the internal information of the Company to a third party within or outside of the Company unless required for the performance of their duties.
- b. **(Provision of Internal Information to an Outside Party)** In the event it is inevitable for an executive officer or an employee to provide the internal information of the Company to any of the Company's counterparties, external auditor, agent, or any other person who enters into an advisory service agreement with the Company (including, without limitation, legal advice services or management consultation services), he or she shall report such provision of the internal information of the Company to the disclosure officer.
- c. **(Media Coverage)** In the event there is a request from media looking to cover the Company, the chief executive officer (the “**CEO**”) or the disclosure officer shall, in principle, respond accordingly.
- d. **(Distribution of Press Release)** In the event an executive officer or an employee wishes to distribute a press release to media, he or she shall consult with the disclosure officer in advance.
- e. **(Establishment of Information Delivery System)** The disclosure officer shall establish an information delivery system within the Company to ensure that important internal information of

the Company, external information, largest shareholder related information, shareholding information and subsidiaries related information are initially reviewed by the chief financial officer (the “CFO”) (in charge of disclosure) and subsequently reported to the disclosure officer and the CEO.

III. PROCEDURE

a. Concentration of Internal Information

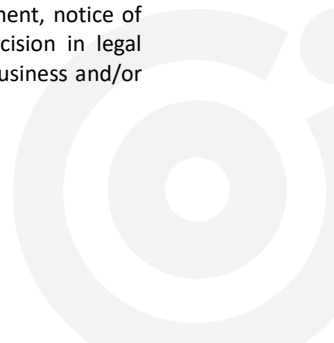
- (i) Each executive officer and head of division shall immediately provide information to the disclosure officer if:
 - 1. the internal information¹ has incurred or is expected to incur; or
 - 2. there occurs, or is expected to occur, an event resulting in the cancellation or modification of the internal information already disclosed; or
 - 3. requested by the disclosure officer.
- (ii) Decisions of the Board of Directors and the CEO shall be subject to the prior review of the CFO (in charge of disclosure).

b. Concentration of External Information

- (i) The disclosure personnel shall be responsible for the receiving of external documents such as formal letters, notices and complaints. The disclosure personnel shall re-distribute such external documents within the Company after confirming them on the date of receipt; *provided, that*, any and all material information² shall be reported to the disclosure officer or the CEO without delay (on the same day of receipt).

¹ Internal information means any information that is subject to the mandatory disclosure under the KOSDAQ Market Disclosure Regulation and other information concerning management or financial conditions of the Company which may affect judgements and investment decisions of investors.

² Material information includes, without limitation, notices of suspension of clinical trial, clinical outcomes, acquired patents, results of new drug approval and revocation of approval, rescission and/or termination of a license-out agreement, notice of transaction suspension and/or termination of agreement from the counterparty, complaints and court’s decision in legal proceedings, notice of penalties, fines or surcharge, notice of administrative measures such as suspension of business and/or suspension of sales and any other notices which may affect judgements and investment decisions of investors.



c. Management of the Largest Shareholder Related Information

- (i) The disclosure officer shall (i) fully explain the facts to the largest shareholder in order to comply with the disclosure obligations and inquiry disclosure requirements concerning the largest shareholder and (ii) ensure that the largest shareholder related information³ can be delivered in a timely manner (on the same day).

d. Monitoring of Shareholding Information

- (i) The disclosure officer shall fully explain the mandatory disclosure of shareholding information provided under the laws and regulations of Korea to the largest shareholder, his/her/its related person(s) and the executive officers of the Company so that (i) the investors are informed of the shareholding information of the largest shareholder in a timely manner and (ii) the executive officers are prevented from engaging in unfair trade practices using the internal information. Further, the disclosure officer shall frequently monitor the mandatory disclosure obligations that may arise from time to time.

e. Concentration of Internal Information of Subsidiaries

- (i) In the event that the subsidiaries of the Company incurred or are expected to incur internal information as specified to be subject to the mandatory disclosure of subsidiaries⁴ under the KOSDAQ Market Disclosure Regulation, the Company shall ensure that the subsidiaries immediately notify the Company's disclosure officer or disclosure personnel of such internal information.

IV. EFFECTIVE DATE OF POLICY

This Policy shall be effective as of December 7, 2021.

³ Largest shareholder related information includes, without limitation, change in the largest shareholder, execution, termination or cancellation of a share purchase agreement or management right transfer agreement involving change of the largest shareholder, execution, termination or cancellation of a share pledge agreement concerning the shares owned by the largest shareholder (applicable only if the largest shareholder can be changed upon enforcement actions).

⁴ Mandatory disclosure of subsidiaries includes, without limitation, a subsidiary's (a) insolvency, (b) motion for commencement of rehabilitation proceedings, (c) occurrence of an event of dissolution, (d) all-inclusive share swap, merger or split-off and (e) (i) suspension of business, (ii) capital increase and decrease, (iii) transfer of material assets and/or business or (iv) filing of litigation related to securities, exceeding certain amount.

