

# **Anti-Corruption Policy of Hotel Lotte**

Hotel Lotte Co., Ltd. (hereinafter the “Company”) enacts and declares the following Anti-Corruption Policy to establish ethical management by setting the standards of conduct for executives and employees for the prevention of corruption and bribery moving forward.

## **Article 1 (Purpose)**

The purpose of this policy is to establish ethical management by setting and implementing standards of conduct for the representative director, executives and employees, and the board of directors of the Company and all executives and employees of partner companies (hereinafter “employees, etc.”) for the prevention of corruption and bribery.

## **Article 2 (Prohibition of Acts of Corruption and Bribery)**

The Company prohibits employees, etc. from committing any acts of corruption such as the acceptance of bribes, including money and goods, entertainment, and accommodations from any stakeholder for any reason, wrongful use of the Company’s intellectual property (IP), or acquisition of unjust profits using internal information.

## **Article 3 (Compliance with Regulations Prohibiting Corruption and Bribery)**

In performing duties, employees, etc. shall do the following: 1) comply with the relevant statutes and internal regulations of the country where the head office is located; and 2) abide by the relevant statutes and internal regulations of the place where overseas branches are set up. If there is any statutory inconsistency between 1) and 2), higher standards shall be followed. Employees, etc. shall not engage in any conduct that violates or may be suspected of violating such laws.

## **Article 4 (Pledge to Comply with the Anti-Corruption Policy)**

Employees, etc. shall pledge to abide by the Anti-Corruption Policy and contribute to achieving the purpose of the Company by reducing the risk of corruption and bribery.

#### **Article 5 (Willingness to Implement and Improve the Anti-Corruption and Bribery Policy)**

The Company shall establish and operate an effective management system and continue to improve the system to prevent and reduce risks against corruption and bribery. In addition, all employees, etc. shall sign the Pledge of Compliance once a year and ensure that it is continuously fulfilled.

#### **Article 6 (Rights and Obligations of Anti-Corruption Officers)**

The Company shall appoint Anti-Corruption Officers for each business division to facilitate efficient operation. Anti-Corruption Officers are granted independent authority and responsibility related to the prevention of corruption and bribery and obliged to provide advice and guidelines for solving the Company's issues related to anti-corruption, and supervise the implementation thereof.

#### **Article 7 (Protection of Status of Anti-Bribery and Corruption Informants)**

The Company shall keep the personal information of Anti-Bribery and Corruption Informants strictly confidential. If the Informant is an employee, etc., the Company shall protect the Informant from being unfavorably evaluated and assigned or put at a financial disadvantage based on the report.

#### **Article 8 (Measures to Be Taken in the Case of Noncompliance with the Anti-Corruption and Bribery Policy)**

The Company may take disciplinary actions as prescribed by the regulations of the Company in the case where employees, etc. violate laws related to this policy or fail to take reasonable measures to prevent the violation of laws even after this is discovered.

#### **Article 9 (Application and Change of Policy)**

This policy shall be applied from the enforcement date. If it undergoes any change, such as addition, deletion, correction, etc., these revisions shall be announced through a notice to be released seven (7) days before the implementation of the change.