Seegene

Seegene Inc.

Compliance Control Standards

Department in charge	Compliance Support Group
Established	July 14, 2021

Chapter 1. General Provisions

Article 1 (Purpose)

Seegene Inc. (hereinafter referred to as the "Company") establishes and implements these Compliance Control Standards to ensure fair and transparent business operations, to foster sound corporate development, and to gain the trust of customers by complying with all applicable laws and regulations.

Article 2 (Definitions of Terms)

The key terms used in these Compliance Control Standards are defined as follows:

1. 'Compliance Control' refers to the entire process of establishing policies and control activities adopted by the Company to systematically identify all laws and regulations applicable to its business operations, internally monitor and assess compliance by officers and employees, prevent violations in advance, and systematically respond to various legal risks.
2. 'Legal Risk' refers to the risk of loss that may arise when officers or employees fail to comply with laws or regulations, resulting in civil, criminal, or administrative liability, or in the invalidation of contractual effects.

3. 'Compliance Officer' refers to the person appointed pursuant to Article 542-13 of the Korean Commercial Act, who is responsible for implementing compliance education and training programs, monitoring adherence to these Compliance Control Standards, and reporting related matters to the Board of Directors.

Article 3 (Application)

① These Compliance Control Standards apply to all business operations of the Company and to all activities of its officers and employees.

② All internal regulations of the Company related to compliance shall align with these Standards, and these Standards take precedence, except as otherwise provided by law or the Articles of Incorporation.

Article 4 (Establishment and Revision)

The Chief Executive Officer ("CEO") shall establish and revise these Compliance Control Standards following a resolution of the Board of Directors.

Chapter 2. Compliance Control Environment

Article 5 (Basic Principles of Organizational Structure and Role Assignment)

The organizational structure and role assignment for compliance control shall be designed to ensure both efficiency in compliance control activities and the independence of the Compliance Officer, with clear definition of the roles and responsibilities of all relevant officers and employees.

Article 6 (Roles of Each Governing Body)

① The Board of Directors shall decide on these Compliance Control Standards and other important matters relating to compliance. The Board shall also supervise whether the CEO has faithfully implemented its decisions in establishing and

operating an effective compliance control system.

② The CEO shall establish, maintain, and operate a compliance control system appropriate to the size and nature of the Company's business, in accordance with these Standards and the resolutions of the Board of Directors, and shall monitor its operation.

③ The Compliance Officer shall develop and implement compliance education and training programs, monitor adherence to these Standards, and report findings to the Board of Directors or the CEO, thereby overseeing compliance control activities in practice.

Article 7 (Appointment and Dismissal of the Compliance Officer)

① The Compliance Officer shall be appointed or dismissed by the CEO upon resolution of the Board of Directors.

② The CEO may dismiss the Compliance Officer in any of the following cases:

1. The Compliance Officer is unable to perform duties due to physical or mental incapacity.
2. The Compliance Officer commits misconduct related to his or her duties or violates laws or the Articles of Incorporation.
3. The Compliance Officer causes losses to the Company through willful misconduct or negligence.

③ The Compliance Officer shall not be dismissed during the term of office without just cause. If dismissal occurs during the term, the CEO shall present sufficient evidence to substantiate the grounds for dismissal under the subparagraphs of paragraph 2.

④ The Compliance Officer shall be entitled to state his or her opinions regarding the proposed dismissal to the Board of Directors.

⑤ If the Compliance Officer is dismissed, resigns, or the term expires, the CEO shall promptly appoint a new Compliance Officer to ensure the continuity of compliance operations.

Article 8 (Qualifications, Term, and Status of the Compliance Officer)

① The Compliance Officer shall be appointed from among persons who meet the qualifications prescribed in Article 542-13 of the Korean Commercial Act and Article 40 of its Enforcement Decree.

② Neither an auditor nor a member of the Audit Committee may serve as the Compliance Officer.

③ The Compliance Officer shall be a full-time position, with a term of 3 years, renewable.

Article 9 (Authority and Duties of the Compliance Officer)

① The Compliance Officer shall have the following authorities and duties:

1. Implementing compliance education and training programs.
2. Conducting regular or ad hoc monitoring and reporting on compliance with these Standards.
3. Collecting necessary information, requesting the submission of materials, and requiring statements in connection with his or her duties.
4. Demanding officers or employees to comply with compliance obligations and requesting suspension, improvement, or correction of actions deemed unlawful.
5. Requesting disciplinary action against officers or employees who violate these Standards or other compliance-related regulations.
6. Attending and stating his or her opinion at the Board of Directors or other meetings related to compliance control activities.
7. Supervising compliance team members and recommending personnel appointments of relevant departments.
8. Performing other duties as determined by the Board of Directors as part of the Compliance Officer's authority.

② The Compliance Officer may seek advice and assistance from external experts as necessary.

③ The Compliance Officer shall perform duties with the due care of a good manager and shall not disclose any trade secrets or confidential information obtained in the course of duties, during or after the term of office.

Article 10 (Independent Performance of Duties by the Compliance Officer)

① The Compliance Officer may report directly and in a timely manner to the Board of Directors or the CEO on matters relating to the performance of his or her duties.
② The Compliance Officer may request the CEO to convene a Board meeting if necessary for the purpose of reporting under paragraph 1.
③ The Compliance Officer shall be positioned within the Company to perform compliance duties independently and effectively.
④ The Company shall not impose any unfair personnel disadvantages on any current or former Compliance Officer for reasons related to the performance of their duties.

Article 11 (Restriction on Concurrent Positions)

The Compliance Officer shall not concurrently engage in any business-related duties that may affect the performance of compliance-related responsibilities.

Chapter 3. Compliance Control Activities

Article 12 (Assessment of Legal Risk)

① The Board of Directors shall establish and operate these Standards as part of an integrated and effective system for assessing and managing legal risks under the Company's overall risk management framework.
② The Compliance Officer shall review the magnitude and frequency of legal risks, assess the likelihood of violations, and categorize major types of legal risk activities. Officers and employees of relevant departments shall cooperate promptly and faithfully upon request by the Compliance Officer for this categorization.

Article 13 (Management of Legal Risk)

① Officers and employees shall familiarize themselves with and comply with all domestic and international laws and regulations related to their duties, these Compliance Control Standards, the Company's Code of Conduct, and other internal regulations related to legal risk. Compliance obligations include, but are not limited to, the following:

1. Officers and employees shall not commit or participate in embezzlement, breach of trust, conflicts of interest with the Company, or insider trading.
2. Officers and employees shall not engage in unfair trade practices or unlawful collusive acts in the performance of their duties.
3. Officers and employees shall not offer or receive bribes or inappropriate gifts to or from domestic or foreign government officials or persons with decision-making influence in connection with business matters.
4. Officers and employees shall comply with accounting-related laws, ensure the reliability and transparency of financial information, and provide accurate corporate information to investors in accordance with disclosure regulations.
5. Officers and employees shall strictly comply with laws relating to the protection of intellectual property rights and personal data.
6. Officers and employees shall comply with all laws and regulations pertaining to the approval, promotion, and advertising of medical devices and in vitro diagnostic medical devices.
7. Officers and employees shall fully comply with all laws and regulations relating to the provision of product information and services to customers.
8. The Company and its officers and employees shall not engage in any form of discriminatory practices based on race, gender, nationality, or age.
9. The Company and its officers and employees shall not engage in any acts prohibited or restricted by domestic or international law.

② Officers and employees shall immediately report or notify any violations of laws, these Standards, or related regulations in accordance with the procedures prescribed herein and shall not participate in or assist in such violations.

③ Relevant departments and the Compliance Officer shall take measures to prevent legal risks from transferring or expanding to other departments.

④ Based on legal risk assessments, the Compliance Officer shall ensure that all officers and employees correctly recognize and understand their obligations under paragraphs 1 and 2.

Article 14 (Operation of Compliance Education and Training Programs)

① The Compliance Officer shall design and implement concrete and systematic compliance education and training programs so that officers and employees can identify legal risks related to their business activities in advance and respond appropriately.

② The Compliance Officer shall conduct compliance training for all officers and employees for a certain minimum number of hours each year, including the following:

1. Regular Compliance Training: Regularly conducted for all officers and employees.
2. Onboarding Compliance Training: Mandatory for all new officers and employees prior to their job placement.
3. Special Compliance Training: Conducted for departments where significant legal risks are anticipated or where additional training is deemed necessary by the Compliance Officer.

③ The Compliance Officer may conduct the compliance training referred to in paragraph 2 through online communication media such as "online/e-learning."

④ The Compliance Officer shall evaluate the effectiveness and efficiency of the compliance education and training programs and, if necessary, conduct surveys to identify areas for improvement.

⑤ The Compliance Officer may operate a consultation system for officers and employees who are significantly exposed to legal risks in the course of their work, in addition to operating the compliance education and training programs.

Article 15 (Day-to-Day Compliance Support)

① The Compliance Officer shall provide ongoing legal advisory services to officers and employees and may require prior consultation whenever an officer or employee engages in business activities that involve significant legal risks, such as contract execution.

② The Compliance Officer shall establish procedures that allow officers and employees to report or disclose violations of laws or these Compliance Control Standards in a secure and timely manner.

③ The Chief Executive Officer (CEO) shall establish a system that enables smooth communication between officers and employees and the Compliance Officer regarding legal risks or compliance-related issues arising during business.

Article 16 (Voluntary Compliance Review by Officers and Employees)

① Each department may independently establish compliance review plans, including compliance training, and conduct periodic self-assessments of its compliance status.

② Each department may prepare and manage a checklist of compliance review items to ensure effective self-assessment.

③ The Compliance Officer shall provide guidance on the establishment of compliance review plans by each department under paragraph 1 and evaluate the implementation of the departments' self-assessments.

Article 17 (Compliance Inspections by the Compliance Officer)

① The Compliance Officer shall establish and operate a compliance inspection system to verify the adherence of all officers and employees to these Compliance Control Standards.

② Compliance inspections conducted by the Compliance Officer shall consist of regular inspections conducted once a year, as well as ad hoc or special inspections regarding specific legal issues that may arise.

③ For efficient compliance inspections, the Compliance Officer may standardize the formats and content of reports or notifications by department and, where necessary, require mandatory reporting or notifications of certain matters.

④ The Compliance Officer shall report the results of compliance inspections to the Board of Directors.

⑤ During compliance inspections, the Compliance Officer may, if necessary, notify or consult with the auditor.

Article 18 (Whistleblowing)

① The CEO may establish an internal whistleblowing mechanism that allows officers and employees to directly report unlawful or improper business conduct to the Compliance Officer or other designated persons.

② Persons receiving or handling whistleblowing reports shall maintain the confidentiality of the whistleblower's identity and the content of the report.

③ If a whistleblower reports unlawful or improper conduct in which they were personally involved, such self-disclosure may be considered a mitigating factor. All whistleblowers shall be protected from any personnel disadvantages or

retaliation as a result of whistleblowing.

Article 19 (Handling of Violations)

① If the Compliance Officer identifies any violation of these Compliance Control Standards or any other unlawful conduct, the Officer shall notify the relevant department head or report it to the CEO, and request appropriate measures such as suspension, remediation, correction, or disciplinary action. If necessary, the Compliance Officer may consult with relevant departments to develop a comprehensive response plan and recommend it to the CEO. In urgent cases, the Compliance Officer may, at their discretion, take necessary measures such as requesting the suspension, remediation, or correction of the relevant act prior to reporting or making recommendations.

② The Company shall impose appropriate disciplinary measures proportionate to the seriousness of the violation against individuals who breach these Compliance Control Standards.

③ The Compliance Officer may recommend measures to prevent recurrence of identical or similar violations to the Board of Directors or the CEO. Once recurrence prevention measures are determined, the Compliance Officer shall notify the relevant departments and ensure that the measures are reflected in the improvement of related programs and policies.

Article 20 (Transmission and Management of Information and Materials)

① To perform compliance-related duties, the Compliance Officer may request necessary information and materials from relevant departments in a form that allows for effective use. Officers and employees receiving such requests shall respond promptly and faithfully.

② The Compliance Officer shall establish an integrated information management system to systematically organize and securely store compliance-related information and materials.

③ Information and materials generated within the compliance control system shall be retained for at least five years.

Chapter 4: Effectiveness Assessment

Article 21 (Standards and Procedures for Effectiveness Assessment)

① The Board of Directors shall regularly review whether the Compliance Control Standards and related systems are effectively designed and operated, and where deficiencies or areas for improvement are identified, seek appropriate corrective measures.

② The Compliance Officer shall conduct independent assessments of the effectiveness of compliance support and monitoring systems and report the results to the Board of Directors.

③ Separately from the Compliance Officer's self-assessment, the Board of Directors may conduct a company-wide assessment of the compliance control system's effectiveness on an annual basis.

④ In conducting effectiveness assessments, empirical reviews shall be carried out on the adequacy and effectiveness of the Compliance Control Standards, legal risk evaluation and management systems, compliance monitoring and reporting mechanisms, the independence of the Compliance Officer's duties, and disciplinary mechanisms for addressing violations.

Article 22 (Follow-up Actions Based on Effectiveness Assessment)

① Based on the results of the effectiveness assessment, the Board of Directors shall establish corrective measures for any deficiencies or defects identified, taking into account the Compliance Officer's opinion.

② The CEO shall implement the corrective measures determined as a result of the effectiveness assessment.

Chapter 5: Miscellaneous

Article 23 (Rewards for Officers and Employees)

The Compliance Officer may recommend awards or promotions for officers and

employees who have faithfully complied with the Compliance Control Standards and have made contributions to preventing or mitigating losses.

Article 24 (Detailed Rules)

The Compliance Officer may establish detailed rules and procedures necessary for the implementation of the Compliance Control Standards.