

# DeNA Group Partner Code of Conduct

March 31, 2021

To all business partners, suppliers, and other business operators who support the activities of the DeNA Group (“Partners”)

DeNA Co., Ltd. (“DeNA”) expects that all officers and employees of DeNA and all subsidiaries of DeNA act based on the DeNA Group Code of Conduct and with the awareness of their respective positions as representatives of their organization, and in all aspects of corporate activities, to comply with laws, regulations, and company rules, and to practice behavior that conforms to social ethics in accordance with a high level of ethical standards. For purposes of the DeNA Group Partner Guideline (“Guideline”), “subsidiary” means a company more than 50% of whose voting rights are directly or indirectly owned by DeNA (together with DeNA, “DeNA Group”).

Each company should ordinarily be able to voluntarily choose whether to undertake such a code of conduct. However, for the products and services provided by the DeNA Group, DeNA recognizes the importance of having our Partners also understand and cooperate with the DeNA Group to act in accordance with this Guideline and fulfill their social responsibilities.

The DeNA Group has formulated this approach in this DeNA Group Partner Guideline (“Guideline”), and expressly stated the matters in which the DeNA Group expects the cooperation of all our Partners for transactions with the DeNA Group.

We sincerely appreciate the understanding and cooperation of our Partners with the intent and content of this Guideline.

## I Fundamental Principles

### 1. Basic Policy for Partners

- 1.1 As a good corporate citizen, Partners will be expected to act in accordance with the highest ethical standards.
- 1.2 Partners will be expected to conduct their businesses in consideration of all stakeholders, which includes their shareholders, customers, business partners, employees, and regional society.

### 2. Compliance with Laws and Regulations and Company Rules

- 2.1 Partners will be expected to comply with all applicable laws and regulations and Partner company rules.
- 2.2 Partners will be expected to establish, maintain and improve the mechanisms to ensure compliance with applicable laws and regulations and Partner company rules, and prevent any breach thereof.

### 3. Prohibition and Avoidance of Conflicts of Interest

- 3.1 Partners will be expected to not take any action pursuing interests of self or any third party which may be in conflict with the legitimate interests of the Partner.
- 3.2 Partners will be expected to use reasonable care so as not to create a situation which presents a conflict of interest in the course of daily business operations.

### 4. Response to Violation

- 4.1 Partners will be expected to carry out prompt investigation when they recognize any violation of applicable laws and regulations and/or Partner company rules, or receive any communication regarding such violation.

4.2 Partners will be expected to take proper action against any violation of applicable laws and regulations and Partner company rules. Such action includes but is not limited to corrective actions of violation, penalties for violators, and/or introduction of preventive measures.

5. Communication and/or Consultation regarding Violation

5.1 Partners will be expected to establish and operate effective hotline systems. Partners will be expected to proceed with an investigation of communication regarding any violation with due care for anonymity and confidentiality. Partners will be expected to not tolerate any retaliatory measures against, or unfair treatment of, anyone who communicates such violation.

II Principles for Business Activities

1. Compliance with Consumer Laws and Regulations

1.1 Partners will be expected to comply with applicable consumer laws and regulations in providing products and services.

2. Advertising

2.1 Partners will be expected to advertise their services in such a way as to properly convey their values and contents without the use of false statements or misleading expressions.

3. Fair Trade and Compliance with Antitrust Laws

3.1 Partners will be expected to comply with all applicable laws and regulations regarding antitrust and competition in each country where they conduct businesses and commit to contributing to a healthy development of markets through fair competition with their rivals.

4. Relationship with Business Partners

4.1 Partners, in consistent with sound commercial practices, will be expected to establish and maintain mutually beneficial business relationships with their business partners.

5. Gift and Business Entertainment

5.1 Partners will be expected to abide by the criminal laws of each country and comply with applicable laws and regulations relating to anti-bribery, including, but not limited to, the U.S. Foreign Corrupt Practices Act. Partners will be expected to not commit any act which may be regarded as bribery or payoff to receive favorable treatment.

5.2 Partner officers and employees will be expected to conform to common sense and prudent commercial practices. Partner officers and employees will be expected to not take any action which may be regarded as commercial bribery and/or receive any personal benefit from business partners.

III Work Environment Principles

1. Compliance with Labor Laws and Regulations

1.1 Partners will be expected to comply with all applicable labor laws and regulations in countries where they conduct their business and will be expected to ensure a healthy and safe workplace environment for their employees.

1.2 Partners will be expected to not require their employees to work involuntarily, and to not use child labor.

2. Respecting Human Rights and Appreciating Diversity

2.1 Partners will be expected to respect fundamental human rights of all people and have an appreciation of cultural and/or regional differences and diversity in their business operations.

3. Equal Opportunity Employment and Prohibition against Harassment and Discrimination
  - 3.1 Partners will be expected to not tolerate any type of harassment including, but not limited to sexual harassment, or discrimination on the grounds of race, religion, gender, age, nationality, origin, disability and/or other factors.
  - 3.2 Partners will be expected to endeavor to ensure equal opportunities in their recruitment activities and treatment of their officers and employees.
4. Safety and Health
  - 4.1 Partners will be expected to provide a safe and healthy workplace environment for Partner officers, employees, and visitors, including, but not limited to their business partners.
5. Prohibition of Drug Use, etc.
  - 5.1 Partner officers and employees will be expected to not sell, buy or use any illegal drugs.
  - 5.2 Partner officers and employees will be expected to acknowledge that driving or working under the influence of alcohol, or any other prohibited substances may cause serious harm to themselves, their companies and/or third parties, and shall refrain from such driving and working.

#### IV Principles regarding Company Assets and Information

1. Appropriate Use and Maintenance of Company Assets
  - 1.1 Partner officers and employees will be expected to endeavor to use company assets, whether tangible or intangible, with legitimate authority and purpose, manage and protect assets properly, and endeavor to maintain their value.
2. Protecting Intellectual Property Rights and Respecting Third Party Rights
  - 2.1 Partners will be expected to recognize that their intellectual property rights are especially important for their business activities and protect such intellectual property rights with utmost vigor.
  - 2.2 Partners will be expected to respect third party rights and not intentionally infringe or misappropriate such rights.
3. Fair Disclosure
  - 3.1 Partners will be expected to ensure timely and fair disclosure to their shareholders and markets in accordance with applicable laws and regulations.
4. Prohibition of Insider Trading
  - 4.1 Partners will be expected to not sell or buy stocks or shares of any company when they know nonpublic material information of such company, whether such nonpublic material information is regarding the Partner company or any other company.
5. Protection of Confidential Information and Personal Information
  - 5.1 Partners will be expected to fully respect the privacy of individuals and properly treat all personal information they collect and maintain in compliance with applicable laws and regulations and their company rules.
  - 5.2 Under the recognition that confidential information of a Partner is an important asset of the company, Partners will be expected to use such confidential information only for legitimate purposes and to not disclose or divulge to any third party without appropriate authorization from authorized personnel. In addition, Partners will be expected to treat confidential information of any third party

with at least the same degree of care.

5.3 Partners will be expected to make every effort to establish, operate and maintain proper information security systems in order to ensure information security.

6. Accurate Recording

6.1 Partners will be expected to recognize that accuracy and completeness of company records, including, but not limited to accounting books, is vital especially for financial reporting in accordance with applicable laws and regulations and accounting principles, and avoid any false or incorrect entries and ensure accuracy and completeness of such records.

V Principles for Social Responsibilities

1. Protection of Children and Young People

1.1 Partners will be expected to recognize the influence of their business activities on children and young people and endeavor to maintain and improve the soundness of services they provide.

2. Conservation of Environment

2.1 In order to contribute to building sustainable societies, Partners will be expected to endeavor to decrease the burden on the environment in every aspect of their business activities and engage in environmental conservation activities.

3. Contribution to Regional Society

3.1 As a member of a regional society, Partners will be expected to engage in activities for regional contribution.

4. Rejection of Relationship with Antisocial Groups and Organizations

4.1 Partners will be expected to take a resolute attitude against unreasonable requests from antisocial groups or organizations and shall never try to solve conflicts by offering money or other benefit.