

Trade restriction compliance policy

Overview

Together with and following the policies of our shareholders, Ulsan Aluminum (together with its subsidiaries, "UAL" or the "Company") impose and enforce restrictions on trade involving certain designated countries and individuals, entities, and end uses.

- Embargoed countries are nations that have been singled out in connection with national security and foreign policy initiatives seeking to enforce certain international standards of national conduct (i.e., Belarus, Côte d'Ivoire, Congo, Cuba, Iran, Libya, Somalia, Sudan, Syria, North Korea,, and Zimbabwe as of July 2012).

- Embargoed individuals and entities are persons identified for their involvement in terrorist, drug trafficking, weapons proliferation, war crimes or other internationally destabilizing activities, or because of a connection with a country or other person subject to embargo restrictions. (These individuals and entities are identified on one or more lists maintained and periodically updated by the relevant governmental authorities.)

- Embargoed end uses generally include the proliferation of weapons of mass destruction, nuclear proliferation, missile/rocket, chemical or biological warfare, and certain military related uses, projects or activities.

The failure to comply with any applicable trade restrictions can result in substantial, even criminal, liability and reputational damage for both the company and the individuals involved.

UAL Code of conduct

Section 17 of the Company's Guidelines for Ethical Behavior sets forth the policy and guidelines for conducting business practices around the world in compliance with export controls and other foreign trade restrictions:

UAL is committed to ethical business practices around the world. If you conduct business for UAL, you are expected to comply with all applicable laws and regulations governing such transactions. You must be aware of any restrictions applicable to hosting a government employee so as not to compromise in any way the parties concerned or UAL.

Various laws govern trade between the host country and foreign countries and prohibit host country companies and their foreign subsidiaries from doing business with certain countries, agencies and individuals. Similar export control restrictions limit the export of certain goods, technology and software to certain countries or individuals. As these laws and regulations vary by country and type of goods, employees engaged in business transactions outside of the host country should obtain advice prior to engaging in such activities.



Trade Restrictions Applicable to UAL

UAL and all of its subsidiaries and affiliates are required to comply with all trade restrictions applicable to their activities. Trade restrictions may be imposed by the host country of our operations, but certain U.S. and Japanese trade restrictions may also apply to UAL's operations outside the Korea, either by operation of law or by contractual extension of obligations through covenants in our credit agreements with our banks. For example, the involvement of an embargoed individual or entity in a transaction in any capacity or role may give rise to the applicability of embargo restrictions. Accordingly, in addition to complying with host country trade restrictions, each operation of UAL must ensure their compliance with applicable U.S. and Japanese trade restrictions.

Global Compliance Process

UAL sells products to shareholders and relies on shareholders' trade restriction. Every transaction involving a UAL operation must be evaluated for compliance with applicable trade restrictions before proceeding. The UAL and shareholder's legal department has established an organized search resource by itself and/or through AEB, a restricted party screening service provider, that can be used in conjunction with our existing contract management processes to check UAL's counterparties and all other parties to a transaction against the lists restricting trade with embargoed individuals and entities. The engaged department should assist with the compliance review for proposed transactions with embargoed countries, individuals or entities, or end uses before proceeding.