

Ethics Charter & Code of Conduct

Last Modified Date	2024.06.10
Document Management Department	Management Planning Team

Contents

- **Preface**
- **Ethics Charter**
- **Code of Conduct**
- **Appendix**

Preface

General Principles

Employees of Dongwon Metal Co., Ltd. and its affiliates play a pivotal role in social and economic development by creating value for a wide range of stakeholders, including customers, employees, and shareholders, based on unity, technological innovation, and commitment to responsibility. To achieve this, we establish and adhere to our Code of Ethics, which serves as the foundation for our actions and decision-making. We strive to manage the company transparently and fairly, earning the trust of society and continually developing as a world-class enterprise.

Purpose

The purpose of this policy is to set forth guidelines for the work practices of Dongwon Metal Co., Ltd. (hereinafter referred to as "the Company") employees and to establish and implement policies that protect and promote the rights of all stakeholders. This includes, but is not limited to, safeguarding human rights.

Coverage

This policy applies to all employees of the Company and its affiliates, covering both domestic and overseas offices and legal entities. Furthermore, stakeholders and business partners involved in the Company's operations are encouraged to respect these principles.

All employees of the applicable organizations must comply with the laws of the respective countries while performing their duties in accordance with this Code of Conduct. The Company shall comply with the laws and regulations of each country in which it operates and respect local business norms. In cases where this Code conflicts with local laws, the local laws will take precedence, and the Code of Ethics and Conduct will be revised to reflect the legal and industrial requirements of the country.

Compliance with the Code of Conduct

All employees must faithfully adhere to the Code of Ethics and will be held accountable for any violations. If an employee is coerced into or becomes aware of any unethical behavior, they are obligated to report it to the department responsible for overseeing the Code of Ethics. In the event of a violation, the Company will conduct a thorough investigation, implement corrective measures, and provide education to prevent recurrence.

Ethics Charter

Six Ethics Charter at Dongwon Metal

1. We adhere to ethical management as a fundamental principle in all internal and external business activities, striving for clear and transparent decision-making processes in business operations
2. We ensure the rights and freedom of negotiation for all members and do not tolerate any form of human rights violations, providing appropriate responses when necessary
3. We dedicate continuous efforts to create and maintain a safe and healthy working environment.
4. We provide safe and efficient products and services to meet customer demands, ensuring the thorough protection of personal information collected by the company.
5. We endeavor for mutual growth with partner companies, supporting fair trade and cooperation based on mutual respect.
6. We are dedicated to sustainable development, striving to contribute to economic and social progress through responsible business practices.

Code of Conduct

1. Business Ethics

We adhere to ethical management as a fundamental principle in all internal and external business activities, striving for clear and transparent decision-making processes in business operations.

Fostering a Healthy Corporate Culture

Employees must diligently perform their duties using appropriate methods and comply with all related laws, regulations, and company policies.

Prohibition of Conflicts of Interest

Employees must avoid any actions or relationships that could create conflicts of interest with the Company. In cases where there is a conflict between the interests of the Company and an individual or department, employees should prioritize the interests of the Company in their actions.

Prohibition on Using Inside Information

Employees must not trade stocks using inside information obtained during the course of their duties.

Employees must not disclose material non-public information that could influence stock prices to third parties without following legal procedures.

Protection of Company Assets and Confidential Information

Employees are responsible for protecting the Company's physical assets, intellectual property, and trade secrets, and must not use them for personal purposes.

Employees must not exploit their position for personal gain or engage in unfair trading using undisclosed information obtained from the Company.

Employees must not leak important information that could affect the Company's interests to external parties.

Prohibition on Political Involvement

Employees are prohibited from engaging in political activities during work hours and must not use the Company's resources, personnel, or assets for political purposes.

While individual voting rights and political views are respected, employees must ensure that their personal political involvement is not mistaken as representing the Company.

Prohibition on Receiving Gifts or Entertainment

Employees must not accept money, gifts, or entertainment from business partners or other

stakeholders.

Employees must not offer or provide money, gifts, or entertainment exceeding social norms, or with the intent to influence specific actions, to business partners.

Employees must not exchange excessive gifts or entertainment with one another.

Documentation

Employees must accurately prepare all documents and must not falsify any information.

The approval, retention, and disposal of documents must comply with internal regulations.

2. Respect for Human Rights

We ensure the rights and freedom of negotiation for all members and do not tolerate any form of human rights violations, providing appropriate responses when necessary.

Fair Treatment

The Company provides fair opportunities to employees based on their abilities and qualifications, without any unfair discrimination.

The Company establishes evaluation criteria for employees' qualifications, abilities, and achievements to ensure fair assessment and compensation.

Prohibition of Discrimination

The Company does not discriminate against employees based on nationality, race, gender, religion, disability, age, political views, or social status.

The Company strives to respect employee diversity and create an inclusive environment.

Protection of Labor Relations

The Company guarantees employees the right to freely form labor unions and does not impose disadvantages based on union membership or activities.

The Company ensures the protection and promotion of employees' human rights in accordance with the laws of the respective country, including the freedom of association and collective bargaining.

Prohibition of Child Labor and Forced Labor

The Company prohibits inhumane practices, including forced labor and child labor, in accordance with the labor laws of the respective country.

Prohibition of Harassment

The Company endeavors to create an environment where employees can work in mutual respect and prohibits any behavior that constitutes harassment beyond appropriate limits.

Harassment includes any verbal or physical actions that cause discomfort, such as sexual harassment, sexual abuse, violence, and verbal abuse.

3. Provision of a Healthy Work Environment

We dedicate continuous efforts to create and maintain a safe and healthy working environment.

Healthy Work Environment

The Company respects the independent dignity and fundamental rights of employees and strives to provide a healthy and safe work environment.

The Company actively supports employees' personal development and self-realization by continuously developing and offering specialized training programs to cultivate proactive and creative talent.

Industrial Accidents

The Company is committed to preventing and managing hazardous materials and potential accidents in advance to ensure the safety of employees and provide a secure working environment.

It is a fundamental principle that all work is performed in accordance with safety regulations, with appropriate preventive measures taken before the start of any task.

Response Measures

Employees must promptly report any working conditions or practices that pose a risk of accidents to safety managers.

In the event of an industrial accident, the safety manager must take immediate safety and health measures and work to prevent recurrence by analyzing the root cause.

Safety Training

The Company provides safety training to ensure that all employees are well-informed about safety issues and regulations, and strives to prevent accidents through proactive education.

4. Provision of Customer Value

We provide safe and efficient products and services to meet customer demands, ensuring the thorough protection of personal information collected by the company.

Customer Respect

The Company always thinks and acts from the customer's perspective, striving to provide the highest quality products and services to achieve customer satisfaction and trust.

The Company provides accurate information about products and services and actively incorporates diverse customer feedback into its business activities.

Customer Protection

The Company protects the interests, safety, and personal information of customers and refrains from engaging in any unfair practices.

Information Provision

The Company provides customers with truthful information and does not disseminate false statements or provide misleading information.

The Company diligently informs customers of any usage precautions or changes related to product safety, ensuring clear understanding.

Quality Assurance

To meet quality objectives, the Company implements and adheres to a rigorous quality management system that spans the entire process from design to sales, based on international standards.

The Company continuously strives to supply high-quality products that meet the specified requirements and fulfill the demands and expectations of customers.

Product Safety

The Company takes responsibility for customer safety and establishes systems to conduct strict quality assurance inspections to provide the highest level of safety.

Harmful Substances Prevention

The Company proactively prevents the use of harmful substances in products that could endanger customer safety, and regularly inspects products to ensure there are no safety risks.

5. Fair Trade

We endeavor for mutual growth with partner companies, supporting fair trade and cooperation based on mutual respect.

Fair Transactions with Business Partners

The Company seeks mutual growth by establishing relationships of trust and cooperation

through transparent and fair transactions with business partners.

Fair Competition

The Company does not abuse its dominant position to coerce or exert influence for any form of unfair practices.

Prohibition of Collusion

The Company adheres to market competition rules and refrains from collusive practices that limit competition, such as price fixing, production volume adjustments, or the exchange of business information.

Prohibition of Unlawful Gains

Employees are prohibited from offering, requesting, or accepting bribes, money, or other valuables in order to create business opportunities.

Cooperation with Investigations

In the event of an investigation or request for materials by authorities, the Company responds promptly and sincerely, fully cooperating with the investigation.

Tax Compliance

The Company complies with tax laws in the countries where its business operates, fulfilling its tax obligations honestly and contributing to national development through responsible tax payment.

Information Disclosure

The Company transparently discloses both financial and non-financial information, including corporate activities, financial status, performance, ownership, and governance, in accordance with relevant laws and regulations.

6. Realization of Sustainability

We are dedicated to sustainable development, striving to contribute to economic and social progress through responsible business practices

Environment

The Company complies with environmental regulations and international standards, taking preventive measures to minimize its environmental impact.

Response to Climate Change

The Company is committed to addressing global climate change by improving energy

efficiency and exploring and adopting sustainable resources.

Development of Eco-Friendly Technology

The Company researches and develops environmentally friendly services to minimize environmental impact and expands the adoption of new green technologies.

Compliance with Domestic and International Laws

As a member of both the nation and the local community, the Company not only complies with national regulations but also adheres to internationally recognized laws and standards.

Contribution to National Economy and Social Development

The Company contributes to national economic and social development through increased productivity, job creation, and responsible tax payment.

Participation in Public Service Activities

The Company encourages and actively supports employees' participation in social and volunteer activities.

Protection of Shareholders' Rights

The Company protects shareholders' rights, respects their legitimate requests and proposals, and works to build mutual trust while striving to maximize shareholder value.

Appendix

Contact Information

Relevant Department: Management Planning Team

Date of Enactment: 2023.12.01

Date of Revision: 2024.06.10

If you have any inquiries regarding the Code of Ethics and Conduct, please contact the responsible person.

Email: dwmic@dwmic.com