

Dongwon Metal Co., Ltd.

Human Rights Management Guidelines

Chapter 1: General Provisions

Article 1: Purpose of Establishing the Human Rights Management Guidelines

This guideline is established to set forth the policies, implementation measures, and other necessary matters regarding the protection and promotion of the human rights of all stakeholders, including all employees of Dongwon Metal (hereinafter “the Company”). Its purpose is to facilitate the systematic and proactive implementation of human rights management in the business activities and overall operations of each division, as well as to preemptively prevent and mitigate human rights risks that may affect various stakeholders, thereby enhancing the company’s sustainability and competitiveness.

Article 2: Definitions

- “Human Rights” refers to the dignity, value, freedoms, and rights of human beings as guaranteed by the Constitution and laws of the Republic of Korea, or as recognized by international human rights treaties and customary international law to which the Republic of Korea is a party.
- “Human Rights Management” means the prevention of human rights violations by the company and the execution of human rights-friendly management activities. This includes the declaration of a human rights policy, the implementation and monitoring of human rights practices, and the provision of redress procedures for victims of human rights violations.
- “Employees” refers to both executives and staff (including non-regular employees) working at the Company.
- “Stakeholders” refers to all individuals involved in or affected by the Company’s business activities, including those affiliated with government agencies or partner companies, as well as local residents, consumers, and any individual who is a rights holder.
- “Partner Companies” refers to companies that have a business relationship with the Company, including subsidiaries, companies within the supply chain, tenants, and customers.
- “Human Rights Violations” refers to actions or discriminatory practices that infringe upon the basic rights that must be guaranteed for the realization of an individual’s inherent dignity as a human being.

Article 3: Scope of Application

This guideline applies to all employees of the Company and to all stakeholders involved in the Company’s business activities.

Chapter 2: General Principles

Dongwon Metal Human Rights Management Principles [Human Rights Charter]

Article 1: Respect for Human Rights

All stakeholders shall be respected as human beings, and the Company shall make every effort to ensure that no one is subjected to dehumanizing treatment—whether mental or physical. In cases where dehumanizing actions such as sexual harassment, abuse, corporal punishment, or verbal insults are confirmed, severe disciplinary measures will be taken in accordance with the disciplinary regulations.

Article 2: Prohibition of Discrimination

Discrimination in any form based on an employee's gender, age, race, skin color, nationality, region of origin, disability, religion, political orientation, family relationships, pregnancy, or childbirth in recruitment, hiring, wages, promotion, education, welfare, etc., is strictly prohibited. The Company is committed to fostering an organizational culture that respects the diversity of its employees.

Article 3: Prohibition of Forced Labor and Child Labor

No employee shall be subjected to forced labor through acts of physical violence, threats, confinement, or by demanding identification such as an ID card or passport against their free will. Furthermore, child labor is strictly prohibited. For minors, measures shall be taken to ensure that employment does not restrict their access to educational opportunities.

Article 4: Compliance with Labor Laws and Guarantee of Freedom of Association and Collective Bargaining

The Company shall comply with the legal working hours established by the laws of the respective countries in which it operates and shall establish standards to ensure that employees receive fair remuneration. Additionally, the Company respects the labor laws of each country or region and provides all employees with ample opportunities for communication.

Article 5: Health and Safety

The Company shall adhere to the health and safety standards mandated by the laws and regulations of the countries or regions in which it operates. Regular inspections of facilities, equipment, and tools will be conducted to ensure that employees work in a safe and hygienic environment.

Article 6: Responsible Supply Chain Management

The Company actively supports partner companies within its supply chain in implementing the principles set forth in this declaration. This is to ensure that risks across the supply chain are effectively managed, while also pursuing a mutually beneficial relationship aimed at

enhancing the competitiveness and growth of partner companies.

Article 7: Protection of Stakeholders' Information

The Company takes special care to ensure that the products and services provided do not harm the lives, health, or safety of stakeholders. Reasonable measures are implemented to secure the personal information of customers collected during business operations.

Article 8: Guarantee of Environmental Rights

Recognizing that environmental issues can directly impact people's lives and health and constitute significant human rights violations, the Company establishes environmental management policies and measures to minimize any negative environmental impacts resulting from its business activities.

Article 9: Human Rights for the Local Community

As a member of the local community, the Company acknowledges its social responsibility for regional development. It actively participates in community service activities and takes care to ensure that local residents' human rights are not infringed upon during business operations, while also striving to protect their rights to safety, health, and freedom of residence.

Chapter 3: Human Rights Management System

Article 1: Human Rights Charter and Human Rights Management Guidelines

- The Sustainable Management Committee shall proclaim a Human Rights Charter to guarantee the dignity and value of human beings in all business activities. All employees must regard this Charter as the code of conduct and a benchmark for ethical decision-making, and practice it accordingly.
- The Company shall periodically review the key human rights risks and, reflecting social changes, consider revising the Human Rights Charter and Guidelines on an annual basis.
- During this process, opinions from a diverse range of stakeholders—including employees, labor unions, partner companies, local residents, customers, and human rights experts—will be actively solicited.
- Each human rights management organization shall develop human rights management plans, establish internal systems, and execute the implementation of human rights management based on the Human Rights Charter and Guidelines.

Article 2: Human Rights Management Promotion Organization

1. Sustainable Management Committee

A. Functions

- To establish a reporting system aimed at preventing human rights risks, thereby efficiently promoting human rights management through the Sustainable Management Committee (hereinafter “the Committee”).
- To deliberate on matters concerning the protection and promotion of the human rights of stakeholders, including employees, such as:
 - a. The establishment or revision of human rights-related declarations and guidelines.
 - b. Issues related to the planning and evaluation of human rights management.
 - c. Any other matters deemed necessary for the protection of human rights.

B. Organization and Meetings

- The convening and composition of the Sustainable Management Committee shall be governed by separate internal regulations.

2. HR and Labor-Related Departments

A. Functions

- To establish and implement the basic plans for human rights management.
- To carry out human rights impact assessments.
- To perform other tasks necessary for effective human rights management.
- Any personnel from the HR and labor-related departments designated as members of the Human Rights Management Practical Council shall collaborate with the council on tasks such as human rights impact assessments to prevent human rights risks.

Article 3: Establishment and Implementation of Human Rights Management Plans

- The responsible department shall regularly develop plans to effectively promote human rights management. These plans must include, but are not limited to, the following:
 - a. Objectives and fundamental directions of human rights management.
 - b. Human rights management initiatives and implementation strategies.
 - c. Obligations related to human rights practices and reviews, including human rights condition surveys and human rights impact assessments.
 - d. Any other matters necessary for the protection and promotion of human rights.
- Concrete measures to enhance organizational leadership, communication, and overall organizational culture must be devised, taking into account internal regulations, decision-making processes, and business relationships (including supply chains).
- The results of both internal and external issues, stakeholder requirements, and human rights impact assessments shall be practically incorporated into annual business operations and organizational management to mitigate or prevent any negative impacts on human rights.
- Consultations shall be held with individuals or groups expected to be negatively affected by the Company's business activities.

Article 4: Human Rights Education and Dissemination

- The department in charge of education is responsible for planning, selecting participants, and preparing programs for human rights education to internalize human rights management and enhance employees' awareness.
- Regular human rights education programs will be provided for all employees to raise their awareness of human rights.
- Specialized human rights training programs may be established for employees, top management, executives, and those responsible for human rights management who are engaged in tasks with significant human rights risks.
- To spread a culture of respect for human rights, regular human rights training may also be conducted for stakeholders and partner companies.
- Human rights education may be delivered via appropriate methods such as online training or group sessions, taking into account the annual education schedule and timing.
- The contents of the human rights management declaration shall be shared with stakeholders within the Company's sphere of influence (including subsidiaries, partner companies, local production plants, and affiliates), and cooperation will be requested to achieve the core objectives of human rights management.
- The Company should exert influence to encourage stakeholders within its business impact area to practice human rights management and, where necessary, provide support.

Article 5: Disclosure of Information

- Information pertaining to human rights management shall be regularly disclosed through

easily accessible and clearly understandable channels such as the Company's website and sustainability management reports, ensuring that both employees and other stakeholders can access it.

- The Company shall listen to stakeholder opinions regarding the disclosed human rights management information and incorporate such feedback into future human rights management planning and assessments.

Chapter 4: Human Rights Impact Assessment

Article 1: Purpose

The Company conducts human rights impact assessments to identify both actual and potential human rights risks associated with its business activities in advance and to prevent them from occurring.

Article 2: Evaluation Cycle and Scope

- As a general rule, the assessment shall be conducted once a year; however, the frequency may be adjusted as necessary.
- The assessment shall cover all domestic and international business sites of the Company.

Chapter 3: Evaluation Process



1. Preparation of the Human Rights Impact Assessment Checklist

- The checklist shall be prepared in consultation with the Human Rights Management Practical Council.
- Based on an analysis of the external and internal environments at the time of the evaluation and the internal Human Rights Declaration, the checklist shall be prepared with reference to documents such as the UN Guiding Principles on Business and Human Rights, OECD Due Diligence Guidelines, UNGC guidelines, and materials from the Ministry of Justice and human rights agencies in each country. If necessary, the language and detailed checklist items may vary depending on the country, industry, or company size.
- The evaluation targets are initially selected by the department in charge of the human rights impact assessment and are finalized through consultations with the Group Human Rights Management Practical Council.
- Under the responsibility of the department head, the evaluation target department shall conduct a self-assessment using the checklist and submit the self-assessment results along with the required supporting evidence to the Group Human Rights Management Practical Council within the pre-agreed deadline.

2. First Evaluation by the Human Rights Management Practical Council

The Human Rights Management Practical Council will conduct an independent human rights impact assessment by reviewing the checklist and supporting documents submitted by the front-line department representatives. During the evaluation process, they may seek advice from a reliable independent expert to ensure fair and reasonable results. Additional inspections of the evaluation target department may be conducted if necessary.

3. Review and Approval by the Human Rights Management Committee

The Human Rights Management Committee shall review the evaluation results from the Human Rights Management Practical Council and provide feedback. If necessary, additional inspections of the evaluation target department may be conducted.

4. Derivation of Improvement Tasks and Establishment of an Implementation Plan

The department in charge of the human rights impact assessment and the evaluation target department shall establish improvement tasks and an implementation plan based on the results of the human rights impact assessment, with the aim of preventing or mitigating any negative impacts on human rights. The plan shall include concrete measures and implementation details covering internal decision-making processes, budget allocation, monitoring procedures, education, and training.

5. Deliberation and Decision on Evaluation Results

- The Human Rights Management Committee shall comprehensively deliberate and decide on the human rights impact assessment results, the scope of external disclosure, the identified improvement tasks, and the implementation plan.
- The Committee shall report the deliberation and decision outcomes to the highest decision-makers of each affiliated company and strive to reflect the results in internal regulations, decision-making processes, budgets, and audit procedures.

Article 4: Implementation of Improvement Tasks

- Departments subject to the improvement tasks shall implement the tasks according to the established plan.
- The relevant department shall prepare a report that includes the extent to which horizontal integration procedures to prevent negative human rights impacts have been implemented, the degree to which human rights violations have been halted, mitigated, or prevented, and the reasons for any ineffectiveness, and then report this to the department in charge of the human rights impact assessment.

Article 5: Public Disclosure of Evaluation Results

- Disclosure Channels: The evaluation results shall be disclosed at appropriate times through channels such as the Sustainability Management Report and the Company's website.
- Scope of Disclosure: This includes, but is not limited to, the number of human rights violation reports, the number of identified risks and improvements, and the status of the implementation of improvement measures.

Chapter 5: Human Rights Remedy Procedures

Article 1: Establishment of Human Rights Remedy Procedures

- The Company shall establish an organizational structure, reporting/receipt channels, and a process for remedy procedures to prevent human rights violations and to protect and redress victims in the event of such violations.
- The organizational unit responsible for operating the Company's human rights violation reporting channels (hereinafter "the Responsible Organization") shall perform necessary tasks to prevent human rights violations against employees through education, counseling, intelligence gathering, report reception, ex officio investigations, and support for victim protection.
- The Company may establish a direct reporting system to top management or a separate decision-making body (hereinafter "the Decision-Making Body") for resolving human rights violation incidents.
- The human rights remedy procedures shall be based on relevant laws and regulations.
- The remedy procedures shall be designed to be easily accessible and user-friendly.

Article 2: Handling Procedures for Human Rights Violation Incidents

- The Responsible Organization shall immediately investigate any incident reported as a human rights violation to verify whether a violation has occurred.
- If a human rights violation is determined to have occurred, the incident shall be directly reported to the highest decision-maker or submitted as an agenda item to the Decision-Making Body for discussion of remedial measures.
- The Responsible Organization shall promptly notify the victim of the decision made by the top management or the Decision-Making Body.
- Depending on the severity of the human rights violation incident, the highest decision-maker or the Decision-Making Body may refer the case to a separate personnel committee, disciplinary committee, or take judicial action if necessary (detailed procedures for human rights remedy shall be separately defined).
- If the victim wishes to use a procedure other than the Company's remedy procedure, the Company shall provide sincere assistance.

Article 3: Protection of the Identity of the Reporter

- Personnel who are or have been part of the Responsible Organization must not disclose or reveal the personal information of the reporter or the victim, or any information that might indicate their identity as a reporter or victim, to any third party. They must keep confidential all report details, including the victim's identity, the content of the violation, the remedy procedures, and the handling results.
- The Responsible Organization shall take necessary measures to ensure that individuals who report human rights violations or risks do not suffer any disadvantages as a result of their reporting.

Article 4: Post-Remedy Management

- The Responsible Organization shall continuously monitor the situation to ensure that the victim does not face difficulties in work performance or workplace life.
- The Responsible Organization shall establish and implement support measures for victim protection, such as providing psychological counseling, separating the victim from the perpetrator when necessary, and offering legal services in response to the victim's requests.
- If the same grievance is repeatedly raised, the Responsible Organization shall investigate the underlying causes through a structural approach to prevent recurrence.

Article 5: Miscellaneous

Any matters not specified in these regulations shall be governed by relevant laws and internal company rules.

Dongwon Metal Co., Ltd

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[Revision History]

Version	Revision Date	Effective Date	Major Revision Details	Author
0	2024-01-01	2024-01-01	Initial Establishment	Jaeil Kwon, General Affairs Safety Team