

# Supplier Code of Conduct

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## 1. Overview

### A. Purpose of the Code of Conduct

Dongwon Metal Co., Ltd. has established this Supplier Code of Conduct to create a transparent and fair business environment that considers mutual benefits with its suppliers. This Code requires all suppliers to strictly comply with applicable laws and regulations, and to adopt best practices in ethics, labor and human rights, safety and health, environment, and management systems. Dongwon Metal Co., Ltd. anticipates that by adhering to this Code, suppliers will gain respect from society, grow into world-class enterprises, and contribute to building a sustainable, mutually beneficial management ecosystem.

This Code of Conduct is based on the Global Automotive Sustainability Practical Guidance (Drive Sustainability) and references the Responsible Business Alliance's Code of Conduct. However, if any recommended practice in this Code conflicts with the laws of a given country, the country's law shall prevail.

### B. Scope of the Code of Conduct

All suppliers that provide goods, services, or enter into contractual transactions with Dongwon Metal Co., Ltd. must comply with this Code. In addition, every supplier is encouraged to ensure that their entire supply chain—including any sub-suppliers—is in compliance with the provisions set forth herein.

### C. Responsibilities and Roles of Suppliers

All suppliers of Dongwon Metal Co., Ltd. are expected to consider the principles outlined in this Code in their management decisions and business operations. Third-party organizations appointed by Dongwon Metal Co., Ltd. may, within the limits permitted by law, inspect and conduct due diligence to verify supplier compliance with this Code. Based on the results of these inspections, Dongwon Metal Co., Ltd. may recommend improvements for any identified risks, and suppliers shall develop and implement risk mitigation plans through mutual consultation.

Please note that this Code does not exhaustively list every obligation of suppliers. It may be periodically reviewed, supplemented, and revised to foster a sustainable supply chain. The full text is available on the Dongwon Metal Co., Ltd. website, and further inquiries may be directed to the appropriate department.

## 2. Environment

### A. Establishment of an Environmental Management System

- ① Suppliers must comply with the environmental laws and regulations of the countries in which they operate and obtain and maintain all necessary environmental permits.
- ② Suppliers are required to operate an environmental management system—comprising organizational structures, planning, procedures, and performance monitoring—to mitigate the environmental impacts of their operations.

### B. Management of Energy Use and Greenhouse Gas Emissions

- ① Suppliers must establish a system to measure energy consumption and greenhouse gas emissions.
- ② They must actively work to reduce both energy use and greenhouse gas emissions.

### C. Water Resource Management

- ① Suppliers must set up a system to measure water usage and wastewater discharge.
- ② They should strive to reduce water consumption and increase recycling, and manage discharged water pollutants in accordance with legal standards or higher internal benchmarks.

### D. Management of Air Pollutants

- ① Suppliers must establish a system to measure air pollutant emissions.
- ② They should minimize such emissions through appropriate methods and adhere to legal or superior internal standards regarding air quality.

### E. Waste Management

- ① Suppliers must establish a system to measure waste generation.
- ② They should minimize waste sent for landfill or incineration through proper practices, expand waste reuse and recycling, and endeavor to recover discarded raw materials and components.
- ③ Consideration of the entire product life cycle is required to minimize environmental residues from waste disposal.

### F. Chemical Management

- ① Suppliers must ensure that chemicals used in their operations are managed safely during transportation, storage, use, and disposal, including appropriate labeling or disclosure of hazard information.
- ② They should verify whether raw materials and components contain substances harmful to human health or the environment.

### 3. Ethics

#### A. Transparent Management and Anti-Corruption

- ① Employees of suppliers must adhere to the highest standards of integrity applicable in the countries where they operate.
- ② They must not abuse their positions to solicit or accept bribes, extort, embezzle, or engage in any improper dealings, nor exploit any weaknesses for personal gain.

#### B. Prevention of Conflict of Interest

- ① Suppliers must carry out their duties responsibly according to established regulations.
- ② Employees must refrain from promising, proposing, authorizing, or providing means for improper benefits, including causing harm to the supplier for personal gain or obtaining undue advantages through third parties.

#### C. Prevention of Unfair Trade Practices

- ① Suppliers are required to comply with the fair trade laws and standards of the countries in which they operate.
- ② They must not abuse market dominance or bargaining power in ways that hinder fair competition.
- ③ Agreements that unreasonably restrict competition regarding prices, supply volumes, trading regions, or conditions are prohibited.
- ④ Suppliers must not use or disclose improperly obtained information from competitors or others.

#### D. Prevention of Counterfeit Parts

- ① Suppliers must not produce, use, or sell unapproved or counterfeit raw materials and components.
- ② They should regularly monitor their operations for counterfeit parts and report any findings immediately to the appropriate government authorities or customers.
- ③ Suppliers must ensure that raw materials and components are used and distributed according to business objectives and contractual conditions.

#### E. Compliance with Export Restrictions

- ① Suppliers must comply with export control laws and international agreements applicable in their operating countries.
- ② They must not engage in transactions with countries, regions, or individuals subject to export restrictions or economic sanctions.
- ③ Regular checks must be conducted to ensure ongoing compliance with these laws and

agreements, with cooperation provided for any related assessments.

#### F. Information Protection

- ① Suppliers must not leak or use confidential business information, trade secrets, or any sensitive data of customers or trading partners without proper authorization.
- ② They must respect the intellectual property rights of customers and partners, and take measures to protect their own intellectual property, including regular monitoring for infringements.
- ③ Personal information must be collected and used only within defined purposes and retention periods, with prior consent for any changes.

#### G. Responsible Procurement of Materials

- ① Suppliers must establish processes to verify the origin and smelter of all minerals and raw materials—including conflict minerals such as tin, tungsten, tantalum, and gold—in their products.
- ② They should actively assess whether significant human rights violations, ethical breaches, or adverse environmental impacts occur at the source, using the established process.
- ③ For suppliers dealing predominantly in minerals, self-certification or external certification should be obtained to confirm that mining and processing activities are free from associated issues.

## 4. Labor/Human Rights

### A. Prohibition of Discrimination

- ① Suppliers must not discriminate against employees on the basis of gender, race, ethnicity, nationality, religion, disability, age, family status, social status, or political beliefs in hiring, promotion, or training.
- ② Discrimination in wage payment or benefit systems is strictly prohibited.
- ③ Suppliers should not impose unnecessary conditions unrelated to job performance during recruitment or hiring.

### B. Provision of Wages and Benefits

- ① Wages must be paid in accordance with local legal requirements, on the specified dates, and with pay statements provided in a language understandable to employees.
- ② Suppliers should provide a comfortable work environment and operate benefit systems that enhance employees' quality of life.
- ③ Mandatory training as prescribed by local laws must be provided, and efforts should be made to support career development and skills enhancement.

### C. Management of Working Hours

- ① Suppliers must comply with legal working hours, including proper management of breaks.
- ② Overtime not desired by employees should be avoided, and if unavoidable, appropriate compensation must be provided.
- ③ Employees should be guaranteed at least one day off per week on average.

### D. Humane Treatment

- ① Suppliers must respect employees' privacy and avoid unnecessary work assignments outside normal hours.
- ② Prior notice and voluntary consent are required when collecting personal data from employees.
- ③ Workplace harassment—using one's position or relationship to inflict undue physical or mental distress—is strictly prohibited. Appropriate measures must be taken for victims, including workplace reassignment, and disciplinary action should be applied against perpetrators.

### E. Guarantee of Freedom of Association

- ① Suppliers must guarantee the freedom of association and collective bargaining, allowing the formation and operation of legitimate labor organizations.



- ② Suppliers are required to consult sincerely with employee representatives on collective bargaining issues.
- ③ In the absence of designated representatives, individual employees should be able to freely propose negotiation issues.

#### F. Prohibition of Child Labor

- ① All forms of child labor are strictly prohibited; the age of employees and applicants must be verified using legal documents such as IDs or birth certificates.
- ② If minors are employed, they must not be assigned high-risk tasks, and measures must be taken to ensure their work does not hinder educational opportunities.
- ③ Suppliers must not source goods or services from entities involved in child labor, and appropriate actions should be taken if such cases are identified.

#### G. Prohibition of Forced Labor

- ① Suppliers must assign work voluntarily in accordance with local labor laws and must not engage in any form of forced or involuntary labor.
- ② Suppliers should not demand documents (e.g., IDs, visas) that restrict personal freedom, nor employ physical or psychological coercion such as assault, threats, or confinement.
- ③ Suppliers must not source goods or services from entities involved in forced labor (including practices such as debt bondage), and necessary actions should be taken upon discovery.

## 5. Safety/Health

### A. Establishment of a Safety and Health Management System

- ① Suppliers must comply with safety and health laws and regulations in their operating countries and obtain and maintain all required permits.
- ② They should operate a safety and health management system—comprising organizational structures, planning, procedures, and performance monitoring—to prevent accidents.

### B. Safety Management of Machinery, Equipment, and Facilities

- ① Suppliers must conduct regular inspections and evaluations of hazardous or dangerous machinery, equipment, and facilities.
- ② They should install and maintain appropriate safety devices, protective barriers, and emergency systems to prevent accidents.
- ③ Personal protective equipment (PPE) must be provided, maintained, and made easily accessible to employees.

### C. Emergency Response

- ① Suppliers must establish emergency response plans for natural disasters, epidemics, fires, and other accidents, and maintain manuals covering reporting, response, and follow-up procedures.
- ② Regular emergency drills must be conducted in accordance with local laws and internal procedures.
- ③ Facilities must be equipped with escape routes, emergency lighting, fire detection systems, and firefighting equipment, with periodic checks to ensure proper operation.

### D. Incident Management

- ① Suppliers must establish a system to monitor the occurrence of industrial accidents or occupational illnesses.
- ② In the event of an accident or serious illness, work should be halted immediately and necessary measures (such as employee evacuation) taken.
- ③ Suppliers must investigate the causes of accidents or illnesses promptly and develop improvement plans accordingly.

### E. Safety Diagnosis

- ① Regular safety risk assessments must be conducted to determine if employees are exposed to hazards; results should be communicated in an understandable format and used to improve

machinery, equipment, or facilities.

- ② Based on assessment results, relevant safety information must be provided to employees in a clear language and be readily accessible.
- ③ Special care should be taken not to assign high-risk tasks to vulnerable groups (e.g., pregnant employees or minors), and an accommodating work environment should be maintained for socially vulnerable employees.

#### F. Health Management

- ① Suppliers should provide facilities such as break areas, restrooms, and cafeterias, maintaining these in a clean condition.
- ② If dormitories are provided, they must include proper safety signage, lighting, temperature control, and controlled access for non-residents.
- ③ Regular general or specialized health examinations must be conducted in accordance with local laws, with adjustments (e.g., job reassignment or reduced hours) made as necessary based on the results.

## G. Management System

### A. Disclosure of Company Statements

- ① Suppliers must communicate their commitment to corporate social responsibility (CSR) at a level consistent with this Code both internally and externally.
- ② This commitment should be shared via management messages, internal guidelines, bulletin boards, etc., and it is recommended to disclose it externally via the company website, business reports, and promotional materials.

### B. Appointment of Responsible Persons

- ① Suppliers must designate personnel responsible for CSR activities.
- ② They should appoint managers to oversee the planning and implementation of CSR initiatives.

### C. Risk Assessment

- ① Suppliers should identify potential risks in the areas of environment, ethics, labor/human rights, and safety/health throughout their operations.
- ② If significant risks are identified, measures must be developed and implemented to mitigate them.

### D. Training and Communication

- ① Suppliers must educate employees on the provisions of this Code and the relevant laws and regulations.
- ② Implementation plans and performance results regarding this Code should be communicated to employees.

### E. Information Management

- ① Suppliers must accurately record and manage data related to environmental, ethical, labor/human rights, and safety/health risks.
- ② When required by local laws, industry associations, or major customers, suppliers should transparently provide this information unless prohibited by law.

### F. Operation of the Grievance Handling System

- ① Suppliers must operate a system that allows employees to report any violations of environmental, ethical, labor/human rights, or safety/health regulations, or any infringement on their rights.
- ② Employees reporting concerns must be protected from any form of retaliation, and their identities must be strictly maintained.

#### G. Management of Suppliers (Sub-Suppliers)

- ① In planning, designing, selling, or manufacturing products or services, suppliers should encourage their contracted sub-suppliers to manage environmental, ethical, labor/human rights, and safety/health factors.
- ② If any violations or risks are identified among sub-suppliers, suppliers must make efforts to recommend or facilitate corrective actions.

#### H. Compliance with the Code

- ① During regular written or on-site inspections by third parties designated by Dongwon Metal Co., Ltd., suppliers must provide information regarding their compliance with this Code.
- ② Suppliers must maintain documentation that demonstrates compliance with this Code, based on actual business operations.
- ③ Any deficiencies or violations identified during inspections must be addressed promptly through an improvement plan.

## **Appendix**

This Supplier Code of Conduct is enacted as of December 15, 2023.