

Human Rights Management Guidelines

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Chapter 1. General Provisions

Article 1 (Purpose of Establishment)

These Guidelines aim to systematically and proactively implement human rights management in all business units of Dongwon Metal (hereinafter “the Company”) and among all stakeholders, including all employees. The Guidelines establish policies and procedures to protect and promote human rights, prevent and mitigate potential human rights risks, and enhance corporate sustainability and competitiveness.

Article 2 (Definitions)

- “Human rights” refer to the dignity, value, freedoms, and rights of all individuals guaranteed by the Constitution and laws of the Republic of Korea, as well as recognized under international human rights treaties and customary international law to which Korea is a party.
- “Human rights management” means conducting business activities in a manner that prevents human rights violations, implements human rights-friendly practices, declares human rights policies, fulfills obligations for monitoring and compliance, and provides remedies to victims of human rights violations.
- “Employees” include all executives and staff of the Company, including non-regular workers.
- “Stakeholders” include individuals or entities affected by or related to the Company’s business operations, such as government bodies, suppliers, local communities, and consumers.
- “Suppliers” include companies with business relationships with the Company, such as investee companies, supply chain partners, tenants, and customers.
- “Human rights violations” refer to actions or discriminatory acts that infringe upon the minimum fundamental rights necessary to ensure human dignity.

Article 3 (Scope of Application)

These Guidelines apply to all employees of the Company and all stakeholders affected by 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 treated with dignity and respect. Any acts of harassment, abuse, corporal punishment, or verbal abuse will be strictly dealt with according to the Company’s disciplinary regulations.

Article 2 (Prohibition of Discrimination)

Discrimination without reasonable grounds on the basis of gender, age, race, skin color, nationality, place of origin, disability, religion, political opinion, family status, pregnancy, or childbirth in recruitment, employment, wages, promotion, training, or benefits is strictly prohibited. The Company promotes a culture that values diversity.

Article 3 (Prohibition of Forced and Child Labor)

Employees shall not be subjected to forced labor through violence, threats, confinement, or by withholding identification documents. Child labor is strictly prohibited, and measures are taken to ensure that young workers' education opportunities are not hindered by work.

Article 4 (Compliance with Labor Laws and Freedom of Association)

The Company complies with statutory working hours of each country and ensures fair remuneration. All employees are provided sufficient communication opportunities, and local labor laws are respected.

Article 5 (Occupational Health and Safety)

The Company complies with health and safety standards required by relevant local laws and regulations. Facilities, equipment, and tools are regularly inspected to maintain a safe and clean work environment.

Article 6 (Responsible Supply Chain Management)

Suppliers in the Company's supply chain are supported to comply with these principles, ensuring that the supply chain does not introduce human rights risks. The Company also seeks mutually beneficial growth with suppliers.

Article 7 (Protection of Stakeholder Information)

Products and services are designed to protect the life, health, and safety of stakeholders. Reasonable measures are taken to safeguard personal information collected in business operations.

Article 8 (Environmental Rights)

Recognizing that environmental issues can seriously impact human life and health, the Company establishes environmental management policies to minimize negative environmental impacts.

Article 9 (Human Rights in Local Communities and Indigenous Peoples)

The Company actively participates in social contribution activities, respects the rights of local residents and indigenous peoples, and ensures their safety and freedom of residence. Prior to expansion or new projects, the Company assesses potential human rights and environmental impacts and conducts necessary evaluations. Land acquisition includes verification of the legal and customary rights of legal owners, local residents, and indigenous peoples. Additionally, when verifying intellectual property, customarily protected rights shall also be reviewed. Stakeholder consultation is conducted to ensure participation.

Article 10 (Living Wage Guarantee)

The Company ensures all employees receive fair compensation at or above the living wage, as defined by the ILO, UN Guiding Principles on Business and Human Rights (UNGPs), and local laws. Wages should cover basic living, education, health, housing, and cultural life. Compensation standards are regularly reviewed and improved.

Chapter 3. Human Rights Management System

Article 1 (Human Rights Charter and Guidelines)

The Sustainability Management Committee shall declare the Human Rights Charter, which employees shall follow as a code of conduct and standard for decision-making.

Key human rights risks are regularly reviewed, and the Charter and Guidelines are updated at least annually.

Input is gathered from employees, labor unions, suppliers, local communities, customers, and human rights experts.

Human rights teams establish plans, internal systems, and implement human rights management practices.

Article 2 (Human Rights Management Organizations)

Sustainability Management Committee

Establishes a reporting system to prevent human rights risks.

Reviews and deliberates on declarations, guidelines, plans, evaluations, and other necessary measures.

Convening and composition follow separate internal regulations.

HR and Labor Departments

Responsible for planning and implementing human rights management, conducting impact assessments, and coordinating with the Human Rights Management Working Group.

Article 3 (Planning and Implementation)

Departments prepare regular plans including objectives, strategies, implementation of human rights practices, monitoring, and evaluation.

Organizational leadership, communication, and culture are considered, including internal rules, decision-making, and supply chain activities.

Annual plans incorporate internal/external issues, stakeholder requests, and results of impact assessments.

Consultations are conducted with affected individuals or groups when negative impacts are anticipated.

Article 4 (Education and Dissemination)

Responsible departments establish and implement human rights education programs for all employees.

Specialized training is provided to high-risk staff, executives, and human rights officers.

Education is also extended to suppliers and stakeholders.

Programs may include online or in-person sessions, considering annual schedules.

Human rights declarations, objectives, and progress are shared with subsidiaries, suppliers, and relevant stakeholders.

Article 5 (Disclosure of Information)

Human rights management information is regularly published via corporate website, sustainability reports, or other accessible channels.

Stakeholder feedback is considered in future planning and due diligence.

Chapter 4. Human Rights Impact Assessment

Article 1 (Purpose)

To identify actual or potential human rights risks arising from business operations and prevent them.

Article 2 (Frequency and Scope)

- Assessments are conducted at least annually, subject to adjustment.
- Applicable to all domestic and international sites.

Article 3 (Process)

1. **Checklist Preparation:** Developed with the Human Rights Management Working Group, referencing UNGPs, OECD Guidelines, UNGC, and local regulations.
2. **Initial Evaluation:** Independent review by the Working Group, consulting external experts as needed.
3. **Committee Review and Approval:** Reviewed by the Human Rights Management Committee; additional inspections conducted as required.
4. **Improvement Plans:** Departments implement improvement measures based on results, covering decision-making, budget, monitoring, and training.

5. **Deliberation and Approval:** Committee reviews results, improvement plans, and reports to top management.

Article 4 (Implementation)

- Departments execute improvement measures and report effectiveness, including successes, limitations, and causes.

Article 5 (Public Disclosure)

- Channels: sustainability reports, website, etc.
- Scope: number of reports, identified risks, improvement measures, and progress.

Chapter 5. Remedy Procedures

Article 1 (Establishment of Procedures)

- Procedures include organizational responsibilities, reporting channels, and remedial processes.
- Responsible units provide education, consultation, intake, investigation, and support.
- Procedures must comply with laws and be accessible.

Article 2 (Handling Process)

1. **Reporting and Intake:** Anonymous or identified reports accepted online, offline, or via email.
 2. **Investigation:** Initiated within three business days; aimed to complete within seven business days.
 3. **Notification:** Progress and results communicated to reporter.
 4. **Appeal:** Reporters may request review within 14 days.
- Findings reported to top management or a decision-making body; disciplinary or legal action may be taken.

Article 3 (Confidentiality and Non-Retaliation)

- Reporter identity and details are strictly confidential.
- Retaliation or discriminatory action against reporters or cooperating parties is strictly prohibited.
- Anonymous reporting systems are provided.

Article 4 (Investigation and Victim Protection)

- Rapid and fair investigation conducted; protective measures provided based on victim consent, including workspace separation, temporary reassignment, paid leave, and counseling.
- Structural causes of repeated complaints are analyzed to prevent recurrence.

Article 5 (Disciplinary Action and Follow-up)

- Disciplinary procedures follow personnel regulations and are conducted independently and fairly.
- Effectiveness and timeliness of grievance procedures are evaluated annually.

Article 6 (Other Matters)

- Matters not specified herein are governed by applicable laws and internal regulations.

Dongwon Metal Co., Ltd.

CEO Sungyong Park

[Revision History]

Version	Date of Revision	Effective Date	Main Changes	Author
0	2024-01-01	2024-01-01	Initial establishment	Department (or Team) responsible for General Affairs
1	2024-12-13	2024-12-13	Article 9, Chapter 2	Department (or Team) responsible for General Affairs
2	2025-06-19	2025-06-19	Article 10, Chapter 2	Department (or Team) responsible for General Affairs
3	2025-07-21	2025-07-21	Chapter 5	Department (or Team) responsible for General Affairs