

Supplier Code of Conduct

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1. Overview

Purpose of the Code of Conduct

Dongwon Metal Co., Ltd. has established this Supplier Code of Conduct to foster a transparent and fair business environment while considering mutual benefits with suppliers. The Code of Conduct requires suppliers to strictly comply with all applicable laws and regulations and adopt best practices in ethics, labor & human rights, health & safety, environment, and management systems.

By adhering to this Code, suppliers are expected to contribute to the growth of Dongwon Metal as a globally respected and sustainable company while creating a win-win ecosystem in which all suppliers can grow together.

This Code is based on the **Drive Sustainability Global Automotive Sustainability Practical Guidance** and references the **Responsible Business Alliance (RBA) Code of Conduct**. Where recommendations in this Code conflict with local laws, local laws shall take precedence.

Scope of Application

All suppliers providing goods or services to Dongwon Metal or entering into contracts for business purposes are required to comply with this Code. Suppliers are also encouraged to ensure that their sub-suppliers comply with the standards outlined in this Code.

Responsibilities and Roles of Suppliers

All suppliers must consider the provisions of this Code in their business decisions and operations. Third-party organizations commissioned by Dongwon Metal may audit or verify compliance within the limits permitted by law. Based on audit results, Dongwon Metal may recommend improvements, and suppliers are expected to develop and implement corrective action plans through mutual consultation.

This Code does not enumerate all obligations of suppliers and may be periodically reviewed and updated to strengthen a sustainable supply chain. The Code is available on the Dongwon Metal website, and specific inquiries can be directed to the responsible department.

2. Environment

Environmental Management System

1. Suppliers must comply with all environmental laws and regulations in their operating countries and obtain and maintain all necessary permits.
2. Suppliers shall implement an environmental management system, including organizational structures, plans, procedures, and performance monitoring, to mitigate environmental impacts.

Energy Use and Greenhouse Gas Emissions

1. Suppliers shall establish a system to measure energy consumption and greenhouse gas emissions.
2. Suppliers should strive to reduce energy use and emissions.

Water Resource Management

1. Suppliers shall measure water usage and wastewater discharge.
2. Suppliers should reduce water use, increase recycling, and manage discharges according to legal or stricter internal standards.

Air Pollution Management

1. Suppliers shall measure air pollutant emissions.
2. Suppliers must minimize emissions and comply with legal or stricter internal standards.

Waste Management

1. Suppliers shall measure waste generation.
2. Suppliers should minimize landfill and incineration, increase reuse/recycling, and recover raw materials and components.
3. Suppliers shall consider product lifecycle impacts to minimize residual environmental effects during disposal.

Chemical Management

1. Suppliers must handle chemicals safely during transportation, storage, use, and disposal, and provide hazard information.
2. Suppliers shall verify that raw materials and components do not contain harmful substances to humans or the environment.

3. Ethics

Transparency and Anti-Corruption

1. Supplier employees must comply with the highest integrity standards in each country of operation.
2. Supplier employees must not engage in bribery, extortion, embezzlement, improper influence, or use any vulnerabilities for personal gain.

Conflict of Interest Prevention

1. Suppliers shall perform duties responsibly according to established rules.
2. Employees shall not offer, promise, or authorize improper benefits for personal gain or company detriment.

Prevention of Unfair Trade

1. Suppliers must comply with all fair trade laws.
2. Suppliers shall not abuse market dominance or engage in unfair trade practices.
3. Suppliers must not collude on prices, supply, regions, or terms.
4. Suppliers shall not acquire or use competitors' confidential information improperly.

Counterfeit Parts Prevention

1. Suppliers must not use or produce unapproved or counterfeit materials.
2. Suppliers must periodically check for counterfeit materials and report to authorities or customers.
3. Suppliers shall ensure proper use and distribution of materials according to contractual purposes.

Compliance with Export Restrictions

1. Suppliers shall comply with national and international export laws.
2. Suppliers shall not transact with sanctioned countries, regions, or individuals.
3. Suppliers must verify compliance and cooperate with monitoring activities if required.

Information Protection

1. Suppliers shall not disclose confidential customer or partner information without authorization.
2. Suppliers shall respect intellectual property rights and take appropriate protective measures.
3. Suppliers shall collect and use personal information only within lawful purposes and with consent.

Responsible Material Sourcing

1. Suppliers must establish processes to trace the origin of minerals (e.g., tin, tungsten, tantalum, gold) and ensure they are responsibly sourced.
2. Suppliers shall verify that sourcing does not involve human rights abuses, ethical violations, or environmental harm.
3. Suppliers shall confirm or obtain certification that minerals and raw materials are conflict-free and responsibly handled

4. Labor / Human Rights

Non-Discrimination

1. Suppliers shall not discriminate based on gender, race, ethnicity, nationality, religion, disability, age, family status, social status, or political views.
2. Suppliers must provide equal wages and benefits.
3. Recruitment shall not require irrelevant qualifications.

Wages and Benefits

1. Suppliers shall comply with national labor laws and pay wages on time with understandable pay statements.
2. Suppliers shall provide a comfortable work environment and welfare benefits.
3. Suppliers shall provide mandatory training and support career development.

Working Hours Management

1. Suppliers shall comply with legal working hours and manage rest periods.
2. Overtime shall be voluntary and compensated fairly.
3. Employees shall have at least one day off per week on average.

Humane Treatment

1. Suppliers shall respect privacy and avoid unnecessary after-hours work.
2. Personal data shall be collected with notice and consent.
3. Workplace harassment is prohibited; victims shall be protected, and perpetrators disciplined.

Freedom of Association

1. Suppliers shall respect employees' rights to organize and bargain collectively.
2. Suppliers shall engage in good faith with employee representatives.
3. In the absence of representatives, employees can freely raise issues individually.

Child Labor Prohibition

1. Child labor is strictly prohibited; legal documentation shall verify age.
2. Minors shall not perform hazardous work and must retain access to education.
3. Suppliers must avoid sourcing from entities violating child labor laws.

Forced Labor Prohibition

1. Suppliers must prohibit forced labor and comply with local labor laws.
2. Suppliers must not demand personal documents or coerce employees.
3. Suppliers must avoid sourcing from entities involved in forced labor.

Conflict and Responsible Minerals

1. Suppliers must implement due diligence based on the OECD Guidance to prevent conflict minerals from funding armed groups.
2. Suppliers must provide transparent information about mineral sourcing and supply chain due diligence.
3. Suppliers must identify risks of human rights violations or unethical sourcing and take corrective action.
4. Suppliers shall comply with all laws and customer requirements; violations may result in contract termination.

5. Health & Safety

Occupational Health & Safety Management System

1. Suppliers shall comply with local OH&S laws and maintain necessary permits.
2. Suppliers shall operate a management system to prevent accidents and injuries.

Machinery, Equipment, and Facility Safety

1. Suppliers shall regularly inspect and assess hazardous machinery.
2. Safety devices, barriers, and emergency measures shall be installed and maintained.
3. Personal protective equipment shall be provided, maintained, and user-friendly.

Emergency Response

1. Suppliers shall develop plans for disasters, infections, fires, and safety incidents.
2. Training shall be conducted based on plans and laws.
3. Emergency equipment shall be installed and regularly checked.

Incident Management

1. Suppliers shall measure and monitor occupational injuries or illnesses.
2. Immediate corrective actions shall be taken in case of serious incidents.
3. Root causes shall be investigated and preventive measures implemented.

Safety Inspections

1. Workspaces shall be regularly assessed for hazards. Results shall be communicated to employees, and improvements implemented.
2. Information about workplace hazards shall be provided in understandable language.
3. Vulnerable employees shall not be exposed to high-risk work.

Health Management

1. Suppliers may provide rest areas, toilets, and cafeterias, maintaining hygiene.
2. Dormitories, if provided, shall meet safety, lighting, HVAC, and access control requirements.
3. Regular health checks shall be conducted according to local laws, with adjustments to work conditions as needed.

6. Management System

Corporate Commitment Disclosure

1. Suppliers shall publicly communicate their commitment to social responsibility or equivalent standards.
2. Communication may include management statements, internal guidelines, notice boards, website, reports, and promotional materials.

Appointment of Responsible Personnel

1. Suppliers shall appoint staff responsible for social responsibility activities.
2. Managers shall oversee planning and implementation.

Risk Assessment

1. Suppliers shall identify potential risks in environment, ethics, labor, human rights, and health & safety.
2. Corrective actions shall be planned and implemented for significant risks.

Education and Communication

1. Employees shall be trained on the Code and relevant laws.
2. Implementation plans and performance shall be shared with employees.

Information Management

1. Suppliers shall accurately record and manage information on risks and status in all areas.
2. Information shall be transparently shared when required by law or customer agreements.

Grievance Handling System

1. Employees shall have a system to report violations or personal rights infringements.
2. Whistleblowers shall be protected from retaliation, and confidentiality maintained.

Sub-supplier Management

1. Suppliers shall encourage sub-suppliers to manage environment, ethics, labor, and health & safety.
2. Suppliers shall monitor sub-suppliers and recommend corrective actions if risks or violations are identified.

Code Compliance

1. Suppliers shall provide requested documentation during audits or inspections by third parties designated by Dongwon Metal.
2. Documentation shall be factual and based on actual business operations.
3. Suppliers shall promptly develop and implement corrective plans for any identified non-compliance.

Dongwon Metal Co., Ltd.

CEO Sungyong Park

[Revision History]

Version	Date Issued	Effective Date	Key Changes	Author
0	2023-12-15	2023-12-15	Initial Establishment	Department (or Team) responsible for Supplier Support
1	2024-05-16	2024-05-16	Section 4, Labor/Human Rights – added “Conflict and Responsible Minerals Management”	Department (or Team) responsible for Supplier Support