

Ethics Charter & Code of Conduct

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Contents

- Preface
- Ethics Charter
- Code of Conduct
- Appendix

Preface

General Principles

Executives and employees of Dongwon Metal Co., Ltd. and its affiliates create value for various stakeholders including customers, members, and shareholders based on Harmony & Unity, Technological Innovation, and Commitment to Responsibility, thereby playing a pivotal role in social and economic development.

To manage the company in a transparent and fair manner, we establish and comply with this Ethics Charter as the standard of our behavior and value-based decision making, striving to become a globally trusted, sustainable, and leading company.

Purpose

This document aims to define guidelines for the working practices of executives and employees of Dongwon Metal Co., Ltd. (hereinafter the "Company"), establish and implement policies for the protection and promotion of human rights of all stakeholders, and define other necessary related matters.

Scope of Application

This document applies to all executives and employees of the Company and all affiliated companies, including domestic and overseas business units and corporations. The Company also encourages stakeholders and business partners involved in business activities to respect these principles.

All executives and employees of organizations governed by this document must comply with national laws and perform their duties in accordance with this Code of Conduct.

The Company complies with the laws and regulations of the countries in which it operates and respects local business practices. In the event that the contents of this document conflict with local laws, the local laws shall take precedence, and the Ethics Charter and Code of Conduct shall be modified in accordance with local requirements and industry characteristics.

Compliance with the Ethics Code

All executives and employees shall faithfully comply with the Ethics Code, and any violation shall result in responsibility for the relevant act.

If executives or employees are required to engage in conduct contrary to the Code or if unfair conduct is recognized, they must report it to the Ethics Code Managing Department.

In the case of violations, the Company shall conduct thorough cause analysis, education, and preventive measures to avoid recurrence.

Ethics Charter

(6 Core Principles) Ethics Charter of Dongwon Metal Co., Ltd.

1. We uphold ethical management as a fundamental principle by making clear and transparent decisions in all internal and external business activities, and we pursue transparency throughout our decision-making processes.
2. We guarantee the human rights and freedom of association of all employees, do not tolerate any form of human rights violations, and provide appropriate measures and responses when necessary.
3. We make continuous efforts to create and maintain a safe and healthy working environment.
4. We provide safe and efficient products and services to meet customer needs, and we strictly protect personal information collected in the course of business to maintain trust.
5. We strive for mutual growth with our business partners, support fair and equitable business practices, and maintain relationships based on mutual respect.
6. As a responsible member of the local community, we pursue sustainable development and contribute to national economic and social progress through sound business activities.

Code of Conduct

1. Ethics

We uphold ethical management as our fundamental principle based on transparent and sound decision-making in all internal and external business operations.

Establishment of Sound Corporate Culture

Executives and employees shall perform their duties with integrity, in accordance with applicable laws and internal regulations.

Prohibition of Conflicts of Interest

Executives and employees shall avoid any act or relationship that conflicts with the interests of the Company. In cases of conflict, the interests of the Company shall take precedence.

Prohibition of Insider Trading

Executives and employees shall not trade securities using internal information obtained in the course of work and shall not provide undisclosed material information to third parties through improper means.

Protection of Company Assets and Confidential Information

Executives and employees shall protect the Company's physical assets, intellectual property, trade secrets, and shall not use them for personal benefit.

They shall not disclose important information that may affect the Company's interests.

Prohibition of Political Activities

Executives and employees shall not engage in political activities during working hours or use company resources for political purposes. Personal political opinions must not be misinterpreted as representing the Company.

Prohibition of Gifts and Entertainment

Executives and employees shall not receive or provide money, gifts, or entertainment that exceed socially acceptable norms from/to stakeholders.

Documentation

Documents must be prepared accurately and in compliance with internal policies regarding approval, retention, and disposal.

2. Human Rights Respect

We guarantee the human rights and freedom of association of all personnel and do not tolerate any violation of human rights.

Fair Treatment & Non-Discrimination

The Company does not discriminate based on nationality, race, gender, religion, disability, age, political opinion, or social status and provides fair opportunities and evaluations.

Labor Rights Protection

Freedom of association and collective bargaining shall be guaranteed according to applicable laws.

Prohibition of Child Labor and Forced Labor

The Company prohibits forced labor and child labor as defined by local labor laws.

Prohibition of Harassment

Harassment, including sexual harassment, violence, abusive language, and any unwelcome behavior is strictly prohibited.

3. Work Environment

We continuously strive to create and maintain a safe and healthy working environment.

Creating a Work Environment

The Company respects the individuality and fundamental rights of all employees and is committed to ensuring a safe and healthy workplace.

The Company supports employees' personal and professional development by continuously developing and providing specialized training programs to foster proactive and creative talent and enable self-realization.

Industrial Safety and Accident Prevention

The Company is dedicated to preventing and managing hazardous materials and potential risks that may threaten employee safety, and to providing a safe working environment.

The Company performs all work activities in accordance with safety guidelines and takes appropriate preventive measures before beginning any work.

Response Measures

If any working condition or practice is identified as potentially unsafe, employees must report it immediately to the safety manager.

Upon the occurrence of an occupational accident, the safety manager shall promptly take necessary safety and health measures and make efforts to prevent recurrence by analyzing the cause.

Safety Training

The Company provides safety training to ensure all employees fully understand safety requirements and rules, and works to prevent accidents through continuous awareness and education.

4. Customer Value

We provide safe and efficient products and services that meet customer needs, and we ensure strict protection of personal information obtained during business activities to maintain trust.

Customer Respect

The Company always acts from the customer's perspective and strives to achieve customer satisfaction by providing high-quality products and services that customers can trust.

The Company provides accurate information regarding its products and services, and respects diverse customer opinions, actively reflecting them in its business activities.

Customer Protection

The Company protects the interests, safety, and personal information of customers and does not engage in any unfair practices against them.

Information Disclosure

The Company provides truthful and accurate information to customers and does not disseminate false or misleading information.

The Company sincerely communicates necessary usage precautions and any changes related to product safety so that customers can fully understand them.

Quality Assurance

To achieve quality objectives, the Company establishes and maintains a rigorous quality management system based on international standards across the entire process, from design to sales.

The Company strives to continuously supply high-quality products that meet regulatory requirements as well as customer needs and expectations.

Product Safety

The Company takes responsibility for customer safety and ensures the highest level of safety by implementing strict quality assurance inspections through an established system.

Hazardous Substance Control

The Company prohibits the use of hazardous substances in products that may pose risks to customer safety and conducts continuous monitoring to confirm that no harmful factors exist.

5. Fair Trade

We pursue mutual growth with our business partners and support fair transactions based on mutual respect.

Fair Transactions with Business Partners

The Company fosters mutual trust and cooperation with its business partners through transparent and fair transactions, thereby pursuing shared growth.

Fair Competition

The Company does not use its superior position to force any unfair actions or exert undue influence on business partners.

Prohibition of Collusion

The Company complies with market competition rules and does not engage in collusive activities that restrict competition, such as price fixing, production control, or the exchange of confidential business information.

Prohibition of Improper Benefits

Employees are prohibited from offering, requesting, or accepting bribes, money, or other valuables for business advantage.

Cooperation with Investigations

When requested by authorities, the Company responds promptly and sincerely and cooperates fully with investigations.

Tax Compliance

The Company complies with tax laws in the countries where it operates and contributes to national development through the faithful payment of taxes.

Information Disclosure

The Company transparently discloses financial and non-financial information—such as business performance, financial status, ownership structure, and governance—in accordance with relevant laws and regulations.

Prevention of Counterfeit Parts

The Company shall not produce or use unapproved or counterfeit raw materials or components.

The Company shall not distribute, sell, or supply counterfeit raw materials or components.

The Company regularly verifies that counterfeit materials or components are not being produced or used within its facilities and shall immediately notify the government or the Company's designated compliance department if such materials are identified.

The Company shall make efforts to ensure that materials and components it produces are used and distributed in accordance with intended business purposes or contractual terms.

Compliance with Export Controls

The Company complies with national laws and international regulations related to export controls.

The Company shall not conduct transactions with countries, regions, or individuals subject to export restrictions or economic sanctions.

The Company periodically reviews its compliance with export control and sanctions regulations and cooperates in any necessary assessments.

6. Sustainability

We pursue sustainable development as a member of the local community by fulfilling our social responsibilities and obligations, and contribute to national economic and societal development through sound business operations.

Environment

The Company complies with environmental laws and international standards and minimizes its environmental impact through preventive actions.

Climate Change Response

The Company strives to enhance energy efficiency and secure sustainable resources to address global climate change.

Development of Eco-Friendly Technologies

The Company researches and develops eco-friendly technologies and services that minimize environmental impact and actively promotes the adoption of new technologies.

Compliance with Domestic and International Laws

The Company complies with all relevant national and regional laws as well as internationally recognized regulations and standards.

Contribution to National Economic and Social Development

The Company contributes to national development through productivity improvement, job creation, and faithful payment of taxes.

Community Engagement

The Company supports and encourages employees' participation in community service and social contribution activities.

Protection of Shareholder Rights

The Company protects shareholder rights and respects legitimate shareholder demands and proposals.

The Company builds mutual trust with shareholders and investors and strives to maximize shareholder value.

Whistleblower Protection

Organizations applying this Code of Ethics and Conduct shall protect whistleblowers and ensure that they do not suffer any unfair treatment, discrimination, or retaliation.

Dongwon Metal Co., Ltd.

CEO Sungyong Park

[Revision History]

Version	Date Issued	Effective Date	Key Changes	Author
0	2023-12-01	2023-12-01	Initial Establishment	Department (or Team) responsible for Planning
1	2024-06-10	2024-06-10	Added provisions on the prevention of counterfeit parts, compliance with export control regulations, and protection of whistleblowers.	Department (or Team) responsible for Planning

For any inquiries regarding this Code of Ethics and Code of Conduct, please contact the Management Planning Team.

Email: dwmic@dwmic.com