

Sustainable Sourcing Policy

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Document Owner	Department (or Team) responsible For Procurement

1. General Provisions

A. Declaration and Purpose

Dongwon Metal Co., Ltd. procures raw materials and auxiliary materials used in the production of its products and services in a socially and environmentally responsible manner. The Company identifies and monitors potential adverse impacts, including human rights violations and environmental degradation, that may occur throughout its supply chain, and seeks to establish a sustainable supply chain by preventing and mitigating such impacts where necessary. In particular, Dongwon Metal declares its commitment to complying with the following principles and standards and establishes this Policy as the foundation for such compliance:

- ① International Standards and Guidelines: the United Nations Global Compact (UNGC) Ten Principles, the United Nations Guiding Principles on Business and Human Rights (UNGPs), the OECD Guidelines for Multinational Enterprises, the OECD Due Diligence Guidance for Responsible Business Conduct, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, etc.;
- ② International Conventions: the International Labour Organization (ILO) Core Conventions, the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social and Cultural Rights (ICESCR), etc.;
- ③ International Initiatives and Alliance Standards: the Responsible Business Alliance (RBA), the Guiding Principles of the Drive Sustainability Initiative, etc.;
- ④ Applicable Laws and Regulations: the EU Corporate Sustainability Due Diligence Directive (CSDDD), the Corporate Sustainability Reporting Directive (CSRD), the EU Deforestation Regulation (EUDR), the EU Battery Regulation (EUBR), etc.

B. Scope of Application

- ① This Policy applies to Dongwon Metal's supply chain. Dongwon Metal's supply chain is defined as all global operations and subsidiaries, as well as relevant stakeholders that participate in or are affected by Dongwon Metal's business activities (including suppliers, distributors, and other entities involved in all stages of product design, production, and distribution).
 - i. All domestic and overseas business sites and subsidiaries of Dongwon Metal, as well as suppliers (business partners) directly related to raw material procurement and all entities within their upstream supply chains, shall comply with the requirements set forth in this Policy to the extent consistent with applicable domestic laws and international standards.
 - ii. Dongwon Metal shall actively communicate and cooperate with all entities within its supply chain to implement this Policy, and all supply chain participants shall support Dongwon

Metal's efforts to establish a sustainable supply chain.

- ② The raw materials covered by this Policy include all forms of raw materials and auxiliary materials used in product manufacturing. Such materials include, but are not limited to, the following:
 - i. Managed Raw Materials
 - Raw Materials: steel coils
 - Auxiliary Materials: bolts, nuts, pads, etc.
 - Other materials and products purchased through suppliers
- ③ Detailed sourcing standards and procedures relating to minerals shall be governed by Dongwon Metal's Conflict (Responsible) Minerals Policy.

2. General Principles for Sustainable Procurement

Dongwon Metal shall comply with the following principles when procuring raw materials and shall require all entities within its supply chain to adhere to the same standards.

A. Social Responsibility

- ① All forms of forced labor, child labor, modern slavery, human trafficking, discrimination, harassment, and other human rights violations are strictly prohibited. Dongwon Metal shall continuously monitor for such risks and take immediate corrective actions where necessary.
- ② Dongwon Metal respects labor rights, including freedom of association and the right to collective bargaining.
- ③ Dongwon Metal shall establish fair and appropriate compensation systems, comply with working hour requirements, and provide a safe and healthy working environment.
- ④ Dongwon Metal respects the rights of affected local communities, particularly the principle of Free, Prior and Informed Consent (FPIC) of Indigenous Peoples, and strives to minimize adverse impacts on communities while contributing to community development.

B. Environmental Responsibility

- ① Dongwon Metal prohibits the procurement of raw materials that contribute to illegal environmental destruction or pollution and implements measures throughout its supply chain to prevent, mitigate, and remediate such impacts.

- ② In alignment with the Paris Agreement, Dongwon Metal strives to achieve emissions reduction objectives by improving energy efficiency and expanding the use of renewable energy throughout its raw material supply chain.
- ③ Dongwon Metal is committed to biodiversity conservation and ecosystem protection and shall not procure raw materials associated with deforestation or forest degradation.
- ④ Dongwon Metal fulfills its environmental responsibilities by conserving water resources, preventing water and soil pollution, and minimizing emissions of air pollutants.
- ⑤ Dongwon Metal responsibly manages environmental risk factors, including noise and vibration, that may affect neighboring communities or ecosystems.
- ⑥ Dongwon Metal promotes a circular economy by minimizing unnecessary resource consumption and reducing the generation of hazardous substances and waste while expanding the use of recycled raw materials.

C. Ethical Responsibility and Transparency

- ① Dongwon Metal prohibits all forms of unethical conduct, including corruption, bribery, money laundering, fraud, and collusion, and maintains integrity while promoting fair competition in all business activities. Dongwon Metal conducts monitoring activities to prevent unethical conduct and implements corrective actions in accordance with a zero-tolerance policy in the event of violations.
- ② Dongwon Metal prohibits any support for illegal armed groups.
- ③ Dongwon Metal ensures transparency regarding the origin and traceability of materials throughout its supply chain.
- ④ Dongwon Metal complies with all applicable laws and regulations in the jurisdictions in which it operates and protects stakeholders' information and intellectual property rights.

3. Sustainable Raw Material Management System

Dongwon Metal establishes and operates a comprehensive and responsible sustainable raw material management system to ensure the effective implementation of this Policy.

A. Sustainable Raw Material Management Process

- ① Dongwon Metal traces the origin and supply routes of raw materials throughout its supply chain and identifies potential or actual human rights and environmental risks that may arise in the process. Where necessary, Dongwon Metal implements risk prevention and mitigation measures and operates monitoring and management processes to assess the effectiveness of such measures.
- ② Dongwon Metal comprehensively evaluates factors such as raw material consumption volume, association with conflict-affected and high-risk areas, inclusion of high-risk materials, social and environmental impacts, and applicability of international regulations to designate "Priority Raw Materials." Enhanced management procedures shall be applied to such Priority Raw Materials.
- ③ The results of these activities shall be reported to senior management at least once annually. However, where significant risks are identified during the management process, such risks shall be reported immediately to senior management. Dongwon Metal shall review the effectiveness of its management processes and improve them where necessary.

B. Supply Chain Capacity Building and Collaboration

- ① Dongwon Metal provides training and support to suppliers to help them meet the requirements of this Policy and, where necessary, provides technical and management assistance to strengthen their capabilities.
- ② Dongwon Metal collaborates with a variety of external stakeholders, including external experts, industry initiatives, and civil society organizations, to promote the development of a sustainable supply chain.

C. Performance Management and Monitoring

- ① Dongwon Metal establishes medium- and long-term performance objectives for the implementation of this Policy and regularly evaluates implementation status and effectiveness using both quantitative and qualitative indicators.
- ② Based on the results of such evaluations, Dongwon Metal reviews the appropriateness of its objectives, adjusts targets where necessary, and develops and implements improvement measures.

D. Third-Party Verification and Certification

- ① Where necessary, Dongwon Metal conducts independent third-party audits of its supply chain due diligence activities and procurement practices and implements corrective actions based on the audit results.
- ② Dongwon Metal encourages the use of raw materials that have obtained environmental certifications, sustainability certifications, or other recognized industry certifications and seeks to expand business relationships with certified smelters and refiners.

4. Governance

A. Roles and Responsibilities of Management Committees, the Board of Directors, and Executive Management

- ① Significant raw material sourcing risks shall be managed and overseen through management committees or similar bodies involving senior executives and key decision-makers. The primary responsibilities of such committees include approving responsible raw material sourcing policies, overseeing policy implementation, reviewing significant social and environmental risks associated with raw material sourcing, evaluating risk response measures, and addressing any other matters deemed necessary in relation to raw material sourcing.
- ② The Board of Directors of Dongwon Metal Co., Ltd. or its subordinate committees (such as the ESG Committee) shall review and deliberate on matters including responses to laws and regulations affecting raw material sourcing, the establishment of monitoring and prevention plans related to raw material sourcing, and relevant investment decisions.
- ③ Executive Management shall establish strategic direction for the effective implementation of this Policy, oversee and monitor implementation progress, and provide the necessary support and resources.
- ④ The procurement department of Dongwon Metal shall be responsible for the day-to-day operation and management of this Policy, implementation of due diligence processes, and communication and cooperation with supply chain participants.

B. Employee Training

Dongwon Metal shall provide regular training on the principles and due diligence procedures set forth in this Policy to all employees engaged in raw material sourcing activities in order to enhance awareness and strengthen capabilities.

5. Grievance Management and Remedy

Dongwon Metal operates accessible, transparent, and secure grievance channels through which concerns regarding potential or actual adverse impacts arising from raw material sourcing activities may be raised.

A. Grievance Reporting

- ① Dongwon Metal provides channels through which employees, suppliers, community members, civil society organizations, and other stakeholders may report grievances.
 - i. Dongwon Metal Ethics & Compliance Reporting Center:
<https://www.dwmic.com/en/sub/esg/sustainability/audit.php>
- ② Grievances may be submitted anonymously, and all reports shall be treated confidentially.
- ③ Retaliation against any individual who submits a grievance is strictly prohibited.

B. Grievance Handling

- ① All reported grievances shall be investigated and addressed fairly and promptly in accordance with applicable laws, internal procedures, and international guidelines.
- ② Where a grievance involves a potentially significant legal violation, a potentially significant impact on local communities, or a material reputational risk to the Company, the response measures shall be reviewed and discussed by the management committee or other highest-level decision-making body.
- ③ Based on the investigation results, Dongwon Metal shall implement appropriate corrective and remedial measures, including restoration and remediation where applicable, and establish measures to prevent recurrence.

- ④ Dongwon Metal shall protect the rights of grievance reporters throughout the grievance reporting, investigation, handling, and remediation process. Such rights include, but are not limited to, the following:
- i. The right to request appropriate follow-up actions;
 - ii. The right to be consulted regarding corrective and remedial measures;
 - iii. The right to receive information regarding the handling process of the submitted grievance and any planned actions.

Dongwon Metal Co., Ltd.
CEO SungRyong Park

[Revision History]

Version	Date Issued	Effective Date	Key Changes	Author
0	2025-12-05	2025-12-05	Initial Establishment	Department (or Team) Responsible for Procurement