

SeAH Group's Human Rights Management Charter

SeAH Group is a global steel manufacturer that places "honesty" as its top priority. SeAH Group values the human rights of all stakeholders, including its officers, employees, partners, and customers, throughout its entire business activities, and together with all stakeholders, strives to act as a company that contributes to make the world a 'more beautiful place.'

SeAH Group complies with the laws and regulations of each country and region and respects international principles and regulations on human rights, including the Universal Declaration of Human Rights (UDHR), the UN Guiding Principles on Business and Human Rights (UNGPs), the OECD Guidelines for Multinational Enterprises, the UN Convention on the Rights of the Child and the Core Conventions of the International Labor Organization. To abide by the above, SeAH Group has established and implemented human rights management policies covering matters relating to internal and external communication, handling of complaints, and remedial procedures.

SeAH Group's human rights management policies shall apply to all of SeAH Group's domestic and overseas places of business. SeAH Group hereby declares this Human Rights Management Charter as follows for common understanding and to implement across the company.

Article 1. Establishment of Human Rights Management System

SeAH Group shall respect all officers and employees and stakeholders as human beings, provide them with regular human rights training to prevent any mental or physical infringement of human rights, and conduct monitoring and complaint handling procedures for human rights

infringement through its Ethics Management Office.

Article 2. Prohibition of Discrimination in Employment

SeAH Group shall not unfairly discriminate against any person based on his/her gender, nationality, religion, social status, race, age, academic background, disability, gender identity, among others, in its human resources management, including its recruitment, promotion, compensation, and provision of educational opportunities.

Article 3. Guarantee of Freedom of Association and Collective Bargaining

SeAH Group shall encourage the Company and its officers and employees to freely communicate with each other to foster a sound organizational culture and guarantee their right to join the union and collective bargaining. In addition, SeAH Group shall not unfairly disadvantage any person based on his/her union activities.

Article 4. Prohibition of Forced Labor

SeAH Group shall not force any person to work against his/her free will by unreasonably restricting his/her mental or physical freedom, such as by using violence, intimidation, or confinement, nor shall it require any officer or employee to transfer his/her identification card or other important personal information as a condition of employment.

Article 5. Prohibition of Child Labor

SeAH Group shall comply with the minimum employment age standards provided by national and local laws and regulations and shall not expose minors to a working environment that is harmful or dangerous to the human body.

Article 6. Guarantee of Industrial Safety

SeAH Group shall regularly inspect the facilities, equipment, tools, etc. of its places of business to ensure that all officers and employees can work in a safe working environment and shall strictly comply with health and safety standards under national and local laws and regulations. In addition, SeAH Group shall provide regular training which covers legal requirements for industrial safety and raise awareness among the officers and employees.

Article 7. Responsible Management of Supply Chain

SeAH Group shall endeavor to share the values and principles of this Human Rights Management Charter with its affiliates and suppliers. If any affiliate or supplier violates this Human Rights Management Charter, SeAH Group may take necessary measures, such as suspending transactions with the violator.

Article 8. Protection of Local Residents' Human Rights

SeAH Group shall manage any potential changes in the community's society and environment affected by its place of business and protect human rights. SeAH Group shall raise concerns regarding potential impact of its place of business on the neighborhood and the residents, and listen to and reflect the community's opinions in its business activities to address problems.

Article 9. Protection of Environmental Rights

SeAH Group shall implement and carry out activities to protect the environment and encourage its domestic and overseas places of business, suppliers, and local communities to participate in its environment protection activities.

Article 10. Protection of Human Rights of Customers

All officers and employees of SeAH Group shall prioritize the protection of life, health, and property of customers when providing products and services

and shall take the best measures to protect personal information collected during their business activities.

Article 11. Prevention of Workplace Harassment and *Gapjil*¹

The officers and employees of SeAH Group shall neither engage in any harassment or aggressive acts that may interfere with other employees from performing their duties, nor shall it give any inappropriate instruction to other employees to perform tasks that violates applicable laws and regulations and the Company's regulations and processes or is unrelated to the duties assigned.

Article 12. Protection of Personal Information

SeAH Group shall protect the personal information of stakeholders, including customers, under national and local laws and regulations and shall not use any personal information for any other purpose without prior consent of the data subject. In addition, SeAH Group shall provide correct information and shall not provide any false information.

Article 13. Compliance with Legal Working Hours and Conditions

SeAH Group shall fully comply with the working hours under national and local laws and regulations and other requirements under the labor law such as minimum wage, social insurance, breaks and leaves.

¹ "*Gapjil*" is a Korean expression that refers to an arrogant or authoritarian attitude or actions of people who have positions of power over others.