

SeAH Steel Holdings

# Sustainability Report 2025

Inspired by SeAH

Overview

Sustainability Framework

Sustainability Priorities

Environmental

Social

Governance

Appendix

# Contents

## Overview

CEO Message

05

Company Profile

06

## Sustainability Framework

ESG Strategy

13

ESG Governance

14

Materiality Assessment

15

Stakeholder Engagement

18

## Sustainability Priorities

Topic 1. Climate Action

20

Topic 2. Ethics and Compliance

31

Topic 3. Safety and Health

40

## Environmental

Environmental Management

53

Biodiversity and Ecosystems

70

## Social

Talent Management

73

Human Rights

81

Responsible Supply Chain

84

Community Engagement

88

## Governance

Corporate Governance

92

Information Security

96

Risk Management

98

## Appendix

ESG Data

102

GRI Index

126

SASB Index

128

ESRS Index

129

Third-Party Assurance Statement

133



- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix

# About This Report

## Report Overview

As a company that pursues and delivers sustainable values, SeAH Steel Holdings publishes an annual report to transparently disclose our ESG management performance to various stakeholders. This is the third sustainability report covering ESG (Environmental, Social, and Governance) performance and future plans of SeAH Steel Holdings and our subsidiaries.

## Reporting Standards

GRI (Global Reporting Initiative)  
SASB (Sustainability Accounting Standards Board)  
ESRS (European Sustainability Reporting Standards)

## Reporting Period

January 1, 2025 – December 31, 2025  
· Some of the key performances include information from the first half of 2026.  
· To offer a comprehensive perspective on quantitative performance trends, we disclose data from the past three years (2023–2025).

## Reporting Scope

Financial Reporting: Based on Korean International Financial Reporting Standards (K-IFRS) for consolidated financial statements  
Non-financial Reporting\*: (Domestic) SeAH Steel Holdings, SeAH Steel, SeAH Coated Metal, Dong-A Steel  
(Overseas) Major subsidiaries and second-tier subsidiaries of SeAH Steel International, and SeAH Wind

\* In case of divergence from the scope of this report, footnotes or additional information are provided.  
\* Certain quantitative data have been revised from the previous year’s report due to updates in calculation methodology or correction of errors. Revised data are indicated with footnotes.

## Assurance

Financial Information: KPMG Samjong Accounting Corp.  
Non-financial Information: Korean Standards Association  
(See Third-Party Assurance Statement on pp. 133-134)

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## Cover Story



The rising curve of SeAH represents the direction and determination of SeAH employees as we move toward a sustainable future with a frontier spirit of change and challenge. Just as straight lines and curves come together in harmony, SeAH Steel Holdings will continue to move forward by connecting resilient steel with a sustainable future amid a changing business environment.

## Interactive Guide

SeAH Steel Holdings Sustainability Report 2025 is published as an interactive PDF with functions to navigate to related pages within the report.

Overview

- CEO Message
- Company Profile

- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix

# Overview

|                 |    |
|-----------------|----|
| CEO Message     | 05 |
| Company Profile | 06 |

Overview

CEO Message

Company Profile

Sustainability Framework

Sustainability Priorities

Environmental

Social

Governance

Appendix

# CEO Message



Turning today’s  
challenges into a  
springboard  
for the next  
“100 Years of SeAH.”

Dear Esteemed Stakeholders,  
It is a great privilege to share with you the path traveled by SeAH Steel Holdings and our domestic and overseas subsidiaries over the past year, as well as our vision for the future.

The global economy has remained in a phase of low-to-moderate growth, while the spread of protectionism and the restructuring of supply chains have heightened external uncertainty more than ever before. In particular, 2026 marks a major inflection point for our steel industry. With the full implementation of the European Union’s Carbon Border Adjustment Mechanism (CBAM), an era has begun in which carbon emissions are directly linked to trade barriers and financial costs. In addition, as sustainability disclosure takes shape in major countries at home and abroad, corporate ESG management now faces a major transition into an era in which it must be proven with concrete data and demonstrable results, beyond mere declarations or qualitative framing.

Many describe this rising wave of global regulation as a crisis. SeAH Steel Holdings, however, does not fear this major paradigm shift. Rather, we see it as an opportunity to prove our true competitiveness in the global market and to lay the foundation for the next “100 Years of SeAH.”

First, we will move beyond carbon regulation to become a key partner in global future energy solutions.  
In a business environment shaped by intensifying carbon regulations worldwide, SeAH Steel Holdings will not remain at the level of passive responses aimed merely at avoiding external regulations and costs. Instead, we will strengthen our competitiveness through fundamental improvements in our business capabilities. The ability to transparently measure and manage the full life cycle of our products—from production and distribution to disposal—is a critical source of competitiveness in winning orders. We plan to further advance the SeAH Energy Management System we proactively established, and to strengthen our low-carbon supply chain ecosystem by expanding low-carbon raw material purchases and securing renewable energy, thereby dramatically reducing embedded emissions. In addition, we will continue to expand our future energy infrastructure portfolio, ranging from steel pipes for H<sub>2</sub> and CO<sub>2</sub> transportation to offshore wind foundations led by SeAH Wind, and grow into a true pioneer leading the global energy transition.

Second, we will firmly embed unwavering ethical management and a non-negotiable culture of safety throughout our organization.  
The coming era of mandatory disclosure demands transparency without the slightest margin for error. Building on our ISO 37301 Compliance Management System certification—the first in the steel industry—and our newly established digital platform, CP Lounge, SeAH Steel Holdings will operate a risk management framework aligned with global standards. Going beyond the formal management of indicators, we will foster a mature corporate culture in which our employees place fairness and ethics at the center of every decision and task. Moreover, no economic rationale or efficiency can ever take precedence over human life and safety. We will protect a healthy workplace where

everyone can work with peace of mind by expanding preventive smart safety networks across our operations and by supporting the safety and health capabilities of our business partners, thereby fostering a shared culture of safety.  
  
Dear Esteemed Stakeholders, ESG has now become more than a simple trend or a response to regulation. It has become a measure of a company’s long-term viability and fundamental values. Rather than highlighting individual achievements one by one, SeAH Steel Holdings will focus on the fundamental transformation needed to move beyond the limits of the steel industry and contribute to environmental and social sustainability. Building on the solid foundation of the past 66 years, we will continue to move forward with quiet resolve under our mission of “Making the World Beautiful.” We ask for your unwavering trust and warm companionship on “SeAH-in’s Journey toward a Beautiful World”—a journey that will connect technology, people, and the environment and move forward steadfastly even amid the fierce waves of change.

Thank you.  
  
June 2026  
SeAH Steel Holdings CEO Youngbin Cho  


Overview

- CEO Message
- Company Profile

- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix

Company Profile

Founded on Oct. 19, 1960, **SeAH Steel Holdings** is a global holding company that leads domestic and overseas investments and supports the growth of our subsidiaries, with a focus on the steel pipe manufacturing business. Through continued investment, we efficiently and professionally manage our expanding business portfolio while strengthening our global strategic capabilities to respond swiftly to rapidly changing trade and commerce environment.

Company Overview

|                     |                                                    |                     |                                       |                                 |                     |
|---------------------|----------------------------------------------------|---------------------|---------------------------------------|---------------------------------|---------------------|
| Company Name        | SeAH Steel Holdings Corp.                          | CEO                 | Joosung Lee, Youngbin Cho             | Revenue (Consolidated)          | KRW 3,759.6 billion |
| Headquarters        | 27th FL, SeAH Tower, 45 Yanghwa-ro, Mapo-gu, Seoul | Establishment Date  | Oct. 19, 1960                         | Operating Profit (Consolidated) | KRW 205.8 billion   |
| Number of Employees | 45                                                 | Main Business Areas | Steel Pipes, Steel Sheets, Investment | Total Assets (Consolidated)     | KRW 6,046.8 billion |

Subsidiaries Overview

|               |                 |
|---------------|-----------------|
| Manufacturing | Sales           |
| 10 sites      | 3 sites         |
| Offices       | Holding Company |
| 4 sites       | 1 site          |

- USA
- SeAH Steel America, Inc.  
State Pipe & Supply, Inc.  
SeAH Steel USA LLC
- CANADA
- SeAH Steel America Calgary Office
- EUROPE
- SeAH Steel Europe S.r.l.  
Inox Tech S.p.A.  
SeAH Wind Ltd.  
SeAH Coated Metal Europe

- ASIA
- SeAH Steel Holdings Corp.  
SeAH Steel Corp.  
SeAH Coated Metal Corp.  
Dong-A Steel Corp.  
SeAH Japan Co., Ltd.  
SeAH Steel Holdings Beijing Office  
SeAH Steel Vina Corp.  
Vietnam Steel Pipe Co., Ltd.  
SeAH Steel UAE, LLC  
SeAH Steel Holdings Middle East Office



Business Areas

Manufacturing and Distribution of Steel Pipes

|                          |                              |
|--------------------------|------------------------------|
| SeAH Steel Corp.         | Dong-A Steel Corp.           |
| SeAH Steel America, Inc. | State Pipe & Supply, Inc.    |
| SeAH Steel USA LLC       | SeAH Japan Co., Ltd.         |
| SeAH Steel Vina Corp.    | Vietnam Steel Pipe Co., Ltd. |
| SeAH Steel UAE, LLC      | Inox Tech S.p.A.             |

Manufacturing of Cold Rolled and Pre-Coated Sheets

SeAH Coated Metal Corp.

Manufacturing of Monopiles for Offshore Wind Power

SeAH Wind Ltd.

Overview

- CEO Message
- Company Profile
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix

Company Profile

Core Business Area ❶ Manufacturing and Distribution of Steel Pipes



**SeAH Steel** Leading global producer of high-quality steel pipes  
SeAH Steel Corp. is a manufacturing company that has led the steel pipe industry through the development of new markets and high-value-added products. Centered on the Pohang Plant, a key production base for high-value-added steel pipes for export, we operate a total of four major domestic production sites including: the Gunsan Plant, which manufactures galvanized steel pipes; the Suncheon Plant, which specializes in large-diameter, thick-walled steel pipes; and the Changwon Plant, which produces special tubes such as stainless steel and titanium pipes. Building on our manufacturing competitiveness in the energy and construction materials sectors, we are expanding our capacity to produce materials for offshore wind foundations and broadening our business portfolio into new markets, including through 24-inch stainless steel pipe production facilities, the largest roll-forming capacity of its kind in Korea.

|                                    |                                                                        |
|------------------------------------|------------------------------------------------------------------------|
| CEO                                | Howard Whi Young Lee, Mangi Hong                                       |
| Establishment Date (Spin-off Date) | Oct. 19, 1960 (Sept. 3, 2018)                                          |
| Headquarters                       | 25, 26 and 27th FLs, 45, Yanghwa-ro, Mapo-gu, Seoul, Republic of Korea |
| Main Business Areas                | Manufacturing and sales of welded steel pipes                          |



**Dong-A Steel** Specialized manufacturer of construction and industrial steel pipes  
Founded in 1991, Dong-A Steel is a specialized steel pipe manufacturer whose core business has been the production and sale of structural steel pipes. Based at the Gwangyang Plant, we operate an integrated production system encompassing slitting, pipe forming, and coating, with an annual production capacity of 320,000 metric tons for pipe forming and 270,000 metric tons for slitting. We hold multiple KS and JIS certifications across various product categories, including steel pipes, C-channel, and color square pipes. Since becoming a second-tier subsidiary of SeAH Steel in 2024, we have served as a pillar of the Group’s structural pipe business, supplying products to both domestic and export markets. We are also expanding domestic and export volumes through product diversification enabled by investment in new facilities.

|                     |                                                                    |
|---------------------|--------------------------------------------------------------------|
| CEO                 | Young Jun Choi                                                     |
| Establishment Date  | Apr. 13, 1991                                                      |
| Headquarters        | 15 Taein 4-gil, Gwangyang-si, Jeollanam-do, Republic of Korea      |
| Main Business Areas | Manufacturing and sales of structural steel pipes and square pipes |



**SeAH Steel America** Hub for steel pipe distribution and supply chain management across North and Latin America  
SeAH Steel America, Inc. is a steel trading company that supplies steel products to a wide range of industries across North and Latin America, including petrochemicals, energy, construction, and agriculture. In the early 1990s, we acquired State Pipe & Supply, a distributor in the western United States, and Panther Supply, an OCTG distributor in the Gulf region, pursuing sales growth through business expansion and the rebuilding of our sales network. With offices in Irvine, Houston, and Calgary, we distribute across the Americas the steel products manufactured by SeAH Steel Holdings’ global manufacturing affiliates—such as SeAH Steel, SeAH Steel USA, SeAH Steel Vina, and Inox Tech—contributing to the expansion of the group’s market share.

|                     |                                                              |
|---------------------|--------------------------------------------------------------|
| CEO                 | Jun Lee                                                      |
| Establishment Date  | Aug. 15, 1978                                                |
| Headquarters        | 2100 Main St. Suite 100, Irvine, California 92614, USA       |
| Main Business Areas | Trading of steel materials, including steel pipes and sheets |



Overview

- CEO Message
- Company Profile
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix

Company Profile

Core Business Area ❶ Manufacturing and Distribution of Steel Pipes



**State Pipe & Supply** Largest steel pipe distribution, manufacturing, and coating operation in the Western United States

State Pipe & Supply, Inc., established in 1949, is a company specializing in the manufacturing and distribution of steel pipes. Since joining the SeAH family in 1990, we have continued to expand our business through sustained investment, operating nine branches across the USA and Canada. In 1996, we expanded into steel pipe processing through the acquisition of West Coast Pipe Lining, and in 2017, we entered steel pipe manufacturing with the launch of the West Coast Spiral Pipe plant. In 2022, we acquired Mobile Pipe, a coating specialist with 60 years of experience, thereby establishing a one-stop shop that covers mother pipe manufacturing, processing, and a wide range of coating processes. In 2025, we further expanded into logistics by establishing WCST, a specialized steel transportation company.

|                     |                                                            |
|---------------------|------------------------------------------------------------|
| CEO                 | Jun Lee                                                    |
| Establishment Date  | Jan. 23, 1990                                              |
| Headquarters        | 183 S. Cedar Ave, Rialto, California 92376, USA            |
| Main Business Areas | Steel pipe manufacturing and coating, wholesale and retail |



**SeAH Steel USA** Specialized manufacturer of steel pipes for the U.S. energy sector

SeAH Steel USA LLC is the first Korean steel pipe manufacturer established in North America specializing in the production of oil country tubular goods (OCTG) and line pipes. We operate a one-stop production system covering the entire process from pipe forming to post-processing, and actively supply the North American energy market with high-end OCTG products such as High-Collapse, Controlled Yield, and Semi-Premium Thread pipes. Despite growing uncertainty in the energy market and continuing trade and supply issues affecting steel products, SeAH Steel USA continues to play a pivotal role in strengthening our presence and competitiveness in the North American energy market.

|                     |                                                       |
|---------------------|-------------------------------------------------------|
| CEO                 | Gene Lee                                              |
| Establishment Date  | Oct. 24, 2016                                         |
| Headquarters        | 16952 Leonard Rd, Houston, Texas 77049, USA           |
| Main Business Areas | Manufacturing and post-processing of OCTG steel pipes |



**Inox Tech** Global leader in high-alloy welded special steel pipes

Inox Tech S.p.A. is a specialized manufacturer of large-diameter, thick-walled welded CRA (Corrosion Resistant Alloys) pipes used in the oil & gas sector, and has established a strong position as a global leader across major projects in Europe, the Middle East, and Asia. With global EPCs and traders in the LNG and offshore sectors as our key customers, we continue to lead the CRA pipe market through the execution of a wide range of projects. We offer a broad portfolio of high-value-added products, including general-purpose 300 series stainless steel, duplex, super duplex, nickel alloy, and clad products, and have achieved record order volumes through consecutive LNG project wins since 2019.

|                     |                                                                                                          |
|---------------------|----------------------------------------------------------------------------------------------------------|
| CEO                 | EunCheol Seol                                                                                            |
| Establishment Date  | June 4, 1989                                                                                             |
| Headquarters        | Via Aldo Moro, 10/e 45026 Lendinara (RO), Italy                                                          |
| Main Business Areas | Manufacturing and sales of special pipes including stainless steel and large-diameter thick-walled pipes |

Overview

- CEO Message
- Company Profile

- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix

Company Profile

Core Business Area ❶ Manufacturing and Distribution of Steel Pipes



SeAH Steel UAE Specialized producer of steel pipes for construction and energy industries in the Middle East

SeAH Steel UAE, LLC is a large-diameter, thick-walled pipe manufacturing company located in the United Arab Emirates. We are equipped with 3-Roll Bending and Press Bending pipe-forming facilities, as well as two heat treatment units, and supply pipes for pressure piping, structural applications, and oil transportation to the construction, petrochemical, and energy markets in the Middle East and North Africa. We are capable of producing line pipes for oil and natural gas transportation and large-diameter, thick-walled pipes for renewable energy projects with a maximum outer diameter of 120 inches and a thickness of up to 60 mm. With an annual production capacity of 150,000 metric tons, SeAH Steel UAE actively meets demand from large-scale construction and energy-related projects in the Middle East market.

|                     |                                               |
|---------------------|-----------------------------------------------|
| CEO                 | Chul-Hong Kim                                 |
| Establishment Date  | Feb. 7, 2010                                  |
| Headquarters        | Al Ghail Industrial Zone, Ras Al Khaimah, UAE |
| Main Business Areas | Manufacturing and sales of steel pipes        |



SeAH Japan Key platform for steel product trading in Asia

SeAH Japan Co., Ltd. is a steel trading company specializing in the import and export of steel pipes, sheets, and other steel products. As a steel trading company that has built strong international trust over many years, we distribute Korean steel products in Japan while also sourcing Japanese raw materials for Korea. In addition, SeAH Japan works closely with SeAH Steel Holdings’ domestic and overseas affiliates through active trade intermediation, serving as a leading business platform in the Japanese market. Headquartered in Tokyo, we function as a key hub for steel trade connecting Japan and Korea, as well as Japan and global markets.

|                     |                                                                      |
|---------------------|----------------------------------------------------------------------|
| CEO                 | Sajin Han                                                            |
| Establishment Date  | Feb. 1, 1995                                                         |
| Headquarters        | 3F Nan-o Bldg. 20-1, Chome, Nishi-Shinbashi, Minato-ku, Tokyo, Japan |
| Main Business Areas | Trading of steel materials, including steel pipes and sheets         |



SeAH Steel Vina Major steel pipe manufacturing center for Vietnam and Southeast Asia

SeAH Steel Vina Corp. is a steel pipe manufacturing company located in southern Vietnam. Since beginning small-diameter pipe production in 1998, we have supplied products to the Vietnamese and Southeast Asian markets. In 2006, we became the first Vietnamese steel pipe company to begin exports to the United States, and in 2009, we obtained API monogram certification and began full-scale operation of our API pipe manufacturing plant. We produce a wide range of products for various applications and steel grades, including structural pipes, ordinary piping, and API pipe products, and export them to global markets such as the United States, Canada, Australia, and Japan. In 2019, SeAH Steel Vina further strengthened our competitiveness by completing our second plant and securing an annual production capacity of 330,000 metric tons.

|                     |                                                    |
|---------------------|----------------------------------------------------|
| CEO                 | Kyu Han Baek                                       |
| Establishment Date  | Aug. 8, 1995                                       |
| Headquarters        | No. 7 Street 3A, Bien Hoa II IZ, Dong Nai, Vietnam |
| Main Business Areas | Manufacturing and sales of steel pipes             |



Overview

- CEO Message
- Company Profile

- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix

Company Profile

Core Business Area ❶ Manufacturing and Distribution of Steel Pipes



**Vinapipe** Vietnam’s first construction pipe manufacturer

Vietnam Steel Pipe Co., Ltd. (Vinapipe) is Vietnam’s first steel pipe manufacturer, established in northern Vietnam as a joint venture with VN Steel, the country’s largest state-owned steel company. In response to rising demand for construction materials driven by infrastructure expansion in Vietnam during the 1990s, we have operated a local production plant to ensure a stable supply of steel pipes. Currently, Vinapipe operates three small-diameter pipe production lines, manufacturing structural and ordinary piping steel pipes for supply to Vietnam and Southeast Asian markets. For more than 30 years since our establishment, we have steadily supplied steel pipes to Vietnam’s construction and infrastructure industries and have grown together with the local steel pipe market.

|                     |                                                    |
|---------------------|----------------------------------------------------|
| CEO                 | SangUk Nam                                         |
| Establishment Date  | Oct. 1, 1993                                       |
| Headquarters        | Km 9, Quan Toan, Hong Bang, Haiphong City, Vietnam |
| Main Business Areas | Manufacturing and sales of steel pipes             |

Core Business Area ❷ Manufacturing of Cold Rolled and Pre-Coated Sheets



**SeAH Coated Metal** Total solution provider in cold rolled and galvanized steel, pre-coated metal

SeAH Coated Metal Corp. is a specialized manufacturer of cold rolled and surface-treated steel sheets, producing pre-coated sheets, galvanized steel sheets, and pickled and oiled steel sheets primarily used in architectural interior and exterior materials and home appliance exteriors. As a comprehensive steel sheet manufacturer, we have built a broad portfolio of pre-coated products ranging from general-purpose to high-value-added products, while also securing production capabilities for premium materials such as pre-coated aluminum sheets, printed steel sheets, matt steel sheets, and embossed steel sheets. In addition, we are expanding sales of high-value-added products, including printed and pre-coated aluminum sheets, through our Europe Office.

|                                    |                                                         |
|------------------------------------|---------------------------------------------------------|
| CEO                                | Jin Ho Cho, Houdong Kim                                 |
| Establishment Date (Spin-off Date) | Jan. 3, 1997 (July 1, 2017)                             |
| Headquarters                       | 241 Jayu-ro, Gunsan-si, Jeollabuk-do, Republic of Korea |
| Europe Office                      | Viale Enrico Forlanini, 23, 20134 Milano, Italy         |
| Main Business Areas                | Manufacturing and sales of pre-coated metal             |

Core Business Area ❸ Manufacturing of Monopiles for Offshore Wind Power



**SeAH Wind** Specialized manufacturer of extra-large monopiles for offshore wind power

SeAH Wind Ltd. is a specialized monopile manufacturer established through its participation, as the only foundation manufacturer, in the UK government-led offshore wind power value chain development program. We have built a state-of-the-art manufacturing facility in Middlesbrough, North Yorkshire, UK, with an annual production capacity of 350,000 metric tons of monopiles, the foundational structures for offshore wind towers. The facility is capable of producing extra-large monopiles with a maximum diameter of 15.5 m, a length of 120 m, and a weight of up to 3,500 metric tons.

|                     |                                                                    |
|---------------------|--------------------------------------------------------------------|
| CEO                 | Chung Ryu                                                          |
| Establishment Date  | Feb. 24, 2021                                                      |
| Headquarters        | SeAH Wind Offices, South Tees Way, Middlesbrough, TS6 6UE, England |
| Main Business Areas | Manufacturing and sales of offshore wind foundations (monopiles)   |

\* Vietnam Steel Pipe Co., Ltd. (Vinapipe) remains in operation as of the reporting date of this report (Dec. 31, 2025), but is scheduled for liquidation in May 2026. Accordingly, Vinapipe will be excluded from the reporting boundary of the next report.

Overview

- CEO Message
- Company Profile

- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix

# SeAH Steel Holdings’ Challenge Toward the Future Energy Market

SeAH Steel Holdings is expanding our business portfolio into future energy infrastructure markets, including offshore wind, LNG, and CCS.

1 SeAH Steel

Offshore Wind

Centered on our Suncheon Plant, SeAH Steel produces jackets—offshore wind foundations—responding to the expansion of the global offshore wind market. From 2023 to 2024, we successfully supplied approximately 46,000 metric tons of jackets, including jackets for offshore substations (OSS), to the Dieppe-Le Tréport offshore wind farm in France through Navantia, the Spanish state-owned shipbuilder. SeAH Steel is also participating in the Shinan Ui Offshore Wind Project, the largest privately developed offshore wind project in Korea.

CCS (Carbon Capture and Storage)

CCS is a key technology for reducing carbon emissions by capturing and storing carbon dioxide generated in industrial processes. SeAH Steel is supplying a total of 1,600 metric tons of stainless-steel pipes suitable for the high-pressure transportation of captured carbon dioxide to the UK’s NZT\* and NEP\*\* projects, which are being developed to support decarbonization in Teesside, UK.

\*Net Zero Teesside Power  
\*\*Northern Endurance Partnership

2 SeAH Coated Metal

SeAH Coated Metal is expanding strategic investment in renewable energy and energy efficiency in order to respond proactively to future environmental changes and secure a sustainable growth foundation. For solar power generation facilities, we installed a new 1,303 kW system on the roof of the 3CCL plant building and converted the existing 1,404 kW system to self-consumption, thereby expanding the basis for renewable energy use. Through these efforts, we expect to reduce annual energy costs by approximately KRW 560 million and greenhouse gas emissions by approximately 530 tCO<sub>2</sub>eq, while also establishing a foundation for RE100 readiness by obtaining renewable energy usage verification from the Korea Energy Agency. In addition, through the establishment of the 3CCL waste heat recovery system, we expect to reduce annual external steam consumption by 12,827 tons and greenhouse gas emissions by approximately 4,234 tCO<sub>2</sub>eq.



3 SeAH Steel UAE

LNG is gaining attention as a transition energy source that supports a stable energy supply during the shift to renewable energy. SeAH Steel UAE contributes to the global energy transition by supplying steel pipes for LNG and future energy infrastructure from our base in the Middle East.

A representative example is the supply of 5,212 metric tons of structural steel pipes for jetty lines to the “Ruwais LNG Project” led by ADNOC, the UAE’s national energy producer. The project is a low-carbon LNG plant that utilizes clean energy and applies an AI-based carbon emissions monitoring system.

4 SeAH Wind

SeAH Wind strengthens our competitiveness in the global offshore wind market by manufacturing monopiles, fixed-bottom foundations that support offshore wind turbines. In 2023, we secured an order for the “Norfolk Vanguard” project, a large-scale offshore wind project off the east coast of Norfolk in the UK, thereby contributing to the expansion of renewable energy and the achievement of carbon neutrality goals in the UK.

5 Inox Tech

Inox Tech is advancing global energy projects centered on the mid-stream segment of the LNG industry, particularly transportation pipelines, and plans to further expand our business into geothermal energy and liquefied hydrogen. A representative example is the supply of approximately 3,400 metric tons of clad pipes for Qatar Energy’s low-carbon LNG expansion project, “NFPS COMP3,” thereby contributing to the global energy transition and carbon reduction.

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Overview

**Sustainability Framework**

    ESG Strategy

    ESG Governance

    Materiality Assessment

    Stakeholder Engagement

Sustainability Priorities

Environmental

Social

Governance

Appendix

# Sustainability Framework

|                        |    |
|------------------------|----|
| ESG Strategy           | 13 |
| ESG Governance         | 14 |
| Materiality Assessment | 15 |
| Stakeholder Engagement | 18 |



Overview

Sustainability Framework

ESG Strategy

ESG Governance

Materiality Assessment

Stakeholder Engagement

Sustainability Priorities

Environmental

Social

Governance

Appendix

# ESG Strategy

## SeAH-in’s Journey toward a Beautiful World

Based on our corporate mission, “Making the World Beautiful,” **SeAH Steel Holdings** has established “SeAH-in’s Journey toward a Beautiful World” as our ESG vision and set three strategic directions to achieve this vision. To support the achievement of this vision, we have also established detailed initiatives under five areas—Management System, Collaboration, Environmental, Social, and Governance—and are promoting ESG management in close linkage between the holding company and our subsidiaries. Going forward, we will continue to advance our ESG strategy and execution framework, strengthen ESG capabilities across the Group, and carry forward our sustainable journey toward a beautiful world.

|                      |                                                                                                                                                                 |                                                                                                                                                                |                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                 |                                                                                                                                                       |
|----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| Mission              | Making the World Beautiful                                                                                                                                      |                                                                                                                                                                |                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                 |                                                                                                                                                       |
| ESG Vision           | SeAH-in’s* Journey toward a Beautiful World                                                                                                                     |                                                                                                                                                                |                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                 |                                                                                                                                                       |
| Strategic Directions | Holding Company                                                                                                                                                 |                                                                                                                                                                | Subsidiaries                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                 |                                                                                                                                                       |
|                      | Action For Synergy                                                                                                                                              |                                                                                                                                                                | Action For Sustainable Growth                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                 |                                                                                                                                                       |
|                      | Build an ESG Foundation for Meaningful Change                                                                                                                   | Engage in Multi-level Cooperation to Internalize ESG                                                                                                           | Conduct ESG Management for Sustainable Growth                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                 |                                                                                                                                                       |
| Key Initiatives      | Management System                                                                                                                                               | Collaboration                                                                                                                                                  | Environmental                                                                                                                                                                                                                                                   | Social                                                                                                                                                                                                                                                                          | Governance                                                                                                                                            |
|                      | Establish an ESG management system centered on the holding company                                                                                              | Strengthen ESG cooperation between the holding company and subsidiaries                                                                                        | Strengthen environmental management toward carbon neutrality                                                                                                                                                                                                    | Practice human rights management for employees and local communities                                                                                                                                                                                                            | Expand sound and transparent management systems                                                                                                       |
|                      | <ul style="list-style-type: none"><li>Establish ESG policies</li><li>Establish ESG governance</li><li>Derive ESG KPIs and reflect them in evaluations</li></ul> | <ul style="list-style-type: none"><li>Drive change in the ESG domain</li><li>Expand stakeholder communication</li><li>Strengthen employee engagement</li></ul> | <ul style="list-style-type: none"><li>Establish a carbon-neutral management system</li><li>Develop eco-friendly business strategies</li><li>Advance environmental management systems</li><li>Implement on-site participatory environmental management</li></ul> | <ul style="list-style-type: none"><li>Advance the human rights management system</li><li>Manage diversity goals</li><li>Strengthen customized training</li><li>Promote a participatory safety culture</li><li>Establish a strategic framework for social contribution</li></ul> | <ul style="list-style-type: none"><li>Establish an ESG management system for the supply chain</li><li>Advance the ethical management system</li></ul> |

Overview

Sustainability Framework

- ESG Strategy
- ESG Governance
- Materiality Assessment
- Stakeholder Engagement

Sustainability Priorities

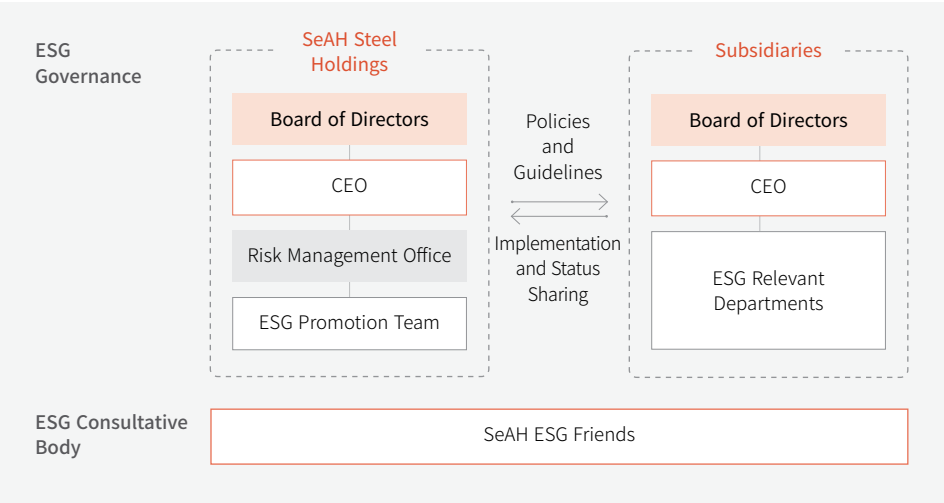
- Environmental
- Social
- Governance
- Appendix

# ESG Governance

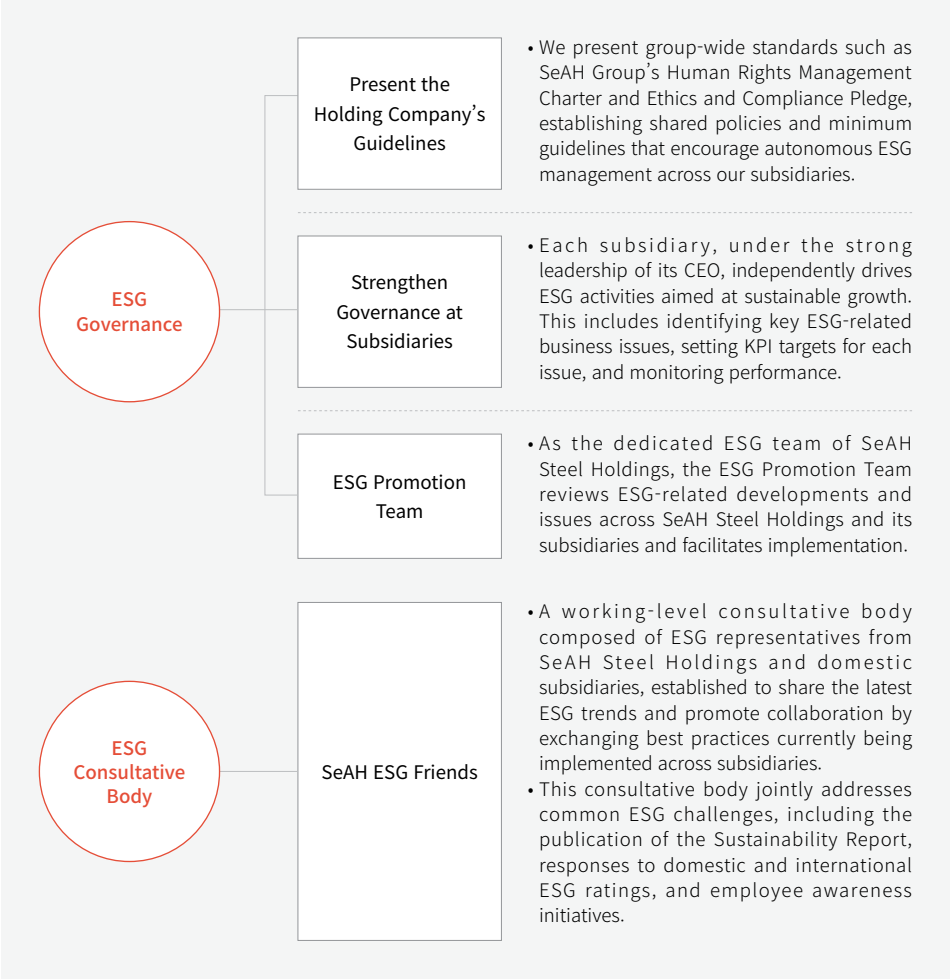
## ESG Decision-Making Structure

SeAH Steel Holdings has established a systematic ESG governance framework to promote sustainable growth based on the autonomous management activities of our subsidiaries. Under this framework, we provide the basic policies and minimum guidelines that all subsidiaries are required to follow, while each company uses them as a basis for its Board of Directors to review and approve major ESG-related policies and strategies. In addition, under the responsibility of the CEO, each company sets ESG management goals and establishes specific execution strategies to implement ESG management in a systematic and effective manner.

To further enhance the efficiency of our ESG management activities, in January 2026 we established the ESG Promotion Team under the Risk Management Office and operate SeAH ESG Friends, a working-level consultative body composed of ESG personnel from SeAH Steel Holdings’ relevant departments and our domestic subsidiaries. Through this structure, we share ESG management performance across SeAH Steel Holdings and our subsidiaries, strengthen close collaboration, and promote the achievement of our ESG goals.



## Roles



Overview

Sustainability Framework

ESG Strategy

ESG Governance

Materiality Assessment

Stakeholder Engagement

Sustainability Priorities

Environmental

Social

Governance

Appendix

# Materiality Assessment

## Double Materiality Assessment Process

SeAH Steel Holdings conducts a materiality assessment based on the concept of double materiality, as required by the GRI Standards and the EU ESRS, in order to systematically identify and manage key ESG issues related to sustainability management. Double materiality is an assessment approach that considers both the impact of external environmental changes on corporate management (outside-in) and the impact of corporate business activities on the environment and society (inside-out). To identify ESG issues from the perspective of key stakeholders, we conduct annual surveys of internal and external stakeholders. This year, we identified a total of 17 ESG topics by reflecting global disclosure standards, industry-specific characteristics, media analysis, and policy and regulatory trends. We then assessed each topic in terms of both impact materiality and financial materiality, selected the material topics, and incorporated the results into decision-making at the Board and management levels.

Step 1

Identification of the ESG Topic Pool

➔

Step 2

Impact Assessment and Prioritization

➔

Step 3

Identification of Material Topics

➔

Step 4

Review and Approval

Topic Pool Development

- Development of a topic pool based on ESRS sub-topics
- Alignment with sustainability disclosure and assessment indicators (GRI, SASB, MSCI, etc.)
- Incorporation of industry-specific issues
- Peer benchmarking

Identification of 17 Topics for Materiality Assessment

| Area              | Topic                         | Area | Topic                    |
|-------------------|-------------------------------|------|--------------------------|
| E                 | Climate Action                | S    | Safety and Health        |
| E                 | Energy Management             | S    | Talent Management        |
| E                 | Waste and Circular Economy    | S    | Human Rights             |
| E                 | Chemical Substance Management | S    | Responsible Supply Chain |
| E                 | Air Pollution Management      | S    | Community Engagement     |
| E                 | Water Resource Management     | G    | Ethics and Compliance    |
| E                 | Biodiversity and Ecosystems   | G    | Corporate Governance     |
| Industry-Specific | R&D                           | G    | Information Security     |
| Industry-Specific | Product Service and Quality   | -    | -                        |

Impact Analysis by Assessment Factor

- Collection of stakeholder feedback
  - Survey Weighting: 50%
  - Survey Period: Jan. 27–30, 2026
  - Survey Method: Online survey
  - Survey Categories: Impact materiality, financial materiality
- Survey Respondents: Employees, customers, business partners, shareholders and investors, and other stakeholders
- Analysis of ESG guidelines and assessment indicators
- Analysis of regulatory and policy trends and recent controversies
- Media Analysis
  - Analysis Period: Jan. 1, 2025–Dec. 31, 2025
  - Method: Analysis of 1,297 articles from 71 media outlets collected via BIGKinds

Identification of Issue Impact

- Impact Materiality
- Financial Materiality

Selection of Material Issues

- Quantitative Analysis: Selection of top issues by total score
- Qualitative Analysis: Analysis of IRO (Impact, Risk, Opportunity) content

Identification of Material Topics

Prioritization of the 17 topics by reflecting both the impact materiality and financial materiality assessment results, and selection of the top three topics as material topics

Selection of Material Topics

| Final Rank | Area | Topic                 |
|------------|------|-----------------------|
| 1          | E    | Climate Action        |
| 2          | G    | Ethics and Compliance |
| 3          | S    | Safety and Health     |

Review and Approval by the Highest Decision-Making Body

- Review and Approval by the Board
  - The Board carries out a review and approval process for the selected issues, the assessment results, and the impact, risk, and opportunity of each issue

External Assurance

- Third-party assurance (AA1000AS)
- Verification of the reliability of reported content

Alignment with Management Strategy

- Integration into company-wide risk management and strategy, based on topic priorities

# Materiality Assessment

## Double Materiality Assessment Results

By conducting the double materiality assessment, **SeAH Steel Holdings** specifically defined our key issues and comprehensively reviewed the impact of each issue on our sustainability management and stakeholders. For the material issues identified, we systematically analyzed both the impact materiality and financial materiality by applying the double materiality assessment process set out in the EU’s ESRS disclosure guidelines; and on this basis, we are further strengthening our strategic management system.

| Rank | Area | Material Issue        | Definition and Overview                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Affected Stakeholders                                             | Impact Materiality | Financial Materiality | GRI                | Reporting Page |
|------|------|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------|--------------------|-----------------------|--------------------|----------------|
| 1    | E    | Climate Action        | “Climate Action” refers to activities undertaken by a company to proactively identify climate-related risks and to establish and implement carbon neutrality targets. As carbon regulations tighten and mandatory global disclosure requirements continue to expand, greenhouse gas emissions management is emerging as both a key management risk and a prerequisite for market access.<br>Companies must reduce emissions by improving energy efficiency in production processes and adopting carbon-reduction technologies, while also building stakeholder trust through regular monitoring and transparent disclosure. | Shareholders and Investors, Customers, Local Communities and NGOs | High               | High                  | GRI 305            | pp. 20-30      |
| 2    | G    | Ethics and Compliance | “Ethics and Compliance” refers to management practices through which a company complies with legal obligations and fosters a transparent and fair business environment based on ethical standards. As the scope of compliance responsibility continues to expand across the supply chain, it is becoming increasingly important to proactively identify legal risks related to anti-corruption and fair trade and to establish robust internal control systems. As violations may lead to legal sanctions and reputational damage, a systematic and preventive management approach is required.                             | Employees, Shareholders and Investors, Business Partners          | High               | High                  | GRI 205<br>GRI 206 | pp. 31-39      |
| 3    | S    | Safety and Health     | “Occupational Safety and Health” refers to activities aimed at establishing and continuously improving safety and health management systems at business sites in order to protect the safety and health of workers and stakeholders. As legal requirements related to industrial safety continue to strengthen, responsibility for managing safety risks across the supply chain, including business partners, is increasingly being placed on principal contractors. Companies must systematically identify physical and chemical hazards and implement preventive measures to minimize the likelihood of accidents.       | Employees, Business Partners                                      | Medium             | High                  | GRI 403            | pp. 40-51      |



Overview

Sustainability Framework

ESG Strategy

ESG Governance

Materiality Assessment

Stakeholder Engagement

Sustainability Priorities

Environmental

Social

Governance

Appendix

# Materiality Assessment

## Material Issue Management Framework

SeAH Steel Holdings identified the opportunities and risks associated with each of the three material issues derived from the materiality assessment and established strategic response plans to strengthen execution capabilities. Going forward, we will continue to advance our ESG management framework by transparently disclosing a wide range of ESG management activities to stakeholders and proactively engaging with them based on the results of the double materiality assessment.

| Rank | Area | Material Issue        | Opportunities and Risks |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Strategies and Plans                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Activities and Performance in 2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|------|------|-----------------------|-------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1    | E    | Climate Action        | Opportunity             | The growing demand for energy transition solutions driven by climate action presents a direct business opportunity. Demand for product categories essential to future energy infrastructure—including offshore wind foundations, steel pipes for H <sub>2</sub> CO <sub>2</sub> transportation, and steel pipes for LNG plants—is expected to increase as the global transition to carbon neutrality accelerates, creating opportunities for new market entry and revenue growth. | <ul style="list-style-type: none"><li>Pursue a 15% reduction in greenhouse gas emissions by 2030 compared with 2018 levels and achieve carbon neutrality by 2050</li><li>Enhance energy efficiency through process improvements</li><li>Advance the energy management system through SEMS implementation</li><li>Develop a low-carbon supply chain ecosystem through expanded resource circulation and the adoption of eco-friendly raw materials</li><li>Expand eco-friendly product development, including steel pipes for H<sub>2</sub>CO<sub>2</sub> transportation and steel pipes for renewable energy applications</li></ul> | <ul style="list-style-type: none"><li>(SeAH Steel) Monitored annual reduction targets and analyzed performance under the 2050 carbon neutrality roadmap</li><li>(SeAH Steel) Improved in-plant energy efficiency and reduced greenhouse gas emissions through facility upgrades</li><li>(SeAH Steel) Secured renewable energy through the construction of a solar power plant</li><li>(SeAH Steel) Established and advanced an energy consumption monitoring system</li><li>(SeAH Steel) Strengthened the foundation for eco-friendly raw material procurement by expanding the electric-furnace raw material supply chain and evaluating new suppliers</li><li>(SeAH Coated Metal) Strengthened cooperation on eco-friendly technologies within the supply chain</li><li>(Inox Tech) Obtained ISO 14001 certification and strengthened the management system based on the certification</li></ul> |
|      |      |                       | Risk                    | If corporate policies and targets for reducing greenhouse gas emissions and the implementation of reduction activities are insufficient, cost burdens may increase due to tightening carbon regulations such as carbon taxes, the Emissions Trading Scheme, and CBAM. In addition, failure to respond to global customers’ low-carbon requirements may weaken export competitiveness and restrict market access.                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 2    | G    | Ethics and Compliance | Opportunity             | Faithful implementation of ethics and compliance can help prevent legal risks and costs arising from regulatory violations and contribute to stable business relationships and long-term contracts built on trust with business partners and customers. As global customers continue to strengthen supply chain compliance standards, a transparent compliance framework also serves as a foundation for building trust with customers and business partners.                     | <ul style="list-style-type: none"><li>Advance compliance risk management through the operation of an ISO 37301-based compliance management system</li><li>Strengthen the integrated ethics and compliance management framework through the establishment of CP Lounge</li><li>Reinforce preventive and management measures related to fair trade, internal transactions, and unfair competition</li><li>Internalize an ethics- and compliance-oriented organizational culture through expanded ethics and compliance training and enhanced employee awareness</li></ul>                                                             | <ul style="list-style-type: none"><li>Completed the second surveillance audit for ISO 37301 and finalized the development of an integrated platform</li><li>Established SeAH CP Lounge as an integrated management framework for ethics and compliance activities</li><li>Collected Ethics and Compliance Pledges from all employees and internalized a culture of ethical and compliant practice</li><li>Prevented fair trade risks through monitoring of the sales management system and review of intercompany transactions</li><li>Strengthened employees’ compliance awareness through the publication of a compliance newsletter and the operation of Compliance Day</li><li>Expanded ethics management across the supply chain by providing ethics guidance to business partners</li></ul>                                                                                                  |
|      |      |                       | Risk                    | Corruption and unfair trade practices may result in legal sanctions and litigation costs, while declining trust among customers and business partners may lead to transaction suspensions, bidding restrictions, exclusion from supply chains, and other financial losses. Reputational damage may also adversely affect the recruitment of top talent and the attraction of investment.                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 3    | S    | Safety and Health     | Opportunity             | The level of occupational safety and health management serves as a key evaluation criterion in bidding for global energy projects and in the selection of business partners. Securing systematic safety management capabilities is directly linked to order competitiveness, while preventing serious industrial accidents can also contribute to production stability, delivery reliability, and improved operational efficiency.                                                | <ul style="list-style-type: none"><li>Establish a safety culture based on the company-wide goal of zero industrial accidents and compliance with work standards and safety rules</li><li>Advance the safety and health management system based on SMART safety equipment and the SSE system</li><li>Intensify the management of high-risk operations and strengthen site-centered risk assessments</li><li>Enhance business partners’ safety and health capabilities and expand KOSHA-MS certification</li><li>Internalize a safety culture through experience-based safety training and health management programs</li></ul>       | <ul style="list-style-type: none"><li>(SeAH Steel) Strengthened compliance with safety rules by implementing Safety Discussion and producing and distributing the “Safety Practice Bible”</li><li>(SeAH Steel) Advanced safety management through the expanded operation of the integrated SHE system and the SSE system</li><li>(SeAH Steel) Expanded the operation of support programs and the establishment of safety and health management systems for business partners</li><li>(SeAH Steel) Internalized a safety culture by operating Safety Culture Training Centers at all sites and expanding hands-on safety training</li><li>(SeAH Steel) Expanded health management reinforcement programs for employees</li></ul>                                                                                                                                                                    |
|      |      |                       | Risk                    | Industrial accidents may cause production disruptions, declines in quality and productivity, reputational damage, and increased financial burdens arising from legal sanctions and related consequences.                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

Overview

Sustainability Framework

ESG Strategy

ESG Governance

Materiality Assessment

Stakeholder Engagement

Sustainability Priorities

Environmental

Social

Governance

Appendix

# Stakeholder Engagement

SeAH Steel Holdings operates a range of communication channels to strengthen engagement and build mutual trust with diverse stakeholders, including customers, employees, business partners, local communities, government, and investors. We also gather feedback through communication methods tailored to the characteristics of each stakeholder group and actively reflect such feedback in practical management improvements and the identification of ESG initiatives. Even amid a changing business environment, we continue to carry out responsible corporate activities for sustainable growth by closely identifying stakeholder expectations and needs and organically integrating them into our sustainability management strategy and execution plans.

 SeAH Group Stakeholder Policy

| Category                   | Customers                                                                                                                                                                 | Employees                                                                                                                                                                                                      | Business Partners                                                                                                                                                               | Local Communities and NGOs                                                                                                                         | Government and Media                                                                                                                                                                     | Shareholders and Investors                                                                                                                                                                 |
|----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Stakeholder Definition     | Users of our products and partners in advancing our society                                                                                                               | Key drivers of the organization’s growth and sustainability                                                                                                                                                    | Partners in mutual growth who build supply chain trust together and create sustainable value through fair, win-win partnerships                                                 | A community of communication and win-win cooperation working together to build a sustainable society                                               | Social watchdogs and advisors who call for transparency and social responsibility                                                                                                        | Value creators with a vested interest in responsible management and shared growth                                                                                                          |
| Key Communication Channels | <ul style="list-style-type: none"><li>• Website</li><li>• Sustainability management blog</li></ul>                                                                        | <ul style="list-style-type: none"><li>• Intranet</li><li>• Labor union</li><li>• Job-level-based communication sessions</li><li>• Interviews</li><li>• Employee surveys</li><li>• Grievance channels</li></ul> | <ul style="list-style-type: none"><li>• Co-growth programs</li><li>• Meetings among supplier business owners</li></ul>                                                          | <ul style="list-style-type: none"><li>• Website</li><li>• Sustainability Report</li><li>• Employee volunteer activities</li></ul>                  | <ul style="list-style-type: none"><li>• Government policy hearings</li><li>• Meetings</li><li>• Sustainability Report</li><li>• Press releases</li><li>• Website</li></ul>               | <ul style="list-style-type: none"><li>• Shareholders’ Meeting</li><li>• IR disclosures</li><li>• Website</li></ul>                                                                         |
| Key Issues of Interest     | <ul style="list-style-type: none"><li>• Response to product and service inquiries</li><li>• Improvement of customer satisfaction</li><li>• Information security</li></ul> | <ul style="list-style-type: none"><li>• Improvement of organizational culture</li><li>• Employee training and capability building</li><li>• Promotion of communication among employees</li></ul>               | <ul style="list-style-type: none"><li>• Win-win cooperation support activities</li><li>• Partner safety management</li><li>• Expansion of supply chain ESG assessment</li></ul> | <ul style="list-style-type: none"><li>• Relief and support</li><li>• Support for vulnerable groups</li><li>• Local environmental cleanup</li></ul> | <ul style="list-style-type: none"><li>• Response to government regulations and policies</li><li>• Participation in national projects</li><li>• Corporate reputation management</li></ul> | <ul style="list-style-type: none"><li>• Enhancement of corporate value</li><li>• Transparent disclosure of corporate activities</li><li>• Expansion of shareholder participation</li></ul> |

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|                                  |
|----------------------------------|
| Overview                         |
| Sustainability Framework         |
| <b>Sustainability Priorities</b> |
| Topic 1. Climate Action          |
| Topic 2. Ethics and Compliance   |
| Topic 3. Safety and Health       |
| Environmental                    |
| Social                           |
| Governance                       |
| Appendix                         |

# Sustainability Priorities

|                                |    |
|--------------------------------|----|
| Topic 1. Climate Action        | 20 |
| Topic 2. Ethics and Compliance | 31 |
| Topic 3. Safety and Health     | 40 |

Overview

Sustainability Framework

Sustainability Priorities

Topic 1. Climate Action

Topic 2. Ethics and Compliance

Topic 3. Safety and Health

Environmental

Social

Governance

Appendix

# Topic 1. Climate Action

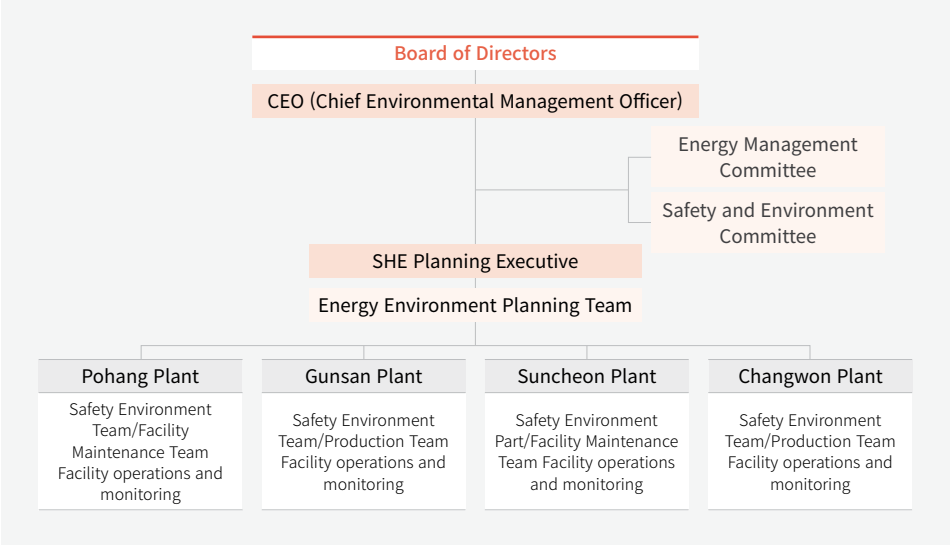
## Governance

**Climate Action Governance**

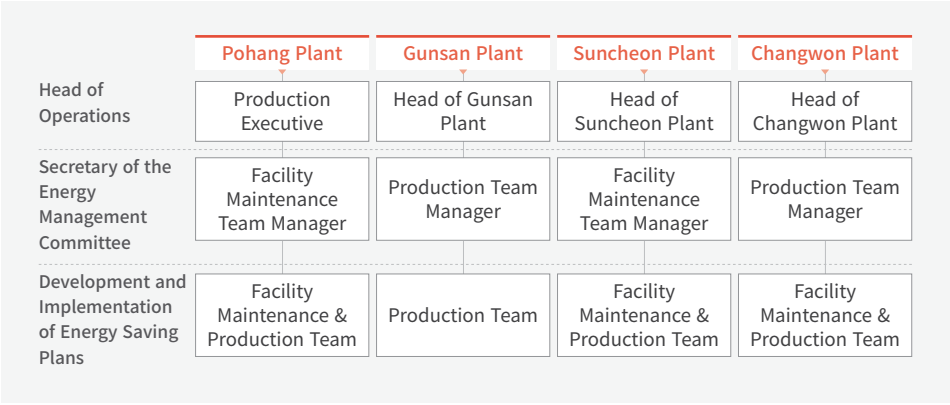
At **SeAH Steel**, the Energy Environment Planning Team oversees climate issues, while at each business site, the department in charge of safety and environment works with the facilities and production departments to establish energy-saving targets and manage implementation results. In alignment with the KPIs of the responsible executives (SHE Planning Executive, Pohang Plant Production Executive) and the relevant departments, mid- to long-term roadmaps and detailed action plans have been established and are being implemented. Implementation performance is reviewed quarterly by the Energy Environment Planning Team and reported to the CEO (Chief Environmental Management Officer). The Energy Management Committee operates as a collaborative body centered on energy-related departments, bringing together production, facility, and support functions. Within this framework, the Committee systematically oversees company-wide energy management and reduction activities, including loss improvement tasks by energy source identified at each plant. Implementation performance is reported to the CEO on a quarterly basis and reflected in management decision-making. In February 2025, we reported the “Environmental Management Plan” to the Board. We have also established a greenhouse gas reduction roadmap and action plans in response to the Emissions Trading Scheme, with the Energy Environment Planning Team continuously monitoring and managing the implementation status.



Climate Action Organizational Chart



Energy Management Committee Organizational Chart



Overview

Sustainability Framework

Sustainability Priorities

Topic 1. Climate Action

Topic 2. Ethics and Compliance

Topic 3. Safety and Health

Environmental

Social

Governance

Appendix

# Topic 1. Climate Action

## Strategy

### Identification of Climate-Related Risks and Opportunities

SeAH Steel Holdings identified key climate-related risks and opportunities across the sites of our domestic and overseas subsidiaries, and we analyzed the potential business impacts accordingly. Based on this analysis, we are managing mid- to long-term operational risks at our business sites while pursuing business transformation that takes into account greenhouse gas emissions reduction and improvements in energy efficiency. We are also advancing climate action through the development of steel pipes for transporting types of gas that contribute to reducing greenhouse gas emissions, the expansion of renewable energy-related businesses such as offshore wind, and increased procurement of products that meet low-carbon standards. Through these efforts, we are managing environmental impacts that may arise in the course of business operations and building a foundation for the low-carbon transition. In addition, to strengthen climate resilience, we are reviewing our “Carbon Neutrality Roadmap” and environmental management strategy, specifying greenhouse gas reduction measures, and applying them in phases. To respond to climate risks such as typhoons and torrential rainfall, we are strengthening our emergency response system while managing the potential for mid- to long-term revenue losses and deteriorating working conditions in plant operations. We are also investing in facilities and conducting research in parallel to improve energy and water resource efficiency and operating a data-based monitoring system – further strengthening our climate action capabilities.

### Identification of Climate Change Risk and Opportunity Factors

| Category         |                  | Financial Impact                                                                                                                                                                        | Response Measures                                                                                                                                                                                                                                                                                                                                                      | Time Horizon |          |           |
|------------------|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|----------|-----------|
|                  |                  |                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                        | Short-term   | Mid-term | Long-term |
| Physical Risks   | Acute            | Revenue losses, disaster recovery costs, and higher insurance premiums may result from typhoons and torrential rainfall.                                                                | <ul style="list-style-type: none"><li>Upgrade waterproofing and disaster prevention infrastructure and improve drainage and stormwater management to prevent natural disasters and strengthen resilience</li><li>Establish an emergency response system to ensure business continuity</li></ul>                                                                        | ●            | ●        |           |
|                  |                  | Heat waves may reduce productivity by worsening outdoor and high-temperature working conditions and may increase cooling energy costs.                                                  | <ul style="list-style-type: none"><li>Establish phased internal work environment standards linked to heat wave advisories and develop an emergency response manual for heatstroke prevention</li></ul>                                                                                                                                                                 | ●            | ●        | ●         |
|                  | Chronic          | Rising temperatures and changes in precipitation patterns may reduce productivity and require equipment replacement and additional investment.                                          | <ul style="list-style-type: none"><li>Reduce water use through process optimization and facility upgrades and establish a water reuse system</li></ul>                                                                                                                                                                                                                 |              | ●        | ●         |
|                  |                  | Sea level rise may cause transaction losses due to port flooding and related disruptions.                                                                                               | <ul style="list-style-type: none"><li>Diversify key logistics routes and secure alternative routes</li></ul>                                                                                                                                                                                                                                                           |              | ●        | ●         |
| Transition Risks | Policy and Legal | Carbon costs may arise from the implementation of carbon regulations, including the Emissions Trading Scheme and the EU CBAM.                                                           | <ul style="list-style-type: none"><li>Establish a decision-making process that incorporates carbon costs in advance</li><li>Build greenhouse gas inventories (Scope 1, 2, and 3) across domestic and overseas affiliates and establish an LCA calculation framework</li><li>Secure renewable energy sources through self-generation, REC purchases, and PPAs</li></ul> |              | ●        | ●         |
|                  |                  |                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                        | ●            | ●        | ●         |
|                  | Technology       | Investment costs may increase due to the introduction of greenhouse gas reduction facilities and the transition to lower-carbon operations.                                             | <ul style="list-style-type: none"><li>Establish screening criteria that include carbon reduction contributions when evaluating the feasibility of adopting new technologies</li><li>Proactively introduce low-carbon, high-efficiency production facilities and expand investment in technology development</li></ul>                                                  | ●            | ●        | ●         |
|                  | Market           | Insufficient response to demand for steel pipes for energy infrastructure may lead to the loss of new revenue opportunities and a decline in market share in the steel pipe industry.   | <ul style="list-style-type: none"><li>Expand production facilities for LNG steel pipes, steel pipes for H<sub>2</sub> transportation, and offshore wind foundation applications, while increasing R&amp;D investment</li></ul>                                                                                                                                         | ●            | ●        | ●         |
|                  |                  | Growing demand for low-carbon steel materials may reduce the market share of existing products.                                                                                         | <ul style="list-style-type: none"><li>Establish a supply chain carbon data cooperation program to secure low-carbon raw material procurement channels</li><li>Diversify steel pipe product portfolios using low-carbon raw materials</li></ul>                                                                                                                         |              | ●        | ●         |
|                  | Reputation       | Insufficient climate-related disclosure may reduce credibility, resulting in lower sales and constraints on attracting investment.                                                      | <ul style="list-style-type: none"><li>Expand TCFD/KSSB-aligned disclosure and the publication of the Sustainability Report</li></ul>                                                                                                                                                                                                                                   |              | ●        | ●         |
| Opportunities    | Technology       | Cost reductions may be achieved through the introduction of high-efficiency facilities and energy-saving technologies.                                                                  | <ul style="list-style-type: none"><li>Expand investment in high-efficiency facilities and advance the energy management framework</li></ul>                                                                                                                                                                                                                            | ●            | ●        | ●         |
|                  |                  | Cost reductions may be achieved through improvements in scrap yield, waste heat recovery, and water reuse rates.                                                                        | <ul style="list-style-type: none"><li>Systematize and manage process-level input-to-output data to improve resource efficiency</li></ul>                                                                                                                                                                                                                               | ●            | ●        | ●         |
|                  | Market           | As major customers strengthen procurement standards, the transition to eco-friendly products may support higher sales and long-term supply contracts.                                   | <ul style="list-style-type: none"><li>Expand eco-friendly certifications, including Eco-Label and ISO 50001, to strengthen customer trust</li></ul>                                                                                                                                                                                                                    | ●            | ●        | ●         |
|                  |                  | New markets may be secured through the expansion of product portfolios, including steel pipes for electric vehicles and steel pipes for H <sub>2</sub> /CO <sub>2</sub> transportation. | <ul style="list-style-type: none"><li>Develop high-efficiency, corrosion-resistant, and high-strength products and obtain application-specific certifications</li></ul>                                                                                                                                                                                                | ●            | ●        | ●         |
|                  | Reputation       | As demand for low-carbon products increases in response to customers’ Scope 3 requirements, SeAH Steel may strengthen our position as a preferred supplier.                             | <ul style="list-style-type: none"><li>Review the establishment of SBTi targets to strengthen trust among global investors</li></ul>                                                                                                                                                                                                                                    | ●            | ●        | ●         |
|                  |                  |                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                        |              |          |           |



Overview

Sustainability Framework

Sustainability Priorities

Topic 1. Climate Action

Topic 2. Ethics and Compliance

Topic 3. Safety and Health

Environmental

Social

Governance

Appendix

# Topic 1. Climate Action

## Climate Action Strategy

**SeAH Steel** has established and is implementing our mid- to long-term climate action strategy along two axes: “physical risks” and “transition risks.” To respond to physical risks associated with extreme weather events such as heat waves and torrential rainfall, we are implementing business site-specific adaptation strategies based on scenario analysis. At the same time, to address transition risks arising from tighter carbon regulations and market changes, we are pursuing business transformation through the transition to a low-carbon production system.

## Physical Risks: Business Site-Specific Climate Adaptation Strategy

Based on the results of SSP scenario analysis grounded in the IPCC Sixth Assessment Report, **SeAH Steel** is establishing customized response systems for each of our business sites to address extreme weather events such as heat waves and heavy rainfall.

### Short- to Mid-Term Response Roadmap (SeAH Steel)

| Category                              | Short-term (2026)                                                                                                                                                                                                                                                                                                                                   | Mid-term (2027~2030)                                                                                                                                                                                                                                                                                              |
|---------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Heat Waves                            | <ul style="list-style-type: none"><li>Standardize internal guidelines across all business sites based on phased action criteria by perceived temperature</li><li>Designate personnel responsible for heat wave prevention</li><li>Establish a date-based recording and retention system</li><li>Standardize heat acclimatization programs</li></ul> | <ul style="list-style-type: none"><li>Operate a focused monitoring system at the Gunsan and Suncheon plants</li><li>Compare and verify actual heat wave days in the first half of the year against scenario-based projections</li><li>Reassess risk grades by business site and update related criteria</li></ul> |
| Heavy Rain and Typhoons               | <ul style="list-style-type: none"><li>Update emergency response manuals linked to heavy rain advisories</li><li>Regularize pre-inspections of drainage and waterproofing facilities at the Pohang and Suncheon plants</li></ul>                                                                                                                     | <ul style="list-style-type: none"><li>Establish priorities for facility improvements based on the results of flood and storm vulnerability assessments</li><li>Advance the integrated flood response system at the Pohang Plant</li></ul>                                                                         |
| High-Temperature Equipment Management | <ul style="list-style-type: none"><li>Inspect areas vulnerable to cooling and ventilation</li></ul>                                                                                                                                                                                                                                                 | <ul style="list-style-type: none"><li>Manage sections with sharp increases in cooling loads in connection with the energy management framework</li></ul>                                                                                                                                                          |
| Monitoring                            | <ul style="list-style-type: none"><li>Establish a monitoring system for extreme climate indices related to high temperatures and precipitation at each business site</li><li>Strengthen the linkage system for heat wave and heavy rain advisories</li></ul>                                                                                        | <ul style="list-style-type: none"><li>Reflect updated first-half SSP1-2.6 projections</li><li>Review the linkage between carbon neutrality roadmap implementation performance and physical risk indicators</li></ul>                                                                                              |

## Heat Wave Response

In accordance with the Occupational Safety and Health Act and the Rules on Occupational Safety and Health Standards, **SeAH Steel** operates a heat wave work management manual across all business sites and applies mandatory measures based on perceived temperature thresholds. When the perceived temperature reaches 31°C or higher, cooling and ventilation equipment is installed and operated, working hours are adjusted, and rest breaks are provided near cooling equipment. At 33°C or higher, employees are required to take at least 20 minutes of rest in front of cooling equipment every two hours. In accordance with internal standards for rest-area installation, rest facilities are operated in nearby locations separated from hazardous and risk factors. At 35°C or higher, outdoor work during peak heat hours is prohibited, and only emergency response work is allowed with sufficient rest periods. Heat illness prevention is overseen by the Safety Environment Team in accordance with the Ministry of Employment and Labor’s Workplace Guidelines for the Prevention of Heat-Related Illnesses during Heat Waves. Preventive measures include pre-work temperature checks and self-assessments of subjective symptoms, separate management of sensitive worker groups, and compliance with the five basic heat wave safety rules. The results of company-wide heat illness prevention activities are reported to the CEO.

## Heavy Rain Response

In accordance with site-specific disaster management and control guidelines, **SeAH Steel** prepares for typhoons, floods, heavy rain, and heavy snow and activates site-specific emergency response manuals in phases when weather advisories are issued by the Korea Meteorological Administration. Under the responsibility of each plant manager, the disaster control headquarters manager and the comprehensive situation room manager take the lead in protecting employees and minimizing the impact on business operations. The **Pohang** and **Suncheon plants**, in particular, sit close to rivers and have built data-driven flood prevention through an “automated drainage monitoring system.” We continuously monitor drainage facilities, disaster-prevention equipment, water barriers, water-blocking supplies, and emergency power generators, operating them in a timely manner to stay prepared. In addition, we regularly conduct storm and flood vulnerability assessments under Article 16 of the Countermeasures against Natural Disasters Act (Ministry of the Interior and Safety) and incorporate the findings into our Business Continuity Plan (BCP).

Overview

Sustainability Framework

Sustainability Priorities

Topic 1. Climate Action

Topic 2. Ethics and Compliance

Topic 3. Safety and Health

Environmental

Social

Governance

Appendix

# Topic 1. Climate Action

**Transition Risks: Mid- to Long-Term Climate Action Strategy**

SeAH Steel has set our vision for eco-friendly management strategy as “Building Sustainable Plants by Transitioning to Low Carbon Production” To achieve this vision, we have established four strategic priorities: process improvement, system development, resource circulation, and low-carbon R&D. Under the process improvement strategy, we are focusing on increasing energy efficiency, investing in the replacement of low-efficiency equipment, and improving power loss across facilities. Under the system development strategy, we have identified the establishment of SEMS (SeAH Energy Management System), the development of a product-level carbon emissions calculation system, and the expansion of the Energy Management System (ISO 50001) as key priorities. Under the resource circulation strategy, we aim to achieve zero waste to landfill, improve waste recycling rates, and obtain low-carbon certifications. Under the low-carbon R&D strategy, we are advancing the development of low-carbon products, including steel pipes for wind, solar thermal, and geothermal power generation, as well as steel pipes for H<sub>2</sub> and CO<sub>2</sub> transportation. Centered on these four strategic priorities, SeAH Steel will continue to implement the transition to a company-wide low-carbon production system in a phased manner.

## Eco-Friendly Management Strategy (SeAH Steel)



Overview

Sustainability Framework

Sustainability Priorities

Topic 1. Climate Action

Topic 2. Ethics and Compliance

Topic 3. Safety and Health

Environmental

Social

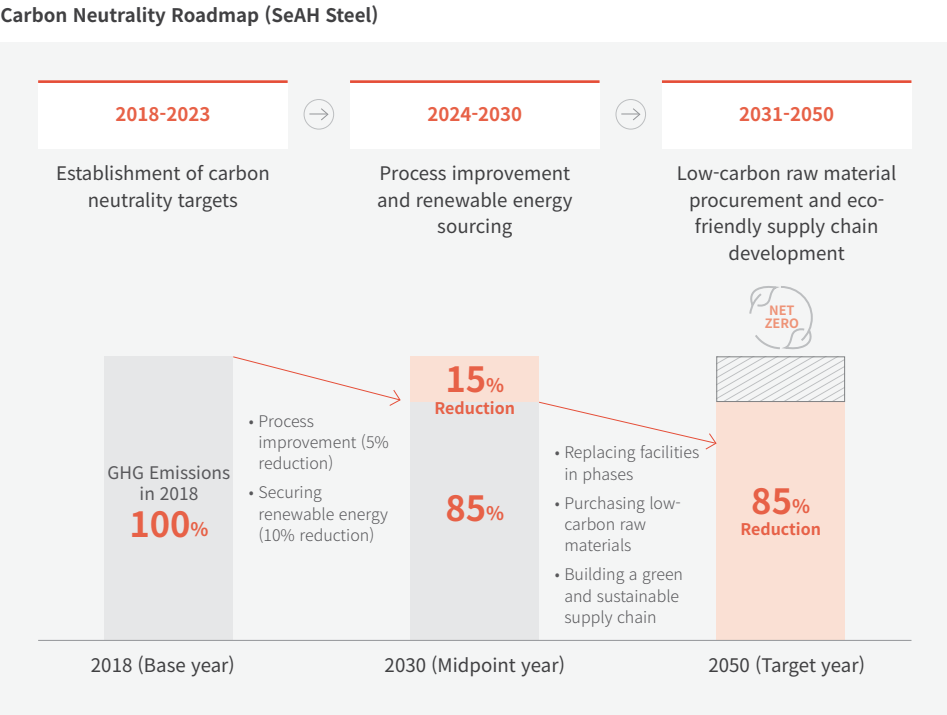
Governance

Appendix

# Topic 1. Climate Action

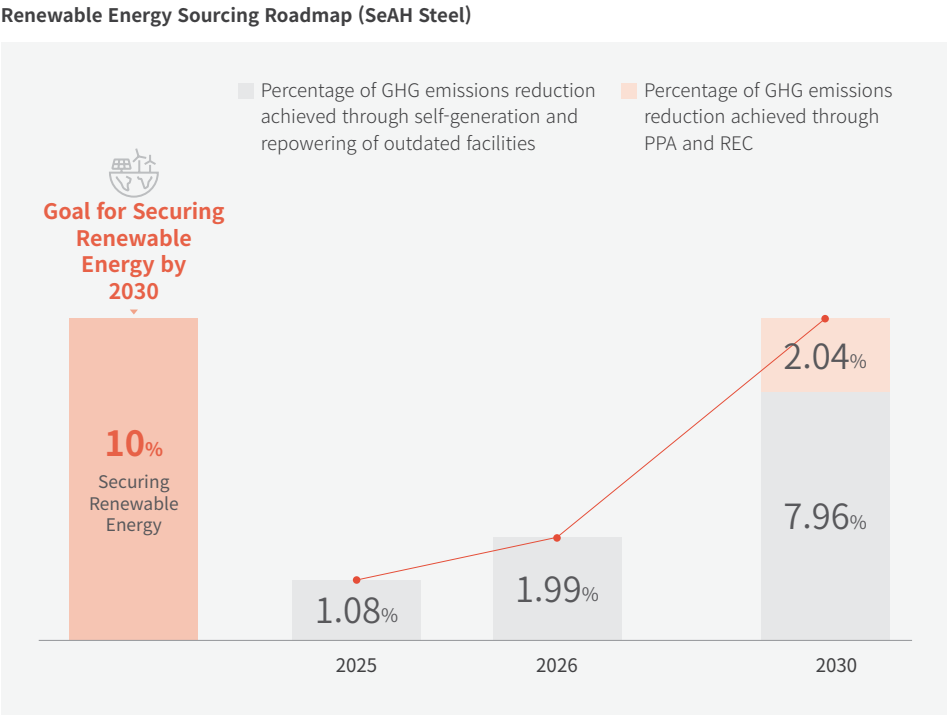
**Carbon Neutrality**

SeAH Steel aims to cut greenhouse gas emissions by 15% by 2030 against a 2018 baseline, measured at the same production volume. To reach this goal, we will pursue two parallel paths on an ongoing basis: a 5% energy reduction from process improvements and a further 10% from PPAs, REC purchases, and other renewable energy sourcing. To manage our progress systematically, we track Scope 1 and Scope 2 emissions as core indicators and monitor them regularly. We are now broadening this scope across the supply chain, having begun in-house calculation of Scope 3 (Category 5) emissions in 2025. In 2026, we plan to refine our category-level calculations and complete third-party verification, further strengthening the credibility of our disclosures.



**Energy Management**

To get ahead of an increasingly complex web of global carbon regulations—EU CBAM, the Emissions Trading Scheme, and Scope 3—SeAH Steel is reinforcing our response framework, including the build-out of an integrated greenhouse gas inventory. On this foundation, we are concentrating company-wide capabilities on giving sharper definition to our "2050 Carbon Neutrality" vision. Notably, more than 80% of our total greenhouse gas emissions come from indirect emissions tied to electricity use (Scope 2), so we have made securing renewable energy a core strategy for achieving carbon neutrality. The Pohang Plant, in particular, is expected to secure renewable energy beyond our original plan through a direct Power Purchase Agreement (PPA). Building on these multifaceted efforts, SeAH Steel will achieve a 10% renewable energy substitution rate by 2030 (against 2018 emissions) and complete the shift to a low-carbon production system.



- Overview
- Sustainability Framework
- Sustainability Priorities
  - Topic 1. Climate Action
  - Topic 2. Ethics and Compliance
  - Topic 3. Safety and Health

- Environmental
- Social
- Governance
- Appendix

# Topic 1. Climate Action

Energy Management System (SEMS) Development To strengthen systematic energy reduction and management, **SeAH Steel** invested in introducing SEMS (SeAH Energy Management System) at the Pohang Plant in July 2024 and brought it into full operation in April 2025. To facilitate the efficient operation of the system, we set up an “Energy Center” within the Energy Environment Planning Team’s office, where real-time data analysis identifies sources of energy loss while improvement work proceeds in parallel. In 2025, we conducted a detailed analysis of energy use patterns for high-energy-consuming facilities. The **Pohang Plant** introduced RTO equipment to advance SEMS and reduce air pollutants, while the **Gunsan Plant** adopted dust-collector upgrades and waste-energy utilization equipment. The **Changwon Plant** is improving energy efficiency by upgrading facilities to reduce greenhouse gas emissions. Building on these data-driven insights, in 2026 we plan to begin developing a “standby power reduction system” to minimize energy waste and maximize operational efficiency.

Implementing Low-carbon Raw Material Procurement  
Green Procurement **SeAH Steel** is gradually expanding the share of purchases of products that contribute to greenhouse gas emissions reduction in accordance with our “Green Procurement Policy.” In particular, while maintaining the existing supply chain to ensure a stable supply of raw materials produced through the electric arc furnace route, which generates only about 25% of the carbon emissions of the conventional blast furnace route, we are also focusing our capabilities on discovering new supply sources. In 2025, rather than simply expanding the volume of use, we focused on verifying quality stability, application suitability, and supply stability by evaluating multiple new suppliers, thereby expanding the foundation for procuring raw materials with lower greenhouse gas emissions.



Transitioning to a Carbon-neutral Procurement System **SeAH Steel America** and **State Pipe & Supply** have continuously expanded the share of electric arc furnace-based raw materials used in the production of structural and water transmission steel pipes in order to lower the carbon intensity of raw materials. As a result, following 2024, we expanded that share to 100% in 2025, thereby strengthening the foundation for reducing carbon emissions and using eco-friendly raw materials. At the same time, based on collaboration with key suppliers, we are continuously exploring ways to expand the procurement of low-carbon raw materials and are systematically promoting carbon reduction activities across the supply chain. Going forward, we plan to continue implementing our carbon reduction policy based on these strategies and to build and maintain a sustainable supply chain management system.

Outcomes of Investments in Greenhouse Gas Reduction and Energy Efficiency Improvement  
Energy Efficiency Improvement and Renewable Energy Sourcing To maximize energy efficiency, **SeAH Steel** monitors sources of energy loss while continuously securing renewable energy. In 2025, we built self-consumption solar power plants totaling 1.5 MW at the **Pohang, Gunsan, and Changwon plants**. In 2026, we plan to strengthen our low-carbon energy production base by adopting a direct PPA and expanding solar generation facilities.

Solar Power Self-generation **SeAH Coated Metal** has established a solar power self-generation system to reduce greenhouse gas emissions and save energy. We converted Solar Unit 1 (1,404 kW) to self-generation in July 2025, and Solar Unit 3 (1,303 kW) began self-generation in September 2025. Renewable energy use in 2025 totaled 1,152,890 kWh, and we obtained usage confirmation certification from the Korea Energy Agency, while reducing greenhouse gas emissions by approximately 530 tCO<sub>2</sub>eq. In February 2026, we additionally began operating a 170 kW solar facility on the warehouse roof, and we are also reviewing a solar power generation project for the annex building.

Establishing Waste Heat Recovery Facilities **SeAH Coated Metal** is establishing and expanding waste heat recovery systems to improve energy efficiency. The 3CCL waste heat recovery system was completed in January 2025 and began full-scale operation in February, reducing external steam purchases by 12,827 tons compared with the previous year and achieving cost savings of approximately KRW 642 million and greenhouse gas reductions of 4,234 tCO<sub>2</sub>eq. Additional waste heat recovery facilities for the 1CCL and CGL processes were completed in January 2026 and have begun operation, and we are currently pursuing both operational optimization and facility supplementation.

Power-saving Facilities **SeAH Coated Metal** is optimizing electricity consumption according to load by applying inverter drive systems to water pumps and blow-off fan facilities. Using the Korea Electric Power Corporation’s support program for the installation of high-efficiency equipment, we completed installation in August 2025 and December 2025 and are reducing electricity consumption by approximately 150,000 kWh per month on average. On an annual basis, we expect savings of approximately KRW 324 million in electricity costs and a greenhouse gas reduction effect of 827 tCO<sub>2</sub>eq.

Overview

Sustainability Framework

Sustainability Priorities

Topic 1. Climate Action

Topic 2. Ethics and Compliance

Topic 3. Safety and Health

Environmental

Social

Governance

Appendix

# Topic 1. Climate Action

Analyzing Energy Use and Optimizing Facility Operations **State Pipe & Supply** analyzed energy use data for major facilities, identified inefficient sections, and optimized operating conditions to reduce electricity consumption. We established a stable foundation for energy management by distributing peak power loads and adjusting operating schedules in coating and production processes, and we are gradually promoting performance improvements in existing facilities while giving priority to the application of high-efficiency equipment to new facilities.

Reducing Power Loss and Improving Energy Efficiency **SeAH Steel USA** upgraded the environment of key electrical rooms in order to ensure the stable operation of electrical facilities and improve energy efficiency. As repeated power outages and related operational disruptions occurred due to overheating of major circuits during prolonged periods of extreme temperatures, we implemented response measures to secure facility stability. We improved the operating environment of facilities by installing dehumidifiers in major electrical rooms and introducing new cooling equipment, smart thermostats, and an energy control monitoring system. Through these measures, we are reducing the frequency of power loss and improving overall energy efficiency.

Reducing Energy Use through Improvements in Lighting and Building Materials **SeAH Steel Vina** replaced the lighting throughout the plant with LED lighting. To reduce indoor heat gain and energy loss caused by changes in external temperature, we also replaced existing glass with polycarbonate panels. To reduce lighting energy use, we installed transparent roof panels to increase the use of natural light and additionally installed ventilators to improve cooling efficiency in work areas. In addition, we installed large-capacity exhaust fans throughout the plant and carried out facility improvements for the hazardous waste and chemical storage areas at the Bien Hoa Plant.

## Eco-friendly Operations

Integrated Energy Monitoring **SeAH Coated Metal** continues to advance our energy monitoring system in order to systematically manage energy use. Through energy intensity analysis linked to the production ERP system, we identify the relationship between production activities and energy use. We have also developed new reports that take into account the usability needs of managers and workers, using them to visualize energy flows and identify inefficiencies and waste factors. These analysis results lead to the identification of improvement tasks and are reflected in management activities to improve energy efficiency.

Conversion to Eco-friendly Abrasives and Process Improvement **State Pipe & Supply** converted the abrasive material used in our coating process from conventional SiO2 (silica)-based materials to Green Diamond Blast, an eco-friendly natural material. Because Green Diamond contains little silica, it helped minimize the generation of fine dust and contributed to improving workers’ respiratory health and the atmospheric environment. The reduced hazard level of waste also eased the environmental burden of the treatment process and made partial recycling possible. In addition, its uniform particle size and high abrasive efficiency helped secure shorter working hours, reduced equipment wear, and energy savings.

Transition to an LNG-based Energy Structure **Vinapipe** conducts company-wide reviews of energy use every three years to support the systematic management and reduction of energy consumption. The results are used to closely analyze energy-use patterns, identify areas for improvement, and incorporate them into management activities. At the same time, we continue to promote improvements in facilities and technologies and are partially utilizing LNG-based facilities to enhance the stability and efficiency of energy operations.

Improving the Heat Source Conversion Structure and Promoting PPA **SeAH Wind** improved the operational safety of our process by converting the heat source for the metal preheating process from the conventional liquefied petroleum gas (LPG) torch method to an electric induction heating method. In the mid- to long-term, we are planning to introduce 10 MW of solar power generation facilities on the roof of the main plant building by utilizing the PPA (Power Purchase Agreement) method.



Overview

Sustainability Framework

Sustainability Priorities

Topic 1. Climate Action

Topic 2. Ethics and Compliance

Topic 3. Safety and Health

Environmental

Social

Governance

Appendix

# Topic 1. Climate Action

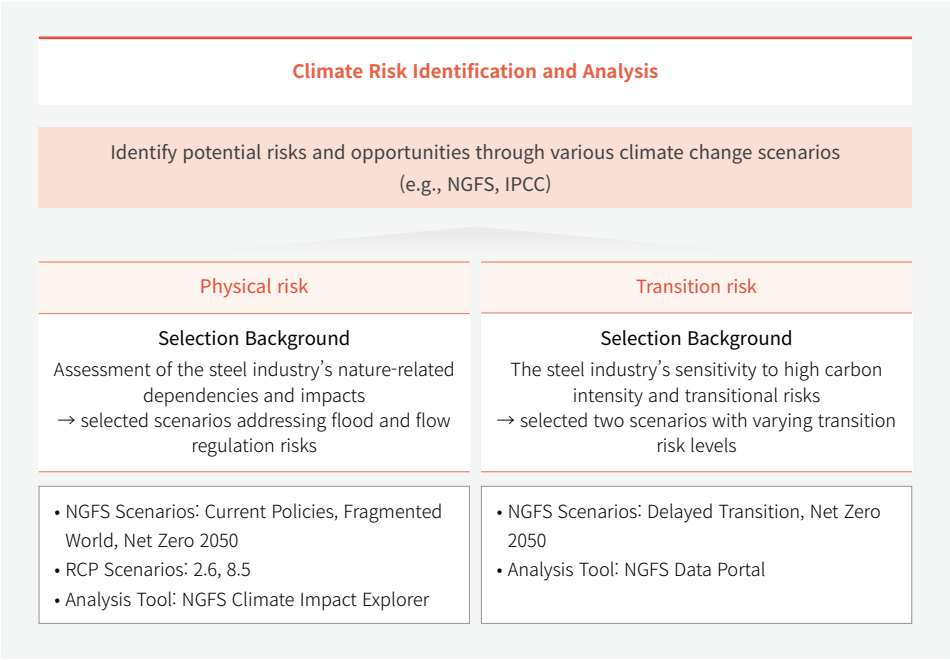
**Selection of Climate Change Risks and Scenarios**

Identifying Climate-related Risks **SeAH Steel Holdings** recognizes the importance of identifying climate risks in advance and assessing the potential financial impacts to protect long-term corporate value. Accordingly, a range of climate change scenarios was selected and potential risks and opportunities were identified. In particular, based on internationally recognized climate disclosure recommendations such as those of the TCFD, we sought to establish an initial climate change response framework to enhance our response to climate change. To this end, we analyzed physical and transition risks across domestic and international business sites using the NGFS (Network for Greening the Financial System) scenario portal and climate projection data from local governments. The results of this analysis will serve as foundational data for developing strategies to respond to climate change and the transition to a low-carbon economy. Building on these, SeAH Steel Holdings intends to strengthen climate resilience and lay a stronger foundation for sustainability management.

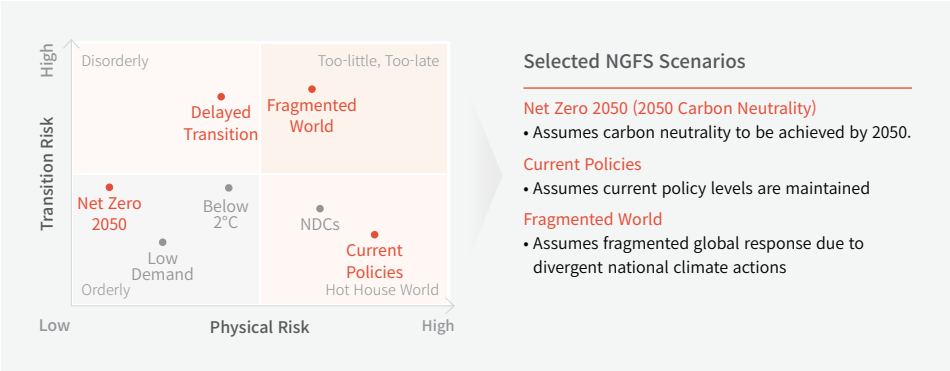
Selection of NGFS Scenarios **SeAH Steel Holdings** analyzed physical risks and transition risks based on NGFS Phase V scenarios, reflecting the characteristics of the steel industry as a carbon-intensive industry. For the analysis of physical risks, we applied the Current Policies, Fragmented World, and Net Zero 2050 scenarios, together with IPCC (Intergovernmental Panel on Climate Change) RCP (Representative Concentration Pathway) 2.6 and 8.5. For the comparison of financial impacts by transition timing, we applied the Net Zero 2050 and Delayed Transition scenarios.

Selected RCP Scenarios

| Scenario | Definition                                                                                                     | Global Temperature Rise |
|----------|----------------------------------------------------------------------------------------------------------------|-------------------------|
| RCP 2.6  | A scenario of keeping a rise in temperature under 2°C from pre-industrial levels via international cooperation | Limited to below 2°C    |
| RCP 8.5  | A scenario of a rise in temperature and humidity hindering agriculture and outdoor activities in certain areas | Exceeding 4°C           |



Climate Change Scenario Framework



Overview

Sustainability Framework

Sustainability Priorities

Topic 1. Climate Action

Topic 2. Ethics and Compliance

Topic 3. Safety and Health

Environmental

Social

Governance

Appendix

# Topic 1. Climate Action

## Climate-related Risk Analysis Results

Assessment of Key Physical Risks **SeAH Steel Holdings** analyzed six major domestic and overseas sites of our subsidiaries under five NGFS- and IPCC RCP-based scenarios, and the results showed that all sites are exposed to the risk of asset damage from floods, typhoons, and heatwaves. In particular, under the RCP 8.5 scenario, the Korean, UK, and U.S. entities could face severe physical risks at the level of asset impairment, with asset damage of more than 30% projected by 2050. The Korean entities showed significant year-by-year volatility in the scale of damage from 2030 to 2050 across all scenarios, suggesting that the implementation of climate mitigation policies could have a significant impact on financial risks. By contrast, the Italian entity showed a generally low level of damage, and under some scenarios the scale of damage tended to decline depending on regional and climatic characteristics. Based on these findings, SeAH Steel Holdings plans to quantitatively assess the level of climate risk exposure and changes at each site and systematically establish strategies to respond to regional physical risks by identifying financial impacts in advance.

| Annual Expected Damage from River Floods, Tropical Typhoons (%)                     |                  |     |     |                  |     |     |               |     |     | < 0%             |             |     |                  |     | ~3% |               | ~6% |     | ~10%             |     | ~16%        |                  | 30%~ |     | Decrease in Labor Productivity Due to Heat Stress (pp) |     |     |                  |     |     |                  |     |     |               | -1pp |  | -2pp |  | -3pp |  | -4pp |  | -5pp |  |
|-------------------------------------------------------------------------------------|------------------|-----|-----|------------------|-----|-----|---------------|-----|-----|------------------|-------------|-----|------------------|-----|-----|---------------|-----|-----|------------------|-----|-------------|------------------|------|-----|--------------------------------------------------------|-----|-----|------------------|-----|-----|------------------|-----|-----|---------------|------|--|------|--|------|--|------|--|------|--|
| NGFS Scenarios                                                                      | Tropical Cyclone |     |     |                  |     |     |               |     |     |                  | Heat Stress |     |                  |     |     |               |     |     |                  |     | River Flood |                  |      |     |                                                        |     |     |                  |     |     |                  |     |     |               |      |  |      |  |      |  |      |  |      |  |
|                                                                                     | Current Policies |     |     | Fragmented World |     |     | Net-Zero 2050 |     |     | Current Policies |             |     | Fragmented World |     |     | Net-Zero 2050 |     |     | Current Policies |     |             | Fragmented World |      |     | Net-Zero 2050                                          |     |     | Current Policies |     |     | Fragmented World |     |     | Net-Zero 2050 |      |  |      |  |      |  |      |  |      |  |
|                                                                                     | '30              | '40 | '50 | '30              | '40 | '50 | '30           | '40 | '50 | '30              | '40         | '50 | '30              | '40 | '50 | '30           | '40 | '50 | '30              | '40 | '50         | '30              | '40  | '50 | '30                                                    | '40 | '50 | '30              | '40 | '50 | '30              | '40 | '50 |               |      |  |      |  |      |  |      |  |      |  |
| Korean Entities (SeAH Steel Holdings, SeAH Steel (Dong-A Steel), SeAH Coated Metal) |                  |     |     |                  |     |     |               |     |     |                  |             |     |                  |     |     |               |     |     |                  |     |             |                  |      |     |                                                        |     |     |                  |     |     |                  |     |     |               |      |  |      |  |      |  |      |  |      |  |
| U.S. Entities (SeAH Steel America, State Pipe & Supply, SeAH Steel USA)             |                  |     |     |                  |     |     |               |     |     |                  |             |     |                  |     |     |               |     |     |                  |     |             |                  |      |     |                                                        |     |     |                  |     |     |                  |     |     |               |      |  |      |  |      |  |      |  |      |  |
| UK Entity (SeAH Wind)                                                               |                  |     |     |                  |     |     |               |     |     |                  |             |     |                  |     |     |               |     |     |                  |     |             |                  |      |     |                                                        |     |     |                  |     |     |                  |     |     |               |      |  |      |  |      |  |      |  |      |  |
| Italian Entity (Inox Tech)                                                          | -                | -   | -   | -                | -   | -   | -             | -   | -   |                  |             |     |                  |     |     |               |     |     |                  |     |             |                  |      |     |                                                        |     |     |                  |     |     |                  |     |     |               |      |  |      |  |      |  |      |  |      |  |
| Vietnamese Entities (SeAH Steel Vina, Vinapipe)                                     |                  |     |     |                  |     |     |               |     |     |                  |             |     |                  |     |     |               |     |     |                  |     |             |                  |      |     |                                                        |     |     |                  |     |     |                  |     |     |               |      |  |      |  |      |  |      |  |      |  |
| UAE Entity (SeAH Steel UAE)                                                         | -                | -   | -   | -                | -   | -   | -             | -   | -   |                  |             |     |                  |     |     |               |     |     |                  |     |             |                  |      |     |                                                        |     |     |                  |     |     |                  |     |     |               |      |  |      |  |      |  |      |  |      |  |

| RCP Scenarios                                                                       | Tropical Cyclone |     |     |         |     |     | Heat Stress |     |     |         |     |     | River Flood |     |     |         |     |     |  |
|-------------------------------------------------------------------------------------|------------------|-----|-----|---------|-----|-----|-------------|-----|-----|---------|-----|-----|-------------|-----|-----|---------|-----|-----|--|
|                                                                                     | RCP 2.6          |     |     | RCP 8.5 |     |     | RCP 2.6     |     |     | RCP 8.5 |     |     | RCP 2.6     |     |     | RCP 8.5 |     |     |  |
|                                                                                     | '30              | '40 | '50 | '30     | '40 | '50 | '30         | '40 | '50 | '30     | '40 | '50 | '30         | '40 | '50 | '30     | '40 | '50 |  |
| Korean Entities (SeAH Steel Holdings, SeAH Steel (Dong-A Steel), SeAH Coated Metal) |                  |     |     |         |     |     |             |     |     |         |     |     |             |     |     |         |     |     |  |
| U.S. Entities (SeAH Steel America, State Pipe & Supply, SeAH Steel USA)             |                  |     |     |         |     |     |             |     |     |         |     |     |             |     |     |         |     |     |  |
| UK Entity (SeAH Wind)                                                               |                  |     |     |         |     |     |             |     |     |         |     |     |             |     |     |         |     |     |  |
| Italian Entity (Inox Tech)                                                          |                  |     |     | -       | -   | -   |             |     |     |         |     |     |             |     |     |         |     |     |  |
| Vietnamese Entities (SeAH Steel Vina, Vinapipe)                                     |                  |     |     |         |     |     |             |     |     |         |     |     |             |     |     |         |     |     |  |
| UAE Entity (SeAH Steel UAE)                                                         | -                | -   | -   | -       | -   | -   |             |     |     |         |     |     |             |     |     |         |     |     |  |

\* The annual expected damage from tropical cyclones is defined as the level of damage from such events that is expected to occur every year on average.

\* Heat stress impact on labor productivity indicates the percentage decrease in efficiency during regular working hours under hot and humid climate conditions, due to the reduced capacity of the human body to perform physical labor.

\* The annual expected damage from river floods is defined as the level of damage from such events that is expected to occur every year on average.

\* A dash (-) indicates that data are not provided.

Overview

Sustainability Framework

Sustainability Priorities

Topic 1. Climate Action

Topic 2. Ethics and Compliance

Topic 3. Safety and Health

Environmental

Social

Governance

Appendix

# Topic 1. Climate Action

Assessment of Key Physical Risks **SeAH Steel Holdings** analyzed the short- to mid-term physical risks of our major overseas production sites using the Water Risk Filter developed by the World Wide Fund for Nature (WWF) and assessed water scarcity and flood risks under each RCP scenario. According to the analysis, production sites located in California, United States, are generally exposed to high levels of physical risk; and although specific trends and impact levels vary by production site, all production sites are projected to experience damage from both flooding and water scarcity by 2050. Based on this analysis of climate risk conditions and regional vulnerabilities, SeAH Steel Holdings recognized the need to establish tailored response strategies for each production site, considering the steel industry’s high dependency on and sensitivity to water resources. Going forward, we will continue our efforts to prevent infrastructure damage caused by natural disasters and to implement strategies for securing stable water resources and ensuring effective water quality management.

Short to Mid-term Physical Risks by Scenario

1.01.82.63.44.25.06.6

Very LowExtreme

| Site                     | Scenario | Chronic Physical Risks |         |         | Acute Physical Risks |      |      |
|--------------------------|----------|------------------------|---------|---------|----------------------|------|------|
|                          |          | Water Scarcity Risk    |         |         | Flood Risk           |      |      |
|                          |          | 2020                   | 2030    | 2050    | 2020                 | 2030 | 2050 |
| California Entity (U.S.) | RCP 2.6  | H                      | H       | M       | H                    | H    | H    |
|                          | RCP 8.5  | H                      | Extreme | Extreme | H                    | H    | H    |
| Texas Entity (U.S.)      | RCP 2.6  | M                      | M       | L       | H                    | H    | H    |
|                          | RCP 8.5  | M                      | M       | L       | H                    | M    | M    |
| Italian Entity           | RCP 2.6  | VL                     | VL      | VL      | H                    | H    | M    |
|                          | RCP 8.5  | VL                     | L       | L       | H                    | M    | H    |
| UK Entity                | RCP 2.6  | VL                     | VL      | VL      | H                    | VH   | H    |
|                          | RCP 8.5  | VL                     | VL      | VL      | H                    | H    | H    |
| Vietnamese Entity        | RCP 2.6  | L                      | L       | L       | H                    | H    | VH   |
|                          | RCP 8.5  | L                      | L       | L       | H                    | H    | VH   |

\* RCP scenarios and SSP (Shared Socioeconomic Pathways) scenarios were used interchangeably, as RCP 2.6, RCP 4.5, and RCP 8.5 assume the same temperature trajectories as SSP1–2.6, SSP2–4.5, and SSP5–8.5, respectively.

\* A uniform risk scoring scale of 1 to 6.6 is consistently applied across all risk categories and types, as calculated and provided by WWF

Overview

Sustainability Framework

**Sustainability Priorities**

**Topic 1. Climate Action**

    Topic 2. Ethics and Compliance

    Topic 3. Safety and Health

Environmental

Social

Governance

Appendix

# Topic 1. Climate Action

## Risk Management

**Climate Risk Assessment**  
SeAH Steel Holdings regularly identifies and assesses climate-related risks and opportunities in order to respond effectively to climate change. Through this process, we derive the key climate risks and opportunities that may affect us and comprehensively review our financial and operational implications. Based on the assessment results, we establish plans to manage climate risks and opportunities, while the dedicated risk management organization periodically monitors the implementation status and effectiveness of response strategies. We also continuously review whether new risks arise and how their impact changes, supplementing existing response strategies or developing new ones as needed.

**Integration with the Enterprise Risk Management Process**  
SeAH Steel Holdings has established an enterprise-wide risk management framework to manage both financial and non-financial risks in an integrated manner. Climate change risks are included in this enterprise risk management process and are reviewed at the company-wide level together with major risks such as finance, ethics and compliance, the external environment, and information security. For identified risks, the responsible departments at each site lead response and mitigation measures, while implementation status and management levels are continuously reviewed through a process of “monitoring, results analysis, evaluation, and feedback.” Through this framework, we systematically manage the potential impacts of climate change and strengthen our risk response capabilities.

Climate Risk and Opportunity Management Process



## Metrics and Targets

SeAH Steel Holdings manages climate action metrics for our operating entities. SeAH Steel has set a target of cutting greenhouse gas emissions by 15% by 2030 against a 2018 baseline at the same production volume. To reach that target, we are progressively pursuing process improvement, renewable energy sourcing, and the procurement of low-carbon raw materials. Because more than 80% of our total emissions come from indirect emissions linked to electricity use (Scope 2), we are broadening our use of renewable energy in parallel with our emission reduction management efforts. We are also steadily broadening the scope of our emissions management, having begun in-house calculation of Scope 3 emissions in 2025. Going forward, we plan to expand our Scope 3 calculation and reinforce data reliability through third-party verification.

Climate Action Metrics (2025)

| Category                 | Metric                           | Unit                    | SeAH Steel’s Target | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
|--------------------------|----------------------------------|-------------------------|---------------------|------------|--------------|-------------------|
| Greenhouse Gas Emissions | Total GHG emissions              | tCO <sub>2</sub> eq     | 69,907              | 64,049     | 3,897        | 73,010            |
|                          | Direct GHG emissions (Scope 1)   | tCO <sub>2</sub> eq     | -                   | 7,364      | 243          | 32,670            |
|                          | Indirect GHG emissions (Scope 2) | tCO <sub>2</sub> eq     | -                   | 56,687     | 3,654        | 40,339            |
|                          | GHG emissions intensity          | tCO <sub>2</sub> eq/ton | 0.07                | 0.08       | 0.03         | 0.14              |
| Energy Consumption       | Energy consumption               | GJ                      | 1,270,368           | 1,215,000  | 89,718       | 1,407,463         |
|                          | Energy consumption (Direct)      | GJ                      | -                   | 134,496    | 5,657        | 605,300           |
|                          | Energy consumption (Indirect)    | GJ                      | -                   | 1,084,417  | 84,061       | 802,163           |
|                          | Energy intensity                 | GJ/ton                  | -                   | 1.53       | 0.76         | 2.61              |
| Environmental Investment | Environmental investments        | KRW million             | -                   | 3,510      | 38           | 189               |

- Overview
- Sustainability Framework
- Sustainability Priorities
  - Topic 1. Climate Action
  - Topic 2. Ethics and Compliance
  - Topic 3. Safety and Health

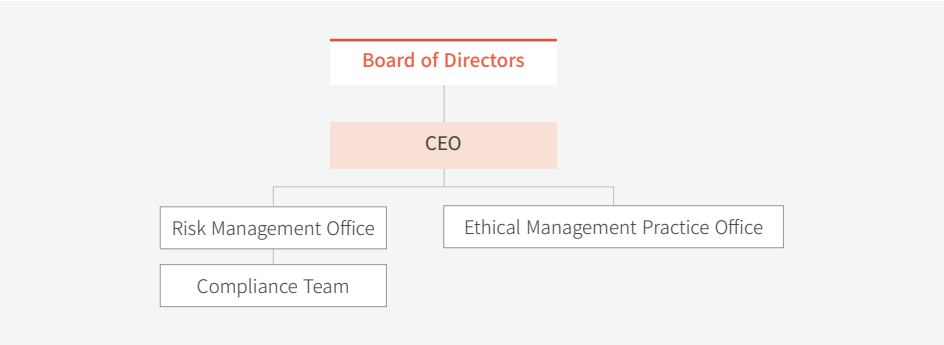
- Environmental
- Social
- Governance
- Appendix

# Topic 2. Ethics and Compliance

## Governance

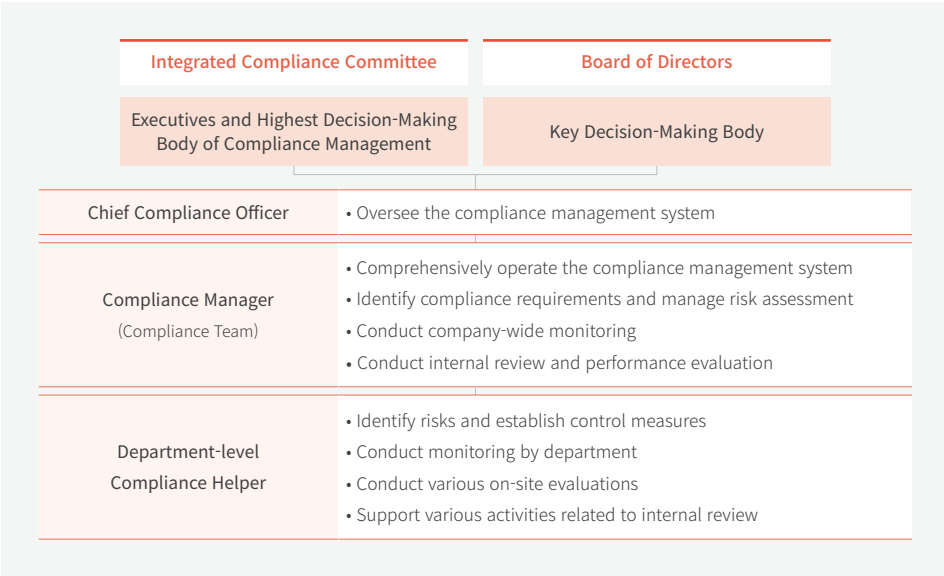
**Ethics and Compliance Management Governance**  
Ethics Management System SeAH Steel Holdings establishes and operates the policy direction for ethics management through the Ethical Management Practice Office directly under the CEO, and we work with the Ethical Management Offices of our subsidiaries to enhance employees’ ethical awareness. At the same time, under the compliance management system, the Chief Compliance Officer performs the role of the officer responsible for risk management.

Ethics Management Organizational Chart



Compliance Management System SeAH Steel Holdings operates a compliance management system centered on the Chief Compliance Officer and extending to the departmental level in order to internalize compliance management. Compliance Helpers in each department identify department-specific risks and conduct risk assessments, while carrying out management activities to prevent risks. The Compliance Manager continuously monitors compliance activities in each department, provides compliance guidelines for areas requiring improvement, and reviews the overall operation of the system through annual internal audits and performance evaluations, reporting the results to the Chief Compliance Officer. With respect to the status of legal violations, when administrative sanctions (including corrective actions, fines, and surcharges) occur, the departmental compliance personnel submit an “Administrative Sanctions Occurrence Report” to the Compliance Team, and the status of administrative sanctions by entity is compiled and disclosed on a quarterly basis. The Chief Compliance Officer reports these matters to the Integrated Compliance Committee and the Board. Through this system, we are implementing a substantive compliance management framework by clearly defining step-by-step roles and responsibilities from the departmental level to senior management.

Compliance Management Organizational Chart  SeAH Group Compliance Management Charter





Overview

Sustainability Framework

Sustainability Priorities

Topic 1. Climate Action

Topic 2. Ethics and Compliance

Topic 3. Safety and Health

Environmental

Social

Governance

Appendix

## Topic 2. Ethics and Compliance

**Integrated Compliance Committee**

SeAH Steel Holdings operates the Integrated Compliance Committee, composed of the management of our domestic subsidiaries, as the highest decision-making body for compliance management. At the Integrated Compliance Committee, which has been held regularly three times a year since 2024, we report on the operating status of the compliance management system and overall compliance activities and strengthen the foundation for management-led risk management by discussing major internal and external issues.

| Integrated Compliance Committee |         |                                                                                                                                                                                                                 |
|---------------------------------|---------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Meeting Date                    | Session | Agenda                                                                                                                                                                                                          |
| Apr. 2025                       | 12th    | Compliance activities and plans<br>① Report on the results of maintaining ISO 37301 certification<br>② Final report on new processes and compliance projects, etc.                                              |
| July 2025                       | 13th    | Compliance activities and reports<br>① Operating status of the 2025 sustainability assessment<br>② Operation of the executive self-check checklist, etc.                                                        |
| Oct. 2025                       | 14th    | Compliance activities and plans<br>① Report on the results of the 2025 sustainability indicator assessment<br>② Report on 2026 compliance goals and schedule and the results of compliance process improvements |

**Dedicated Organizational Unit**

SeAH Steel Holdings has appointed one Compliance Officer pursuant to Article 542-13 of the Commercial Act and operates a Compliance Team composed of personnel with experience in major business functions and law majors. Based on its legal expertise, the Compliance Team proactively prevents and manages legal risks and actively provides compliance training for employees centered on personnel with specialized capabilities.

Compliance Team Structure

| Compliance Team (Total of Four Members)                                                                                                                   |  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Team Manager                                                                                                                                              |  |
| • Compliance Officer / Domestic Lawyer / Compliance Management System (ISO 37301) Certification Auditor (assistant)                                       |  |
| Team Members                                                                                                                                              |  |
| • Composed of experts in core business areas such as planning, sales, accounting, and human resources, as well as law majors and other relevant personnel |  |
| • Two certified auditors (assistant) on ISO 37301/one internal auditor                                                                                    |  |

Key Activities of the Compliance Officer

| Date            | Activities                                                                                            |
|-----------------|-------------------------------------------------------------------------------------------------------|
| Jan. –Dec. 2025 | Review of intercompany transactions among affiliates in 2025                                          |
| Jan. –Dec. 2025 | Publication of the compliance newsletter (SeAH’s OWL)                                                 |
| Feb. –Mar. 2025 | Passed the second surveillance audit for ISO 37301                                                    |
| Feb. 2025       | Report to the Board on the management review related to the compliance management system              |
| Feb. 2025       | Signing of the ethics and compliance practice pledge by all employees                                 |
| Mar. 2025       | Completion of the compliance digital platform (SeAH CP Lounge)                                        |
| Mar. –Dec. 2025 | Implementation of compliance-related training                                                         |
| Mar. –Dec. 2025 | Board approval, reporting, and operation related to the Office of the Board Review & Support          |
| Apr. –Dec. 2025 | Establishment and operation of the implementation plan for the compliance management system           |
| Apr. –Dec. 2025 | Report on the progress and performance of compliance work through the Integrated Compliance Committee |

Overview

Sustainability Framework

**Sustainability Priorities**

Topic 1. Climate Action

**Topic 2. Ethics and Compliance**

Topic 3. Safety and Health

Environmental

Social

Governance

Appendix

# Topic 2. Ethics and Compliance

**Ethics Charter and Code of Ethics**

**SeAH Steel Holdings** has adopted SeAH Group’s Ethics Charter and established and distributed the Code of Ethics and the Guidelines for Practicing the Code of Ethics to lay the foundation for implementing ethics management.

**Ethics Charter**

SeAH respects the order of the free market economy that pursues fair and transparent competition based on an ethical corporate culture that adheres to the basics and principles, and complies with all laws and regulations. SeAH aims to become a “company that makes the world more beautiful” by creating rich values and growing together with its stakeholders.

| Code of Ethics  |                                                                                                                                                                                 |
|----------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Social Responsibility                                                                              | We strive to be a trusted corporate citizen by practicing transparent management and conducting business rationally.                                                            |
| Responsibilities to Stakeholders                                                                   | We prioritize the value of our customers and shareholders and pursue mutual prosperity with our business partners.                                                              |
| Responsibilities to Employees                                                                      | We consider our employees as our most valuable assets and do our best to make the company a place of self-fulfillment for our employees.                                        |
| Basic Ethics of All Employees                                                                      | Employees uphold sound ethical values and do not engage in unethical or illegal conduct that could be condemned by society in their daily lives or in the course of their work. |

**Code of Ethics Implementation Guidelines**

|                                                                                                                                         |
|-----------------------------------------------------------------------------------------------------------------------------------------|
| Chapter 1 General Provisions                                                                                                            |
| Chapter 2 Prohibition on Receiving Gifts or Favors (Money, Goods, etc.) from Stakeholders                                               |
| Chapter 3 Prohibition on Improper Equity Participation in Business Partners                                                             |
| Chapter 4 Prohibition on Non-Transparent Practices in the Selection of Suppliers/Partners                                               |
| Chapter 5 Prohibition on Illegal or Improper Use of Company Assets                                                                      |
| Chapter 6 Prohibition on Falsification of Documents/Figures and False Reporting                                                         |
| Chapter 7 Other Violations of Ethical Standards (Neglect of Duty, Failure of Supervision, Abuse of Authority, Conduct Unbecoming, etc.) |
| Chapter 8 Reporting and Handling of Ethical Violations                                                                                  |

**Compliance Guidelines**

**SeAH Steel Holdings** operates a compliance control system built on internal whistleblower protection and an independent compliance management function. This system centers on adherence to domestic and international laws and internal regulations, reinforcing the foundation for company-wide compliance.

**Compliance Guidelines**

1. The Company and our employees shall comply with all mandatory compliance requirements applicable in Korea and overseas.
2. If an employee violates a mandatory compliance requirement, or is aware of a violation but fails to take reasonable measures to prevent it, the Company shall not bear responsibility on the employee’s behalf and may take disciplinary measures in accordance with internal regulations.
3. All employees are responsible for managing compliance issues and reporting them to the Chief Compliance Officer.
4. The Company shall establish a system for reporting non-compliance with mandatory compliance requirements, keep the contents of such reports and the reporting person’s information confidential, and protect reporters from unfavorable treatment based on their report.
5. The Company shall establish, continuously administer, and improve a compliance management system to achieve the goals of compliance management.
6. The Chief Compliance Officer shall hold appropriate authority and independence and is obligated to report directly and regularly to the governing bodies.

**Implementation and Operation of the Compliance Management System (ISO 37301)**

**SeAH Steel Holdings, SeAH Steel, and SeAH Coated Metal** introduced the Compliance Management System to proactively manage legal risks amid a tightening regulatory environment. In March 2023, we became the first in the steel industry to obtain ISO 37301 certification and subsequently passed the surveillance audit covering two years of operational performance. Based on this, we continue systematic risk management by conducting the periodic internal audits required under the Compliance Management System, evaluating risks related to unfair trade and unfair competition, and identifying improvement measures.

Overview

Sustainability Framework

Sustainability Priorities

Topic 1. Climate Action

Topic 2. Ethics and Compliance

Topic 3. Safety and Health

Environmental

Social

Governance

Appendix

# Topic 2. Ethics and Compliance

## Strategy

**Compliance Management Initiatives**

**SeAH Steel Holdings** seeks to foster a clean organizational culture through lawful and ethical business practices and the fulfillment of social responsibilities, based on SeAH Group’s core value of Integrity. To this end, we have established and are pursuing mid- to long-term compliance management initiatives, including the efficient and effective operation of the Compliance Management System (ISO 37301), the establishment of internal preventive processes for legal compliance, the advancement of compliance evaluation systems for domestic and overseas affiliates, and the establishment of a compliance-oriented organizational culture through periodic training.

Mid- to Long-term Compliance Management Initiatives

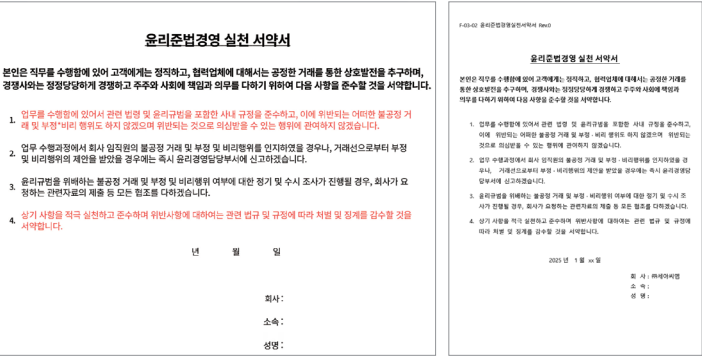
|                                                                     |                                                                                             |
|---------------------------------------------------------------------|---------------------------------------------------------------------------------------------|
| Operation of the Compliance Management System                       | Enhance operational effectiveness through the establishment of SeAH CP Lounge (IT Platform) |
| Establishment of Internal Preventive Processes for Legal Compliance | Improve processes to minimize the risk of legal violations                                  |
| Advancement of the Compliance Evaluation Framework                  | Establish a practical and differentiated compliance evaluation framework                    |
| Establishment of a Compliance-oriented Organizational Culture       | Provide customized training on key compliance issues                                        |

**Internalization of Ethics and Compliance**

**Ethics and Compliance Pledge** All executives and employees of **SeAH Steel Holdings** and **SeAH Coated Metal** prepare the Ethics and Compliance Pledge every year, pledging honesty toward customers, fairness toward business partners, integrity toward competitors, and responsibility and accountability toward shareholders and society.

**SeAH Steel Holdings** has established and publicly announced our compliance policy and collects signed pledges of practice from executives and employees, demonstrating our commitment to compliance management both internally and externally. In doing so, we seek to embed the principles of ethical management across the organization and foster a broader culture of ethics and compliance.

**SeAH Coated Metal** requires all executives and employees to submit the practice pledge in line with annual personnel appointments and separately requires new hires to submit the pledge upon joining the company. In addition, after the pledge is signed, training on major ethics regulations and anti-corruption practices is provided in parallel so that the process goes beyond a simple signature and leads to the practical internalization of ethical awareness among executives and employees.



Ethics and Compliance Pledge (SeAH Steel Holdings, SeAH Coated Metal)

Overview

Sustainability Framework

Sustainability Priorities

Topic 1. Climate Action

Topic 2. Ethics and Compliance

Topic 3. Safety and Health

Environmental

Social

Governance

Appendix

## Topic 2. Ethics and Compliance

Providing Compliance Guidelines **SeAH Steel Holdings** systematically manages legal risks in response to the changing regulatory environment. To support the implementation of compliance management, we regularly monitor enactments and amendments to major laws, including the Fair Trade Act and the Subcontracting Act, and provide compliance guidelines reflecting these developments.

Strengthening Ethics and Compliance at Overseas Affiliates **SeAH Steel America** and **State Pipe & Supply** reorganized our ethics and compliance policies in 2024 and updated internal regulations in line with the latest legal and regulatory changes. Based on this, we conducted regular ethics and compliance training for employees in 2025, thereby enhancing ethical awareness and the level of internal control. In addition, in response to increasing ESG-related requirements, we are improving the governance reporting system and engaging external consulting services to strengthen transparency in major decision-making processes.

Employee Ethics Training **SeAH Steel Holdings** promotes the internalization of ethical awareness among employees based on our ethics training system. The ethics training program consists of four mandatory courses, and office employees are required to complete them online. In relation to workplace harassment and the prevention of sexual harassment, face-to-face training is provided in addition to statutory training. We also operate Compliance Day, a job level-specific compliance program reflecting the results of the ethics survey, to continue strengthening employees’ ethical awareness.

| Completion Status of Ethics Training (SeAH Steel Holdings) |      |      |      | (Unit: persons) |
|------------------------------------------------------------|------|------|------|-----------------|
| Category                                                   | 2023 | 2024 | 2025 |                 |
| Ethics Management                                          | 0    | 16   | 19   |                 |
| Workplace Harassment                                       | 52   | 41   | 47   |                 |
| Sexual Harassment Prevention                               | 52   | 41   | 47   |                 |
| Disability Awareness                                       | 45   | 41   | 47   |                 |
| Information Security                                       | 47   | 44   | 46   |                 |

Enhancing Employee Compliance Awareness **SeAH Steel Holdings** systematically fosters employees’ compliance awareness through a variety of programs. In collaboration with SeAH Group’s legal organization, we provide online and offline training on major laws as well as job-level seminars, and regularly share legal issues and updates on major enactments and amendments through the compliance newsletter. In addition, Compliance Day is an offline ethics and compliance training program led by expert instructors, tailored to reflect differences in conflicts of interest by job level—targeting managers in 2024 and staff/assistant managers in 2025. Furthermore, we hold an annual compliance quiz contest to encourage employee participation and broaden compliance knowledge across the organization. In December 2025, we recognized outstanding participants at the 3rd SeAH Group Compliance Quiz Contest.

| Operational Status of Compliance Training Programs |                                 |                        |      |                     |            |                   |              | (Unit: persons) |
|----------------------------------------------------|---------------------------------|------------------------|------|---------------------|------------|-------------------|--------------|-----------------|
| Program                                            | Target                          | Number of Participants |      |                     |            |                   |              |                 |
|                                                    |                                 | 2024                   | 2025 | SeAH Steel Holdings | SeAH Steel | SeAH Coated Metal | Dong-A Steel |                 |
| Understanding the Compliance Management System     | Employees <sup>1</sup>          | 495                    | 48   | 9                   | 29         | 7                 | 3            |                 |
| General Online Training on the Fair Trade Act      | Employees <sup>2</sup>          | 453                    | 89   | 18                  | 54         | 17                | -            |                 |
| Compliance Day (compliance/ethics training)        | By Job Level                    | 245                    | 267  | 19                  | 205        | 31                | 12           |                 |
| CP Lounge System Training                          | Responsible Staff by Department | -                      | 111  | 5                   | 52         | 31                | 23           |                 |

1. All employees in 2024; new hires in 2025  
2. All employees in 2024; applicants in 2025

Overview

Sustainability Framework

Sustainability Priorities

Topic 1. Climate Action

Topic 2. Ethics and Compliance

Topic 3. Safety and Health

Environmental

Social

Governance

Appendix

## Topic 2. Ethics and Compliance

### Risk Management

**Employee Awareness Enhancement**  
Ethics Awareness Survey **SeAH Steel Holdings** conducts surveys on ethics awareness for employees and regularly checks the level of employees’ ethical awareness. The survey results are reflected in the development of ethics training content and are used to enhance the effectiveness of training. In addition, each department identifies ethics-related risks and establishes related control activities to proactively manage the risk of violations that may arise in the course of work.

Monitoring Ethical Management Practices **SeAH Steel Holdings** has managed the level of employees’ compliance with ethical standards through monitoring of ethical management practices since 2021. Each year, we conduct inspections for all employees and provide guidance on specific implementation methods to encourage voluntary evaluation and improvement activities.

Inspection of Code of Ethics Implementation **Inox Tech** has gone beyond the formal adoption of ethical principles and actively implements our Code of Conduct by transitioning to a practical stage of operation. We have also established an ethics risk management system to identify and mitigate potential compliance risks in advance. The supervisory body conducts interviews with key decision-makers to systematically identify vulnerable processes and reviews whether ethical guidelines are being implemented across management activities. In addition, through regular communication with management, we continue to advance the internal control system and strengthen the effectiveness of the management framework by timely reflecting changes in laws and regulations and the results of on-site inspections. These efforts enable ethics risk management to function as a core element of management strategy beyond simple regulatory compliance, while contributing to the creation of a transparency-centered organizational culture and the proactive prevention of corporate liability risks under applicable laws and regulations.

**Reporting and Counseling System for Unethical Behavior**  
Ethical Management Suggestion Center **SeAH Steel Holdings** continuously receives reports of violations of corporate ethics and suggestions for improving unreasonable practices within the organization through the Ethical Management Suggestion Center. To improve access to reporting channels, we operate a KakaoTalk open chat room in Korea that allows users to choose between anonymous and named reporting, enabling employees to submit reports and opinions more conveniently. Reports received are handled under a strict confidentiality policy. The Ethical Management Office of each affiliate or the Audit Office of SeAH Steel Holdings conducts fact-finding and investigations and takes follow-up measures where necessary.

Status of Reports Received and Resolved by the Ethical Management Suggestion Center  
(Including SeAH Steel Holdings and Subsidiaries)

| Category            |            | 2023 | 2024 | 2025 |
|---------------------|------------|------|------|------|
| Reports (Cases)     | Misconduct | 0    | 3    | 2    |
|                     | Grievances | 2    | 0    | 2    |
|                     | Other      | 0    | 3    | 3    |
| Resolution Rate (%) |            | 100  | 83   | 85   |

\* Some reports received in 2024 and 2025 are currently under review and investigation, and the final resolution rate may change in the future.

**SeAH Coated Metal** operates a continuous reporting and counseling system through the Ethical Management Suggestion Center so that employee grievances can be resolved promptly and fairly whenever they arise. We continue to strengthen communication across the organization and build a healthy organizational culture through this system.



Overview

Sustainability Framework

**Sustainability Priorities**

Topic 1. Climate Action

**Topic 2. Ethics and Compliance**

Topic 3. Safety and Health

Environmental

Social

Governance

Appendix

## Topic 2. Ethics and Compliance

**Grievance Handling Process**

SeAH Steel America and State Pipe & Supply strengthened the accessibility and reliability of the grievance handling system in 2025 by advancing the management framework to ensure the anonymity of employee opinions and enable opinions to be reflected more transparently and promptly. We standardized the grievance handling process for the anonymous reporting channel, the HR Online Opinion Line, and clarified the response deadline and result feedback procedures. We also strengthened the principles of confidentiality and non-retaliation to enhance trust in the reporting process and linked major grievance cases to management reporting and improvement measures to drive improvements in the overall working environment. Through these efforts, we continue to strengthen the protection of employees’ rights and interests and promote communication within the organization while building a fair and trusted organizational culture.

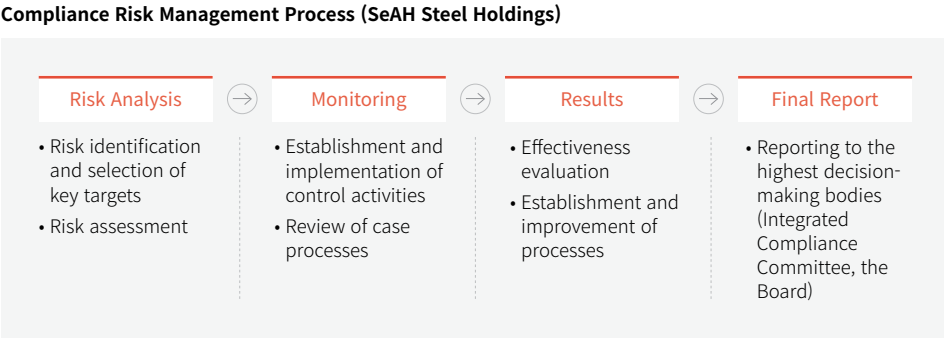
**Reporting Legal Violations**

Whistleblower System SeAH Steel Holdings operates a whistleblower system for legal violations by employees. The system is operated through the company website to receive reports and inquiries and is structured to ensure confidentiality through the whistleblower protection program.

| Whistleblower Protection Program (SeAH Steel Holdings) |                                                                                                                                                                                                                               |
|--------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Confidentiality                                        | The identity of the whistleblower will not be disclosed or implied without the whistleblower’s consent.                                                                                                                       |
| Non-Retaliation                                        | Whistleblowers are protected from any disadvantage or discrimination, including disciplinary action by their department or business partners, as a result of making a report, providing a statement, or submitting materials. |
| Leniency                                               | If a whistleblower’s fault or error is identified in connection with the report, disciplinary action may be reduced or waived.                                                                                                |

**Compliance Risk Management**

Risk Identification and Assessment Process SeAH Steel Holdings proactively manages compliance risks together with the departments in charge of fair trade, anti-corruption, safety and environment, HR and labor, and finance based on the Compliance Management System. The responsible departments identify and assess all risks and select the major risks for management, and each department establishes control measures for the selected risks. The Compliance Team, as the department in charge, verifies actual implementation through supporting evidence and reflects the results in the evaluation of the executive in charge, thereby carrying out practical risk management. In addition, when laws and regulations related to the risks of each department are amended, we have established a system that automatically notifies each department by e-mail, thereby supporting the updating of relevant risks. The selected major risks for management are subject to ongoing monitoring, and we inspect whether the pre-established control activities are functioning properly to prevent exposure to legal violation risks. Every year, the department in charge of risk management identifies regulatory trends and reviews and improves related internal processes to minimize the possibility of legal violations, and the final results are regularly reported to the Integrated Compliance Committee and the Board.



Overview

Sustainability Framework

Sustainability Priorities

Topic 1. Climate Action

Topic 2. Ethics and Compliance

Topic 3. Safety and Health

Environmental

Social

Governance

Appendix

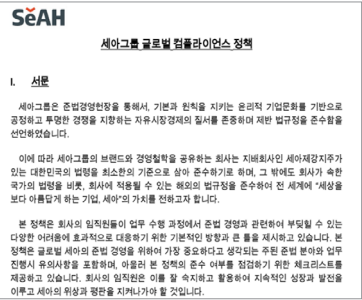
## Topic 2. Ethics and Compliance

### Preventive Compliance Risk Management Activities

- Preventive Monitoring System
  - Consult with the Compliance Program Manager to prevent risks related to tasks with potential fair-trade issues
  - Operate pre- and post-reporting processes to prevent risks arising from employees’ interaction with parties in the same industry
- Build a compliance IT platform to strengthen compliance activity management and improve employee accessibility
- Formalize a pre-screening process for inter-affiliate transactions
- Enact the Corporate Governance Charter to establish and operate a balanced governance framework
- Establish a preventive process for serious accidents in line with the Serious Accidents Punishment Act

### Management of Compliance at Overseas Affiliates

Compliance Monitoring and Policy Establishment **SeAH Steel Holdings** has established and distributed the SeAH Group Global Compliance Policy and incorporated it into internal regulations for each subsidiary. In addition, we regularly review the status of implementation through self-assessment checklists. As the proportion of global business continues to expand, we are continuously strengthening the level of compliance management at overseas affiliates and plan to establish customized compliance systems by closely identifying the regulatory environment of each country and the needs of each affiliate.



SeAH Group Global Compliance Policy

### Operation of the Fair Trade Compliance Program (CP)

**SeAH Steel Holdings** operates a Compliance Program (CP) to comply with laws and regulations related to fair trade and subcontracting and to establish a fair order of market competition. We distribute a compliance handbook containing the Eight Principles of Fair Trade and fair trade principles for stakeholders in line with amendments to the Monopoly Regulation and Fair Trade Act and the Fair Transactions in Subcontracting Act, and establish and implement plans for preventive activities against misconduct and for the investigation of violations. In addition, we strive to establish a fair transaction culture by conducting effectiveness reviews and evaluations of investigation results together with periodic monitoring and internal audits.

### The Eight Core Elements of CP

1. Preparing and implementing standards and procedures of CP  
Prepare standards and procedures for abiding by and practicing laws related to fair trade
2. Commitment to and support for voluntary compliance by top management  
Top management publicly expresses its intention and policy for voluntary fair trade compliance and actively supports CP operation
3. Production and use of voluntary compliance handbooks  
Write and distribute handbooks on laws regulating fair trade, CP standards, and procedures
4. Establishment of internal surveillance systems  
Establish supervision systems to prevent violations and report the results to the Board
5. Appointment of a Compliance Program Manager  
The highest decision-making body (Board of Directors) appoints a Compliance Program Manager within the organization, assigning responsibility for effective CP operation
6. Effectiveness evaluation and improvement measures  
Conduct examination and evaluation of CP standards, procedures, and operations, followed by improvement measures
7. Providing continuous and systematic voluntary compliance training  
Conduct regular training for employees about standards and procedures of CP and compliance in matters regarding fair trade
8. Disciplinary measures for employees who violate Fair Trade Laws  
Establish and enforce disciplinary measures commensurate with the severity of violations, preventing the re-occurrence of similar behaviors

Overview

Sustainability Framework

Sustainability Priorities

Topic 1. Climate Action

Topic 2. Ethics and Compliance

Topic 3. Safety and Health

Environmental

Social

Governance

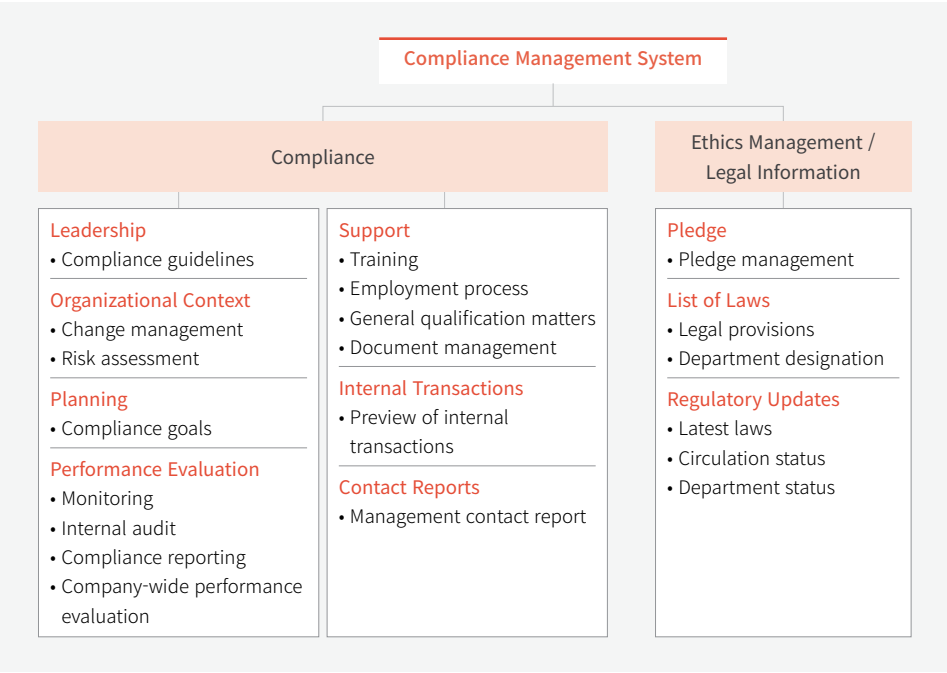
Appendix

## Topic 2. Ethics and Compliance

**Establishment of the Integrated IT System (CP Lounge)**

SeAH Steel Holdings operates CP Lounge, an integrated IT platform designed to centralize compliance channels and improve access to policies. By bringing together core functions—the compliance system, compliance process operations, and the Ethics and Compliance Pledge—the CP Lounge enables compliance and ethics activities to be managed efficiently in one place. It also delivers department-specific legal information that keeps employees aware of the laws relevant to their work, while flagging the risks that arise whenever laws are enacted or amended. Through this platform, we continue to build and refine our compliance processes, steadily reinforcing our overall compliance management system.

Advancement of the CP Lounge Operating Framework (SeAH Steel)



### Metrics and Targets

SeAH Steel Holdings continuously monitors key quantitative indicators in order to systematically manage ethics and compliance risks that may arise across overall business operations. We manage the status of ethics and compliance management based on quantitative indicators such as the number of legal violations, certification status, and training performance, and the relevant indicators are reviewed on a regular basis and used to continuously improve the level of management.

Ethics and Compliance Metrics (2025)

| Category              | Indicator                                      | Unit    | SeAH Steel Holdings | Target |
|-----------------------|------------------------------------------------|---------|---------------------|--------|
| Committee Operation   | Integrated Compliance Committee meetings held  | Times   | 3                   | 3      |
| Certification Status  | ISO 37301 site certificate rate                | %       | 100                 | 100    |
| Regulatory Violations | Number of corruption violations                | Cases   | 0                   | 0      |
|                       | Number of anti-competitive law violations      | Cases   | 0                   | 0      |
| Training Records      | Understanding the compliance management system | Persons | 9                   | -      |
|                       | General online training on the Fair Trade Act  | Persons | 18                  | -      |
|                       | Compliance workshop                            | Persons | 19                  | -      |

- Overview
- Sustainability Framework
- Sustainability Priorities
  - Topic 1. Climate Action
  - Topic 2. Ethics and Compliance
  - Topic 3. Safety and Health
- Environmental
- Social
- Governance
- Appendix

# Topic 3. Safety and Health

## Governance

**Safety and Health Management System**

**SeAH Steel** has established and operates a company-wide safety and health management system, with the CEO serving as Chief Safety and Health Officer. At the start of each year, the CEO issues a safety and health message and shares it with all employees via the company bulletin board, conveying management’s strong commitment to safety and health. The Safety Planning Team, the dedicated department overseeing company-wide safety and health affairs, identifies and addresses on-site hazards by operating internal review systems—such as CP inspections and SHE TOP diagnostics—and conducting risk assessments. We also closely monitor changes in relevant laws and regulations, including the Serious Accidents Punishment Act, and establish annual safety and health plans that are implemented after being reported to and approved by the Board.

Operating under the leadership of the CEO, the Safety and Environment Committee holds regular meetings and working-level meetings, reviews monthly safety statistics, and identifies areas for improvement to help embed a sustainable safety culture. In 2025, we introduced a certification program for establishing business partners’ safety and health management systems, laying the groundwork for win-win cooperation. We further strengthened safety capabilities across our business partners through the operation of “Safety Discussion” sessions and the distribution of the “Safety Practice Bible” for supervisors. In 2026, we plan to internalize job-specific expertise through an in-house safety and health specialist development program and expand the adoption of AI-based SMART safety equipment to help prevent accidents caused by human error.

 SeAH Steel Occupational Safety and Health Policy

**SeAH Coated Metal** expanded the headcount of our Safety Environment Team and increased the number of managers, including those from internal and external business partners, from 70 in 2024 to 124 in 2025, thereby establishing a site-centered safety and health system. In addition, we designated a dedicated person for win-win cooperation within the Safety Environment Team and operate a working structure centered on the Win-Win Cooperation Director together with team leaders, staff members, and the advisory group. Through the Safety Culture Practice Promotion Group, we support the safety activities of business partners, including the implementation of safety campaigns and the installation of safety fences, and manage safety and health plans and performance through annual CEO approval and semi-annual management reviews.

**Dong-A Steel** has designated a Chief Safety and Health Officer and has established and operates a company-wide safety and health management system. Through this framework, we are advancing proactive prevention activities and further strengthening the protection of employees’ safety and health. Dong-A Steel has strengthened our on-site safety management by establishing the Safety Environment Part and adding dedicated staff. To keep pace with tightening safety and health regulations such as the Serious Accidents Punishment Act, we also benchmark affiliates and conduct consulting with external experts.

**State Pipe & Supply** holds a monthly Safety Committee to review and improve major safety issues. We operate a process that links the sharing of risk factors and improvement items at each site to the establishment and execution of response measures, thereby preventing recurring issues in advance. We established a dedicated safety department and have been promoting various safety management activities in phases to reduce industrial accidents and improve EMR (Experience Modification Rate). At the same time, we are reexamining and continuously improving our existing safety policies and procedures and strengthening compliance at the site level, thereby enhancing the effectiveness of our safety management framework.

**SeAH Steel USA** operates a communication system under which accidents and issues are shared through weekly safety meetings and reflected in safety briefings. With accident prevention, legal compliance, and the strengthening of safety culture as our key priorities, we continue to improve our level of safety and health through transparent communication with employees.

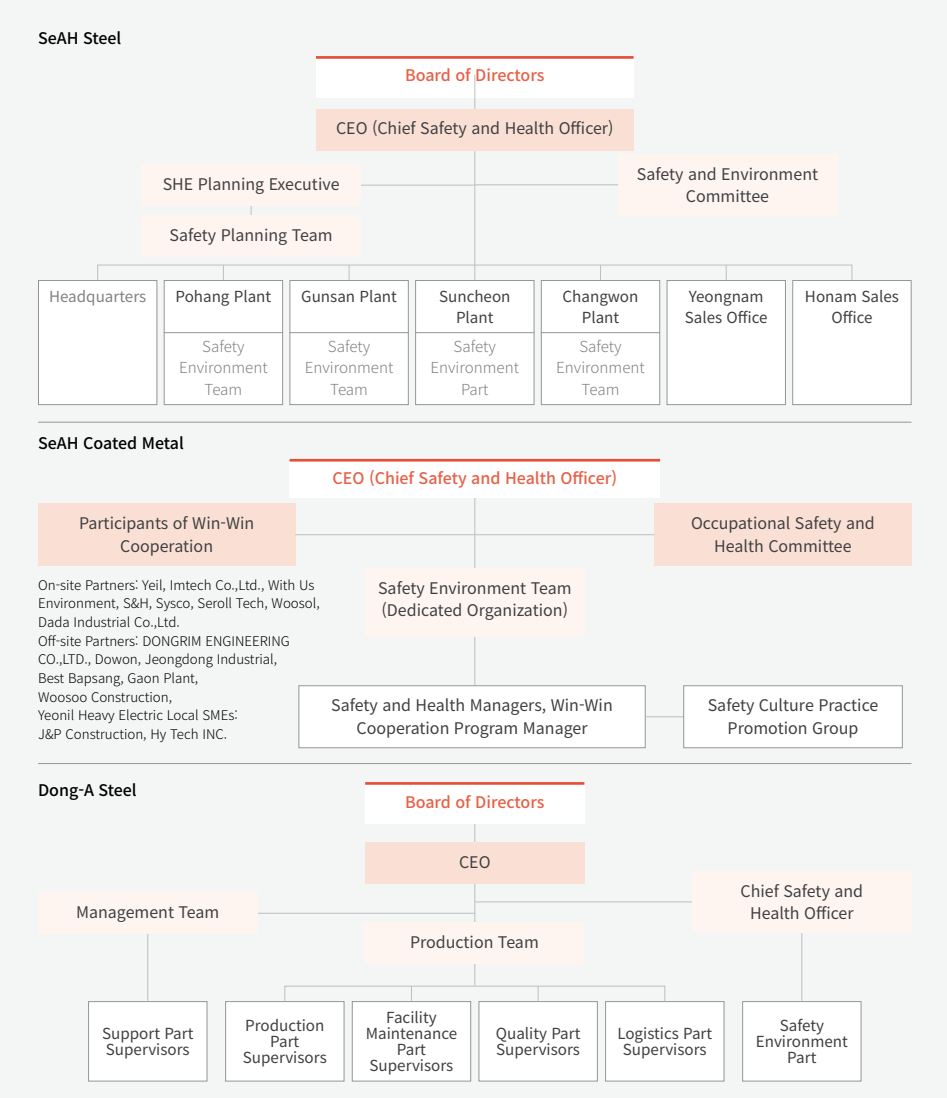
**SeAH Steel Vina** continues to improve our Safety and Health Management System. Our safety committee consists of 15 members, and our dedicated safety and health team consists of eight members. We also conduct quarterly SeAH safety campaigns to enhance employees’ safety awareness.

**Inox Tech** has identified the establishment of an integrated management system as a strategic priority. We plan to enhance our operating framework with the aim of integrating safety and health standards, major accident prevention guidelines, corporate administrative responsibility, and compliance requirements into a single governance framework.

|                                |
|--------------------------------|
| Overview                       |
| Sustainability Framework       |
| Sustainability Priorities      |
| Topic 1. Climate Action        |
| Topic 2. Ethics and Compliance |
| Topic 3. Safety and Health     |
| Environmental                  |
| Social                         |
| Governance                     |
| Appendix                       |

# Topic 3. Safety and Health

Safety and Health Organizational Chart



## Strategy

### Occupational Safety and Health Roadmap

**SeAH Steel** has set our top safety and health priorities for 2026 as achieving ZERO industrial accidents company-wide, ensuring strict compliance with work standards and safety rules, and establishing a “Mature” stage of safety culture. To achieve these goals, we have defined and are implementing five core strategic directions to strengthen our safety and health capabilities. Specifically, these comprise: ▲ Improving company-wide safety and health standards—expanding business partners' KOSHA-MS certification and adopting SMART safety equipment; ▲ Strengthening site-centered safety and health detail—enhancing voluntary safety activities and intensively managing high-risk factors; ▲ Building a sustainable safety culture—encouraging employees’ voluntary participation and operating company-wide Safety Culture Training Centers; ▲ Achieving accident-free business sites—proactive prevention, spreading the safety culture, and rigorous management of high-risk work; and ▲ Advancing the safety and health system—site-specific risk assessments and optimizing a data-based management system.

### 2026 Safety and Health Roadmap for Business Sites (SeAH Steel)

|                     |                                                                                                                                                                               |                                                                                                                             |                                                                                                                                                                                   |                                                                                                                                                                                                |                                                                                                                                                           |
|---------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
| Goal                | Company-wide ZERO industrial accidents, compliance with work standards and safety rules, and achievement of a “Mature” stage of safety culture                                |                                                                                                                             |                                                                                                                                                                                   |                                                                                                                                                                                                |                                                                                                                                                           |
| Strategic Direction | Enhance the level of the safety and health framework across sites and systems                                                                                                 |                                                                                                                             | Establish a SMART safety management system                                                                                                                                        |                                                                                                                                                                                                |                                                                                                                                                           |
| Business Site Goals | Planning Division                                                                                                                                                             | Operations Division                                                                                                         |                                                                                                                                                                                   |                                                                                                                                                                                                |                                                                                                                                                           |
|                     | Upgrade company-wide safety and health standards                                                                                                                              | Strengthen sitecentered safety and health execution                                                                         | Foster a sustainable safety culture                                                                                                                                               | Achieve accident-free business sites                                                                                                                                                           | Advance the safety and health system                                                                                                                      |
| Key Tasks           | 1. Expand KOSHA-MS certification among business partners<br>2. Expand the application of permit-to-work procedures for high-risk tasks<br>3. Introduce SMART safety equipment | 1. Intensify management of high-risk groups<br>2. Establish a smart system<br>3. Strengthen self-directed safety activities | 1. Provide practical safety and health training through the Safety Culture Training Center<br>2. Pilot Behavior-Based Safety (BBS)<br>3. Activate lockout/tagout (LOTO) practices | 1. Expand safety culture and raise safety awareness among workers<br>2. Expand the application of permit-to-work procedures for high-risk tasks<br>3. Expand the use of AI-based smart devices | 1. Enhance site-specific risk assessments<br>2. Improve serious-accident prevention infrastructure<br>3. Develop safety experts for high-risk work groups |

- Overview
- Sustainability Framework
- Sustainability Priorities
  - Topic 1. Climate Action
  - Topic 2. Ethics and Compliance
  - Topic 3. Safety and Health
- Environmental
- Social
- Governance
- Appendix

# Topic 3. Safety and Health

**Enhancement of Safety and Health Capabilities**  
SeAH Safety Management Exchange Meeting **SeAH Group** holds the “SeAH Safety Management Exchange Meeting” on a quarterly basis to advance safety culture at the group level and strengthen collaboration among affiliates. Major affiliates, including SeAH Steel, SeAH Besteel, SeAH Changwon Special Steel, SeAH Special Steel, and SeAH Aerospace & Defense, participate in the meeting to share leading safety and health practices, explore future improvement measures, and reinforce the group-wide safety and health network. As a forum that brings together the experience and know-how of each company, the meeting will continue to enhance safety synergies and support joint efforts to achieve accident-free business sites.



The 12th Safety Management Exchange Meeting

Practicing Safety Management Each quarter, the CEO (Chief Safety and Health Officer) of **SeAH Steel** personally visits all business sites to identify hazards and risk factors, listens to on-site safety and health concerns, and develops practical solutions. For our business partners, we provide systematic support through the Safety and Health Cooperation Group, including safety and health training, assistance with risk assessments, and on-site safety inspections. Through these efforts, we aim to help our business partners build self-directed safety management capabilities and establish a sustainable safety culture.

Safety Environment Exchange Meetings **SeAH Steel** holds the “Safety Environment Exchange Meeting” every year under the leadership of the Safety Planning Team as part of our strategy to advance as a leading company in the field of safety and environment. Through this meeting, we share the direction of safety and environment management at each business site, promote collaboration among relevant departments, strengthen our capacity to respond proactively to safety and environment issues, and raise organization-wide awareness of safety and environment matters. In April 2025, we held the 8th Safety Environment Exchange Meeting at the **Pohang Plant**, where 33 participants from related departments engaged in a wide range of discussions aimed at strengthening occupational safety and health. Discussions covered the advancement of the SSE system, response procedures for serious accidents, and revisions to safety accident investigation procedures.

Cross-inspections Between Sites **SeAH Steel** has operated the “Company-wide CP (Compliance Program) Cross Inspection” system since 2021. Under this system, the Safety and Environment Team and Safety and Environment Part at each business site conduct cross-site inspections of other sites, enabling us to identify hazardous and risk factors that may be difficult to detect through self-inspections alone. By bringing fresh perspectives to site conditions and sharing feedback across sites, we are strengthening a more proactive safety management framework. Since 2024, we have expanded the inspection cycle to once every half year and intensified inspections and improvement activities focused on high-risk areas. In 2024, we identified a total of 730 hazardous and risk factors and completed 100% of corrective actions. In 2025, we shifted to more detailed inspections centered on high-risk areas, identified 299 hazardous and risk factors, and completed all required improvements. Beginning in 2026, we plan to expand the scope of inspections beyond field conditions to include documentation as well.



- Overview
- Sustainability Framework
- Sustainability Priorities
  - Topic 1. Climate Action
  - Topic 2. Ethics and Compliance
  - Topic 3. Safety and Health
- Environmental
- Social
- Governance
- Appendix

## Topic 3. Safety and Health

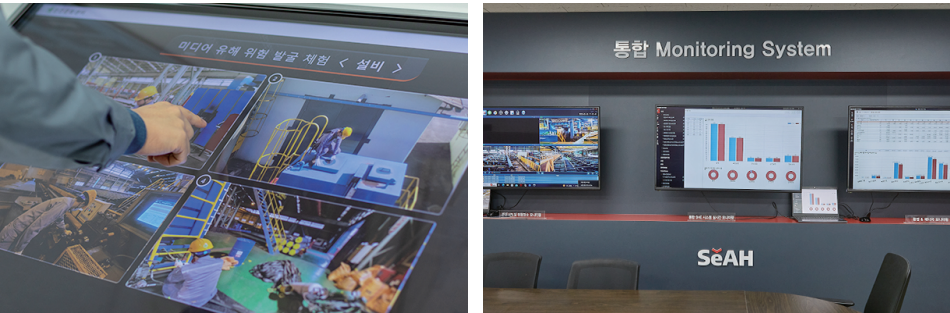
Strengthening the Capabilities of Safety Managers **Dong-A Steel** is expanding safety education by supporting capability-building programs for personnel responsible for safety management and by offering training led by external instructors. We also offer Safety Culture Center tours and experiential programs to raise workers’ safety awareness and build a participation-based safety culture, thereby contributing to stronger safety and health capabilities.

Building and Operating Experiential Safety Training Infrastructure **SeAH Steel** has established Safety Culture Training Centers at the **Pohang, Gunsan, Suncheon, and Changwon plants** to provide experiential safety training and drills for employees. All employees are required to complete safety and health training at least once a year, while workers engaged in outsourced construction work and workers from our business partners must also complete mandatory safety training before beginning work. In particular, the **Suncheon Plant** provides experiential safety training using our Safety Culture Training Center upon request from nearby business sites and also carries out CSR activities aimed at spreading safety culture in the local community. Through experience-based training, we develop in-house safety and health experts and improve training quality, and we issue CPR certificates to those who complete the program above the CPR standard score. We expect these efforts to further contribute to the company-wide spread of safety culture.

Joint Labor-Management Safety and Health Inspections To establish a tangible safety culture, **SeAH Steel** conducts joint labor-management safety and health inspections on a regular basis. Led by each site’s plant manager, the inspections bring together employees’ representatives, team leaders, safety and health managers, and partner business owners to identify hazards from diverse perspectives and develop improvements, with a principle of 100% corrective action for all identified risk factors. By fostering a horizontal communication culture and encouraging voluntary participation by all members, we are making accident prevention efforts more effective in practice. **Dong-A Steel** also encourages partner business owners and workers to take part in monthly regular joint inspections and ad hoc safety diagnostics, identifying hazards from multiple perspectives and establishing improvement measures.

Regular Safety Training **State Pipe & Supply** conducts regular safety training twice a month and also provides scenario-based training to strengthen employees’ response capabilities. In addition, we established grading standards for respirator masks by process and standardized crane sling belt specifications to improve operational safety. We also conduct fire drills and accident response simulations on a regular basis to enhance on-site response capabilities.

Strengthening a Shared Safety Culture with Business Partners **SeAH Japan** carries out safety management activities for partner unloading companies and warehouse management personnel to prevent safety accidents in the unloading and sales process for steel pipe products. By checking fall-prevention facilities before shipment operations, emphasizing compliance with safety operating rules for unloading equipment such as forklifts, and regularly sharing safety precautions and conducting on-site inspections, we are strengthening safety culture together with business partners.



Integrated SHE System (SeAH Steel)

Overview

Sustainability Framework

**Sustainability Priorities**

Topic 1. Climate Action

Topic 2. Ethics and Compliance

**Topic 3. Safety and Health**

Environmental

Social

Governance

Appendix

# Topic 3. Safety and Health

**Establishing a Safe Working Environment**

Integrated SHE System **SeAH Steel** strengthened data-based safety management in 2025 by adding a near-miss reporting function to our SHE system and linking it with the Safety Feedback Platform to encourage employees to identify potential hazards proactively. We also identified leading TBM practices, developed them into standardized training materials, and distributed them across our operations and to our business partners, thereby promoting a more standardized approach to safety management. In 2026, we plan to invest further in improving the UI/UX and functions of both the integrated SHE system and the SeAH Keeper mobile application to enhance the system’s practical usability. Through these improvements, we aim to maximize site accessibility through a more user-friendly interface while also advancing the permit-to-work process to strengthen approval and monitoring procedures for high-risk tasks.

SSE System **SeAH Steel** has established and operates the SSE (SeAH Safety Eye) system, a site-specific smart safety management framework designed to prevent workplace accidents and proactively manage high-risk factors. The SSE system consists of an intelligent fire prevention system, a crane safety system, and smart cameras, which detect and monitor potential hazards in the work environment in real time. One of its core functions is automatic control, which immediately stops relevant equipment when a worker enters a hazardous area, thereby fundamentally preventing the likelihood of accidents. Based on this system, we continue to advance technology-driven safety management and strive to create a safer working environment.

Working Environment Inspection and Improvement **SeAH Coated Metal** identifies risk factors for each production line every month and implements improvement measures, and shares the results company-wide through Safety and Environment Inspection Day. At year-end, the top three lines with outstanding practices are recognized through awards to motivate on-site workers, and when requested by on-site departments, the Safety Culture Practice Promotion Group is immediately deployed to address unsafe conditions. In addition, we conduct an annual intensive safety and health inspection for in-house business partners, and the identified improvement items are tracked and managed until completion. The most significant risk factor was identified as tank cleaning in the wastewater treatment facility, and, as a fundamental improvement measure, confined-space work was eliminated. Spray nozzles for cleaning water and drain holes were installed inside the tank, and an agitator-type impeller and air piping were installed to prevent solidification and improve the ease of internal cleaning.

Introduction of Industrial Robots **SeAH Coated Metal** has introduced CMMS (Computerized Maintenance Management System) to prevent equipment failures in advance through the automation of regular inspection and maintenance schedules. In addition, we continued to operate the collaborative industrial robot installed in 2CCL in August 2024 in a stable manner in 2025, helping prevent injuries and musculoskeletal disorders caused by repetitive work while contributing to safer working conditions and improved work efficiency.



Mobile App “SeAH Keeper”  
(SeAH Steel)



Smart Camera Monitoring (SeAH Steel)



Safety Culture Practice Promotion Group (SeAH Coated Metal)



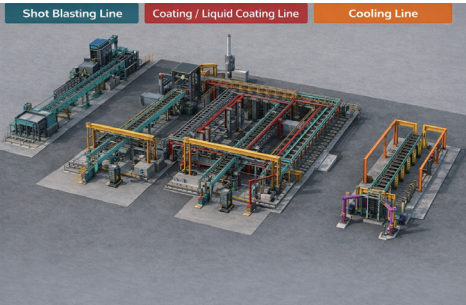
Collaborative Industrial Robot (SeAH Coated Metal)

- Overview
- Sustainability Framework
- Sustainability Priorities
  - Topic 1. Climate Action
  - Topic 2. Ethics and Compliance
  - Topic 3. Safety and Health
- Environmental
- Social
- Governance
- Appendix

## Topic 3. Safety and Health

Equipment Improvement **State Pipe & Supply** is introducing an integrated automated equipment system consisting of a Shot Blasting Line and a Coating and Liquid Coating Line to improve production efficiency and secure worker safety. By continuously enhancing the level of automation, we plan to minimize direct worker intervention, reduce exposure to dust and hazardous substances, and create a safer working environment.

Strengthening Safety in Emergencies **SeAH Steel Vina** made facility investments to improve plant-wide safety and equipment operation systems in order to comply with Vietnam’s newly enacted Fire Prevention and Rescue Law and Occupational Safety and Health Law. Accordingly, we additionally installed emergency lighting and guide lights at all workplaces and introduced a fire alarm transmission system to strengthen equipment safety and response capabilities. In accordance with regulations, we installed additional work platforms for air columns and replaced the exhaust fan system with a more powerful system to improve air circulation inside the Bien Hoa Plant, thereby further strengthening the health and safety of employees.



Automated Equipment System (State Pipe & Supply)



Fire Alarm Transmission System (SeAH Steel Vina)

### Enhancing Employees’ Safety Awareness

Safety and Health Performance Evaluation System **SeAH Steel** has operated a Safety and Health Performance Evaluation System since 2024 to establish a self-directed safety system at operational sites. The evaluation results are reflected in the performance assessments of team leaders in each department and are conducted objectively and fairly based on quantitative indicators, including accident and injury rates, risk assessment results, and evaluations of safety and health personnel. Through this system, we are advancing the internalization of a safety culture within the organization and the establishment of a sustainable safety and health management system.

Safety Keeper and Reward Program **SeAH Coated Metal** conducts safety campaigns and point-and-call activities every Tuesday to establish a self-discipline-based prevention system. To encourage compliance with safety rules among employees, business partners, and workers at external contractors, we operate the Safety Keeper program, and in 2025, we presented a total of 36 awards to promote safety awareness.

Spreading a Family-Friendly Safety Culture **SeAH Coated Metal** held the Idea Contest for Building a Stronger Safety Culture in 2025. The short-form videos produced through the contest, which covered topics such as near-miss incidents at home, short-form safety practice content, and safety slogans, are being used as internal safety training materials to help employees better understand on-site risk factors. In particular, we participated in the Safety Culture User-Created Content (UCC) Contest held in 2025 for the construction and manufacturing industries in the Jeonbuk region and received the Governor’s Award.



Idea Contest for Building a Stronger Safety Culture (SeAH Coated Metal)



Overview

Sustainability Framework

Sustainability Priorities

Topic 1. Climate Action

Topic 2. Ethics and Compliance

Topic 3. Safety and Health

Environmental

Social

Governance

Appendix

# Topic 3. Safety and Health

Regular Safety Training **SeAH Steel Vina** conducts monthly in-house safety training to strengthen workplace safety at our plants. We also reinforce employees’ safety awareness by installing and updating safety rules and warning signs across the workplace, and once a year we invite external specialists to provide professional industrial safety training.

Situational Awareness Training **Inox Tech** improved key safety performance indicators, including the lost-time injury rate, from the previous year. Based on a root-cause analysis of the minor accidents that remained, we confirmed that behavioral factors and individual carelessness, rather than systemic or procedural issues, were the main causes. Accordingly, we are strengthening behavioral safety education and situational awareness training.

Safety Training for Managers **SeAH Wind** regularly conducts Toolbox Talks for operational personnel and, in parallel, provides job-specific programs for managers, including safety training for managers, Working at Height training, and Incident Controller Training, thereby strengthening site safety capabilities.



Industrial Safety Expert Training (SeAH Steel Vina)



Behavioral Safety Training (SeAH Steel Vina)

## Employee Health Promotion Activities

Health Promotion Programs **SeAH Steel Holdings** operates a wide range of health promotion programs to manage employees’ health systematically, including programs for the prevention of musculoskeletal disorders, cerebrovascular diseases, and hearing loss, while also supporting regular health checkups.

**SeAH Steel** and **Dong-A Steel** also operate a range of health examination programs to protect and promote employees’ health. These programs regularly check workers’ health and support disease prevention and follow-up care.

Implementation of the Employee Assistance Program (EAP) **SeAH Steel** operates an Employee Assistance Program (EAP) to proactively relieve employees’ job stress and psychological anxiety and to promote a healthy and stable workplace.

Health Clinic Operation **SeAH Steel’s Pohang Plant** operates a Health Clinic to support the health and well-being of employees. A resident nurse provides health counseling and conducts blood pressure and blood sugar checks through regular rounds, while a specialist in preventive medicine visits once a month to provide professional health care support. The plant is also equipped with various medical devices—blood pressure, blood sugar, and cholesterol monitors to prevent cardiovascular and cerebrovascular diseases, and low-frequency massagers, full-body massage chairs, and infrared therapy devices to prevent musculoskeletal disorders—creating an environment that promotes workers’ health.

Prevention of Cerebrovascular and Cardiovascular Diseases **SeAH Steel’s Pohang Plant** operates smoking cessation clinics, weight-loss programs, and exercise programs to help prevent cerebrovascular and cardiovascular diseases such as stroke and angina that may result from obesity, hypertension, hyperglycemia, and hyperlipidemia. Since 2025, we have also installed AEDs at each plant and begun training designated Heart Saver responders who are prepared to provide rapid assistance in cardiac arrest situations and help prevent further harm. These personnel receive training in first aid and the use of AEDs, and continuous refresher training helps them maintain the confidence and capability needed to respond without hesitation in emergencies.

**SeAH Steel’s Gunsan Plant** provided CPR and AED training to all employees in March 2025. Through a combination of classroom instruction and hands-on practice using training equipment, participants learned emergency response procedures and shared an understanding of the importance of securing the critical response window in emergency situations.

Overview

Sustainability Framework

Sustainability Priorities

Topic 1. Climate Action

Topic 2. Ethics and Compliance

Topic 3. Safety and Health

Environmental

Social

Governance

Appendix

# Topic 3. Safety and Health

SeAH Steel’s Suncheon Plant has also signed an MOU with the Jeonnam Eastern Workers’ Health Center to provide follow-up health management and preventive education on cardio-cerebrovascular diseases. The education raises awareness of the risks of underlying conditions that cause cardiovascular and cerebrovascular diseases—such as hypertension, diabetes, hyperlipidemia, and obesity—and helps workers manage them consistently. We also offer tailored health counseling to those with abnormal findings or requiring observation from general and special health checkups, providing health management guidance suited to each person’s condition.

Preventing Exposure to Hazardous Substances and Hearing Loss SeAH Steel’s Gunsan Plant expanded the distribution of customized hearing protection devices to workers in the pipe-forming and threading processes in April 2025. Based on field feedback collected through follow-up satisfaction surveys, we plan to continue improving both the functionality and comfort of the protective equipment.

Dong-A Steel also works to prevent exposure to hazardous substances and hearing loss through quarterly work environment inspections led by a dedicated industrial hygienist. In addition, we continue to protect workers from harmful environments through environmental improvement activities and the provision of appropriate protective equipment.

Customized Health Programs SeAH Steel’s Pohang Plant also operates a variety of programs aimed at promoting employee health and encouraging healthy lifestyles, including smoking cessation clinics, weight-loss programs, and the “SeAH Manbo” walking campaign.

Dong-A Steel also provides customized care by using health examinations and counseling to help prevent hypertension, diabetes, musculoskeletal disorders, and cardio-cerebrovascular diseases, while identifying employees who need intensive care.

SeAH Coated Metal operates customized health-promotion programs focused on major high-risk conditions such as dyslipidemia, diabetes, obesity, and high blood pressure. In 2025, we strengthened the criteria for selecting employees requiring health monitoring, expanding the number of employees subject to intensive management to 68, and we plan to further advance disease-specific customized programs through consulting by external professional institutions. Beyond physical health, we have also introduced mental-health programs that incorporate EEG-based stress measurement and aromatherapy, and we regularly provide stretching programs to prevent musculoskeletal disorders as well as preventive education on cerebrovascular and cardiovascular diseases for senior personnel. We are also fostering an organizational culture in which employees can promote their health voluntarily through support for in-house clubs.

## Risk Management

**Safety and Health Management System (ISO 45001) Certification**

SeAH Steel has obtained and maintains certification of the Safety and Health Management System (ISO 45001) across all of our business sites. We engage all employees in complying with safety and health laws and regulations, preventing safety accidents, and carrying out safety-related Compliance Program (CP) activities. We also provide annual internal auditor training for ISO standards to support continued certification and further strengthen our management capabilities.



ISO 45001 Certificates (SeAH Steel Pohang, Gunsan, Suncheon, and Changwon Plants)

SeAH Wind operates our safety and health management system based on ISO 45001 certification. Through Safety Standdown (company-wide intensive safety inspection) activities, we have established new safety standards for workplace safety levels, fencing, access control, RAMS (Risk Assessment Method Statements), and SOP (Standard Operating Procedures), and we are implementing step-by-step improvements in the safety discipline and behavior of employees and business partners, as well as in facilities and equipment.

Overview

Sustainability Framework

Sustainability Priorities

Topic 1. Climate Action

Topic 2. Ethics and Compliance

Topic 3. Safety and Health

Environmental

Social

Governance

Appendix

# Topic 3. Safety and Health

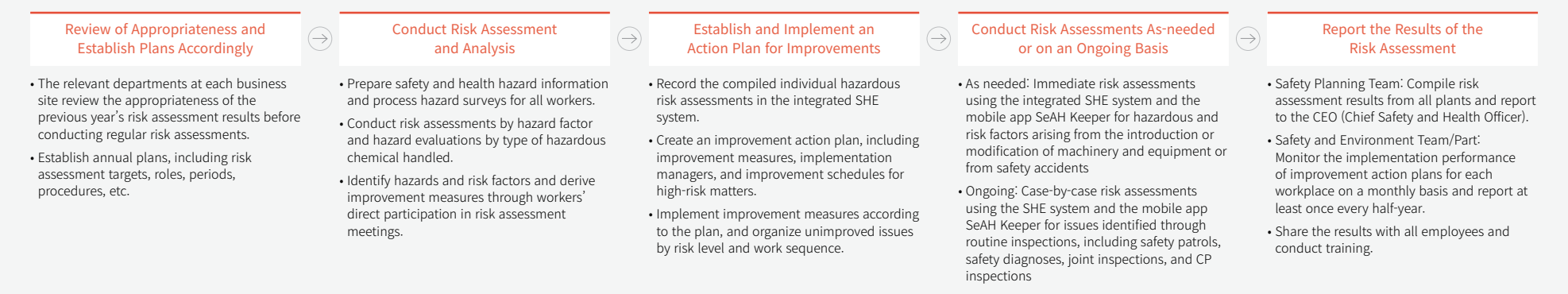
## Strengthening Risk Assessment

KRAS Risk Assessment Through systematic risk assessments, **SeAH Steel** identifies hazards and risk factors at industrial sites in advance and continuously pursues improvement activities to manage them. We apply the KRAS (Korea Risk Assessment System) methodology to assess risks based on the frequency and severity of factors such as mechanical and equipment-related, electrical, chemical, biological, work-characteristic, and work-environment factors. In 2025, we further advanced the KRAS methodology by analyzing these six core factors and demonstrated strong execution by immediately improving 99% of the 434 hazardous factors identified. Building on these results, we plan to expand the scope of risk assessments to our business partners in 2026 as part of our efforts to achieve accident-free business sites. In particular, we will broaden support for business partners seeking KOSHA-MS certification and move beyond simple on-site inspections to actively provide technical support and consulting, helping business partners establish self-directed safety and health management systems.

Recognition of Business Partners for KOSHA-MS and Excellent Workplace for Risk Assessment (SeAH Steel) As of January 2026 (Unit: Companies)

| Category                                               | Pohang Plant | Gunsan Plant | Suncheon Plant | Changwon Plant |
|--------------------------------------------------------|--------------|--------------|----------------|----------------|
| Certificate of Excellent Workplace for Risk Assessment | 2            | 3            | 6              | 4              |
| KOSHA-MS                                               | 2            | -            | -              | -              |

## Risk Assessment Process (SeAH Steel)





Overview

Sustainability Framework

Sustainability Priorities

Topic 1. Climate Action

Topic 2. Ethics and Compliance

Topic 3. Safety and Health

Environmental

Social

Governance

Appendix

# Topic 3. Safety and Health

**Hazard and Risk Identification Activities** **SeAH Steel** operates an inspection system to identify latent hazards and risk factors across our business sites and prevent accidents before they occur. These activities involve a range of participants—workers, supervisors, safety managers, and business partners—helping to establish a field-centered safety management culture. We conduct regular risk assessments with worker participation and carry out safety patrols across our business sites to identify hazards and risk factors in the workplace. Supervisors also perform safety diagnostics, while safety managers conduct CP Cross-Inspections at other business sites to reinforce the objective identification of hazards and risk factors. In addition, we improve the safety management capabilities of our business partners through joint safety inspections involving representatives of business partners. Through this inspection framework, we identify hazards and risk factors at an early stage and pursue improvement activities. We connect identified risk factors to practical improvement measures. Given the nature of our operations, which involve frequent crane-based heavy-material handling and extensive use of rotating equipment, the risks of falling objects and entanglement remain inherent. To mitigate these risks, we have installed protective covers on all exposed rotating equipment and conduct regular safety inspections and nondestructive testing for cranes and slings/rigging equipment through external specialized institutions. Through this system of early hazard identification and follow-up improvement, we continue to enhance safety and health standards across our business sites.

| 2025 Hazard and Risk Identification Activities (SeAH Steel) <span>(Unit: Cases)</span> |                            |                           |                |                    |                      |                   |
|----------------------------------------------------------------------------------------|----------------------------|---------------------------|----------------|--------------------|----------------------|-------------------|
| Category                                                                               | Risk Assessments (Regular) | Risk Assessments (Ad Hoc) | Safety Patrols | Safety Diagnostics | CP Cross Inspections | Joint Inspections |
| Identified                                                                             | 292                        | 142                       | 2,050          | 876                | 299                  | 220               |
| Improved                                                                               | 291                        | 139                       | 2,017          | 873                | 299                  | 219               |
| Improvement Rate                                                                       | 99%                        | 98%                       | 98%            | 99%                | 100%                 | 99%               |

**Dong-A Steel** completed improvements for 60 of the 63 hazards and risk factors identified through regular and ad hoc risk assessments and our business owners’ council, achieving a 95% improvement rate. Our Plant 1 and Plant 2 have also earned recognition as Excellent Workplaces for Risk Assessment, and we continue to carry out improvement and training activities to maintain that recognition and build management systems aligned with the same standard. We also establish response plans for emergencies such as fires and safety accidents and promote prevention-based safety management activities.

**Major Accident Prevention Activities**

**Emergency Response Drills** **SeAH Steel** conducts emergency response drills tailored to actual workplace scenarios at each of our business sites in order to strengthen employees’ emergency response capabilities and reinforce a site-centered safety culture. We also carry out regular safety inspections and non-destructive testing for key hazardous machinery and equipment, including conveyors, cranes, and slings/rigging equipment, to identify and remove potential risks in advance and provide workers with a safer working environment.

**SeAH Coated Metal** distributed personal mission handbooks company-wide to advance our emergency response system, with each handbook containing action guidelines for 30 different emergency situations, and conducted tabletop drills based on virtual scenarios. In the second half of 2025, we further strengthened practical response capabilities by combining training on the proper use of emergency protective equipment, including self-contained breathing apparatus, with hands-on CPR practice. Going forward, we plan to continuously update the crisis scenarios in the handbooks and expand practical training opportunities to include business partners.

**SeAH Steel Vina** invites external experts every year to provide chemical safety training and conducts fire evacuation drills together with the fire authorities.

**Inox Tech** analyzes the results of site inspections and emergency response drills through an integrated management system and manages them in connection with compliance. Through an integrated monitoring dashboard, we enhance the transparency of safety and health performance, strengthen the effectiveness of corrective actions across all departments, and foster a proactive risk management culture.

**SeAH Wind** operates a Hand-Arm Vibration Syndrome (HAVS) management program to control tool usage time and exposure standards, and we maintain a healthy working environment by introducing skin-protection measures and facilities to improve working conditions. In relation to the emergency response system, we have established and operate emergency response procedures and continue to update building-specific evacuation plans. We are also strengthening safety facilities by expanding Automated External Defibrillator (AED) installations and operating an emergency alert system.



Overview

Sustainability Framework

Sustainability Priorities

Topic 1. Climate Action

Topic 2. Ethics and Compliance

Topic 3. Safety and Health

Environmental

Social

Governance

Appendix

# Topic 3. Safety and Health

Equipment Safety Inspections **SeAH Steel’s Pohang Plant** conducted regular inspections of 356 units of equipment, including pressure vessels, lifting equipment such as cranes, conveyors, and industrial robots. Through these inspections, we verified the safety of all relevant equipment and carried out preventive checks and maintenance for high-risk facilities to further enhance operational safety.

Confined-Space Asphyxiation Emergency Response Drills In June 2025, **SeAH Steel’s Gunsan Plant** conducted an emergency response drill to prepare for asphyxiation accidents that may occur during confined-space operations. Aimed at building rapid response capabilities and familiarity with each team’s role in the event of a casualty, the drill proceeded through step-by-step missions—from the first responder to the rescue, support, and guidance teams. It followed a realistic, step-by-step process—reporting to 119, sounding the alarm, dispatching the on-site response team, rescuing and administering first aid, and transporting to hospital—and after the drill, a debrief and feedback session reviewed the entire process and addressed shortcomings.

Building a Visual Work Environment **SeAH Steel Vina** is implementing a visual work-environment program and has introduced the 3R (Right Location, Right Product, Right Quality) and 5S (Sort, Set in Order, Shine, Standardize, Sustain) models to improve operational efficiency, secure workplace safety, and create a professional work environment.

**Enhancing the Safety Capabilities of Business Partners**  
Safety and Health Win-Win Cooperation **SeAH Steel** operates a professional safety consultant system to help our business partners establish and operate their own safety and health management systems. Beyond providing simple legal compliance advice, safety consultants deliver tailored consulting that reflects site-specific conditions of each business partner. They also help strengthen organization-wide safety awareness by providing guidance related to the Serious Accidents Punishment Act and the Occupational Safety and Health Act, as well as safety leadership training for management. In addition, we continue to improve the safety and health standards of our business partners through a range of activities, including recommendations based on risk assessments, inspections of safety facilities, practical training support, and verification of compliance with safety rules at outsourced construction sites.

| Status of Safety and Health Training (SeAH Steel) |                |
|---------------------------------------------------|----------------|
| Category                                          | 2025           |
| Training Participants                             | 28,127 persons |
| Training Hours                                    | 6,642 hours    |

**SeAH Coated Metal** expanded the number of participating workplaces in our win-win cooperation program to a total of 17 companies in 2025 in order to enhance the safety and health standards of business partners. Through site-specific matching-support consulting, we carried out preventive activities for confined-space work risks, chemical risk assessments, and the identification of the three major accident types and eight major risk factors, and we achieved 100% implementation of the resulting safety improvement tasks. In addition, along with improvements to aged high-risk equipment, we provided business partners with essential on-site safety equipment, including smart emergency broadcasting systems, forklift safety devices, AEDs, and gas concentration meters, thereby reinforcing the physical safety net.

SeAH Coated Metal has also operated systematic programs such as the Focused Safety Observation System, Risk Assessment Supporters, and Joint Safety Campaigns as part of our win-win cooperation efforts, enabling all participating business partners to achieve zero accidents. In recognition of these efforts, we were selected for three consecutive years as an excellent company in the Large and Small-Medium Enterprise Safety and Health Win-Win Cooperation Program, hosted by the Ministry of Employment and Labor and the Korea Occupational Safety and Health Agency, in which 258 companies nationwide participated. Accordingly, we are carrying out Large and Small-Medium Enterprise Safety and Health Win-Win Cooperation Activities as a voluntary safety and health implementation company under the Ministry of Employment and Labor. In addition, following the Minister’s Award (Grand Prize) at the 2024 National Best Practices Presentation Contest for Safety and Health Win-Win Cooperation, we also received a Chairman’s Commendation Plaque from the Korea Occupational Safety and Health Agency in 2025. SeAH Coated Metal is also contributing to the spread of a safety culture in local communities by sharing our on-site safety management know-how through activities such as presentations on ESG safety and environment win-win cooperation cases at regular meetings of the Gunsan Safety and Health Consultative Body, participation in the Gunsan Regional Office mentoring program, and appointment as a Risk Assessment Instructor by the Ministry of Employment and Labor.



Selected as an Excellent Company in Safety and Health Win-Win Cooperation (SeAH Coated Metal)

Overview

Sustainability Framework

Sustainability Priorities

Topic 1. Climate Action

Topic 2. Ethics and Compliance

Topic 3. Safety and Health

Environmental

Social

Governance

Appendix

## Topic 3. Safety and Health

**Dong-A Steel** supports business partners through safety and health training and risk assessments, and listens to the opinions of business partner owners through the operation of consultative bodies among business owners and regular meetings with business partner representatives. In addition, to expand worker participation, we have introduced mobile-accessible communication channels and strengthened safety and health capabilities by providing safety and health information on a regular basis through active social media channels, including KakaoTalk and Band, while also collecting workers’ voluntary suggestions.

Achieving “S Grade” PSM at All Business Sites **SeAH Steel** earned an S grade in the Process Safety Management (PSM) rating evaluation overseen by the Ministry of Employment and Labor, with the applicable plants—**Gunsan, Suncheon, and Changwon**—recognized for the excellence of our PSM management systems. Going forward, we will continue to build business sites that embody our commitment to ZERO industrial accidents through detailed diagnostics of high-risk processes and the proactive elimination of hazardous and risk factors.

Strengthening the Evaluation for Selecting Qualified Business Partners **SeAH Coated Metal** reflects safety-management items with a 40% weighting in the evaluation criteria for selecting qualified business partners. For business partners scoring below 70, we induce meaningful safety improvements by applying special diagnoses, requiring the submission of improvement plans, and imposing a five-month restriction on bidding eligibility. In 2025, we evaluated 29 business partners, rating 21 as outstanding and 8 as average.

Support for Strengthening Safety Capabilities **SeAH Coated Metal** operates a Focused Safety Observation System for in-house business partners and inspects document-based and on-site safety management through experts from the Safety Environment Team, industrial safety managers, and the Korea Industrial Health Association. In addition, through the Safety and Health Consultative Body held every month, we provide training on key safety and health matters and document preparation methods, while also conducting semiannual one-on-one training for business partners in response to the expanded application of the Serious Accidents Punishment Act.

### Metrics and Targets

**SeAH Steel** systematically manages major safety and health risks by establishing quantitative indicators jointly with employees and business partners and by conducting continuous monitoring. We manage performance based on key indicators such as the industrial accident rate and the lost-time injury frequency rate, and the results of these indicators are used through regular reviews to diagnose the level of safety and health management and to identify improvement tasks. With the goal of Zero Industrial Accidents, we are strengthening work standards and safety rules and continuously improving risk factors identified through risk assessments.

**SeAH Coated Metal** has set our 2025 goal to “Become a zero-accident workplace by improving the safety and health management system,” and is establishing and executing detailed strategies accordingly. We are building a smart safety system that blocks access to hazardous areas through real-time location-tracking technology and enables immediate rescue through automatic alerts when a worker’s location remains stationary for a certain period during confined-space work. We are also implementing participatory programs such as call-and-response safety slogans, safety campaigns, and contests, together with customized health-checkup-based health management. Going forward, we plan to expand the smart safety control system across all processes and to sustain accident-free workplaces by establishing a win-win cooperation model with business partners.

Safety and Health Metrics (SeAH Steel)

| Category                        |                   | Unit                            | Performance | Target |
|---------------------------------|-------------------|---------------------------------|-------------|--------|
|                                 |                   |                                 | 2025        | 2028   |
| Occupational injury rate        | Total             | %                               | 0.46        | 0      |
|                                 | Employees         |                                 | 0.64        | 0      |
|                                 | Business Partners |                                 | 0.19        | 0      |
| Fatality rate                   | Total             | %                               | 0.00        | 0      |
|                                 | Employees         |                                 | 0.00        | 0      |
|                                 | Business Partners |                                 | 0.00        | 0      |
| Injury severity rate            | Total             | ‰                               | 0.36        | 0      |
|                                 | Employees         |                                 | 0.40        | 0      |
|                                 | Business Partners |                                 | 0.31        | 0      |
| Lost-time injury frequency rate | Total             | Cases per million working hours | 1.88        | 0      |
|                                 | Employees         |                                 | 2.60        | 0      |
|                                 | Business Partners |                                 | 0.79        | 0      |

\* Lost-time injury frequency rate (LTIFR): An indicator of the frequency of industrial accidents, based on the number of lost-time injury cases per one million working hours.

# Environmental

|                             |    |
|-----------------------------|----|
| Environmental Management    | 53 |
| Biodiversity and Ecosystems | 70 |

Overview

Sustainability Framework

Sustainability Priorities

Environmental

Environmental Management

Biodiversity and Ecosystems

Social

Governance

Appendix

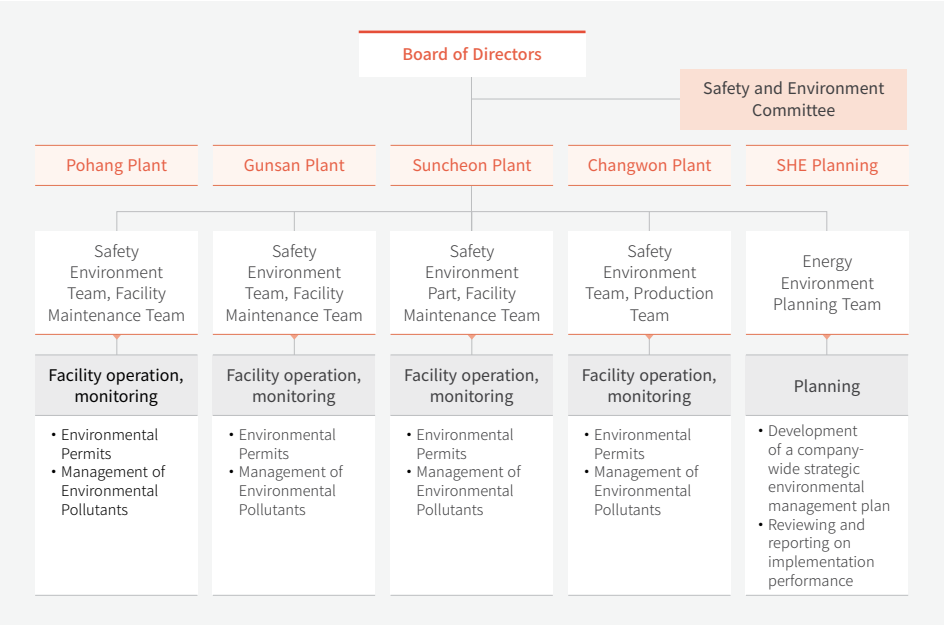
# Environmental Management

## Governance

**Environmental Management System**

SeAH Steel has established a company-wide environmental management system centered on our Energy Environment Planning Team, the dedicated organization responsible for environmental management. Through this system, we operate environmental management activities across our business sites in an integrated manner. The Energy Environment Planning Team comprehensively manages environmental improvement results by each business site, the status of related investment and budget execution, and overall environmental performance monitoring. Key environmental management matters, including our mid- to long-term environmental strategy and annual implementation results, are reported to and reviewed by the Board at least once a year. Through this reporting structure, we continue to strengthen the Board’s oversight and supervisory role, enhance transparency in environmental management, and sustain systematic environmental management across our business sites.

Environmental Management Organizational Chart (SeAH Steel)

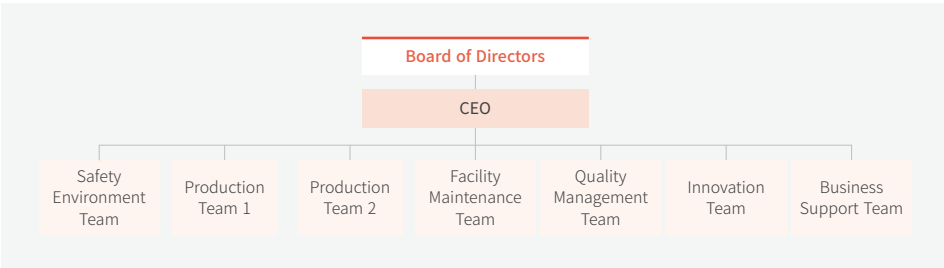


Board Reporting on Environmental Matters (SeAH Steel)

| Date         | Resolution | Key Agenda Items                                                                                                                                                                           |
|--------------|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Feb. 5, 2025 | Approved   | 2025 Environmental Management Plan (Measures to secure renewable energy, measures to improve waste recycling rate, etc.)                                                                   |
| Feb. 4, 2026 | Approved   | 2026 Environmental Management Plan (Measures to increase the renewable energy transition rate, greenhouse gas reduction measures, and responses to global environmental regulations, etc.) |

SeAH Coated Metal regularly carries out related investments and measurements to reduce the negative environmental impact caused by pollutants, and reports major environmental issues and investment plans to the Board at least once a year. At the Board meeting in January 2026, we reviewed the 2026 management policy agenda, the 2026 business plan, and the budget, and selected “Strengthening Ongoing Carbon and Energy Reduction Activities” as a detailed policy direction. Accordingly, in 2025, we invested in solar power generation facilities to expand the use of renewable energy and promote reductions in greenhouse gas emissions. In addition, we are reducing gas and electricity consumption by establishing an exhaust heat recovery system for the CGL and 1CCL facilities and by introducing high-efficiency air compressors. Meanwhile, in 2026, we plan to build an environmental risk response system using AppSheet to identify environmental risks at sites in real time and immediately reflect them in facility improvements.

Environmental Management Organizational Chart (SeAH Coated Metal)



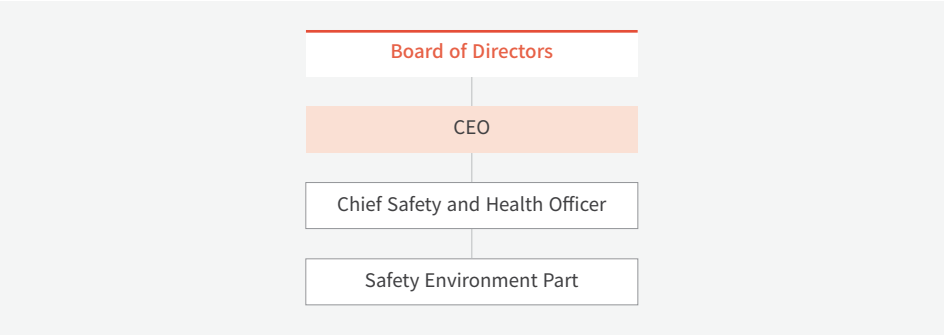


- Overview
- Sustainability Framework
- Sustainability Priorities
  - Environmental**
    - Environmental Management**
    - Biodiversity and Ecosystems
  - Social
  - Governance
  - Appendix

# Environmental Management

**Dong-A Steel** continuously carries out activities—such as reducing air pollutants and waste emissions, expanding resource circulation, and handling and managing hazardous chemicals—through its Safety Environment Part, in order to minimize the environmental impact arising from its site operations and systematically manage risks.

Environmental Management Organizational Chart (Dong-A Steel)



## Environmental Management Policy

**SeAH Steel** has established an environmental management system to minimize the negative environmental and social impacts of our business activities in response to the level of environmental management expected by the international community. We operate this system based on the Plan-Do-Check-Action (PDCA) cycle, thereby managing the entire process in a systematic manner from planning and implementation to monitoring and improvement. We also revised our Environmental and Energy Management Guidelines by integrating the management principles of ISO 14001 and ISO 50001. Based on this, we established a company-wide environmental management policy, enhancing consistency and efficiency in our management framework.

## Environmental and Energy Management Guidelines (SeAH Steel)

 SeAH Steel Environmental Management Policy

1. We comply with environmental and energy-related laws and regulations in accordance with ISO 14001 and ISO 50001 standards.
2. We establish and carry out environmental and energy goals and action plans and pursue ongoing execution and improvement.
3. We achieve carbon neutrality by transitioning to renewable energy and designing eco-friendly facilities.
4. We contribute to environmental preservation by actively minimizing waste generation and promoting resource circulation.
5. We fulfill our social responsibility by reducing greenhouse gas emissions through the procurement of eco-friendly raw materials and the development of sustainable products.
6. We establish and operate our environmental and energy management system with the participation and communication of all employees and stakeholders.
7. We proactively assess the environmental and energy risks of our business activities, establish appropriate measures, and continuously implement improvements.

- Overview
- Sustainability Framework
- Sustainability Priorities
  - Environmental**
    - Environmental Management**
    - Biodiversity and Ecosystems
  - Social
  - Governance
  - Appendix

# Environmental Management

**SeAH Coated Metal** established an Environmental Management Policy that reflects the CEO’s commitment to eco-friendly workplace operations, disclosed it on the company website, and distributed it to all departments. Based on this policy, the Safety Environment Team establishes annual work plans. In addition, we systematically assess major environmental risks, including climate change, resource depletion, and changes in environmental regulations, and continuously review department-specific response measures.

**Environmental Management Policy (SeAH Coated Metal)**

1. We adopt safety, health, and environmental management as core values of our business, and all employees shall lead by example in creating a safe and pleasant workplace.
2. We enhance safety, health, and environmental awareness among all employees, seeking to become a leading company that fulfills our responsibilities for the development of the social community.
3. We comply with regulations established based on domestic and international laws and agreements, and proactively respond to safety, health, and environmental risks through regular evaluations, improvements, and training.
4. We identify safety, health, and environmental risk factors in advance and work continuously to improve unreasonable conditions.
5. We minimize safety, health, and environmental impact throughout each stage of product planning, production and provision.

**Environmental Management System and Certification Status**

Environmental Management System (ISO 14001) Certification **SeAH Steel** practices responsible management for environmental protection and sustainable development by operating an environmental management system across all of our business sites. All of our domestic sites hold ISO 14001 certification for a 100% certification rate, providing external validation that our system for reducing environmental impact and using resources efficiently is sound. To keep the environmental management system effective, we undergo annual regular and renewal audits by a third-party certification body. Any deficiencies or improvement points found during these audits are corrected without delay, and the process underpins our proactive management of environmental risks that may arise across operations.

**SeAH Coated Metal** operates an ISO 14001-based environmental management system and undergoes annual surveillance and renewal audits by third-party certification bodies to verify the appropriateness of the entire process, from establishing environmental policies to implementation, performance review, management review, and improvement. In addition, we continue to promote improvement activities based on the audit results.

**SeAH Steel Vina** obtained certification from Bureau Veritas Certification (BVC) for its Bien Hoa and Nhon Trach plants in order to strengthen plant operations based on ISO 14001. In 2025, we also opened an ISO 14001 internal audit course for the Nhon Trach Plant and provided related training. In 2026, we are finalizing environmental procedures with the goal of obtaining an environmental permit for the Bien Hoa Plant.

**Inox Tech** obtained ISO 14001 certification on Dec. 5, 2025.

# Environmental Management

| Site           | Certification Status         |
|----------------|------------------------------|
| Pohang Plant   | Aug. 22, 2024–Aug. 21, 2027  |
| Gunsan Plant   | Sept. 5, 2023–Sept. 25, 2026 |
| Suncheon Plant | Apr. 11, 2023–Apr. 10, 2026  |
| Changwon Plant | Feb. 15, 2025–Feb. 14, 2028  |



ISO 14001 Certificates (SeAH Steel Pohang, Gunsan, Suncheon, and Changwon Plants)



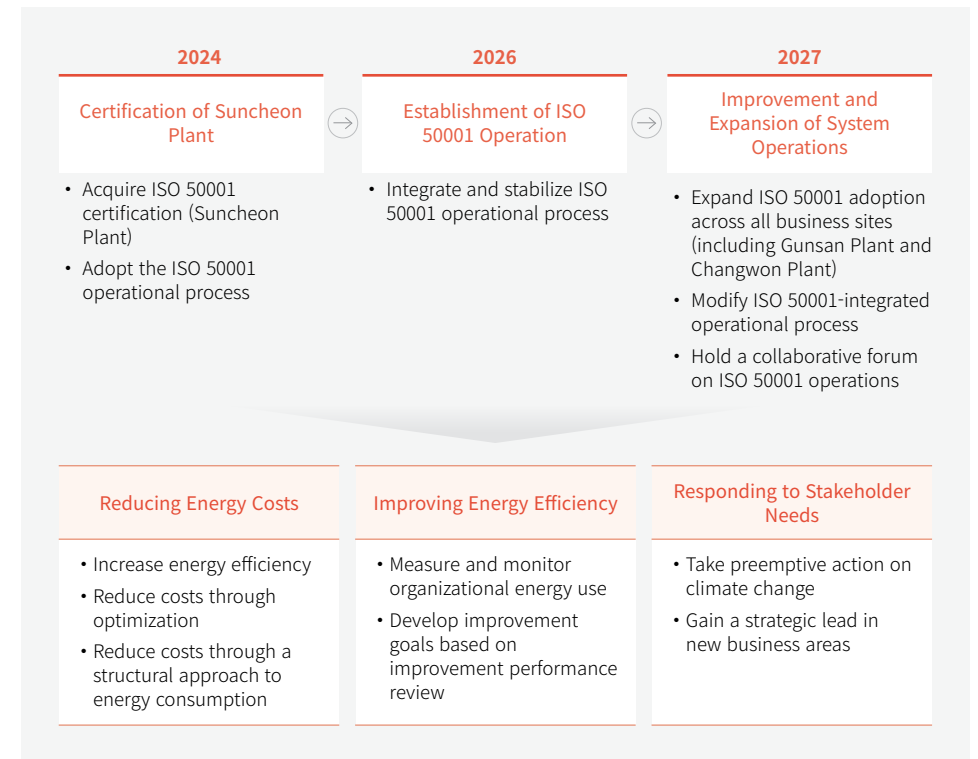
ISO 14001 Certificate  
(SeAH Coated Metal)

ISO 14001 Certificate (SeAH Steel Vina)

ISO 14001 Certificate  
(Inox Tech)

Energy Management System (ISO 50001) Certification **SeAH Steel's Pohang and Suncheon plants** operate an energy management framework based on the Energy Management System (ISO 50001), working to reduce energy consumption and greenhouse gas emissions. The system works through a clear management cycle: monitoring energy use, analyzing efficiency, setting targets, and implementing improvements. At each stage, the plants review their performance and reflect the feedback, steadily strengthening energy management capabilities across the organization.

## Strategy for Company-Wide Expansion of ISO 50001



- Overview
- Sustainability Framework
- Sustainability Priorities
  - Environmental
    - Environmental Management
    - Biodiversity and Ecosystems
  - Social
  - Governance
  - Appendix

# Environmental Management

Expanding EPD Certification **SeAH Steel** uses Environmental Product Declaration (EPD) certification to transparently disclose information on the environmental impacts of our products throughout their life cycle. We provide this information to a wide range of stakeholders, including customers and business partners. EPD is an internationally recognized certification framework that quantitatively assesses resource inputs and greenhouse gas emissions across the full life cycle of a product, from raw material extraction and manufacturing to distribution and disposal, and serves as an objective basis for evaluating environmental impacts. Through EPD certification, SeAH Steel is proactively responding to increasingly stringent carbon emissions regulations and environmental requirements. We are also strengthening our competitiveness in global markets, including the construction and energy industries, where environmental standards are becoming increasingly important.

**SeAH Coated Metal** obtained International EPD certification from IVL in 2023 in order to respond proactively to expanding environmental trade barriers such as the EU Carbon Border Adjustment Mechanism (CBAM). The certification covers a total of five cold-rolled product categories: color-coated steel sheets (PPGI, PPGL, and PPAL), galvanized steel sheets (GI), and 55% aluminum-zinc alloy-coated steel sheets (GL).

| EPD Certification Status (SeAH Coated Metal) |                             |
|----------------------------------------------|-----------------------------|
| Cold-rolled Products                         | Certification Status        |
| GI                                           | Aug. 13, 2023–Aug. 13, 2028 |
| GL                                           | Aug. 22, 2023–Aug. 22, 2028 |
| PPGI                                         | Aug. 22, 2023–Aug. 22, 2028 |
| PPGL                                         | Aug. 22, 2023–Aug. 22, 2028 |
| PPAL                                         | Aug. 22, 2023–Aug. 22, 2028 |

**Dong-A Steel** systematically monitors environment-related laws and regulations to proactively respond to evolving global environmental requirements and, based on this, continues to strengthen our compliance activities. We also continue to renew and maintain our Environmental Product Declaration (EPD) and Restriction of Hazardous Substances (RoHS) certifications, which we acquired in 2024, in order to respond effectively to changes in global environmental laws and regulatory requirements.

## Strategy

**Integrated Management System**  
**SeAH Coated Metal** is implementing the integrated environmental management system under the Act on the Integrated Control of Pollutant-Discharging Facilities in order to enhance the efficiency and transparency of environmental management at the plant level. This system consolidates seven existing environment-related laws and ten individual permits into a single management framework and operates through a structured process that includes preliminary consultation, main consultation, preparation of the integrated environmental management plan, and follow-up management. On this basis, we apply Best Available Techniques (BAT) tailored to the characteristics and environmental impact of each plant in order to reduce environmental impact. In addition, we systematically collect and manage environment-related data every month and prepare annual reports based on 13 items, including facility operating hours, electricity and fuel consumption, raw material and chemical input volumes, and air and water operation logs. These reports are submitted to the relevant environmental authorities and disclosed externally, supporting the transparent operation of the integrated environmental management system.

**State Pipe & Supply** is standardizing environmental and safety management processes based on a company-wide integrated operating system and advancing environmental and safety risk management across its business sites. To support this effort, we hired specialized personnel and, beginning in March 2025, launched monthly safety committee meetings led by site-specific personnel in charge. These meetings are designed to identify site-centered risk factors in advance and create a framework for sharing and improving management standards across business sites. We also provide regular safety and environmental training on a systematic basis to strengthen employee awareness and on-site execution.

**SeAH Wind** is reinforcing the consistency and execution of environmental and safety management through an ISO-based integrated management system. We have established an integrated management system centered on ISO 14001 and ISO 45001, incorporating environmental and safety standards across all stages of production and construction, and we continue to enhance the system through expanded certification. To strengthen site-level execution, we have refined operating standards and built a response framework that can address risks arising during the transition from the construction stage to the operational stage. We have also established management processes that reflect environmental impact factors by process and are embedding the management system in day-to-day operations by incorporating environmental and safety factors into standard operating procedures (SOPs).

- Overview
- Sustainability Framework
- Sustainability Priorities
  - Environmental
    - Environmental Management
    - Biodiversity and Ecosystems

- Social
- Governance
- Appendix

# Environmental Management

In addition, we have established a preventive management system to proactively manage environmental risks that may arise across our operations. We identify key environmental impact factors and assess potential process-specific risks in advance based on the waste management registers and Environmental Aspects registers, then reflect the results in our management activities. In particular, we have established a management system for waste generated during production and construction, and we are working to reduce environmental impacts by applying management standards that take into account site drainage and the potential release of pollutants. We also identify risk factors in advance to prevent environmental accidents, regularly check compliance with on-site environmental management standards, and connect the findings to improvement activities.

Furthermore, we have established processes that enable an immediate response in emergency situations and maintain cooperative frameworks with stakeholders and relevant authorities, thereby strengthening our response capabilities.

| Total Environment-Related Costs in 2025 <span>(Unit: KRW million)</span> |            |                   |              |                |                 |          |                |           |
|--------------------------------------------------------------------------|------------|-------------------|--------------|----------------|-----------------|----------|----------------|-----------|
| Category                                                                 | Domestic   |                   |              | Overseas       |                 |          |                |           |
| Subsidiaries                                                             | SeAH Steel | SeAH Coated Metal | Dong-A Steel | SeAH Steel USA | SeAH Steel Vina | Vinapipe | SeAH Steel UAE | Inox Tech |
| Total Costs                                                              | 3,510      | 1,277             | 38           | 569            | 93              | 6        | 185            | 267       |

**Advancing Environmental Management**

Minimizing Environmental Impact **SeAH Coated Metal** is advancing its production system through facility investments to minimize environmental impacts across its operations. When introducing new equipment, we give priority to options that can minimize environmental impact, and we continue to identify improvement tasks for existing processes through regular inspections. Issues identified during inspections are linked to investment and improvement plans, further strengthening the effectiveness of environmental impact reduction efforts.

**SeAH Steel USA** has introduced a system that enables voluntary demand adjustment during peak electricity-consumption hours in order to advance its power demand management system. By building a dashboard that can monitor electricity market supply and demand conditions in real time, along with a Strobe Alarm System, we are responding to fluctuations in power supply associated with the expansion of renewable energy and optimizing plant electricity demand. We have also established a power demand management process that allows operations to be suspended immediately when electricity prices exceed a certain threshold.

**SeAH Steel Vina** continues to carry out various implementation tasks in 2025 to reduce energy use and improve the worksite environment. We operate an electricity-saving program and are strengthening management activities that ensure unused electrical equipment is switched off. We are also carrying out a rooftop tree-planting campaign as part of our broader efforts to improve the worksite environment.



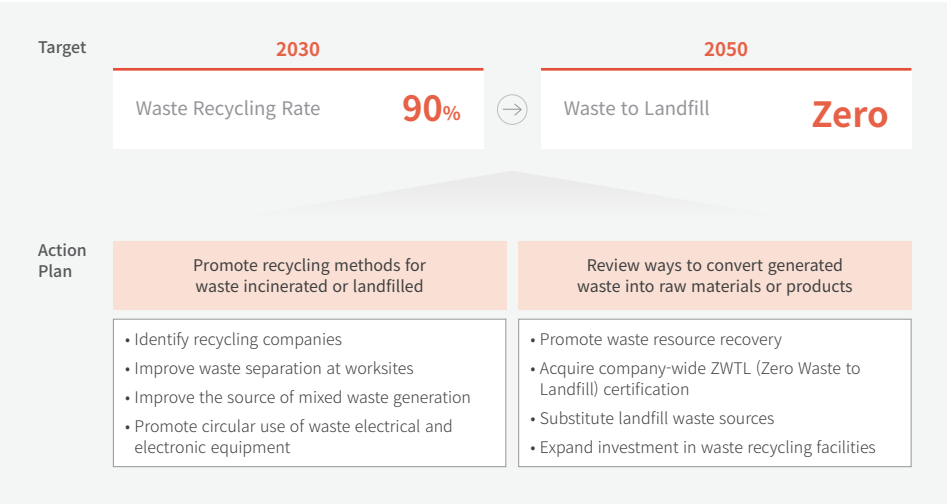
Worksite Environment Improvement (SeAH Steel Vina)



# Environmental Management

**Pollution Management Strategy**  
Resource Circulation and Waste Management Strategy **SeAH Steel** has established a mid- to long-term resource circulation roadmap with the goals of achieving “a company-wide waste recycling rate of 90% by 2030” and “Zero landfill waste by 2050.” Based on this roadmap, we are advancing our waste management system in phases. To support these goals, we have set waste recycling rate as a key performance indicator (KPI) and operate a management process under which performance is reviewed and evaluated on a quarterly basis. Waste-related impacts primarily arise from iron scrap, sludge, waste oil, and waste packaging materials generated in the production process. These impacts occur mainly within our business sites, while some are also linked to the supply chain and the product end-of-life stage. To minimize the environmental impacts that may arise from landfill and incineration, we are pursuing management activities centered on waste reduction and the expansion of recycling. In particular, to reduce the proportion of waste sent to landfill and incineration, we continue to identify additional recycling service providers while pursuing a range of investments and execution initiatives, including the establishment of real-time monitoring systems and improvements to production processes. We also conduct regular annual supplier evaluations of waste transport and treatment contractors, and we transparently provide hazard information required under the Wastes Control Act to support stakeholders’ safe handling.

## Mid- to Long-Term Resource Circulation Strategy and Targets



Pursuing Zero Waste to Landfill (ZWTL) Certification **SeAH Steel’s Gunsan Plant** pursued Zero Waste to Landfill (ZWTL) certification as part of our company-wide mid- to long-term strategy to transition to a resource-circulating business site and minimize the environmental impacts of waste. In line with this strategy, we have established a recycling-centered management system for wastes generated in the manufacturing process, including waste sulfuric acid, wastewater treatment sludge, process sludge, and dust, while continuing to identify qualified specialized contractors and provide employee training. As a result of these efforts, we sustained a recycling rate of over 99% in 2025, earning Gold certification for the second consecutive year. We plan to expand related activities in 2026 with the goal of achieving “Platinum,” the highest level of Zero Waste to Landfill (ZWTL) certification, and thereby continue to enhance the resource circulation competitiveness of all our business sites.



ZWTL Gold Designation (SeAH Steel)

Water Resource Management Strategy **SeAH Steel** recognizes the importance of water resource management and strictly manages water pollutants at levels no greater than 30% of the statutory discharge limits. To prevent legal risks and ensure the sustainable use of water resources, we also rigorously manage reductions in industrial water consumption and the quality of discharged water in order to prevent the overuse and contamination of water resources.

- Overview
- Sustainability Framework
- Sustainability Priorities
  - Environmental
    - Environmental Management
    - Biodiversity and Ecosystems
  - Social
  - Governance
  - Appendix

# Environmental Management

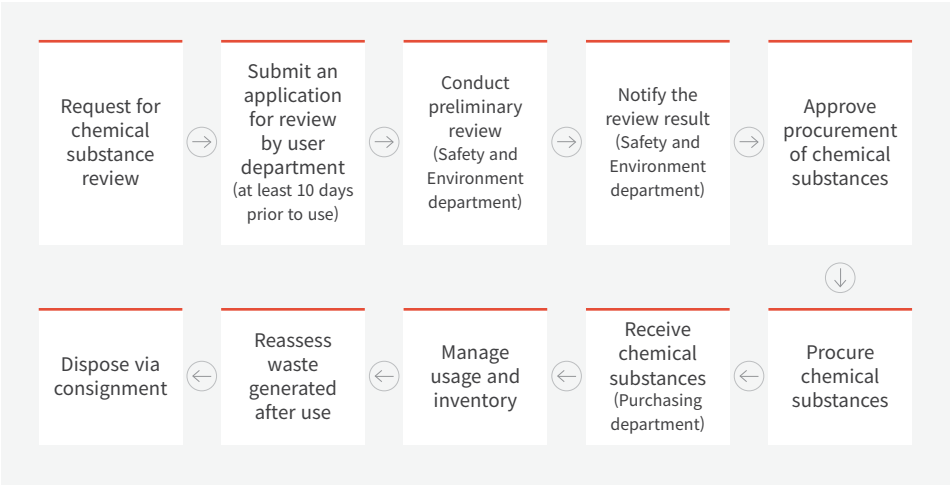
**Dong-A Steel** has established a reuse system under which industrial water used in our production processes is recovered and recirculated, and we reuse all of this water in order to minimize the environmental impacts that may arise from industrial water consumption. In addition, in the case of pipe-forming oil that may become contaminated in the production process and working environment, we separate pollutants by applying oil skimmers and sludge scrubbers to tanks and regularly removing sludge from equipment. Through this process, we continuously improve and operate a management system that allows waste (waste oil) to be separated and discharged appropriately.

Establishing Internal Standards and Strategies for Air Pollutant Management **SeAH Steel** has established a real-time monitoring system for air pollutants generated throughout the entire steel pipe manufacturing process and manages emission levels on an ongoing basis. We strictly manage air pollutant concentrations in accordance with internal standards set at or below 30% of the emission limits required under the Clean Air Conservation Act.

Chemical Management Strategy **SeAH Steel** has established a company-wide management system to protect workers from hazardous chemicals and prevent chemical accidents, while also carrying out prevention activities centered on education and training. We provide information on hazardous chemicals handled at our business sites through Material Safety Data Sheets (MSDS) and other relevant materials, and conduct safety training so that workers can fully understand the hazards and risks associated with these substances. We also conduct regular emergency response drills simulating chemical leak scenarios for workers assigned to all process lines where such substances are handled, thereby strengthening response capabilities from initial response to recovery in the event of an accident. Meanwhile, we continuously review safety and check legal compliance across the entire chemical life cycle—from purchase and use to disposal. In particular, we proactively manage potential risk factors through regular inspections of facilities handling hazardous chemicals and through leak detection systems. We also maintain a safe working environment by providing site-centered emergency response supplies and establishing appropriate response systems.

**Dong-A Steel** operates chemical management activities centered on worker education and information provision in order to prevent chemical-related accidents and maintain a safe working environment. Information on hazardous chemicals handled at our business sites is updated on an ongoing basis and provided to workers, while Material Safety Data Sheets (MSDS) postings and safety signage help enhance on-site awareness. In addition, we provide regular safety training for process workers at least once a year on chemical handling, safety management, accident response, and MSDS, and supplement this with ad hoc training whenever substances are added or changed. Hazardous chemicals are also systematically stored and managed in designated locations, including materials warehouses and hazardous materials storage areas, in order to ensure safe handling.

Chemical Life Cycle Management Process (SeAH Steel/Dong-A Steel)



Overview

Sustainability Framework

Sustainability Priorities

Environmental

Environmental Management

Biodiversity and Ecosystems

Social

Governance

Appendix

# Environmental Management

**Enhancing Eco-Friendly Product Competitiveness**  
Eco-Friendly Product Development **SeAH Coated Metal** is expanding supply-chain-based technology collaboration and building a more sustainable product portfolio to respond proactively to tightening global environmental regulations and changing market demands. Based on strategic collaboration with business partners, we hold an annual new product development seminar and use the outcomes to establish mass-production plans that reflect market needs identified in the field. In December 2025, we held the Preliminary Seminar for 2026 New Product Development with a key business partner in the coatings sector, where we shared our innovation product roadmap and future development directions. The seminar included in-depth discussions on technical improvement measures for key technologies and high-value-added product groups designed to address environmental regulations, including coatings that can reduce NOx emissions, biomass-based surface treatment agents, highly corrosion-resistant coatings for coastal environments, non-combustible printed steel sheets (PRINT), and ammonia-resistant coatings for livestock facilities. We are closely reviewing the commercialization potential of the proposed new product ideas and focusing our company-wide capabilities on linking the collected feedback to prototype production and line testing. In particular, in collaboration with our production departments, we are reviewing the field applicability of Chromium-Free (Cr-Free) and biomass-based post-treatment agents while pursuing lower environmental impact in process operations.



New Product Development Seminar (SeAH Coated Metal)

## Risk Management

Utilizing the Electronic Waste Information System, Allbaro **SeAH Steel** has established and operates a management framework aimed at achieving “Zero landfill waste” by reviewing mid-to long-term resource recovery options for major wastes generated in the production process. In particular, we continuously pursue recycling and reduction measures focused on slag and wastewater treatment sludge—which account for most landfill waste—and we fully recycle by-products such as steel scrap generated in production. We also regularly monitor company-wide waste generation and recycling volumes through our integrated SHE system and systematically establish and implement waste reduction and recycling plans based on these data. In addition, wastes generated at our business sites are lawfully entrusted to verified transportation and treatment service providers in accordance with the Wastes Control Act.

Resource Circulation of Waste Battery, Electrical and Electronic Equipment **SeAH Steel** signed an MOU with the Korea Battery Recycling Association on April 22, 2025, to establish a resource recycling system for waste batteries. Based on this MOU, we expanded the scope of collection beyond waste batteries generated at our business sites to include waste batteries left unused in employees’ homes, thereby encouraging proper disposal and helping increase the recovery of valuable metal resources such as nickel, cobalt, and lithium, which in turn contributes to minimizing resource waste. In 2025, SeAH Steel collected 100.8 kg of waste batteries and recovered approximately 85.7 kg of recyclable resources. During the same period, SeAH Steel also collected 935 kg of waste electrical and electronic equipment and produced a total of 913kg of recyclable resources, thereby achieving a Scope 3 greenhouse gas reduction of 2,557 kgCO<sub>2</sub>eq.



Certificate of Resource Circulation Activity and Greenhouse Gas Reduction (SeAH Steel)

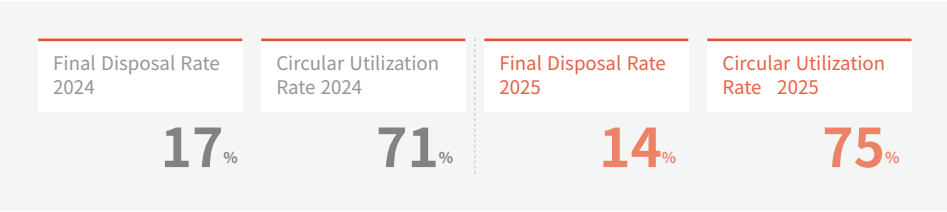
- Overview
- Sustainability Framework
- Sustainability Priorities
  - Environmental
    - Environmental Management
    - Biodiversity and Ecosystems
  - Social
  - Governance
  - Appendix

# Environmental Management

Advancing the Waste Management System to Mitigate Risks **SeAH Steel** is making a range of efforts to achieve a 90% waste recycling rate by 2030, including separating and sorting mixed non-recyclable waste by material characteristics and identifying new waste treatment service providers, in order to recycle waste items that would otherwise be sent for incineration or landfill. As a result of these continued efforts, our 2025 waste recycling rate (excluding construction waste) reached 86.7%, up 7.5% from the previous year, bringing us closer to our mid- to long-term target.

**SeAH Coated Metal** gives priority to resource circulation and recycling in its waste-treatment process as part of its effort to reduce waste generation. In the galvanized and color-coated steel sheet production process, we send scrap, iron oxide, and zinc sludge to recycling companies for treatment, and we recycle more than 60% of major waste items, including wastewater-treatment sludge, waste thinner, waste drums, and waste wood. In particular, the use of recycled thinner has generated annual cost savings of approximately KRW 300 million, and we exceeded our targets by recording a final disposal rate of 14% and a circular utilization rate of 75% under the criteria of the Act on Promotion of Transition to a Circular Economy and Society. Compared with 2024, the final disposal rate fell by 3%p, while the circular utilization rate increased by 4%p. All waste is handled by transport and treatment companies licensed by the Ministry of Environment, and we use the Allbaro system (the Ministry of Environment’s electronic waste tracking system) to manage and disclose treatment records. We also provide regular training on waste classification and discharge to manage legal risk, and by changing our waste-sales contractor, we have improved both cost efficiency and the effectiveness of resource circulation. Starting in 2025, we began separately discharging cans, paper, and plastic that had previously been treated as general waste and processing them through recycling vendors, while also running an on-site source-separation campaign to encourage broader employee participation. These measures reduced the volume of general waste by 36 tons compared with 2024 and generated annual cost savings of about KRW 6 million. In addition, we are planning an R&D project to recycle scum generated at our sites into solid fuel as part of our continued effort to reduce waste.

Waste Management Performance (SeAH Coated Metal)



**State Pipe & Supply** operates a management system covering both process and site operations in order to reduce waste generation and expand recycling. In major processes, we manage waste such as Steel Grit in accordance with operating standards designed to maintain reuse rates, and we minimize waste generation by optimizing process control and equipment operation. We have also refined our classification and treatment standards to increase the recovery rate of recyclable resources, while setting landfill and disposal ratios as management indicators and continuously reducing them. In particular, we are expanding the use of reusable by-products to improve the efficiency of resource circulation, while operating a waste-data collection and monitoring system to manage the environmental impact of waste management more systematically.

**SeAH Steel USA** carries out waste-reduction activities from the point of generation. In cooperation with waste-management companies, we are applying measures to reduce the volume of waste sent to landfill, and we have lowered the amount of waste generated at our facilities compared with the previous year by refining our waste-storage standards. This has helped us reduce costs while also managing environmental impact and compliance levels. We are also improving process operations by applying Lean manufacturing principles, which is helping us increase production efficiency, reduce defect rates, and improve inventory management at the same time.

**SeAH Steel Vina** renovated and newly built the hazardous waste storage facility at the Bien Hoa Plant in order to comply with new government environmental regulations, and we are preparing to apply for the environmental permit required by law for that plant.



New Construction at the Bien Hoa Plant (SeAH Steel Vina)



- Overview
- Sustainability Framework
- Sustainability Priorities
  - Environmental**
    - Environmental Management**
    - Biodiversity and Ecosystems
- Social
- Governance
- Appendix

# Environmental Management

**SeAH Steel UAE** operates a waste management system that classifies and manages general waste, commercial waste, and sewage waste in accordance with environmental regulations. In response to strengthened environmental laws and annual inspection requirements, we have refined our waste management procedures and are using them to improve operational efficiency. Waste is handled through authorized contractors, allowing us to maintain regulatory compliance while also improving cost efficiency. We also apply management procedures based on safety standards to strengthen employee protection and maintain trust with local communities and other stakeholders. In addition, we have further segmented our waste separation system and improved our outsourced treatment approach to better manage sewage and kitchen waste, while also improving resource efficiency and overall waste management performance.

**Inox Tech** has introduced an electronic waste tracking system in accordance with Italian law and strengthened its administrative control framework for waste management by obtaining ISO 14001 certification. Based on applicable regulations and internal standards, we apply structured management procedures to strengthen monitoring across the waste treatment process, helping us maintain both administrative control and operational stability.

**SeAH Wind** operates its waste management system based on the Site Waste Management Plan. Across both pre-production and mass-production stages, we manage waste generation and recycling rates in an integrated manner in line with established management standards, allowing us to address regulatory compliance, waste reduction, carbon emissions, and resource efficiency together. Steel and other materials are also managed according to designated waste streams designed to maximize reuse and recycling, helping us minimize waste generation across operations. In addition, based on waste management activities tailored to each process, we manage both resource-use efficiency and the level of environmental impact reduction.



Separate Management of Site Waste and General Waste (SeAH Steel UAE)

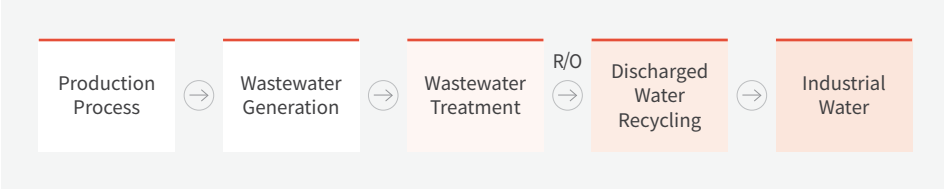
## Water Pollution Management

Water Management System **SeAH Steel** classifies our water sources into industrial water and domestic water and measures and manages water consumption based on utility billing data. Industrial water is supplied through water intake facilities within industrial complexes and is used for cooling, replenishing water-soluble cutting fluids for rust prevention, and other operational needs at our business sites. Wastewater that cannot be reused after use is transferred to in-house wastewater treatment facilities, where it is thoroughly treated to levels below statutory standards before being discharged, thereby minimizing impacts on the aquatic ecosystem and the surrounding environment.

Automating Sluice Gates in Drainage Channels **SeAH Steel** installed an automatic sluice gate system in major drainage channels at the **Pohang Plant** to respond to heavy rainfall linked to climate change and to prevent water quality incidents. By linking water level sensors with electric actuators, we improved the system so that sluice gates open automatically during high-water conditions, thereby shortening response time and strengthening response capability. We also use IoT cameras for real-time monitoring, which helps us proactively prevent pollutant leaks and flooding damage during vulnerable periods such as nighttime and holidays.

Establishing an Effluent Reuse Facility **SeAH Steel** established an advanced effluent reuse facility based on a Reverse Osmosis (R/O) system at the **Gunsan Plant** to reduce water consumption and environmental loads. By purifying wastewater effluent through reverse osmosis and reintroducing it into the production process, we achieved an annual reuse rate of approximately 12.1%. Through this effort, we reduced water intensity year on year and through continuous water quality monitoring, we are simultaneously ensuring a stable water supply and preventing water pollution.

### Wastewater Reuse Process (SeAH Steel)





- Overview
- Sustainability Framework
- Sustainability Priorities
  - Environmental**
    - Environmental Management**
    - Biodiversity and Ecosystems
  - Social
  - Governance
  - Appendix

# Environmental Management

Introducing a Smart Wastewater Treatment System **SeAH Steel** introduced a smart wastewater treatment system at the **Suncheon Plant** to improve the efficiency of wastewater treatment operations and fundamentally prevent water pollution. By monitoring water quality analysis results and facility operation data in real time, we advanced the process so that optimal chemical input volumes can be adjusted automatically and immediate responses can be made when abnormal water quality is detected. This has laid the foundation for ensuring the stability of effluent quality.

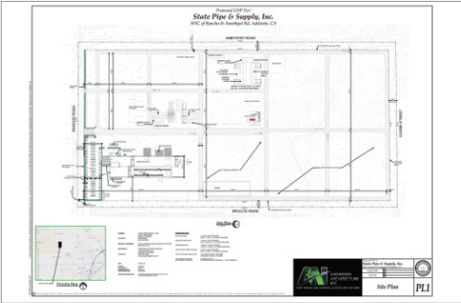
**SeAH Coated Metal** operates a management system covering the full cycle of water use and treatment in order to improve water-resource management efficiency at the workplace and minimize water-quality impact. Water used at the site is broadly supplied through two sources: industrial water and tap water. The incoming water is used primarily in washing facilities that remove impurities from the steel-sheet surface and in cooling facilities that lower the temperature of manufacturing equipment exposed to high heat. After use, the water is collected in an in-house water pool used for industrial water storage and recirculated back into the process for reuse. The wastewater generated is treated at our in-house wastewater treatment plant through physicochemical treatment before being discharged externally in compliance with legal water-quality discharge standards. Industrial water generated from indirect cooling facilities is recycled through the water pool to improve resource-use efficiency, while concentrated water generated from the industrial water purification facility (R/O system) is no longer discharged into the river and is instead transferred to a municipal wastewater treatment plant for processing. In addition, we manage the concentrated water by conducting analysis once each quarter and once annually. To prevent the inflow of non-point source pollution during rainfall, we operate a total of six reduction facilities, and to maintain their performance, we carry out dredging work three times a year, strengthening both facility reliability and regulatory compliance. To further reduce water pollutants, we invested a total of KRW 16.17 million in 2025 to upgrade and improve wastewater treatment facilities. As a result, water-pollutant emissions decreased by 61.4% compared with 2024.



Industrial Water Purification Facility (SeAH Coated Metal)

**State Pipe & Supply** has established facilities designed to manage water resources used in the Natural Curing process more efficiently, and we have improved the structure of water use by recycling process water and introducing a catchment pond system. We continue to maintain systems for rainwater and process-water recycling, sediment management, and sludge treatment, while managing water-pollution risk through regular inspections and operating standards for the related facilities. These efforts have helped us reduce water consumption and minimize wastewater generation, while also improving resource-circulation efficiency and limiting the impact on water quality.

**SeAH Steel USA** operates a wastewater management system designed to prevent pollutants from entering water systems and to ensure that treated water remains suitable for ecosystems and human use. To support this, we have strengthened monitoring of overall water use, while carrying out water sampling and analysis procedures in a structured manner. To reduce the generation of contaminated water, we improved the chlorination treatment system and conducted performance verification tests, and each treatment facility is managed through quarterly sample testing to ensure regulatory compliance.



Natural Curing Process (State Pipe & Supply)

- Overview
- Sustainability Framework
- Sustainability Priorities
  - Environmental
    - Environmental Management
    - Biodiversity and Ecosystems
  - Social
  - Governance
  - Appendix

# Environmental Management

**SeAH Steel Vina** has established and operates its own wastewater treatment facility to treat wastewater generated in both production and day-to-day operations, and the treated wastewater is discharged through the industrial complex’s water treatment system. We also separate rainwater and sewage and manage them through independent drainage systems, and the related facilities are kept in stable operation through regular cleaning and inspections conducted at least once a year.

**Inox Tech** has seen an increase in total water use as a result of expanded new Clad orders, the operation of the Soft Pickling Tank, and the addition of two high-pressure washers, but we have maintained stable water-use efficiency on a production basis year after year.

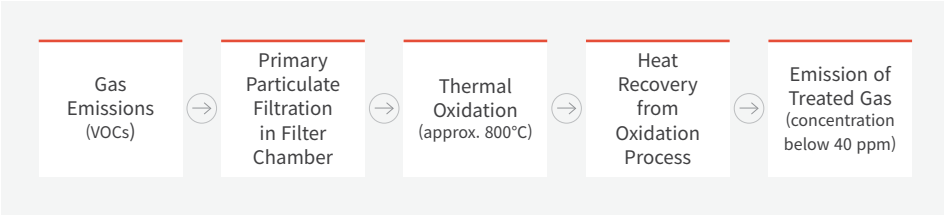
**SeAH Wind** incorporated a water recycling system into the design of the Monopile Wash Down process. The system was adopted to manage the potential increase in water use and discharge impact that may arise from the new manufacturing facility, and it provides an operating foundation that improves water-use efficiency through in-process water reuse while minimizing the potential environmental impact of discharge. We are also preparing to introduce a Water Use Assessment to manage post-operation water use more systematically, and plan to expand its scope of application from the end of 2026.

## Air Pollutant Management

Advancing the Air Quality Management System **SeAH Steel** has promoted the digitalization of air management based on our integrated SHE system in order to improve the transparent management of air pollutant-emitting processes and enhance administrative efficiency. Through this effort, we converted air operation logs that had previously been prepared manually into a digital system and established a framework that allows real-time monitoring of operating conditions across all plants. We also implemented functions that eliminate the risk of data omission and loss and automatically convert accumulated data into reporting formats required by the Ministry of Environment, including the Stack Emission Management System and the Integrated Environmental Permit System. As a result, we significantly reduced time spent on repetitive administrative work and enhanced data reliability. Going forward, we plan to add functions that automatically calculate emissions based on accumulated digital data and, through this, establish a more proactive response framework for managing air emission indicators and improving air quality.

Risk Management Framework Based on Emissions Monitoring **SeAH Steel’s Pohang Plant** has introduced an RTO (Regenerative Thermal Oxidizer) to fundamentally block the volatile organic compounds (VOCs) and odor generated in the coating process. Pollutant gases are incinerated at high temperatures of 800°C, enabling us to continuously comply with applicable emission limits. We also regularly measure and manage plant boundary areas and odor sources on a quarterly basis in order to minimize impacts on nearby communities and proactively mitigate legal risks. The **Gunsan Plant** expanded exhaust gas treatment capacity and improved dust collection efficiency by approximately 40% compared with previous levels, by carrying out improvement investments to fully replace the body and ducts of our aging dust collectors. At the **Changwon Plant**, we use a Tele Monitoring System (TMS) to measure and manage pollutant concentrations in real time. We also introduced a TMS mobile monitoring system, enabling managers to check flow and concentration data in real time and respond immediately to abnormalities even on weekends and holidays when managers may not be on-site, thereby establishing a data-based air management environment.

### RTO (Regenerative Thermal Oxidizer) Operation Process (SeAH Steel)



- Overview
- Sustainability Framework
- Sustainability Priorities
  - Environmental**
    - Environmental Management**
    - Biodiversity and Ecosystems
- Social
- Governance
- Appendix

# Environmental Management

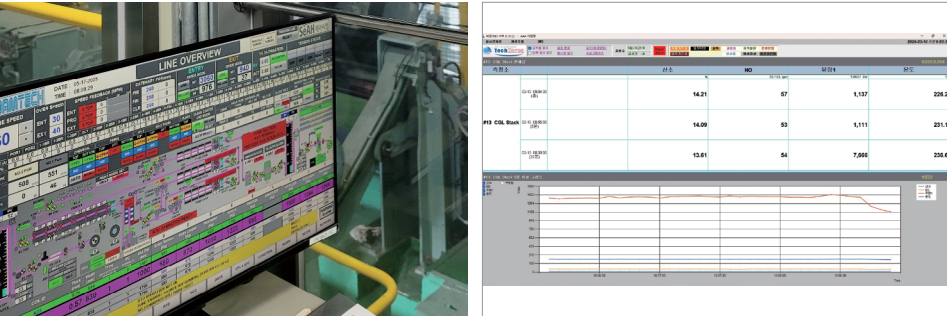
**SeAH Coated Metal** expanded its site-centered monitoring framework in 2025 by adding five new TMS monitoring screens across the workplace in order to strengthen real-time response capabilities for pollutant emission control. Moving away from an office-centered management approach, we shifted to a real-time, on-site monitoring system and upgraded our management framework so that any abnormal signs can be addressed immediately.

**Dong-A Steel** has established and operates a data-based management system to control air pollutants generated in the pipe-forming process and improve the working environment. Through IoT measuring devices at three painting process locations—Painting Line 1 at Gwangyang Plant 1, Painting Line 2 at Gwangyang Plant 2, and the C-channel painting equipment—we manage air pollutant emissions and the operating status of prevention facilities in real time. We also apply current meters to filtration dust collection and adsorption facilities, as well as to emission and prevention facilities. The resulting data are linked to GreenLink, a management system for small-scale air emission facilities, where measurements are collected and managed. Through these efforts, Dong-A Steel is improving the efficiency of maintaining local exhaust systems and strengthening air pollutant management across processes.

Construction of an Automated Shot Blasting Line **State Pipe & Supply** has continued to promote the construction of an automated painting and shot blasting line in order to reduce air pollutants and improve process efficiency. The automated line is a key facility designed to reduce dust and hazardous-material emissions while improving the working environment, and we plan to install it in phases after careful review and proceed with trial operation.

Closed-Loop System and Integrated Process Framework **SeAH Steel USA** operates an integrated framework covering source management, process improvement, and monitoring in order to enhance the level of air-pollutant control. In the heat-treatment department, we are replacing burners and optimizing combustion conditions to improve combustion-process efficiency and reduce emissions. We have also established a closed-loop system to detect potential leaks and vapor loss at an early stage, while carrying out preventive maintenance on key equipment such as valves, tanks, and seals to manage the risk of equipment failure and environmental pollution in advance.

Preventive Management Framework Centered on Emission Sources **Inox Tech** focuses more on preventive management aimed at reducing the generation of pollutants at the process stage itself than on post-treatment methods that collect, purify, and discharge contaminated air through ducts and blowers. By continuously improving process operating conditions and equipment management practices, we are minimizing the generation of dust and hazardous substances and operating a management framework that reduces the impact on the air environment from the point of generation.



TMS-Based Monitoring (SeAH Coated Metal)

Overview

Sustainability Framework

Sustainability Priorities

Environmental

Environmental Management

Biodiversity and Ecosystems

Social

Governance

Appendix

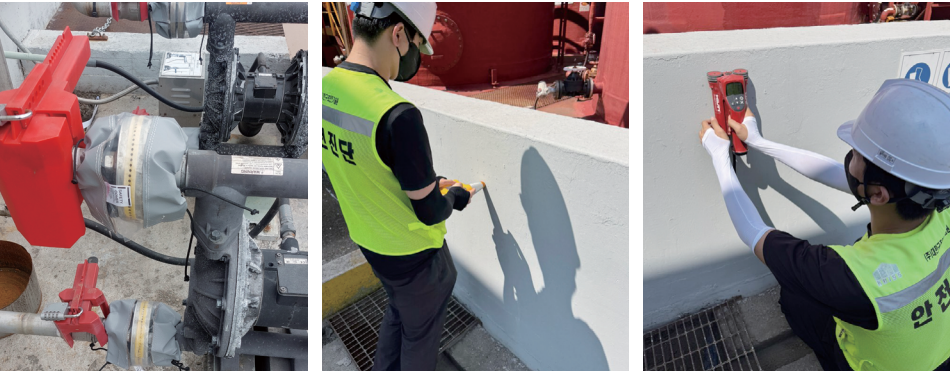
# Environmental Management

## Chemical Substance Management

Strengthening Chemical Accident Prevention and Response Infrastructure **SeAH Steel** is working to achieve a zero-chemical-accident business site at the **Changwon Plant** by strengthening both human capabilities and physical infrastructure. We provide practice-oriented preventive training for workers handling hazardous chemicals and, in particular, operate customized training and assessment programs for foreign workers to help close safety gaps arising from language barriers. We also completed the installation of sluice gates on the final stormwater pipeline to fundamentally block the spread of leaked chemicals into nearby rivers. Through this effort, we established a control system that can immediately block the external release of pollutants in the event of an incident and fundamentally prevent the risk of secondary environmental damage outside the plant during vulnerable periods such as nighttime and holidays.

Chemical Accident Response System **SeAH Steel** operates a chemical leak prevention framework and continues to expand facility investments at major chemical handling sites. We have installed gas and leak detectors at major facilities to proactively block hazardous chemical leaks, and we operate leak and spill prevention systems that enable prompt response in the event of an incident. In addition, CCTV cameras are installed at key locations for real-time monitoring of chemical handling operations.

**SeAH Coated Metal** improved its facilities and provided employee training to enhance the level of environmental management related to the safe use of chemicals and accident prevention. By inviting external instructors, we delivered chemical competency training for both office staff and on-site personnel, helping employees build a solid understanding of chemical handling standards and strengthen emergency response capabilities. Through the activities of the Environmental Consultative Body, we reviewed cases from other companies and installed flange covers on pipe connection points at chemical handling facilities to help prevent chemical leaks and dispersion. We also conducted a structural safety diagnosis of the containment wall for hydrochloric acid handling facilities, checking fine cracks and structural risk factors in advance and managing the risk of potential chemical leakage incidents.



Chemical Capability-Building Training (SeAH Coated Metal)

| 2025 Chemical Management (SeAH Coated Metal) |                             |                                           |                                         | (Unit: ton/year) |
|----------------------------------------------|-----------------------------|-------------------------------------------|-----------------------------------------|------------------|
| Category                                     | Fresh Hydrochloric Acid Use | Volume of Treated Waste Hydrochloric Acid | Volume of Regenerated Hydrochloric Acid | Recovery Rate    |
| 2025                                         | 391                         | 13,823                                    | 18,126                                  | 131.13%          |
| YoY Change                                   | +66%                        | +4.9%                                     | +5.4%                                   | +0.56%           |



- Overview
- Sustainability Framework
- Sustainability Priorities
  - Environmental**
    - Environmental Management**
    - Biodiversity and Ecosystems
- Social
- Governance
- Appendix

# Environmental Management

SeAH Coated Metal has established and operates a response framework designed to prevent chemical leaks and enable rapid action in the event of an accident. To prepare for leaks involving key accident preparedness substances such as hydrochloric acid and sulfuric acid, we operate recovery facilities at the wastewater treatment plant and apply a real-time monitoring system using liquid leak detectors and gas detectors. These detection facilities undergo regular annual inspection and calibration to ensure reliability, and we have installed containment walls to prevent external release while operating a constant surveillance system using CCTV at hazardous chemical handling facilities. We also provide and manage appropriate personal protective equipment for employees involved in disaster-prevention work, and maintain its protective performance through annual regular performance inspections. In particular, we apply maintenance standards for breathing apparatus, including air replacement at least semiannually. We also notify nearby residents of chemical-related information by mail once a year and register the relevant information in the National Institute of Chemical Safety system for ongoing management. By directly visiting business sites located within the area of impact to share the relevant information and provide accident response training, we maintain a framework for communication with local communities and for safety cooperation.



Site Visits and Communication (SeAH Coated Metal)

**SeAH Steel USA** has established a management framework for the use of new chemicals in cooperation with the warehouse management department and refined management standards covering the entire cycle of storage, handling, and use. To strengthen prior verification of worker exposure safety when chemicals are ordered, we improved our chemical-related management procedures overall and revised standards governing the storage, handling, transportation, and disposal of chemicals, thereby reinforcing the level of protection for both people and the environment. We have also introduced additional storage cabinets for flammable substances to reduce the risk of exposure in the workplace and apply a safer storage framework. Based on this management framework, we operate at a level that meets OSHA standards as well as EPA and TCEQ requirements.

**SeAH Steel Vina** strictly complies with government regulations related to hazardous materials management and applies Chemical Safety Rules that set out management procedures covering the full cycle of chemical purchasing, use, storage, transport, and disposal. In our production processes, we apply products whose environmental safety has been verified, and we have established safety management procedures covering every stage, including the transport, storage, receipt, and use of chemicals, as well as distribution history traceability. We also renovated existing chemical storage facilities and newly built additional ones at the two plants, and revised regulations related to fire prevention, firefighting, and rescue in response to government requirements on fire safety and environmental protection. At the same time, we have improved facilities while refining management standards, strengthening both the level of application and the operational stability of our chemical management framework.



Renovation and New Construction of Chemical Warehouses (SeAH Steel Vina)



# Environmental Management

SeAH Steel UAE strengthened its management framework to reduce environmental and worker-safety risks that may arise during chemical handling. To support the safe handling of hazardous substances, we refined key management standards, including improved access to Material Safety Data Sheets (MSDS) and expanded employee training. To apply standardized handling procedures, we updated the chemical inventory list and improved the work environment by introducing visual storage labeling, helping raise employees’ safety awareness. No major chemical spill incidents occurred during 2025, and we managed spill risk and minimized environmental impact by improving storage facilities and making safety signage and MSDS more accessible. In addition, we operate periodic risk assessments and hazardous chemical training, and maintain an emergency response framework by improving storage facilities, including storage cabinets and spill-prevention pallets, while also providing spill-response kits and prevention equipment.

Inox Tech maintains a strict chemical control and inventory management system for all chemicals, with particular focus on those used in the pickling process department subject to the Seveso regulation. We have also carried out chemical substitution initiatives to replace highly hazardous substances with safer alternatives, further strengthening the foundation for risk reduction. For substances used in the bunker area, we conduct evaluations in line with regulatory requirements and internal standards to identify lower-hazard chemical options and ensure the safe management of substances used in the sheet-developing process.



MSDS (SeAH Steel UAE)



Labeling Work (SeAH Steel UAE)



Strengthening Employee Training (SeAH Steel UAE)



# Biodiversity and Ecosystems

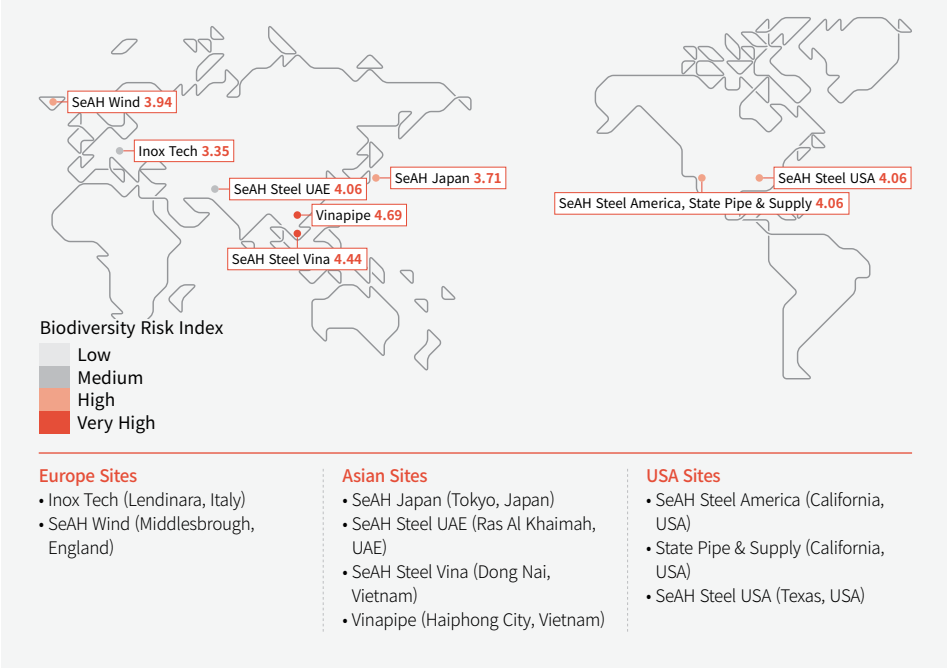
## Biodiversity Management

**Status of Biodiversity Risks**  
SeAH Steel Holdings quantitatively assessed biodiversity risk at major domestic and overseas subsidiary sites using the WWF Biodiversity Risk Filter and the IBAT. Using the IBAT, we identified species and population counts within a 50 km radius of each site based on the IUCN Red List, while the WWF Biodiversity Risk Filter was used to assess the impact of overseas sites on nearby ecosystems. The analysis showed that biodiversity risk across all sites ranged from medium to high, and some sites were found to be located near Key Biodiversity Areas. As a result, the potential impact on surrounding ecosystems and the need for site-specific management were identified. Based on these findings, we are systematically identifying nearby species and population levels around each site and applying refined standards for biodiversity risk management.

Species Count Based on the Red List

| Asia                |                                   |                         |
|---------------------|-----------------------------------|-------------------------|
| Dong Nai, Vietnam   | Critically Endangered: 20 species | Endangered: 38 species  |
| Haiphong, Vietnam   | Critically Endangered: 30 species | Endangered: 129 species |
| Ras Al-Khaimah, UAE | Critically Endangered: 15 species | Endangered: 67 species  |
| Europe              |                                   |                         |
| Lendinara, Italy    | Critically Endangered: 12 species | Endangered: 29 species  |
| Middlesbrough, UK   | Critically Endangered: 9 species  | Endangered: 12 species  |
| North America       |                                   |                         |
| California, USA     | Critically Endangered: 13 species | Endangered: 30 species  |
| Texas, USA          | Critically Endangered: 13 species | Endangered: 30 species  |

Analysis of Major Overseas Sites and Threatened Species



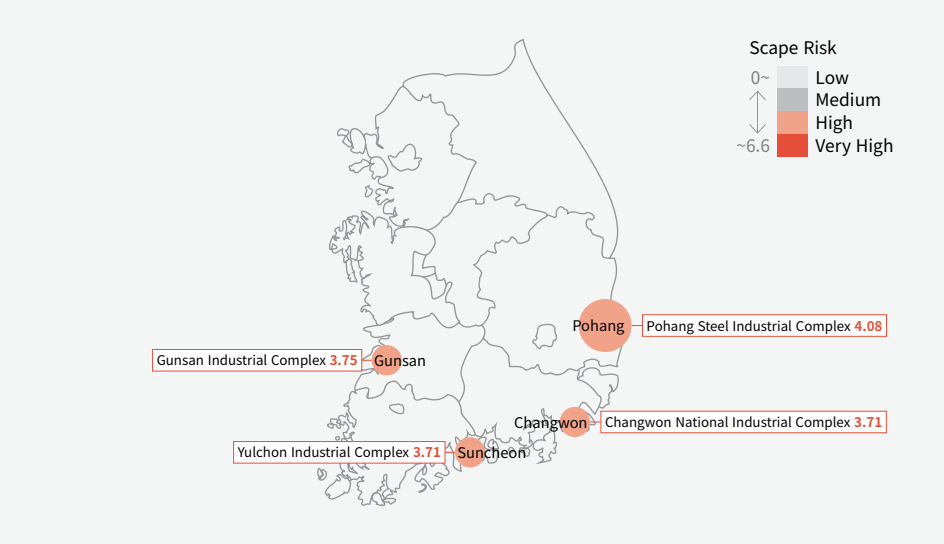
SeAH Steel conducted a separate analysis using the WWF Biodiversity Risk Filter to manage biodiversity risk in the regions where our sites are located. The results showed that biodiversity risk at domestic sites was at a High level, and we therefore plan to establish and implement ecosystem mitigation measures.

In addition, an analysis of ecosystem characteristics around our major sites in Pohang, Gunsan, Suncheon, and Changwon confirmed the presence of key endangered species, including the otter, white-tailed eagle, hooded crane, and black-headed gull. Based on these findings, we developed a list of priority protection targets for aquatic ecosystems and wild birds.

- Overview
- Sustainability Framework
- Sustainability Priorities
  - Environmental
    - Environmental Management
    - Biodiversity and Ecosystems
  - Social
  - Governance
  - Appendix

# Biodiversity and Ecosystems

Biodiversity Risk Areas near Domestic Business Sites



Number of Endangered Species Identified near Domestic Business Sites

| Domestic Business Sites | Class I and II Endangered Species                                                                                         |
|-------------------------|---------------------------------------------------------------------------------------------------------------------------|
| Pohang Plant            | 3 mammal species, 21 bird species                                                                                         |
| Gunsan Plant            | 2 mammal species, 35 bird species, 3 amphibian and reptile species<br>2 invertebrate species, 3 terrestrial plant species |
| Suncheon Plant          | 4 mammal species, 27 bird species                                                                                         |
| Changwon Plant          | 4 mammal species, 15 bird species, 2 fish species                                                                         |

## Analysis of Natural Capital Dependencies and Impacts

SeAH Steel used the ENCORE tool to identify the natural capital dependencies (Dependency) and impacts (Impact) associated with the steel pipe manufacturing industry, in order to develop a multifaceted understanding of our relationship with nature. The analysis showed that our dependencies on ecosystem services are at or below a “Medium” level, with the most relevant services being water supply and the regulation of water quality and soil. By contrast, the analysis identified water and soil pollution, as well as noise and light pollution, as having a “High” level of impact on ecosystems. Based on these findings, SeAH Steel is reviewing management measures to minimize ecosystem impacts and plans to strengthen our response framework in a phased manner.

Natural Capital Dependency of the Steel Pipe Manufacturing Industry\*

| Relevant Indicators                     | Level  |
|-----------------------------------------|--------|
| Flood mitigation                        | Medium |
| Air purification                        | Medium |
| Flow regulation                         | Medium |
| Water purification                      | Medium |
| Water supply                            | Medium |
| Prevention of soil and sediment erosion | Medium |

\* The ENCORE tool’s industry classification follows the International Standard Industrial Classification (ISIC), under which the steel pipe manufacturing industry corresponds to “Casting of Metals.”

Natural Capital Impact of the Steel Pipe Manufacturing Industry

| Relevant Indicators                                    | Level  |
|--------------------------------------------------------|--------|
| Water and soil contamination from hazardous pollutants | High   |
| Noise and light pollution                              | High   |
| Greenhouse gas emissions                               | Medium |
| Non-greenhouse gas air pollutants                      | Medium |
| Water and soil pollution from nutrients                | Medium |
| Water use                                              | Low    |

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|                           |
|---------------------------|
| Overview                  |
| Sustainability Framework  |
| Sustainability Priorities |
| Environmental             |
| <b>Social</b>             |
| Talent Management         |
| Human Rights              |
| Responsible Supply Chain  |
| Community Engagement      |
| Governance                |
| Appendix                  |

# Social

|                          |    |
|--------------------------|----|
| Talent Management        | 73 |
| Human Rights             | 81 |
| Responsible Supply Chain | 84 |
| Community Engagement     | 88 |

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
  - Talent Management
  - Human Rights
  - Responsible Supply Chain
  - Community Engagement
- Governance
- Appendix

# Talent Management

## Governance

**Talent Management System**  
**SeAH Steel Holdings** recruits and systematically develops talent aligned with our business model and strategic direction in response to changes in the business environment. Our dedicated HR organizations operate group-wide common training programs and company-specific, job-focused training courses to attract and develop outstanding talent tailored to the characteristics of each affiliate. We also continue to enhance our talent management system so that recruitment, development, evaluation, and compensation are fairly and organically linked.

**SeAH Steel** carries out talent management activities through close collaboration among the HR Team, the Corporate Culture Team, and relevant departments. The HR Team is responsible for the overall operation of HR systems, including recruitment, evaluation, compensation, and labor relations. The Corporate Culture Team oversees organizational culture initiatives, education and competency development, and employee communication programs. Through this framework, we continue to enhance our talent management programs so that we can respond more flexibly to a rapidly changing business environment.

**Dong-A Steel** conducts the talent management strategy through a dedicated HR organizational unit based on communication with employees. We establish and implement talent management principles, expand the recruitment of local talent, and operate a fair performance evaluation and compensation system based on KPIs. In addition, Dong-A Steel provides inclusive welfare programs regardless of gender or employment type and supports the growth of all employees.

## Strategy

**Talent Management Strategy**  
**SeAH Steel Holdings**, **SeAH Steel**, and **Dong-A Steel** establish our talent management strategies in line with the Group’s ideal talent profile. To foster an organizational culture built on collaboration and trust among all employees, we operate a systematic talent management process.

**SeAH Group’s Ideal Talent Profile**

| A Person with Sound Judgment and Integrity                                                                                                    | A Person with Creativity and Initiative                                                                                                     | A Person with Adaptability and Team Harmony                                                                                                                                 |
|-----------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| A person who demonstrates decision-making based on reason and logic, guided by principles that are universally acknowledged as fair and just. | A person who proactively generates new ideas, methods, or value through original thinking and strives to implement them in meaningful ways. | A person who effectively performs assigned duties regardless of the given task and builds strong interpersonal relationships through a cooperative and respectful attitude. |
|                                                            |                                                          |                                                                                          |

**Recruitment of Key Talent**  
**SeAH Steel Holdings** selects talent with job expertise and growth potential based on the SeAH Group’s ideal talent profile. To respect diversity and prevent discrimination based on region, age, physical characteristics, gender, religion, and other personal attributes, we recruit talent in accordance with the hiring guidelines set out in our Rules of Employment and HR Management Regulations. Through a systematic review process and clear evaluation criteria, we assess each applicant’s capabilities and qualifications in an objective and fair manner.

**SeAH Steel** carries out employer branding activities to attract outstanding talent, including job interviews and the revamp of the recruitment website. Through a user-centered recruitment website, we enhance the credibility and transparency of our hiring procedures. Recruitment is conducted on both a regular and rolling basis. Candidates across all job categories are identified through a three-stage process consisting of document screening, an AI-based competency assessment, and interviews. We do not discriminate in hiring based on gender, age, race, nationality, cultural background, physical characteristics, or religion. Regular training for interviewers also helps foster a fair and objective recruitment culture.



- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
  - Talent Management
  - Human Rights
  - Responsible Supply Chain
  - Community Engagement
- Governance
- Appendix

# Talent Management

**SeAH Coated Metal** places respect for human rights at the core of our talent management and operates a recruitment and HR management system that excludes all forms of discrimination based on gender, age, academic background, place of origin, disability, nationality, religion, or sexual orientation, so that all employees are respected and given fair opportunities without discrimination. We also actively expand the recruitment of women, provide growth opportunities at each job level, and operate industry-academia cooperation programs and internships for young people in order to foster future talent. In addition, we implement proactive employment policies aimed at expanding the economic participation of socially vulnerable groups, including senior workers and persons with disabilities. By pursuing voluntary expansion of employment beyond legally required hiring standards, we seek to foster an inclusive organizational culture.

**Dong-A Steel** identifies local talent as part of the effort to promote mutual growth with local communities. In addition to direct recruitment postings, talent recommendations are received through local educational institutions such as Sunchon National University and Suncheon Cheongam University, as well as regional recruitment channels including the Gwangyang HRD Center and Good Job Gwangyang. Rolling recruitment is also conducted through participation in the Jeonnam Job Fair and the Employment Council of the Jeonnam Comprehensive Employment Center.

**State Pipe & Supply** has implemented a cloud-based integrated HR management system to ensure the fair and equitable administration of HR management, payroll, attendance, performance management and evaluation, training and development, and employee benefits. In our recruitment process, we provide all applicants with fair and equal opportunities and strictly prohibit all forms of discrimination prohibited under federal, state, and local regulations. To foster a discrimination-free workplace, we provide all employees with comprehensive anti-discrimination training and systematically manage individual training records. After watching the relevant training videos, employees participate in discussions on preventing workplace discrimination, and certificates are issued upon completion of the training.

## Talent Development Programs

Coaching Program for Newly Appointed Executives **SeAH Steel Holdings** operates a coaching program to enhance newly appointed executives’ understanding of their roles, strengthen motivation, and support the stable operation of the organization. The program consists of three stages: pre-program, main program, and post-program. In the pre-program stage, we help executives review their own leadership capabilities and clearly recognize the roles expected of them within the organization through leadership assessments and interviews with the CEO. In the main program stage, we help participants deepen their understanding of role transitions through workshops, while one-on-one coaching sessions with professional coaches provide in-depth feedback on each individual’s core leadership issues. In 2025, two newly appointed executives participated in the program. Through strengths assessments, they reviewed their leadership styles and strengthened their organizational management capabilities through one-on-one feedback sessions with professional coaches.

Team Leader Workshop **SeAH Steel Holdings** operates workshops for team leaders across all affiliates to strengthen leadership capabilities and foster collaboration across organizations. Through leadership lectures delivered by top management, we share our management philosophy and leadership direction, while guest lectures and various sessions provide practical leadership insights. In 2024, participants visited major affiliate production sites to deepen their understanding of manufacturing environments and operating systems. In 2025, the program focused on strengths-based coaching capabilities, helping participants build a coaching mindset while also creating opportunities to share know-how and expand networking across affiliates.

One SeAH Program **SeAH Steel Holdings** operates the “One SeAH Program,” an invitation program that brings locally hired employees from overseas subsidiaries to headquarters. Through exchanges between locally hired employees and Headquarters personnel, we help deepen understanding of Korean culture and SeAH’s corporate culture while strengthening global networking across overseas subsidiaries, thereby contributing to talent development.

Mid- to Long-Term Training Roadmap **SeAH Steel** operates a mid- to long-term talent development roadmap that incorporates employee feedback to strengthen core competitiveness. Based on organizational adaptation, learning management, and leadership development, we run a range of training programs. In 2026, we plan to further advance the talent development framework by adding programs focused on strengthening engineers’ job expertise and AI-enabled problem-solving capabilities. We also track the effectiveness of training programs and manage outcomes based on tangible performance indicators such as job competency improvement, contribution to organizational performance, and on-the-job application.

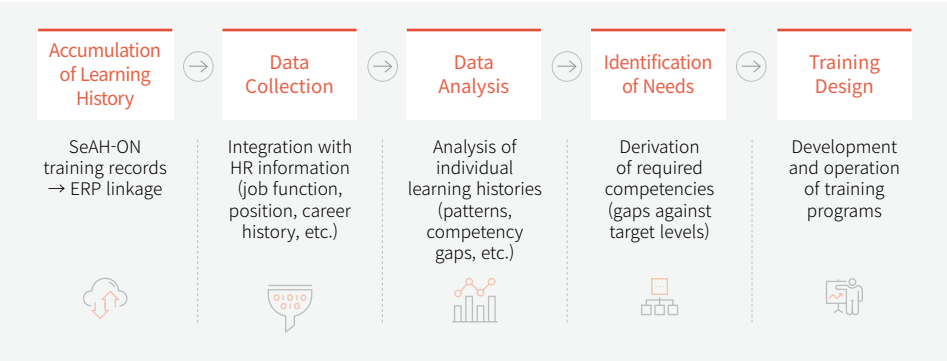
- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
  - Talent Management
  - Human Rights
  - Responsible Supply Chain
  - Community Engagement

- Governance
- Appendix

# Talent Management

Learning Infrastructure **SeAH Steel** operates an integrated learning management system centered on “SeAH-ON,” the Group learning platform, through which employees can access online content, apply for offline training, and review their training history. As of March 2025, SeAH-ON offered a total of 4,063 courses, including 1,414 common job courses, 127 specialist job courses, 1,150 foreign-language courses, and 700 certification courses. Linked with the internal ERP system, SeAH-ON accumulates course histories and training performance data. Based on these data, we analyze individual competency gaps and support the design of customized training programs. By linking SeAH-ON with “SeAH-IDP,” our self-directed learning system, employees can also establish and review recommended annual learning plans based on the competency assessment results of both themselves and their supervisors. Through this data-based management approach, which provides clear learning direction and greater autonomy, we enhance both execution and engagement. In 2024, this system was recognized as a notable practice in the surveillance audit for the Quality Management System (ISO 9001), and we recorded a 99.9% completion rate against individual learning plans.

SeAH-ON Learning Data Utilization Process



SeAH-IDP System Operating Results (SeAH Steel)

| Category                    | Unit    | 2024   | 2025   | Year-on-Year    |
|-----------------------------|---------|--------|--------|-----------------|
| Number of Employees Trained | persons | 831    | 828    | 0.36% decrease  |
| Total Training Hours        | hours   | 52,859 | 77,869 | 47.31% increase |
| Training Hours per Employee | hours   | 64     | 94     | 46.88% increase |

\* “Total training hours” and “training hours per employee” refer to the training hours of employees who attended at least one training course during the year.

Development of Specialized Technical Personnel **SeAH Coated Metal** operates training programs for the acquisition of legally required appointment qualifications, including RI (Radioisotope), Industrial Safety Engineer, Hazardous Materials Industrial Engineer, and Energy Management Engineer, and systematically develops specialized personnel in safety management. Voluntary participation and employee interest continue to increase, thereby strengthening our on-site safety management capabilities.

Learning Club **SeAH Coated Metal** operates the Learning Club program for office employees to strengthen their understanding of steel production processes and enhance practical capabilities in the field. Through team-based learning, we provide practice-oriented training that promotes a systematic understanding of major production processes, including cold rolling, pickling, rolling, annealing, and surface treatment, while also encouraging discussion of on-site issues and solutions.

Qualification Training **State Pipe & Supply** continues to operate training programs for the acquisition and maintenance of job-related qualifications, including NDT, QP, and welding certifications. We maintain an NDT qualification and certification system based on ASNT SNT-TC-1A, and in 2025, three employees obtained ASNT NDT Level II certification. We also continue to operate the CWI (Certified Welding Inspector) training course in order to strengthen the development of new talent.

\* NDT (Non-Destructive Testing): A certification granted to individuals who complete specialized training and pass examinations in non-destructive testing techniques used to inspect materials or structures without causing damage.  
\* QP (Qualified Person): An industrial coating-related certification issued by SSPC (Society for Protective Coatings), now AMPP.

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
  - Talent Management
  - Human Rights
  - Responsible Supply Chain
  - Community Engagement

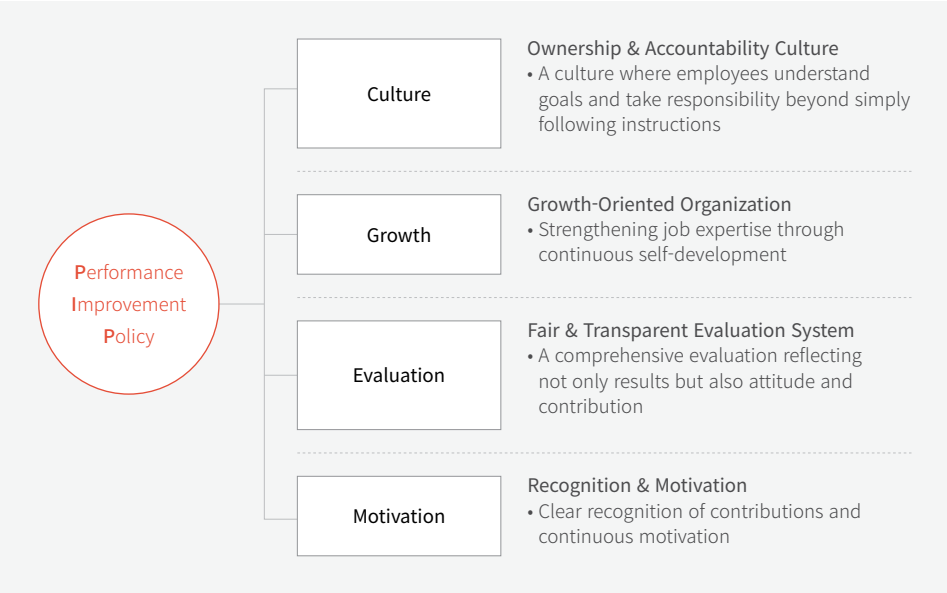
- Governance
- Appendix

# Talent Management

Competency-Building Training **SeAH Steel USA** provides Lean Manufacturing training for all employees, with a focus on continuous improvement, waste elimination, and fostering a sense of ownership. In 2025, we also launched the “Lean Together Project,” through which employees are applying what they have learned directly to their work in order to improve both operational efficiency and quality.

Job Competency Development **Inox Tech** supports employees in obtaining UT Level 3 non-destructive testing certification and operates external job training programs and government-supported business coaching programs for managers in order to strengthen professional expertise and leadership capabilities. In 2026, we plan to pilot our internally developed “Performance Improvement Policy” to create an environment in which employees can proactively develop both soft skills and job expertise while fostering a culture of continuous learning.

4 Core Pillars (Inox Tech)



## Fair Performance Evaluation and Compensation

Performance Management Framework **SeAH Steel Holdings** promotes the recruitment of outstanding talent and supports employees’ continuous growth and motivation through a fair performance-based compensation system and HR framework.

**SeAH Steel** operates a performance management framework based on the Balanced Scorecard (BSC) and conducts performance management using qualitative and quantitative indicators linked to company-wide strategy. By aligning and agreeing on goals between the managers and employees, we enhance consistency and alignment in evaluations. We also support the real-time review and improvement of performance through an ongoing feedback system enabled by IT platforms.

**SeAH Coated Metal** operates a fair and systematic performance evaluation and management system that links organizational performance with individual performance. To ensure fairness and reliability in the evaluation process, we establish clear evaluation criteria and procedures and manage the process so that objective evaluations can be carried out through evaluator training and verification procedures. Evaluation results are used to support employees’ competency development and career growth, and after the evaluation, feedback is shared between supervisors and employees on the level of achievement and directions for improvement in order to support continuous performance enhancement.

**Dong-A Steel** conducts KPI evaluations based on specific performance indicators linked to organizational goals and systematically operates the HR and evaluation system through clear and objective standards for performance management.

Performance Evaluation System **SeAH Steel Holdings** operates an absolute performance evaluation system that emphasizes collaboration toward the achievement of company-wide goals while also managing the achievement of individual goals.

Overview

Sustainability Framework

Sustainability Priorities

Environmental

Social

Talent Management

Human Rights

Responsible Supply Chain

Community Engagement

Governance

Appendix

# Talent Management

Performance-Linked Compensation System **SeAH Steel Holdings** reflects performance evaluation results across all areas of HR management, including salary increases, promotions, and talent development, and provides compensation in two forms: the “Management Performance Bonus” and “Organizational Performance Bonus.” Our domestic and overseas affiliates operate performance evaluation systems in consideration of the institutional frameworks and operating conditions of the countries in which they are located, as described below.

**SeAH Steel** promotes stronger job performance and employee motivation through a performance-centered HR and evaluation system. There are no gender-based pay differences, and male and female university graduates receive the same starting salary upon joining SeAH Steel. By linking performance evaluation results to compensation and HR operations, we enhance employee acceptance of the system and levels of engagement. Rotational employment also helps employees gain experience across a range of functions and identify the areas best suited to them.

**SeAH Coated Metal** operates a rational compensation system in which performance is linked to rewards. We apply organizational and individual performance results across the overall HR system, including salary increase rates, promotion point allocation, promotion candidate reviews, and the establishment of talent selection and development policies.

**SeAH Steel Vina** operates a team-based evaluation and compensation system focused on strengthening teamwork in order to foster a safe and productive working environment. By establishing team goals, closely managing production schedules, and rewarding production teams that exceed their targets, we contribute to employee motivation and a stronger culture of collaboration.

## Communication-Driven Culture

Strengthening Organizational Culture **SeAH Steel Holdings**, **SeAH Steel**, and **SeAH Coated Metal** have operated the “One Team Workshop” since 2023 to strengthen team-level communication, collaboration, and execution capabilities. Through this program, each team establishes its ways of working and direction, while sharing individual tendencies and opinions among team members. In this way, we foster stronger bonds and a more collaborative culture. In 2025, SeAH Steel ran workshops for 11 teams led by managers in their second year of appointment, then conducted an in-depth diagnosis of the changes before and after the workshops and analyzed the results. In 2026, we plan to expand participation through an application-based process and introduce a benchmarking framework using “Linkers” to facilitate the exchange of organizational culture improvement ideas across teams. Outcomes derived by each team through this framework will also be supported for continued implementation in the workplace.

Open Communication Culture **SeAH Wind** is building a company-wide communication system centered on the Communication Task Team based on the principle of “Right Information, Right People, Right Time.” Through a company-wide survey, we identified issues related to limited access to information and insufficient understanding of goals and priorities, and on that basis established communication standards that are clearer and more frequent. Following a roadmap structured around the stages of diagnosis, execution, and advancement, we are carrying out improvement initiatives while enhancing collaboration efficiency among management, sites, and departments through a feedback-based two-way communication system and an integrated information-sharing platform.

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
  - Talent Management
  - Human Rights
  - Responsible Supply Chain
  - Community Engagement
- Governance
- Appendix

# Talent Management

## Employee Benefits

Flexible Work Arrangements **SeAH Steel Holdings** provides the same employee benefits to all employees regardless of employment type. To create a more flexible working environment, we operate a staggered working hours system that allows employees to adjust their working hours according to individual needs such as childcare, study, and commuting distance.

**SeAH Steel America** has introduced an hourly leave system to help employees respond flexibly to urgent personal matters.

Leave and Rest Support **SeAH Steel Holdings** operates a range of leave programs, including refresh leave, summer leave, and anniversary leave, and provides separate leave allowances. We also express our appreciation for long-term service by awarding plaques and monetary rewards every five years to employees with at least 10 years of service, and by providing special leave and travel expenses to employees with at least 25 years of service.

Health Management **SeAH Steel Holdings** increased the level of support for health checkups in 2025 and added biennial examination items.

**SeAH Coated Metal** supports general, special, and comprehensive health checkups, as well as influenza vaccinations.

**SeAH Steel America** provides private health insurance.

**SeAH Japan** supports annual health checkup expenses of JPY 40,000 per employee.

Housing and Living Support **SeAH Coated Metal** provides interest-free home purchase and lease-deposit loans for employees with at least three years of service. As of 2025, we have provided home purchase loan support to a total of 22 employees.

Children’s Education Support **SeAH Steel America** provides annual education support for employees with children in college, with no limit on the number of children eligible for support.

**Inox Tech** provides tuition subsidies and reimbursement vouchers to employees with children in middle school, high school, and university, and offers separate financial support for employees with children with disabilities in order to ease caregiving burdens.

Childbirth and Childcare Support **SeAH Steel America** provides up to four months of leave for employees in connection with pregnancy and childbirth and also supports adjustments to work intensity.

**SeAH Japan** operates a maternity leave system consisting of six weeks before childbirth and eight weeks after childbirth, provides childbirth congratulatory payments, and offers up to one year of childcare leave.

Retirement Pension **SeAH Steel Holdings’** domestic affiliates primarily operate a defined benefit (DB) plan, while employees may also choose to participate in a defined contribution (DC) plan.

**SeAH Steel USA** operates a comprehensive employee benefits program that includes retirement pension benefits along with medical services and paid leave.

Strengthening Culture and Belonging **SeAH Steel America** holds monthly birthday parties and a year-end Christmas party to create opportunities for communication with employees and their families.

**SeAH Steel Vina** strengthens solidarity and a sense of belonging among employees through events for International Women’s Day and Vietnamese Women’s Day, as well as gifts for anniversaries and holidays.

**Inox Tech** expands opportunities for cultural enjoyment by providing employees with opera tickets.



Women’s Day Celebration (SeAH Steel Vina)



Lunar New Year Gift Distribution (SeAH Steel Vina)



- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
  - Talent Management
  - Human Rights
  - Responsible Supply Chain
  - Community Engagement
- Governance
- Appendix

# Talent Management

**Labor-Management Cooperation Programs**  
Town Hall Meeting **SeAH Steel Holdings** holds an annual Town Hall Meeting every April, bringing together all employees, including the CEO, to share the company’s vision and strategic direction. Through active employee participation, we discuss the company’s role and direction while facilitating communication across the organization, thereby strengthening mutual understanding and respect for diversity.

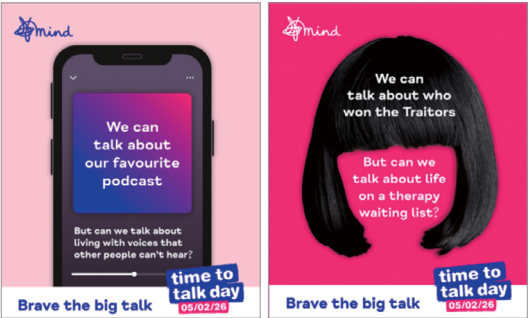
Labor-Management Council **SeAH Steel Holdings** operates a labor-management council as a consultative body where management and employee representatives meet to communicate and discuss ways to help employees grow as leaders responsible for SeAH’s future and to create a happier and more enjoyable workplace. The council is called “SeAH-ri,” a name that conveys meanings such as “SeAH’s voice” and “SeAH village.” Through discussions on working conditions, improvements in employee benefits, the direction of wage and performance compensation, and the resolution of employee grievances, the “SeAH-ri” labor-management council strengthens mutual trust and helps build an organizational foundation in which both employees and the company can grow together. In place of a labor union, the council represents the voices of all employees by sharing management information, listening to employee opinions, and facilitating final coordination. Going forward, we will continue to foster a culture of cooperation and shared growth based on mutual trust and respect while working together to build a better workplace.

One Family Council **SeAH Coated Metal** operates the “One Family Council” to build healthy labor-management relations. We also operate a consultative body for technical professional managers, a consultative body for business partner company CEOs, and a safety consultative body, and hold monthly meetings to listen to on-site opinions and discuss improvement measures in areas such as working conditions, safety management, and organizational culture. In 2025, we held a total of six meetings for technical professionals and office employees. We also shared production-line performance and key management updates transparently with employees through management briefing sessions held at least once every two months.

QHSE Labor-Management Council **SeAH Wind** shares views between management and employees through regular communication channels, including town hall meetings, and provides information sharing and Q&A on organizational operations and key issues. Employee opinions are collected through a separate feedback system and reflected in organizational management.

## Risk Management

**Establishment of a Psychological Safety Net**  
Counseling Program **SeAH Steel Holdings** and **SeAH Steel** operate a counseling program in cooperation with specialized external organizations to support employees’ psychological well-being in areas such as interpersonal relationships, work-related stress, and family conflict. We provide up to eight counseling sessions per person each year, and consultation records and personal information are kept strictly confidential. When an individual is identified by a specialist as being in a high-risk group, additional support may be provided in consultation with relevant departments, subject to the individual’s consent.  
**SeAH Wind** operates a counseling and support system to help employees manage mental health issues and resolve grievances. We have established a Mental Health First Aid (MHFA) team as an initial point of contact and provide counseling based on the principles of confidentiality and non-judgment. In addition to early-stage mental health support, we connect employees with external medical and counseling services when needed. To raise awareness of mental health, we also operate the “Time to Talk Day” participation program. Through this initiative, we foster an organizational culture in which employees can share difficulties and provide emotional support through everyday conversation.



Time to Talk Day Participation Program (SeAH Wind)

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
  - Talent Management
  - Human Rights
  - Responsible Supply Chain
  - Community Engagement
- Governance
- Appendix

# Talent Management

## Grievance Counseling

SeAH-ri Labor-Management Council **SeAH Steel Holdings** receives employee grievances on a quarterly basis through SeAH-ri, our labor-management council. In 2025, we received and handled a total of 12 grievances through four council meetings.

Grievance Counseling System **SeAH Coated Metal** operates an anonymous grievance counseling system to enable not only employees but also workers at business partners to freely raise concerns. We carefully review all submitted grievances and systematically manage grievance details and outcomes as confidential documents in order to ensure the protection of personal information and fair handling. In 2024, a total of 305 grievances and suggestions were received, of which 288 were resolved. In 2025, 163 of 182 submitted cases were addressed.

**SeAH Steel America** and **State Pipe & Supply** enhanced the operating framework of our grievance handling systems in 2025 in order to improve accessibility. We standardized the handling process for grievances submitted through the anonymous “HR Online Opinion Line” channel and clarified response deadlines and result feedback procedures in order to improve both responsiveness and transparency. We also strengthened the principles of confidentiality and non-retaliation to enhance employee trust and linked major grievance cases to management reporting and improvement measures, thereby contributing to broader improvements in the working environment. Through these efforts, we continue to build a fair and trusted organizational culture while strengthening the protection of employee rights and promoting communication across the organization.

## Organizational Culture Assessment

**SeAH Steel Holdings** conducts an annual Organizational Culture Assessment and carries out follow-up improvement activities based on the results. The assessment consists of three areas—organization satisfaction, job satisfaction, and organizational culture—through which we identify employees’ level of organizational engagement, job satisfaction, and the characteristics of our internal corporate culture. The results are shared with employees, and the views gathered through the assessment are reviewed in consultation with relevant departments and linked to specific improvement activities.

**SeAH Steel** and **Dong-A Steel** conduct an annual organizational culture assessment for all employees in order to enhance employee satisfaction. Through this survey, we identify employees’ levels of organizational and job satisfaction as well as organizational culture types, and use the findings to carry out improvement activities. SeAH Steel also aligned the values and ways of working we seek to promote in order to improve organizational and job satisfaction, and carried out company-wide online campaigns and internalization workshops. Through these activities, we promote employee growth and positive change at the organizational and team levels.

**SeAH Coated Metal** conducts an annual employee satisfaction survey to foster a healthy organizational culture and improve employee satisfaction. Through this survey, we gather employee feedback and reflect it in organizational culture improvement activities. In 2025, the overall employee satisfaction score improved from the previous year. In particular, positive perceptions continued to be maintained in areas reflecting employees’ sense of belonging and attachment to the organization. At the same time, as some feedback indicated that improvement was needed in certain areas related to organizational operations and work systems, we plan to promote organizational culture improvement activities focused on enhancing process efficiency and strengthening internal communication.

Overview

Sustainability Framework

Sustainability Priorities

Environmental

Social

    Talent Management

    Human Rights

    Responsible Supply Chain

    Community Engagement

Governance

Appendix

# Human Rights

## Governance

**Human Rights Management System**

Based on the **SeAH Group** Human Rights Management Charter, SeAH Steel Holdings places the protection of the human rights of all stakeholders as a top priority and advances human rights management reflecting major international standards, 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.

**SeAH Steel’s** human rights management system applies to all domestic business sites and the supply chain. In response to changes in the internal and external environment, we continue to enhance our preventive processes for potential human rights violations. As part of these efforts, we conducted a human rights impact assessment in May 2026.

SeAH Group Human Rights Management Charter

|                                                                                 |                                                                        |
|---------------------------------------------------------------------------------|------------------------------------------------------------------------|
| <u>Article 1.</u> Establishment of a Human Rights Management System             | <u>Article 8.</u> Protection of the Human Rights of Local Residents    |
| <u>Article 2.</u> Prohibition of Discrimination in Employment                   | <u>Article 9.</u> Protection of Environmental Rights                   |
| <u>Article 3.</u> Guarantee of Freedom of Association and Collective Bargaining | <u>Article 10.</u> Protection of Customer Human Rights                 |
| <u>Article 4.</u> Prohibition of Forced Labor                                   | <u>Article 11.</u> Prevention of Workplace Bullying and Abuse of Power |
| <u>Article 5.</u> Prohibition of Child Labor                                    | <u>Article 12.</u> Protection of Personal Information                  |
| <u>Article 6.</u> Guarantee of Occupational Safety                              | <u>Article 13.</u> Compliance with Legal Working Hours and Conditions  |
| <u>Article 7.</u> Responsible Supply Chain Management                           |                                                                        |

**Three Zero-Tolerance Principles**

**SeAH Steel Holdings, SeAH Steel, SeAH Coated Metal, and Dong-A Steel** apply the “Three Zero-Tolerance Principles” and respond strictly to workplace bullying, sexual harassment, and acts of violence. We conduct annual preventive training for employees, receive and address related grievances through grievance handling channels, and disclose internal guidelines and standards and require all stakeholders across our business activities to comply with them. We also revised our rules of employment in response to strengthened labor standards and systematically manage unethical conduct across the organization in order to address ethical risks.

SeAH Steel Anti-Workplace Bullying, Anti-Sexual Harassment, and Anti-Violence Policy

Bullying in the Workplace

Acts involving the abuse of one’s position or authority to cause physical or mental harm to another employee or to negatively impact the working environment beyond what is appropriate for the scope of work.

Sexual Harassment in the Workplace

Acts where an employer, supervisor, or employee uses their position in the workplace to engage in sexual behavior that causes others to feel humiliated or uncomfortable, or imposes disadvantages in working conditions or employment as a result of non-compliance with such behavior or related demands.

Violence

Violent acts between employees that result in injury, physical assault, threats, confinement, property damage, or any form of physical and tangible violence intended to cause harm, even if no actual injury occurs.

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social**
  - Talent Management
  - Human Rights**
  - Responsible Supply Chain
  - Community Engagement

- Governance
- Appendix

# Human Rights

## Risk Management

### Human Rights Due Diligence

**SeAH Steel** conducted a human rights impact assessment in the first half of 2026 based on the UN Guiding Principles on Business and Human Rights (UNGPs), CHRB (Corporate Human Rights Benchmark), CSDDD (Corporate Sustainability Due Diligence Directive), and the guidelines of the National Human Rights Commission of Korea. The assessment was conducted as a self-assessment for employees responsible for human rights-related activities involving employees and partners at the headquarters and business sites. We applied a combined methodology that included surveys, interviews, and on-site inspections, and covered 25 key human rights areas, including occupational health and safety, environmental protection and environmental rights, the elimination of employment discrimination, the protection of the rights of Indigenous Peoples and local communities, the protection of migrant workers’ rights, and the prevention of forced labor. Identified risks were classified into high-, medium-, and low-risk categories based on likelihood and severity. The assessment focused on areas requiring enhanced management, with occupational health and safety, environmental protection and environmental rights, and supply chain human rights management identified as relatively higher-risk areas. For the risks identified, we established response plans by distinguishing between short-term corrective actions and mid- to long-term management directions. Based on the results of this first human rights impact assessment, we plan to designate implementation officers in each relevant department—such as HR, safety, and procurement—and continuously review the status of corrective actions. We are also considering the establishment of a system to monitor implementation through regular internal reviews and report the results to management. SeAH Steel plans to conduct human rights impact assessments on an annual basis and reflect the results in management activities so that both our employees and employees of business partners can continue to work in a safe and dignified environment.

### Identified Risk Items and Corrective Actions (SeAH Steel)

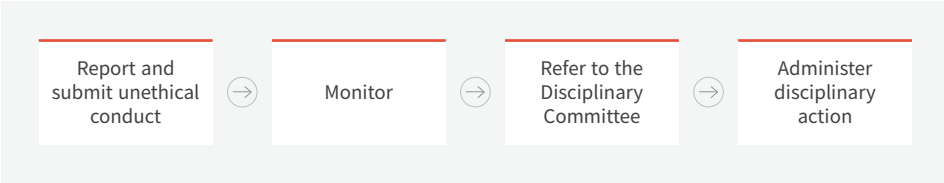
| Category                            | Key Risk Items                                                        | Key Stakeholders (Vulnerable Groups) | Improvement Measures                                                                                                                                                                                    |
|-------------------------------------|-----------------------------------------------------------------------|--------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ensure Occupational Health & Safety | Industrial accidents among workers in high-risk processes             | Employees, Business Partners         | Expansion of health & safety training and implementation of workplace environment improvement measures                                                                                                  |
| Protect Environmental Rights        | Exposure of communities near industrial sites to hazardous substances | Local Communities                    | Management of air and water quality based on internal standards set at or below 30% of the statutory allowable limits, and operation of a 24-hour system to prevent leaks/spills of hazardous chemicals |
| Manage Supply Chain Human Rights    | Human rights risks within the supply chain                            | Business Partners                    | Establishment of procedures for assessing human rights conditions for business partners                                                                                                                 |

### Human Rights Reporting and Management

**SeAH Steel Holdings** operates grievance handling channels in order to protect employee rights and interests and create a healthy working environment. Through these channels, employees are free to raise a wide range of grievances and suggestions related to work, organizational culture, and interpersonal relationships. Submitted cases are handled promptly and fairly, and we continue to manage them so that employee feedback can lead to meaningful improvement.

**SeAH Coated Metal** operates various communication channels in order to listen to and address the grievances of employees and stakeholders. In addition, we hold a bimonthly regular consultative body to gather the opinions and concerns of on-site managers and business partner site managers and to share improvement measures and handling results.

### Grievance Handling Center Operation Process



### Status of Reports to the Grievance Handling Center (SeAH Steel Holdings)

| Category        | Unit  | 2023 | 2024 | 2025 |
|-----------------|-------|------|------|------|
| Reported Cases  | cases | 3    | 0    | 12   |
| Resolved Cases  | cases | 3    | 0    | 12   |
| Resolution Rate | %     | 100  | -    | 100  |

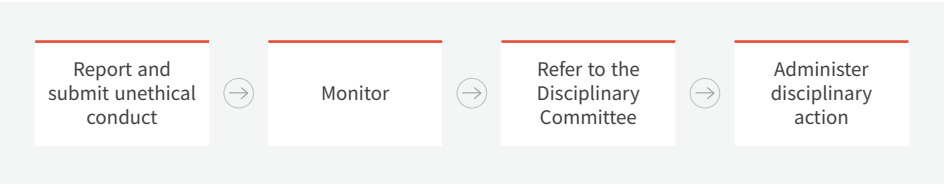
- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social**
  - Talent Management
  - Human Rights**
  - Responsible Supply Chain
  - Community Engagement

- Governance
- Appendix

# Human Rights

Grievance Handling and Remediation **SeAH Steel** and **Dong-A Steel** operate a Grievance Handling Center in order to protect the human rights of all stakeholders. The Center accepts anonymous reports not only from employees but also from external stakeholders. Reports concerning unethical conduct and human rights violations—including workplace bullying, sexual harassment, and abuse of power—are received on a continuous basis and handled fairly through on-site investigations to verify the facts and deliberation by the Disciplinary Committee. The relevant party is subject to appropriate disciplinary action in accordance with the final decision, and we continue follow-up monitoring to help secure the psychological safety of affected employees and prevent recurrence.

Grievance Handling Center Operation Process



Status of Reports to the Grievance Handling Center (SeAH Steel)

| Category        | Unit  | 2023 | 2024 | 2025 |
|-----------------|-------|------|------|------|
| Reported Cases  | cases | 3    | 0    | 5    |
| Resolved Cases  | cases | 3    | 0    | 5    |
| Resolution Rate | %     | 100  | -    | 100  |

## Embedding Respect for Human Rights

**SeAH Steel Holdings** provides annual preventive training for employees based on a zero-tolerance principle toward bullying in the workplace, sexual harassment, and violence. The training is conducted based on internal guidelines and standards for the prevention of prohibited conduct. **SeAH Steel** also operates human rights training to enhance employees’ human rights awareness and sensitivity. The number of employees completing the training has increased each year.

Human Rights Training Status (SeAH Steel)

| Category                                | Unit    | 2023  | 2024  | 2025  |
|-----------------------------------------|---------|-------|-------|-------|
| Number of Employees Completing Training | persons | 1,096 | 1,207 | 2,334 |

**State Pipe & Supply** uses a cloud-based HR management system to provide a range of training programs related to respect for human rights and ethics. Through this system, we systematically manage training completion records and have strengthened accessibility so that all employees can participate in relevant training. Through regular training, we continue to raise awareness of human rights protection and the prevention of discrimination, thereby reinforcing a fair and respectful working environment and a human rights-centered organizational culture.



- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social**
  - Talent Management
  - Human Rights
  - Responsible Supply Chain**
  - Community Engagement
- Governance
- Appendix

# Responsible Supply Chain

## Governance

**Supply Chain Management System**  
**SeAH Steel** operates an integrated management system involving the departments responsible for procurement, quality, production, safety, and ESG in order to build a sustainable supply chain. Within this framework, each department carries out its respective roles in supplier evaluation, procurement, communication, and support activities, enabling us to manage supply chain risks in a systematic manner. Supplier evaluations are conducted based on key criteria such as quality, delivery, safety, environment, ethics, and human rights, allowing us to identify potential risks in advance. Based on the evaluation results, we also continue to require suppliers to implement improvement measures and monitor their follow-through.

**SeAH Coated Metal** operates a business partner support and management system centered on the Purchasing Team and the Business Support Part. To build long-term and stable partnerships with our business partners, we have established cooperation programs and provide guidance and training on legal and ethical requirements so that our business partners can put ESG management into practice. We also provide information and management systems to support compliance with applicable laws and regulations and responsible management activities, thereby helping strengthen the ESG capabilities of our business partners. In addition, we seek to prevent management risks that may arise in the course of cooperation and to foster a sustainable growth environment based on mutual cooperation.

## Strategy

**Supply Chain Management Strategy**  
**SeAH Steel** recognizes that changes in the external environment—including the global slowdown in steel demand, oversupply, uncertainty in the trade environment, and tighter environmental regulations—can have a significant impact on supply chain stability. In response, we are pursuing a sustainable supply chain based on three strategic pillars: Supply Chain ESG Assessment, Green Procurement, and Mutual Growth. In 2024, we established a Code of Conduct for Business Partners, and plan to incorporate a clause requiring compliance with the Code of Conduct into standard subcontracting agreements. In addition, to further strengthen our supply chain management system, we established a Supply Chain Management Policy applicable to all suppliers. Through these efforts, we plan to continue enhancing the effectiveness of our supply chain management system.

 Code of Conduct for Business Partners



**Responsible Minerals Policy**  
**SeAH Steel** selects suppliers in the raw materials procurement process by reviewing not only supply stability, but also sustainability factors such as carbon emissions data, the level of environmental management, and responsible minerals sourcing systems. We comply with the international principle of using only minerals mined in accordance with the human rights and environmental protection standards set by global regulations on conflict and responsible minerals—such as the OECD Due Diligence Guidance, the U.S. Dodd-Frank Act, and the EU Conflict Minerals Regulation. Based on these principles, we have established and operate a Responsible Minerals Policy that sets out our basic principles and implementation measures.

 SeAH Steel Responsible Minerals Policy

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
  - Talent Management
  - Human Rights
  - Responsible Supply Chain
  - Community Engagement
- Governance
- Appendix

# Responsible Supply Chain

**Supply Chain Stability Strategy**  
Raw Material Sourcing and Quality Management **SeAH Steel Vina** strengthens the stability of our regional supply chain by securing stable raw material suppliers within the global supply chain and building partnerships in Vietnam that enable long-term contracts and quality assurance. While maintaining relationships with high-performing raw material suppliers, we continue to identify new suppliers and promote supply chain diversification. In addition, management regularly visits suppliers in person to inspect and evaluate their operations, helping us maintain a stable raw material supply system.



Regular Visits to Raw Material Suppliers (SeAH Steel Vina)

**Strengthening Communication with Business Partners**  
**SeAH Steel** operates regular communication channels with key business partners and has established a joint response system to address supply chain issues as they arise. Through this framework, we provide non-financial support to our business partners and discuss improvement measures with them. By actively incorporating the views of our business partners, we received 74% more suggestions year on year and addressed 99.6% of these, thereby improving the overall environment for collaboration with suppliers.  
**SeAH Coated Metal** holds a business partner representatives council meeting every two months to strengthen trust-based, win-win cooperation with our business partners. With the participation of business partner representatives as well as our management and relevant departments, the council serves as a cooperation platform where a wide range of on-site opinions and operational difficulties are shared and improvement measures are discussed through regular meetings. Key topics discussed at the council include subcontract operation and system improvement, working environment and occupational safety and health management, subcontract payment and

operation, business challenges faced by business partners, and support for training and capability enhancement. Opinions and suggestions raised through the council are reviewed by the relevant departments, reflected in system improvement and operational policies, and shared again with business partners, helping us build transparent and responsible cooperative relationships. SeAH Coated Metal will continue to develop the business partner representatives council beyond a simple channel for collecting feedback into a governance framework for win-win cooperation and mutual growth with business partners. Through this effort, we aim to strengthen the foundation for sustainable supply chain management by enhancing the management stability of business partners and the efficiency of on-site operations.  
**SeAH Steel Vina** manages supply quality through ad hoc meetings and annual evaluations with business partners, while also supporting stronger capabilities and improved risk response among business partners.  
**SeAH Steel America** and **State Pipe & Supply** identify requests and operational difficulties faced by business partners through weekly and monthly regular meetings. In addition, we gather feedback from business partners and share major issues through regular meetings and consultative bodies, enabling us to respond more quickly to on-site issues.  
**SeAH Steel America** also holds annual meetings with key business partners to discuss cooperation measures and improvement plans together. Based on this regular communication, we continue to enhance the efficiency of supply chain management, expand opportunities for mutual growth, and further strengthen trust-based relationships with our business partners.



Regular Meetings with Business Partners (SeAH Steel Vina)

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social**
  - Talent Management
  - Human Rights
  - Responsible Supply Chain**
  - Community Engagement
- Governance
- Appendix

# Responsible Supply Chain

## Risk Management

**Protection of Business Partners’ Rights**  
**SeAH Steel** protects the rights of our business partners and enhances the efficiency of contract management by adopting a standardized subcontract agreement. The agreement clearly stipulates key terms, including quality assurance, legal matters related to inspection and acceptance, payment methods and the prohibition of unfair deductions, and occupational safety and health expenses. By standardizing contract forms that previously differed by company, we have improved our contract management framework so that the responsibilities and authority of business partners are fully reflected.

**SeAH Coated Metal** places the highest priority on fairness and mutual respect when entering into subcontract agreements with business partners. The agreement clearly defines key matters such as the scope of the contract, working conditions, occupational safety and health obligations, payment terms, defect repair, and the grounds for contract termination. In particular, based on a standard subcontract agreement, we conclude contracts through mutual consultation and reflect the opinions of business partners to ensure that no unfair clauses are included. In addition, when work details or contract terms are changed, we manage the process through separate amendment procedures so that business partners do not suffer any disadvantage. Payments are made regularly and transparently based on electronic tax invoices, and we continue to strengthen the efficiency of related procedures to minimize the administrative and operational burden on business partners. At the same time, while encouraging business partners to comply with their obligations under the Occupational Safety and Health Act, SeAH Coated Metal also provides safety and health support and conducts site inspections within our scope of responsibility, thereby reinforcing a framework for win-win cooperation. Through this subcontract management system, we help ensure the managerial autonomy and on-site accountability of business partners and support them in maintaining independent and sustainable operations.

**Mutual Growth Support Programs**  
Financial and Funding Support **SeAH Steel** and **Dong-A Steel** implement policies to shorten payment terms and ease financing burdens in order to support the smooth cash flow and stable management of business partners. Payments for subcontracting fees incurred during the current month are made in full, in cash or notes, on the 10th and 7th of the following month, helping improve suppliers’ cash flow. To reduce the burden of contract performance deposits required when signing subcontract agreements, we also allow performance guarantee insurance bonds to be used in place of cash or marketable securities.

**SeAH Coated Metal** also operates various support policies to help business partners maintain stable business operations and secure liquidity. Monthly subcontract payments are made in full in cash on the 10th of the following month, enabling business partners to establish predictable funding plans while maintaining transparent and reliable payment procedures. We also allow contract performance deposits to be replaced with performance guarantee insurance bonds rather than cash deposits when subcontract agreements are signed, thereby reducing the financial burden on business partners.

Win-Win Cooperation Partnership **SeAH Coated Metal** continues to listen to the various difficulties faced by our business partners and make efforts to address them through our win-win cooperation partnership agreement. Based on regular communication with business partners, we reflect on-site feedback in our management activities and provide various incentives, including performance bonuses, according to management results, thereby promoting the mutual growth of our business partners. We also provide a range of training opportunities, including organizational activation training and job competency enhancement training, to support the improvement of the professionalism and competitiveness of our business partners. Through these efforts, we are strengthening the foundation for cooperation so that business partners can respond proactively to changes in the industrial environment and achieve continued growth.

Other Support for Business Partners **State Pipe & Supply** has established a plan to convert an unused office building into a rest area in order to improve the working environment and welfare of business partners and employees. The space is intended to serve as a shared rest area not only for employees but also for workers of business partners, with the goal of providing a more comfortable working and resting environment. Through this initiative, we expect to strengthen our win-win cooperative relationship with business partners and contribute to higher job satisfaction and improved work efficiency for on-site workers.



- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social**
  - Talent Management
  - Human Rights
  - Responsible Supply Chain**
  - Community Engagement

- Governance
- Appendix

# Responsible Supply Chain

## Risk Management

**Supply Chain Risk Management System**  
**SeAH Steel** operates a range of evaluation systems to strengthen supply chain stability and improve ESG standards across the supply chain. In 2025, we participated in the Korea Iron & Steel Association’s “Steel ESG Assessment Framework Development” project and conducted ESG assessments of 10 suppliers through 74 assessment items. In 2026, we plan to regularize this process and establish a supply chain ESG management system aligned with global standards. We also established internal evaluation criteria to assess supplier capabilities and conducted pilot evaluations of 39 companies. Going forward, we are reviewing the expansion of the target companies and the introduction of an incentive program. In addition, we conduct evaluations of qualified suppliers before hazardous work begins in order to assess the safety and health capabilities of our business partners. In 2025, we completed regular evaluations of 50 companies with construction work records and preliminary evaluations of 17 new companies, while also implementing corrective measures for companies requiring improvement. We also maintain a systematic third-party management system through preventive measures, including ISO 37301-based risk assessments, dissemination of our compliance management guidelines to external business partners, and collection of ethics and compliance pledges.  
**SeAH Coated Metal** quantitatively verifies the business capabilities and financial soundness of business partners by using an internal evaluation checklist and external credit assessment information during the selection process. We also maintain a real-time monitoring system that enables us to respond promptly to changes in business conditions. In addition, we operate a third-party management process based on a compliance management system in order to prevent ethics and compliance risks in advance. Through these efforts, we plan to minimize potential transaction risks, foster a fair culture of cooperation, and continue to advance our supply chain risk management system.

**SeAH Steel America** and **State Pipe & Supply** closely review the management risks, financial soundness, and transparency of management activities of new business partners through site visits or interviews. At the same time, based on long-term partnerships with key business partners, we maintain a stable supply chain while continuing to strengthen our management system to regularly assess their quality and delivery response capabilities and management stability so that potential risks can be identified and addressed in advance. Through these efforts, we minimize risks that may arise within the supply chain and help ensure the stability and continuity of our business operations.  
**SeAH Steel Vina** continues to strengthen our annual supply chain evaluations and customer quality assessment standards, thereby ensuring consistent product quality from the initial stage through final delivery to customers.



Strengthening Customer Quality Inspections and Cooperation (SeAH Steel Vina)

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social**
  - Talent Management
  - Human Rights
  - Responsible Supply Chain
  - Community Engagement**

- Governance
- Appendix

# Community Engagement

## Governance

**Community Engagement Framework**  
**SeAH Steel Holdings** carries out our community engagement activities based on the mid- to long-term direction and business plans established by the SeAH Brand Management Committee. Our subsidiaries also operate social contribution programs aimed at contributing to local communities, and through regular volunteer activities, we seek to promote the sustainable growth of both the company and local communities. SeAH Steel Holdings expands a culture of sharing through donations and sponsorships for vulnerable groups in local communities, volunteer activities by employees, and solidarity with social organizations and companies.

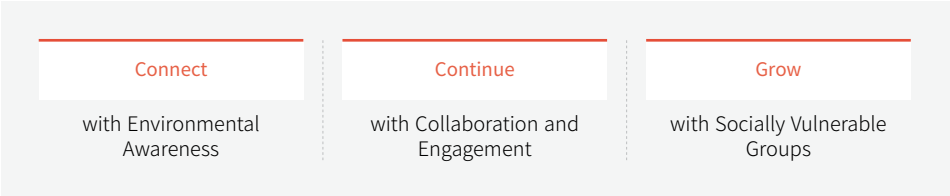
**SeAH Coated Metal** carries out our community engagement activities on the basis of company-wide participation. The Business Support Team oversees cooperation with social organizations, as well as annual planning and budget allocation, while volunteer activities are carried out mainly through the SeAH Coated Metal Volunteer Group. Centered on the head of the volunteer group, all employees, including business partners, participate in sharing activities at least once a year, regularly engaging in meal service volunteer work and support for vulnerable groups.

 Community, Donation, and Sponsorship Policy (SeAH Steel Holdings)

## Strategy

**Community Engagement Strategy**  
**SeAH Steel Holdings** contributes to strengthening industrial competitiveness by supplying high-quality steel pipes to the energy, construction, and industrial infrastructure sectors in Korea and overseas. We also help revitalize local economies and generate positive indirect economic impacts through mutual growth with business partners and job creation. At the same time, we practice responsible management by taking into account the environmental and social impacts that may arise in the course of our business operations. In line with our three directions for community engagement, we carry out activities that promote environmental awareness, collaboration and engagement with internal and external stakeholders, and care for socially vulnerable groups.

### Community Engagement Themes (SeAH Steel Holdings)



### Community Engagement Guidelines (SeAH Steel Holdings)

- SeAH Steel Holdings reaches out to neighbors in need, pursuing sincere initiatives that offer practical support and contribute to the growth of society.
- We cultivate a culture of empathy and voluntary participation by encouraging employee-led campaigns focused on sharing and mutual understanding.
- By sharing and communicating the outcomes of various initiatives within the company, we foster a culture of giving where employees feel connected and inspired through a shared purpose.

**SeAH Coated Metal** promotes tailored community engagement activities for local children, youth, and vulnerable groups with the aim of mutual growth with local communities. We also make efforts to support local talent development and job creation. Through volunteer activities and donation campaigns in which employees participate voluntarily, we are embedding a participatory culture of sharing across the organization and operating a range of programs so that all employees can play a meaningful role in creating social value. We also carry out joint community engagement activities in solidarity with business partners and various stakeholders in order to strengthen social responsibility across the supply chain as a whole.



- Overview
- Sustainability Framework
- Sustainability Priorities
  - Environmental
  - Social**
    - Talent Management
    - Human Rights
    - Responsible Supply Chain
    - Community Engagement**

- Governance
- Appendix

# Community Engagement

## Community Engagement Initiatives and Strategies (SeAH Coated Metal)

|                                                                           |                                                                                                                                                                                                                                                                                                                                             |
|---------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Pursuing Shared Growth with the Local Community</b>                    | <ul style="list-style-type: none"><li>• Proactive implementation of social contribution activities in cooperation with local communities</li><li>• Specialized sharing activities for local children, youth, and vulnerable groups</li><li>• Strengthened collaboration for local talent development and employment opportunities</li></ul> |
| <b>Establishing a Culture of Sharing with Employee Participation</b>      | <ul style="list-style-type: none"><li>• Operation of voluntary employee participation programs such as volunteer activities and donation campaigns</li></ul>                                                                                                                                                                                |
| <b>Promoting Environmental Protection and Sustainability</b>              | <ul style="list-style-type: none"><li>• Community engagement activities linked to eco-friendly campaigns (e.g., reducing single-use products, saving energy)</li><li>• Environmental conservation activities (e.g., ESG-linked plogging)</li></ul>                                                                                          |
| <b>Strengthening Partnerships with Business Partners and Stakeholders</b> | <ul style="list-style-type: none"><li>• Partnership-driven sharing efforts to reinforce social responsibility throughout the supply chain</li></ul>                                                                                                                                                                                         |

### With Environmental Awareness

Plogging Volunteer Activities **SeAH Coated Metal** regularly carries out plogging volunteer activities as part of our efforts to improve the environment around our worksites and promote employee participation in environmental activities. In 2025, we conducted a total of five activities, including three on-site plogging sessions around the plant and two external environmental clean-up activities in Sanbuk-dong, Miseong-dong, and Eunpa Lake Park (Eunpa Recreation Area) in Naun-dong, Gunsan. In each activity, our volunteer group collected litter and cleaned public spaces in everyday living areas, including roadsides, parks, and walking trails frequently used by local residents. These plogging activities help prevent environmental pollution through local waste collection while also raising employees’ awareness of the local environment.

Vegetable Garden Volunteer Activities **SeAH Coated Metal** carried out vegetable garden volunteer activities twice in cooperation with Gunsan Community Welfare Center. Ten employees participated in cultivating a garden near the welfare center, contributing to the creation of an eco-friendly environment and to community-based activities.

### With Collaboration and Engagement

Institutional Sponsorship **SeAH Steel Holdings** provided a total of KRW 30 million in sponsorships in 2025 to major public-interest institutions, including Holt Children’s Services, Habitat for Humanity Korea, and Yonsei University. In March 2026, we further expanded our sponsorship into cultural heritage education by supporting the production of Daedongyeojido educational activity materials for the National Museum of Korea.

Meal Service Volunteer Activities To provide warm meals for senior residents in the local community and continue community engagement, **SeAH Coated Metal** entered into an agreement with Daeseong Senior Center in Gunsan and carried out regular monthly meal service volunteer activities from January to December 2025. Across 12 sessions during the year, our volunteer group participated in the full process of meal preparation, serving, and clean-up, contributing both to meal support for senior residents and to stronger engagement with the local community.

Blood Donation Campaign **SeAH Coated Metal** conducted a blood donation campaign in 2025 in cooperation with the Jeonbuk Blood Center of Korean Red Cross Blood Services. Twenty employees participated, putting the value of sharing life into practice and contributing to a more stable local blood supply.

Mural Painting Volunteer Activities **SeAH Coated Metal** carried out a mural painting volunteer activity in cooperation with Gunsan Community Welfare Center. Ten employees participated in brightening and improving an aging local space, thereby contributing to local environmental improvement and stronger community engagement.

Support for the Miso Village Community Festival **SeAH Coated Metal** sponsored the Miso Village Community Festival organized by Gunsan Community Welfare Center. By supporting this community event, where local residents and vulnerable groups could come together, we contributed to the spread of a culture of sharing and to stronger community cohesion.

Women’s Day Events **SeAH Steel Vina** holds annual events for women employees in celebration of International Women’s Day on March 8 and Vietnamese Women’s Day on October 20. Through these activities, we seek to raise awareness of women employees and strengthen a culture of solidarity across the organization.

Support for the Korean Community **Vinapipe** provides annual sponsorship of VND 20 million to the Korean Association in Hai Phong and a local coaching organization, continuing our solidarity with the local Korean community.

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social**
  - Talent Management
  - Human Rights
  - Responsible Supply Chain
  - Community Engagement**
- Governance
- Appendix

# Community Engagement

**With Socially Vulnerable Groups**  
Residential Environment Improvement Volunteer Activities **SeAH Coated Metal** carried out residential environment improvement volunteer activities in March and September 2025 for vulnerable households experiencing difficulty in managing their living environments due to physical or mental challenges. A total of 33 participants, including employees and local community volunteers, took part in organizing, cleaning, and improving living conditions, thereby helping enhance hygiene and the overall living environment of vulnerable residents.

Scholarships for Children from Child-Headed Households **SeAH Coated Metal** provides annual scholarships totaling KRW 5.4 million for children from child-headed households in cooperation with the Jeonbuk Community Chest of Korea. The scholarships are provided on a regular monthly basis and help children and adolescents continue their studies and build self-reliance despite financial hardship.

Briquette Sharing Volunteer Activities To help ease the winter heating burden on energy-vulnerable households, **SeAH Coated Metal** carried out briquette sharing volunteer activities in Soryong-dong, Gunsan, in December 2025. A total of 21 employees participated and personally delivered briquettes to seven households, contributing to improved winter living conditions for vulnerable households in the local community.

Food Sharing Volunteer Activities To help stabilize the diets of vulnerable groups on a seasonal basis, **SeAH Coated Metal** carried out food sharing volunteer activities in 2025. In July, our employee volunteer group and 20 local residents participated in a samgyetang (ginseng chicken soup) sharing event held in cooperation with Gunsan Community Welfare Center. In November, 20 employees and local volunteers also took part in food sharing volunteer activities.

Support for Children Overseas **SeAH Steel Vina** regularly donates gifts, school supplies, and beds to children at Suoi Sao Orphanage. Through our labor union, we also provide support to employees undergoing cancer treatment, helping them overcome hardship.

Support for Marginalized Groups in Local Communities **Vinapipe** makes regular contributions to a relief fund for low-income residents in nearby communities, thereby supporting marginalized groups in the local area.

## Risk Management

**Community Risk Management**  
Identification and Management of Negative Impacts on Local Communities **SeAH Steel Holdings** manages potential negative impacts on local communities that may arise in the course of operating our major domestic business sites by classifying them into three areas: environment, safety, and the local economy.

|                                         |                                                                                                                                                                                                                                                                                                                                                                                                           |
|-----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Environmental Impact Management</b>  | We conduct regular environmental monitoring in order to minimize the impact of our operations on surrounding communities, including air pollution, noise, and water quality. In addition, we continuously review compliance with relevant laws and regulations through investments in pollution reduction facilities and the operation of a waste treatment management system.                            |
| <b>Safety Impact Management</b>         | To enhance the level of safety management at our business sites, including for business partners, we operate safety capability assessment and consulting support programs. We also strengthen our risk assessment system and carry out activities to foster a culture of safety in order to prevent safety risks affecting nearby local communities in advance.                                           |
| <b>Local Economic Impact Management</b> | Through capability enhancement support for local business partners and the operation of win-win cooperation programs, we help improve the management stability of business partners and contribute to maintaining local employment. We also strive to create economic value within local communities through inclusive employment policies, including preferential hiring for socially vulnerable groups. |

Community Communication System **SeAH Steel Holdings** communicates with local communities and direct stakeholders based on the Stakeholder Policy, the Human Rights Management Charter, and the Community, Donation, and Sponsorship Policy. Through regular meetings with local administrative agencies and business partners at each business site, we continuously monitor issues such as local environmental protection and social contribution activities and reflect relevant feedback in our management objectives. We also continue transparent communication with local communities by disclosing our ESG management performance both internally and externally.

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|                           |
|---------------------------|
| Overview                  |
| Sustainability Framework  |
| Sustainability Priorities |
| Environmental             |
| Social                    |
| <b>Governance</b>         |
| Corporate Governance      |
| Information Security      |
| Risk Management           |
| Appendix                  |

|                      |    |
|----------------------|----|
| <b>Governance</b>    |    |
| Corporate Governance | 92 |
| Information Security | 96 |
| Risk Management      | 98 |

Overview

Sustainability Framework

Sustainability Priorities

Environmental

Social

**Governance**

    Corporate Governance

    Information Security

    Risk Management

# Corporate Governance

## Board of Directors

**Board Composition**

**SeAH Steel Holdings’** Board of Directors consists of four directors in total, including three inside directors and one outside director. In accordance with Article 28 of the Articles of Incorporation, we maintain at least three directors and comply with the requirement under the Commercial Act that outside directors account for at least one quarter of the Board. To maximize management efficiency, we operate the Board at an appropriate size that reflects our scale and role as a pure holding company, while separating the Chairperson of the Board from the CEO. We also restrict the voting rights of directors with conflicts of interest in order to prevent conflicts of interest and to ensure the independence and objectivity of the Board. In addition, major matters related to conflicts of interest—including the status of the largest shareholder, relationships and transactions with related parties, and the balances of receivables and payables—are transparently disclosed to stakeholders through business reports and disclosures in accordance with applicable laws and regulations.

Board Composition (SeAH Steel Holdings)

| Category                                   | Name             | Gender | Date of Birth | Term Expiration | Professional Background                                                                                                                                                                                                                                                                      | Conflict of Interest                                                       |
|--------------------------------------------|------------------|--------|---------------|-----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|
| Inside Director (Chairperson of the Board) | Soon-hyung Lee   | Male   | Feb. 1949     | Mar. 20, 2026   | <ul style="list-style-type: none"><li>Graduated from Hanyang University, Business Administration</li><li>Current Chairman of SeAH Steel Holdings</li><li>Current Chairman of SeAH Holdings</li></ul>                                                                                         | Equity Ownership, Family Relationship, Concurrent Position at a Subsidiary |
| Inside Director                            | Joosung Lee      | Male   | Oct. 1978     | Mar. 26, 2027   | <ul style="list-style-type: none"><li>Graduated from the University of Chicago, Economics</li><li>Graduated from the Columbia Business School (MBA)</li><li>Current President of SeAH Steel Holdings</li><li>Current President of SeAH Steel</li><li>Current CEO of APAC Investors</li></ul> | Equity Ownership, Family Relationship, Concurrent Position at a Subsidiary |
| Inside Director                            | Youngbin Cho     | Male   | Jan. 1965     | Mar. 26, 2027   | <ul style="list-style-type: none"><li>Graduated from Chung-Ang University, Business Administration</li><li>Current Head of Business Management Division and Risk Management Office of SeAH Steel Holdings</li></ul>                                                                          | N/A                                                                        |
| Outside Director                           | Seong-taek Hwang | Male   | Mar. 1977     | Mar. 26, 2027   | <ul style="list-style-type: none"><li>Graduated from Yonsei University, Civil Engineering</li><li>Current Executive Vice President of Invesco Real Estate Korea</li></ul>                                                                                                                    | N/A                                                                        |

Board Composition (SeAH Coated Metal)

| Category                                   | Name            | Gender | Date of Birth | Term Expiration | Professional Background                                                                                                                        |
|--------------------------------------------|-----------------|--------|---------------|-----------------|------------------------------------------------------------------------------------------------------------------------------------------------|
| Inside Director (Chairperson of the Board) | Jin Ho Cho      | Male   | June 1963     | Dec. 22, 2027   | <ul style="list-style-type: none"><li>Current CEO of SeAH Coated Metal</li></ul>                                                               |
| Inside Director                            | Houdong Kim     | Male   | Sept. 1967    | Mar. 24, 2028   | <ul style="list-style-type: none"><li>Current CEO and Chief Safety and Health Officer of SeAH Coated Metal</li></ul>                           |
| Other Non-Executive Director               | Youngbin Cho    | Male   | Jan. 1965     | Mar. 20, 2027   | <ul style="list-style-type: none"><li>Current Head of Business Management Division and Risk Management Office of SeAH Steel Holdings</li></ul> |
| Auditor                                    | Seonghwan Jeong | Male   | Nov. 1970     | Mar. 24, 2028   | <ul style="list-style-type: none"><li>Current Audit Office Director and Finance Director of SeAH Steel Holdings</li></ul>                      |

### Board Operations

**SeAH Steel Holdings** operates regular quarterly Board meetings in principle and convenes ad hoc meetings when necessary. Under the Board Operating Regulations, the Chairperson of the Board convenes meetings and notifies all directors and the auditor through appropriate means of communication by no later than one day prior to the meeting date. Directors and the auditor may also request that a Board meeting be convened by specifying the agenda and the reasons when necessary. If such a request is refused without justifiable grounds, the requesting director may convene the Board meeting directly. Depending on the agenda items and the status of proposal preparation, notice is generally given one to four days prior to the meeting date. Unless otherwise provided by applicable laws and regulations, resolutions of the Board require the attendance of a majority of directors and the approval of a majority of the directors present. In addition, even where all or part of the directors do not attend the meeting in person, they may participate in the resolution through telecommunication methods that enable simultaneous voice transmission and reception. In such cases, the relevant directors are deemed to have attended the meeting. In accordance with Article 10 of the Board Operating Regulations, directors with a special interest in matters submitted to the Board are restricted from exercising voting rights in order to prevent conflicts of interest. In March 2025, we also established the Office of Board Review & Support to ensure faithful deliberation by the Board. Through this office, we conduct prior reviews of agenda items submitted to the Board and support the efficient operation of the Board.

Overview

Sustainability Framework

Sustainability Priorities

Environmental

Social

Governance

Corporate Governance

Information Security

Risk Management

# Corporate Governance

Board Operations Status (SeAH Steel Holdings)

| Category                             |                  | 2023 | 2024 | 2025 |
|--------------------------------------|------------------|------|------|------|
| Number of Board Meetings Held        | (Unit: Cases)    | 12   | 10   | 10   |
|                                      | Regular          | 4    | 4    | 4    |
|                                      | Ad hoc           | 8    | 6    | 6    |
| Number of Agenda Items Discussed     | Approved         | 26   | 22   | 25   |
|                                      | Rejected         | 0    | 0    | 0    |
| Average Attendance Rate of the Board | (Unit: %)        | 93   | 93   | 93   |
|                                      | Inside Director  | 89   | 90   | 90   |
|                                      |                  |      |      |      |
|                                      | Outside Director | 100  | 90   | 100  |

Major Board Resolutions (SeAH Steel Holdings)

| Meeting No. | Category | Date          | Agenda                                                                                  | Resolution | Inside Director |             |              | Outside Director |
|-------------|----------|---------------|-----------------------------------------------------------------------------------------|------------|-----------------|-------------|--------------|------------------|
|             |          |               |                                                                                         |            | Soon-hyung Lee  | Joosung Lee | Youngbin Cho | Seong-taek Hwang |
| 1           | Regular  | Feb. 4, 2025  | Report - 2024 management performance, 2025 management plan, and major management issues | -          | -               | -           | -            | -                |
|             |          |               | Report - 2024 internal accounting management system operation status                    | -          | -               | -           | -            | -                |
|             |          |               | Report - 2024 auditor's evaluation                                                      | -          | -               | -           | -            | -                |
|             |          |               | of the internal accounting management system                                            | -          | -               | -           | -            | -                |
|             |          |               | Report - Amendment of internal accounting management regulations                        | -          | -               | -           | -            | -                |
|             |          |               | Report - Compliance Management System (ISO 37301) operation management review           | -          | -               | -           | -            | -                |
|             |          |               | ① Approval of the financial statements and business report for the 66th fiscal year     | Approved   | Absent          | In favor    | In favor     | In favor         |
|             |          |               | ② Resolution to convene the Annual General Meeting and its agenda                       | Approved   | Absent          | In favor    | In favor     | In favor         |
|             |          |               | ③ Determination of 2025 executive remuneration                                          | Approved   | Absent          | In favor    | In favor     | In favor         |
|             |          |               |                                                                                         |            |                 |             |              |                  |
| 2           | Ad hoc   | Mar. 5, 2025  | ① Approval of a transaction with a related party                                        | Approved   | Absent          | In favor    | In favor     | In favor         |
| 3           | Ad hoc   | Mar. 25, 2025 | ① Approval of the financial statements for the 66th fiscal year                         | Approved   | In favor        | In favor    | In favor     | In favor         |
| 4           | Ad hoc   | Mar. 25, 2025 | ① Amendment to the Board Operating Regulations                                          | Approved   | In favor        | In favor    | In favor     | In favor         |

| Meeting No. | Category | Date          | Agenda                                                                  | Resolution | Inside Director |             |              | Outside Director |
|-------------|----------|---------------|-------------------------------------------------------------------------|------------|-----------------|-------------|--------------|------------------|
|             |          |               |                                                                         |            | Soon-hyung Lee  | Joosung Lee | Youngbin Cho | Seong-taek Hwang |
| 4           | Ad hoc   | Mar. 25, 2025 | ② Appointment of the Chairperson of the Board                           | Approved   | In favor        | In favor    | In favor     | In favor         |
| 5           | Regular  | May 13, 2025  | ① Approval of a transaction with a related party                        | Approved   | Absent          | In favor    | In favor     | In favor         |
|             |          |               | ② Approval of a transaction with a related party                        | Approved   | Absent          | In favor    | In favor     | In favor         |
|             |          |               | ③ Approval of the amendment to the auditor's duty regulations           | Approved   | Absent          | In favor    | In favor     | In favor         |
|             |          |               | Report - Q1 2025 management performance and major management issues     | -          | -               | -           | -            | -                |
|             |          |               | Report - key compliance achievements and plans                          | -          | -               | -           | -            | -                |
| 6           | Regular  | Aug. 11, 2025 | ① Approval of a transaction with a related party                        | Approved   | In favor        | In favor    | In favor     | In favor         |
|             |          |               | ② Approval of the amendment to the auditor's duty regulations           | Approved   | In favor        | In favor    | In favor     | In favor         |
|             |          |               | Report - 1H 2025 management performance and major management issues     | -          | -               | -           | -            | -                |
|             |          |               | Report - double materiality assessment for ESG management and key tasks | -          | -               | -           | -            | -                |
| 7           | Ad hoc   | Oct. 1, 2025  | ① Approval of a transaction with a related party                        | Approved   | In favor        | In favor    | In favor     | In favor         |
|             |          |               | ② Approval of a transaction with a related party                        | Approved   | In favor        | In favor    | In favor     | In favor         |
|             |          |               | ③ Approval of the disposal of treasury stock                            | Approved   | In favor        | In favor    | In favor     | In favor         |
|             |          |               | ④ Approval of the issuance of exchangeable bonds                        | Approved   | In favor        | In favor    | In favor     | In favor         |
| 8           | Regular  | Oct. 30, 2025 | ① Approval of a transaction with a related party                        | Approved   | In favor        | In favor    | In favor     | In favor         |
|             |          |               | Report - Q3 2025 management performance and major management issues     | -          | -               | -           | -            | -                |
| 9           | Ad hoc   | Nov. 27, 2025 | ① Approval of a transaction with a related party                        | Approved   | In favor        | In favor    | In favor     | In favor         |
| 10          | Ad hoc   | Dec. 30, 2025 | ①-1 Approval of a transaction with a related party                      | Approved   | In favor        | In favor    | In favor     | In favor         |
|             |          |               | ①-2 Approval of a transaction with a related party                      | Approved   | In favor        | In favor    | In favor     | In favor         |
|             |          |               | ①-3 Approval of a transaction with a related party                      | Approved   | In favor        | In favor    | In favor     | In favor         |
|             |          |               | ② Approval of the 2026 bond issuance limit                              | Approved   | In favor        | In favor    | In favor     | In favor         |
|             |          |               | ③ Organizational restructuring                                          | Approved   | In favor        | In favor    | In favor     | In favor         |
|             |          |               | ④ Approval of the 2026 donation limit                                   | Approved   | In favor        | In favor    | In favor     | In favor         |
|             |          |               | ⑤ Approval of executive performance bonuses for 2025                    | Approved   | In favor        | In favor    | In favor     | In favor         |



- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance**
  - Corporate Governance**
  - Information Security
  - Risk Management

Appendix

# Corporate Governance

On Dec. 30, 2025, **SeAH Coated Metal** held a Board meeting and reviewed agenda items covering our 2026 management direction, business plan, and budget. We approved the 2026 management direction, “Securing a Stable Profit Structure for Future Growth,” and plan to implement detailed action plans.

## 2026 Management Direction and Key Initiatives (SeAH Coated Metal)

| Initiative                                                      | Detailed Objectives                                                                                                                                                                            |
|-----------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Improve Profitability Through Sales Expansion                   | <ul style="list-style-type: none"><li>Strengthen domestic and overseas market development and maximize sales</li><li>Increase the share of high-value-added strategic products</li></ul>       |
| Strengthen Competitiveness Through Manufacturing Cost Reduction | <ul style="list-style-type: none"><li>Continuously identify and implement cost-saving initiatives</li><li>Enforce disciplined spending and foster cost awareness among all employees</li></ul> |
| Secure World-Class Quality                                      | <ul style="list-style-type: none"><li>Strengthen defect-improvement activities</li><li>Reinforce quality control for initial products</li></ul>                                                |
| Embed ESG Management                                            | <ul style="list-style-type: none"><li>Continue carbon and energy reduction activities</li><li>Achieve an accident-free workplace</li></ul>                                                     |
| Build a Foundation for Future Growth                            | <ul style="list-style-type: none"><li>Strengthen new product R&amp;D and develop new markets</li></ul>                                                                                         |

## Board Operation Status (SeAH Coated Metal)

| Category                             |                  | 2023 | 2024 | 2025 |
|--------------------------------------|------------------|------|------|------|
| Number of Board Meetings Held        | (Unit: Cases)    | 10   | 12   | 9    |
|                                      | Regular          | 4    | 4    | 4    |
|                                      | Ad hoc           | 6    | 8    | 5    |
| Number of Agenda Items Discussed     | Approved         | 22   | 21   | 21   |
|                                      | Rejected         | 0    | 0    | 0    |
| Average Attendance Rate of the Board | (Unit: %)        | 83   | 100  | 100  |
|                                      | Inside Director  | 100  | 100  | 100  |
|                                      | Outside Director | 50   | 100  | 100  |

## Board Expertise and Diversity

Board Independence **SeAH Steel Holdings** strives to establish a foundation for independent and professional decision-making by composing our Board of individuals who satisfy the qualification requirements set out in applicable laws and regulations and who possess expertise, accountability, and strategic judgment. We operate our Board independently from management and controlling shareholders. In appointing directors, we do not discriminate on the basis of gender, age, or religion. Director candidates are recommended by the Board and appointed at the Shareholders’ Meeting in accordance with the Commercial Act and our Articles of Incorporation, with a term of office not exceeding three years. When recommending director candidates, we provide shareholders with relevant information on the nominees with sufficient time in advance. We also strive to inform shareholders of each candidate’s suitability and professional experience through disclosures and notices posted on our website. In addition, we have introduced measures such as an electronic voting system to enhance accessibility and to ensure that the views of minority shareholders are duly reflected in the appointment process. Through a Board with expertise and diversity, SeAH Steel Holdings seeks to strengthen our competitiveness and ensure that decision-making is based on professional judgment.

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
  - Corporate Governance
  - Information Security
  - Risk Management
- Appendix

# Corporate Governance

Outside Director Training **SeAH Steel Holdings** supports our directors in performing their duties by providing training materials and supporting their participation in external training programs. We disclose details of these activities through our quarterly and semi-annual business reports. In addition, outside directors may, when necessary, seek advice from external experts in accordance with the Board Operating Regulations.

| Date           | Training Provider   | Outside Director in Attendance | Contents                                                             |
|----------------|---------------------|--------------------------------|----------------------------------------------------------------------|
| Sept. 10, 2025 | SeAH Steel Holdings | Seong-taek Hwang               | The role and importance of the internal accounting management system |

**Board Evaluation and Remuneration**  
**SeAH Steel Holdings** does not conduct a separate evaluation of the Board. Instead, we continuously monitor the performance of each outside director and disclose the results through our business report filings. We comprehensively consider these results when determining whether to reappoint outside directors. Compensation for directors is paid within the limit approved at the Shareholders’ Meeting in accordance with Article 388 of the Commercial Act and our Articles of Incorporation. To ensure the independence of outside directors, we provide fixed compensation and do not grant stock options. Details of compensation paid to directors are also disclosed in our business reports. CEO compensation consists of a base salary and performance-based compensation determined in accordance with standards established by the Board. Performance-based compensation is calculated in an objective and transparent manner based on annual results, including sales and operating profit.

## Protection of Shareholder Rights

**Mid- to Long-Term Dividend Policy**  
**SeAH Steel Holdings** determines dividends based on the principle of enhancing shareholder value, while comprehensively considering investment plans, financial soundness, and the business environment. To provide transparent and predictable dividend information, we have established the foundation for a mid- to long-term dividend policy. Based on this framework, we plan to expand dividends as our business performance improves. In addition, we have set a mid- to long-term target dividend payout ratio of at least 30% of net income on separate financial statements, excluding one-off non-recurring gains and losses. SeAH Steel Holdings will continue to strengthen our policies to enhance shareholder value.

**Shareholder-Friendly Systems**  
**SeAH Steel Holdings** respects shareholder rights and provides relevant information to support the smooth exercise of those rights. We disclose the date, venue, and agenda of the Shareholders’ Meeting through the electronic disclosure system at least two weeks before the meeting date, and we send notices of convocation to shareholders holding more than 1% of shares. We also participate in the “Voluntary Dispersal Program for General Shareholders’ Meetings” to enhance shareholder convenience and protect voting rights. Since the 63rd Annual General Meeting (AGM) in 2022, we have avoided concentrated AGM dates in order to support quorum formation and facilitate the exercise of voting rights. To protect the rights of minority shareholders, we have introduced and operated an electronic voting system in accordance with Article 368 of the Commercial Act, thereby encouraging shareholders to express their views more actively. SeAH Steel Holdings amended our Articles of Incorporation at the 65th AGM in 2024 to allow the Board to determine the dividend record date by resolution. From the 66th fiscal year, we designated the dividend record date after the dividend amount had been finalized, thereby improving dividend-related predictability for investors. Dividends are implemented through resolutions of the Board and the Shareholders’ Meeting in accordance with our Articles of Incorporation. Within the scope of distributable profits, we pay cash dividends while considering investment for sustainable growth and the mid- to long-term interests of stakeholders. In particular, on February 25, 2026, we made a preliminary disclosure of our corporate value enhancement plan. Going forward, we plan to establish a policy that balances growth investment and shareholder value, and to disclose our shareholder return policy within 2026.

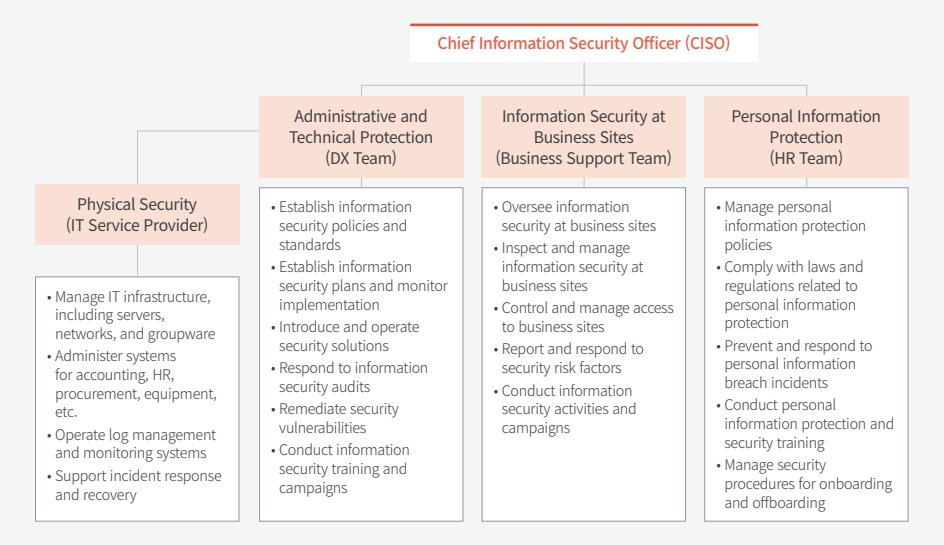
- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
  - Corporate Governance
  - Information Security
  - Risk Management

# Information Security

## Governance

**Information Security Management System**  
**SeAH Steel Holdings** manages information security risks through the DX Team under the Management Strategy Office, which periodically reviews our internal information security regulations and systems and responds to emerging risks by introducing and operating a range of security solutions.  
**SeAH Steel** has established a systematic information security management system centered on the Chief Information Security Officer (CISO), covering administrative and technical protection, information security at business sites, personal information protection, and physical security. Through this system, we manage our internal information assets in a structured and consistent manner. We disclose the status of our information security activities in a transparent manner while maintaining strict control over employees’ access rights through regular reviews of information security policies and SAP authorizations. In addition, we proactively respond to information security risks through the operation of various security solutions. We have also established information security and personal information protection guidelines and update related regulations and guidelines at least once a year to respond to the evolving security environment. In 2026, we plan to establish detailed information security guidelines and management regulations to further advance our risk management framework.

**Information Security Organization (SeAH Steel)**



## Strategy

**Information Security Education and Training**  
Information Security Education **SeAH Steel Holdings** continuously shares information on the latest security threats through our internal notice board in order to enhance employees’ security awareness. We provide annual training on information security, personal information protection, and information security guidelines for all employees, and a total of 46 employees completed the training in 2025. The training covers not only internal information security practices but also cyber threats that require caution in daily life, including phishing messages and smishing. Through these efforts, we help strengthen employees’ security awareness both inside and outside the workplace.  
**SeAH Steel Holdings** and **SeAH Steel** also strengthen practical response capabilities against cyber threats through regular security drills. To reinforce employees’ security awareness, we conduct simulated malicious e-mail training twice a year, and we provide recipients of simulated phishing e-mails with personal information protection guidelines and relevant threat information. In addition, we conduct regular internal inspections on antivirus installation status and compliance with security policies. We also operate a disaster recovery system to ensure prompt and systematic recovery in the event of a security incident, thereby enhancing the overall effectiveness of our information security management system.  
**Dong-A Steel** has also conducted simulated malicious e-mail training to strengthen our proactive response capabilities against increasingly sophisticated and frequent cyberattacks. In addition, we have introduced NAC and DLP systems to further enhance our level of information security.

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance**
  - Corporate Governance
  - Information Security**
  - Risk Management
- Appendix

# Information Security

## Risk Management

**Information Security Enhancement Activities and Programs**  
**SeAH Steel Holdings** periodically reviews our internal information security regulations and systems and systematically manages information assets across the organization. Through quarterly authorization reviews of Douzone ERP, we strictly control access rights for all employees and respond to information security risks by leveraging a range of security solutions.

**Key Security Solutions**

1. DDoS SAFER: Detects and blocks large-scale malicious traffic in real time, helping ensure service stability and protect our systems.
2. EDR (Endpoint Detection & Response): Detects and responds to endpoint-based threats to help prevent emerging attacks and ransomware in advance.
3. NAC (Network Access Control): Blocks unauthorized devices from accessing the internal network through authentication and policy-based access control for connected endpoints.
4. DLP (Data Loss Prevention): Prevents the external leakage of critical information through real-time monitoring and control.
5. Harmful Website Blocking Solution: Prevents security threats in advance by blocking access to malicious and non-business-related websites.

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
  - Corporate Governance
  - Information Security
  - Risk Management
- Appendix

# Risk Management

## Governance

**Risk Management System**  
SeAH Steel operates a risk management process to proactively identify and manage financial and non-financial risks that may arise from internal and external changes. In particular, by designating a compliance helper in each working-level department to carry out risk prevention and management activities, we have improved company-wide management efficiency. For identified risks, we conduct a risk impact assessment based on severity and likelihood and establish and implement control measures accordingly. In addition, the department responsible for compliance management and compliance helpers in each department regularly and ad hoc monitor implementation status to ensure that risk management measures are effectively carried out.

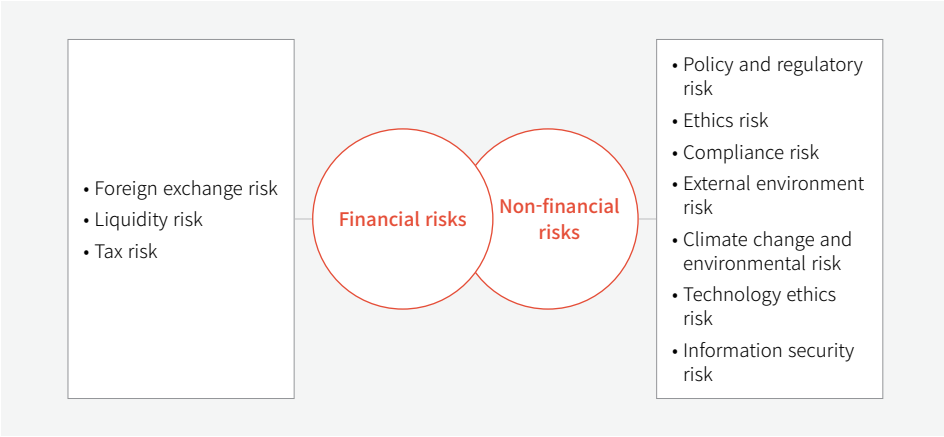


**Operation of a Full-time Auditor** SeAH Steel Holdings operates our audit function through a full-time auditor rather than establishing a separate Audit Committee. The full-time auditor attends Board meetings and, from an independent position, supervises the execution of directors’ duties. When necessary, the full-time auditor also receives reports from the company on business-related matters and reviews management information through various channels. In 2025, the full-time auditor attended a total of 10 regular and ad hoc Board meetings, where major agenda items were reviewed and deliberated as part of the decision-making process. To strengthen the expertise required for audit duties, the full-time auditor also participated in internal and external training covering overall business operations, M&A risk management, principles of business judgment and the duty of oversight, practical cases in accounting, finance, and tax, and the internal accounting management system.

## Strategy

**Risk Analysis and Response**  
SeAH Steel Holdings systematically analyzes and manages risks across overall management activities by classifying them into financial risks and non-financial risks. We assess the priority of each risk based on severity and likelihood, and go beyond reviewing current conditions to prepare preventive responses that support business continuity. The results of our risk analysis are reflected in decision-making to ensure consistency in company-wide responses. Rather than relying on ex-post measures, we place greater emphasis on early detection and structural mitigation strategies in order to support stable business operations.

### Key Financial and Non-financial Risk Factors





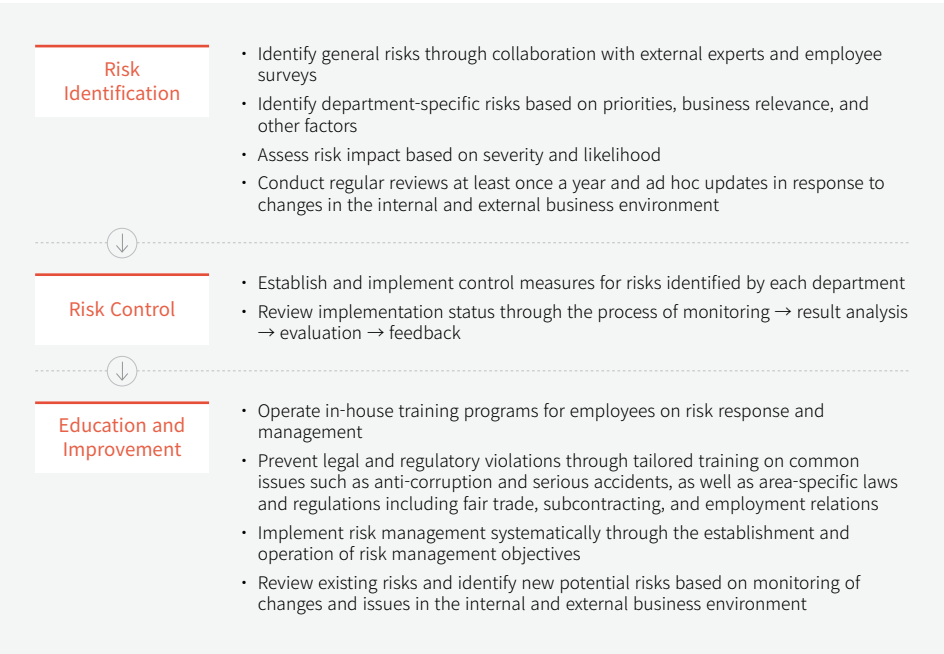
- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance**
  - Corporate Governance
  - Information Security
  - Risk Management**

# Risk Management

## Risk Management

**Risk Management Process**  
**SeAH Steel Holdings** operates a systematic risk management process to proactively respond to uncertainty in the business environment. In the risk identification stage, potential risks are uncovered and prioritized through external experts and working-level surveys of employees. Identified risks are then monitored by the responsible personnel in each department and managed through a continuous cycle of assessment and feedback, thereby enhancing the accuracy of risk management. Finally, in the education and improvement stage, we regularly provide in-house training programs to strengthen company-wide risk response capabilities, while continuously advancing the risk management framework through regular reviews of risk management standards and compliance criteria.

**Risk Management Process**



**Risk Control**  
Internal Accounting Management System **SeAH Steel Holdings** operates an internal accounting management system to provide transparent management information. As a listed corporation, we undergo an audit by an external auditor in accordance with the Act on External Audit of Stock Companies, and the CEO reports the review results on the operational status of the system to the Shareholders’ Meeting, the Board, and the auditor. We also provide regular company-wide training on the internal accounting management system to maintain the expertise and qualifications of our employees.

|                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                               |
|--------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Operational Assessment Plan</b>                     | <ul style="list-style-type: none"><li>• Determine the materiality threshold based on the financial statements, reflecting plans to address deficiencies identified in the previous year</li><li>• Select control activities related to accounting accounts, and report the annual operation plan for the internal accounting management system and the external audit schedule to the CEO and the full-time auditor</li></ul> |
| <b>Design Assessment</b>                               | <ul style="list-style-type: none"><li>• Identify whether control activities have been established</li><li>• Assess the appropriateness of control activities, including verification of the alignment between business processes and control activities</li></ul>                                                                                                                                                             |
| <b>Operating Effectiveness Assessment</b>              | <ul style="list-style-type: none"><li>• Control owners and responsible personnel conduct sample testing of key control activities</li><li>• Review supporting evidence and assess the operating effectiveness of control activities through the dedicated internal accounting department</li></ul>                                                                                                                            |
| <b>External Audit and Operational Status Reporting</b> | <ul style="list-style-type: none"><li>• Undergo an audit of the internal accounting management system by an independent external auditor</li><li>• Review the operational status of the internal accounting management system and report key deficiencies to the CEO, Shareholders’ Meeting, Board, and full-time auditor</li></ul>                                                                                           |

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
  - Corporate Governance
  - Information Security
  - Risk Management

Appendix

# Risk Management

Performance Evaluation (KPI) **SeAH Steel Holdings** reflects relevant performance indicators (KPIs) in the performance evaluation of team managers in order to ensure the effective operation of the internal accounting management system and enhance employees’ awareness of internal control. The evaluation is based on quantitative indicators, and by linking performance evaluation to internal control outcomes, we strengthen the practical implementation of the system and reinforce employees’ sense of accountability. Going forward, we will continue to systematically review the operating level of the internal accounting management system and further solidify the foundation for sustainability management through its continued stabilization and advancement.

Evaluation of Internal Control Design and Operation **SeAH Steel Holdings** manages Entity-Level Controls (ELC) and Transaction-Level Controls (TLC) separately based on the Risk Control Matrix (RCM). Major deficiencies identified through design and operational evaluations are reported to the CEO, the full-time auditor, and the Board, and are improved through collaboration with the relevant departments. In addition, every half year, we receive change management reports from business departments covering changes in organization, systems, processes, and personnel, and reflect them in the Risk Control Matrix (RCM) and work manuals to maintain the timeliness and appropriateness of control design and minimize any gap between the control status at the time of evaluation and actual operating conditions.

| Category                         | Details                                                                                                                                                                                                                                                                                  |
|----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Entity-Level Controls (ELC)      | <ul style="list-style-type: none"><li>• Composed of five control components: control environment, risk assessment, control activities, information and communication, and monitoring</li><li>• Used to review the overall operating foundation of the internal control system</li></ul>  |
| Transaction-Level Controls (TLC) | <ul style="list-style-type: none"><li>• Key control activities are identified across eight process areas, including equity management, funds, tax, and financial reporting</li><li>• Design and operational evaluations are conducted for risks embedded in business processes</li></ul> |

Internal Audit System In February 2025, **SeAH Steel Holdings** established the Internal Audit Regulations to enhance the independence and professionalism of internal audit activities and to build a systematic internal control foundation. These regulations set out the standards and procedures for internal audits across SeAH Steel Holdings and our subsidiaries, with the aim of enhancing the transparency, efficiency, and effectiveness of company operations and fostering a sustainability management environment. The internal audit organization also holds regular meetings with the external auditor at least once every quarter to ensure objective audit discussions based on the

independence of the external auditor. SeAH Steel Holdings will continue to advance audit functions linked to ESG management through the ongoing review and improvement of our internal audit system.

**Tax Risk Management**  
**SeAH Steel Holdings** recognizes that the transparent and diligent fulfillment of tax obligations is a core element of sustainability management, as it enables us to fulfill our corporate social responsibility and build trust with stakeholders. To this end, we go beyond strict compliance with domestic and overseas tax laws and operate an advanced system designed to secure tax transparency and proactively manage tax risks. We systematically document proper supporting documentation for transactions and review and control tax risks in advance across overall business activities, including transactions involving goods and services, corporate spin-offs, mergers and acquisitions (M&A), and overseas transactions. In addition, under the responsibility of the Board and senior management, we establish and implement transparent tax policies in order to respond thoroughly to internal and external risks.

**Tax Policy (SeAH Steel Holdings)**

| Core Values                                                                                                                 | Detailed Practices                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-----------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Faithful Tax Payment and Enhanced Tax Transparency                                                                          | <ul style="list-style-type: none"><li>• Strictly comply with the tax laws of each country and pay the appropriate taxes in jurisdictions where actual business sites creating value are located.</li><li>• Do not design or participate in transaction structures using tax havens without economic substance for the purpose of tax avoidance or artificial profit shifting.</li><li>• Actively embrace international tax trends, including BEPS and the global minimum tax, in order to enhance tax transparency.</li></ul> |
| Proactive Tax Risk Management System                                                                                        | <ul style="list-style-type: none"><li>• Continuously monitor tax risks arising from routine and non-routine transactions through our in-house tax organization.</li><li>• Where highly specialized judgment is required for tax issues, we actively use advice from external expert groups to minimize uncertainty.</li></ul>                                                                                                                                                                                                 |
| Management of International Transactions in Line with Global Standards                                                      | <ul style="list-style-type: none"><li>• In transactions with overseas related parties, we prioritize the OECD Transfer Pricing Guidelines and the tax laws of each relevant country.</li><li>• We strictly adhere to the arm’s length principle by excluding arbitrary profit shifting and applying the arm’s length price used between independent third parties.</li></ul>                                                                                                                                                  |
| Trust-based Communication with Regulatory Authorities (Cooperation with the National Tax Service and Korea Customs Service) | <ul style="list-style-type: none"><li>• We maintain transparent and sound cooperative relationships with domestic and overseas tax and regulatory authorities, including the National Tax Service and Korea Customs Service.</li><li>• For tax and customs issues involving interpretive ambiguity, we respond proactively through written inquiries and advance ruling mechanisms, and cooperate sincerely and promptly with investigations and data requests from the authorities.</li></ul>                                |

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|                                 |
|---------------------------------|
| Overview                        |
| Sustainability Framework        |
| Sustainability Priorities       |
| Environmental                   |
| Social                          |
| Governance                      |
| <b>Appendix</b>                 |
| ESG Data                        |
| GRI Index                       |
| SASB Index                      |
| ESRS Index                      |
| Third-Party Assurance Statement |

# Appendix

|                                 |     |
|---------------------------------|-----|
| ESG Data                        | 102 |
| GRI Index                       | 126 |
| SASB Index                      | 128 |
| ESRS Index                      | 129 |
| Third-Party Assurance Statement | 133 |

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix
  - ESG Data
  - GRI Index
  - SASB Index
  - ESRS Index
  - Third-Party Assurance Statement

# ESG Data

## Environmental

| Energy Consumption                                         |             |        |            |              |                   |            |              |                   |                        |              |                   |
|------------------------------------------------------------|-------------|--------|------------|--------------|-------------------|------------|--------------|-------------------|------------------------|--------------|-------------------|
| Category                                                   |             | Unit   | 2023       |              |                   | 2024       |              |                   | 2025                   |              |                   |
|                                                            |             |        | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel             | Dong-A Steel | SeAH Coated Metal |
| Energy consumption targets                                 |             | GJ     | 1,337,633  | -            | -                 | 1,390,018  | -            | -                 | 1,270,368              | -            | -                 |
| Total energy consumption                                   |             | GJ     | 1,433,009  | 97,342       | 1,431,027         | 1,309,658  | 99,892       | 1,520,752         | 1,215,000 <sup>1</sup> | 89,718       | 1,407,463         |
| Energy consumption (Direct)                                | Total       | GJ     | 157,519    | 6,382        | 659,685           | 144,162    | 6,515        | 659,126           | 134,496 <sup>2</sup>   | 5,657        | 605,300           |
|                                                            | LPG         | GJ     | 552        | 106          | 0                 | 333        | 238          | 0                 | 0                      | 235          | 0                 |
|                                                            | LNG         | GJ     | 153,229    | 5,636        | 658,846           | 139,337    | 5,579        | 658,225           | 130,304                | 4,813        | 604,402           |
|                                                            | Diesel      | GJ     | 962        | 641          | 233               | 1,953      | 698          | 413               | 2,016                  | 609          | 496               |
|                                                            | Gasoline    | GJ     | 699        | 0            | 606               | 841        | 0            | 488               | 766                    | 0            | 402               |
|                                                            | Kerosene    | GJ     | 2,077      | 0            | 0                 | 1,698      | 0            | 0                 | 1,410                  | 0            | 0                 |
| Energy consumption (Indirect)                              | Total       | GJ     | 1,275,490  | 90,959       | 770,727           | 1,165,496  | 93,377       | 860,945           | 1,084,417              | 84,061       | 802,163           |
|                                                            | Electricity | GJ     | 1,198,646  | 90,959       | 751,686           | 1,095,534  | 93,377       | 798,036           | 1,017,389              | 84,061       | 774,914           |
|                                                            | Steam       | GJ     | 76,844     | 0            | 19,041            | 69,962     | 0            | 62,909            | 67,028                 | 0            | 27,249            |
| Percentage of renewable energy in total energy consumption |             | %      | 0.00       | 0.00         | 0.00              | 0.00       | 0.00         | 0.00              | 0.13                   | 0.00         | 0.80              |
| Energy intensity <sup>3</sup>                              |             | GJ/ton | 1.54       | 0.72         | 3.01              | 1.47       | 0.76         | 2.82              | 1.53                   | 0.76         | 2.61              |

1) A discrepancy exists between total energy consumption and the sum of direct and indirect energy consumption (site-level figures are truncated before being aggregated at the company level).  
2) A discrepancy exists between the detailed direct energy consumption figures and the total (site-level figures in the verification statement are truncated before being aggregated at the company level, in accordance with the Ministry of Environment’s GHG Emissions Reporting and Certification Guidelines).  
3) Energy intensity: Energy consumption (GJ) ÷ production volume (ton); prior-year data has been restated based on this calculation method.  
※ 2025 Energy Savings by SeAH Steel site: Pohang Plant 382GJ, Gunsan Plant 1,049GJ, Changwon Plant 122GJ

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix
  - ESG Data
  - GRI Index
  - SASB Index
  - ESRS Index
  - Third-Party Assurance Statement

ESG Data

| Greenhouse Gas (GHG) Emissions       |                             |                         |            |              |                   |            |              |                   |                     |              |                   |
|--------------------------------------|-----------------------------|-------------------------|------------|--------------|-------------------|------------|--------------|-------------------|---------------------|--------------|-------------------|
| Category                             |                             | Unit                    | 2023       |              |                   | 2024       |              |                   | 2025                |              |                   |
|                                      |                             |                         | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel          | Dong-A Steel | SeAH Coated Metal |
| GHG emissions targets                |                             | tCO <sub>2</sub> eq     | 70,568     | -            | -                 | 73,031     | -            | -                 | 69,907              | -            | -                 |
| Total GHG emissions                  |                             | tCO <sub>2</sub> eq     | 75,030     | 4,611        | 73,349            | 68,586     | 4,928        | 82,028            | 64,049 <sup>1</sup> | 3,897        | 73,010            |
| Direct GHG emissions (Scope 1)       |                             | tCO <sub>2</sub> eq     | 8,500      | 284          | 35,105            | 7,854      | 278          | 36,367            | 7,364               | 243          | 32,670            |
| Indirect GHG emissions (Scope 2)     |                             | tCO <sub>2</sub> eq     | 66,530     | 4,327        | 38,244            | 60,732     | 4,650        | 45,661            | 56,687              | 3,654        | 40,339            |
| GHG emissions intensity <sup>2</sup> | Total                       | tCO <sub>2</sub> eq/ton | 0.08       | 0.03         | 0.15              | 0.08       | 0.04         | 0.15              | 0.08                | 0.03         | 0.14              |
|                                      | Scope 1 emissions intensity | tCO <sub>2</sub> eq/ton | 0.009      | 0.002        | 0.074             | 0.009      | 0.002        | 0.067             | 0.009               | 0.002        | 0.061             |
|                                      | Scope 2 emissions intensity | tCO <sub>2</sub> eq/ton | 0.072      | 0.032        | 0.081             | 0.068      | 0.036        | 0.085             | 0.071               | 0.031        | 0.075             |

1) In accordance with the Ministry of Environment’s GHG Emissions Reporting and Certification Guidelines, site-level figures in the verification statement are truncated before being aggregated at the company level.  
2) GHG emissions intensity: GHG emissions (tCO<sub>2</sub>eq) ÷ production volume (ton); prior-year data has been restated based on this calculation method.  
※ 2025 GHG reductions by SeAH Steel site: Pohang Plant 18.3tCO<sub>2</sub>eq, Gunsan Plant 50.2tCO<sub>2</sub>eq, Changwon Plant 5.8tCO<sub>2</sub>eq

| Environmental Management                                  |                           |             |            |              | * SeAH Steel figures are based on data from the Pohang, Gunsan, Suncheon, and Changwon plants. |            |              |                   |            |              |                   |
|-----------------------------------------------------------|---------------------------|-------------|------------|--------------|------------------------------------------------------------------------------------------------|------------|--------------|-------------------|------------|--------------|-------------------|
| Category                                                  |                           | Unit        | 2023       |              |                                                                                                | 2024       |              |                   | 2025       |              |                   |
|                                                           |                           |             | SeAH Steel | Dong-A Steel | SeAH Coated Metal                                                                              | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| Environmental investments                                 |                           | KRW million | 1,270      | 72           | 637                                                                                            | 5,282      | 164          | 140               | 3,510      | 38           | 189               |
| Environmental Management System (ISO 14001) certification | Number of eligible sites  | Site(s)     | 4          | 2            | 1                                                                                              | 4          | 2            | 1                 | 4          | 2            | 1                 |
|                                                           | Number of certified sites | Site(s)     | 4          | 0            | 1                                                                                              | 4          | 0            | 1                 | 4          | 0            | 1                 |
|                                                           | Certification rate        | %           | 100        | 0            | 100                                                                                            | 100        | 0            | 100               | 100        | 0            | 100               |
| Energy Management System (ISO 50001) certification        | Number of eligible sites  | Site(s)     | 4          | 2            | 1                                                                                              | 4          | 2            | 1                 | 4          | 2            | 1                 |
|                                                           | Number of certified sites | Site(s)     | 1          | 0            | 0                                                                                              | 2          | 0            | 0                 | 2          | 0            | 0                 |
|                                                           | Certification rate        | %           | 25         | 0            | 0                                                                                              | 50         | 0            | 0                 | 50         | 0            | 0                 |



- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix
  - ESG Data
    - GRI Index
    - SASB Index
    - ESRS Index
    - Third-Party Assurance Statement

# ESG Data

## Eco-friendly Vehicle Ownership

| Category                            |                          | Unit   | 2023       |              |                   | 2024       |              |                   | 2025       |              |                   |
|-------------------------------------|--------------------------|--------|------------|--------------|-------------------|------------|--------------|-------------------|------------|--------------|-------------------|
|                                     |                          |        | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| Total number of vehicles            |                          | Number | 34         | 11           | 13                | 36         | 12           | 13                | 34         | 12           | 14                |
| Number of eco-friendly vehicles     | Total                    | Number | 3          | 0            | 0                 | 3          | 4            | 0                 | 5          | 4            | 5                 |
|                                     | Electric vehicles        | Number | 2          | 0            | 0                 | 2          | 0            | 0                 | 2          | 0            | 0                 |
|                                     | Hydrogen vehicles        | Number | 1          | 0            | 0                 | 1          | 0            | 0                 | 1          | 0            | 0                 |
|                                     | Hybrid electric vehicles | Number | 0          | 0            | 0                 | 0          | 4            | 0                 | 2          | 4            | 5                 |
|                                     | Solar-powered vehicles   | Number | 0          | 0            | 0                 | 0          | 0            | 0                 | 0          | 0            | 0                 |
| Percentage of eco-friendly vehicles |                          | %      | 8.8        | 0.0          | 0.0               | 8.3        | 33.3         | 0.0               | 14.7       | 33.3         | 35.7              |

## Purchase of Raw Materials

| Category                                           |  | Unit | 2023       |              |                   | 2024       |              |                      | 2025       |              |                   |
|----------------------------------------------------|--|------|------------|--------------|-------------------|------------|--------------|----------------------|------------|--------------|-------------------|
|                                                    |  |      | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel | Dong-A Steel | SeAH Coated Metal    | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| Total raw materials purchased                      |  | ton  | 1,054,615  | 146,800      | 276,200           | 1,008,998  | 136,909      | 309,615 <sup>1</sup> | 916,639    | 125,136      | 312,915           |
| Eco-friendly raw materials <sup>2</sup> purchased  |  | ton  | 6,191      | 0            | 45                | 163        | 0            | 0                    | 59         | 0            | 0                 |
| Percentage of eco-friendly raw materials purchased |  | %    | 0.59       | 0.00         | 0.02              | 0.02       | 0.00         | 0.00                 | 0.01       | 0.00         | 0.00              |

1) Data has been corrected due to an input error.  
2) Raw materials produced using the electric-arc-furnace method, which emits approximately 25% of the carbon emissions of the conventional blast-furnace method.

## Sales Performance of Environmentally Certified Products (EPD, HB Certified)

| Category                                                                      |  | Unit        | 2023       |              |                   | 2024       |                    |                   | 2025       |              |                   |
|-------------------------------------------------------------------------------|--|-------------|------------|--------------|-------------------|------------|--------------------|-------------------|------------|--------------|-------------------|
|                                                                               |  |             | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel | Dong-A Steel       | SeAH Coated Metal | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| Sales of environmentally certified products (EPD, HB certified)               |  | KRW million | 1,009,381  | 0            | 178,914           | 991,149    | 9,577 <sup>1</sup> | 192,636           | 891,988    | 20,679       | 191,679           |
| Percentage of sales of environmentally certified products (EPD, HB certified) |  | %           | 54.2       | 0.0          | 38.8              | 55.5       | 7.2 <sup>2</sup>   | 38.4              | 65.0       | 18.5         | 40.1              |

1), 2) Data has been corrected due to an input error.

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix
  - ESG Data
  - GRI Index
  - SASB Index
  - ESRS Index
  - Third-Party Assurance Statement

# ESG Data

## Water Withdrawal and Wastewater

\* SeAH Steel figures are based on data from the Pohang, Gunsan, Suncheon, and Changwon plants.  
\* As of 2025, water “consumption” has been reclassified as water “withdrawal,” based on the internationally standardized term.

| Category                                 |                                | Unit                 | 2023       |              |                   | 2024       |              |                   | 2025       |              |                   |
|------------------------------------------|--------------------------------|----------------------|------------|--------------|-------------------|------------|--------------|-------------------|------------|--------------|-------------------|
|                                          |                                |                      | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| Water withdrawal targets                 |                                | 1,000 m <sup>3</sup> | 375.5      | -            | -                 | 455.3      | -            | -                 | 462.5      | -            | -                 |
| Water withdrawal <sup>1)</sup>           | Total                          | 1,000 m <sup>3</sup> | 470.6      | 13.3         | 648.0             | 476.8      | 12.7         | 707.5             | 384.1      | 11.4         | 546.0             |
|                                          | Industrial water <sup>2)</sup> | 1,000 m <sup>3</sup> | 315.6      | 5.7          | 621.0             | 324.5      | 5.7          | 688.8             | 246.1      | 4.4          | 529.0             |
|                                          | Potable water <sup>3)</sup>    | 1,000 m <sup>3</sup> | 155.0      | 7.5          | 27.0              | 152.3      | 6.9          | 18.7              | 137.9      | 7.0          | 17.0              |
| Water withdrawal intensity <sup>4)</sup> |                                | m <sup>3</sup> /ton  | 0.507      | 0.000        | 0.001             | 0.536      | 0.000        | 0.001             | 0.484      | 0.000        | 0.001             |
| Water reused <sup>5)</sup>               |                                | 1,000 m <sup>3</sup> | 0.000      | 0.000        | 0.000             | 0.554      | 0.000        | 0.000             | 13.836     | 0.000        | 0.000             |
| Wastewater discharged                    |                                | 1,000 m <sup>3</sup> | 229.3      | 0.0          | 359.0             | 216.6      | 0.0          | 396.0             | 157.9      | 0.0          | 287.5             |
| Wastewater reused <sup>6)</sup>          |                                | 1,000 m <sup>3</sup> | 0.0        | 0.0          | 0.0               | 0.5        | 0.0          | 0.0               | 13.8       | 0.0          | 0.0               |
| Wastewater reuse rate <sup>7)</sup>      |                                | %                    | 0.0        | 0.0          | 0.0               | 0.2        | 0.0          | 0.0               | 8.8        | 0.0          | 0.0               |

1) SeAH Steel and Dong-A Steel’s 2023-2024 data has been corrected due to an input error.  
2), 3) SeAH Steel’s 2023-2024 data has been corrected due to an input error.  
4) Water withdrawal intensity: Water withdrawal (m<sup>3</sup>) ÷ production volume (ton); prior-year data has been restated based on this calculation method.  
5), 6), 7) SeAH Steel’s 2024 data has been corrected due to an input error.

## Water Pollutants

SeAH Steel figures are based on data from the Pohang, Gunsan, Suncheon, and Changwon plants.

| Category                       |  | Unit | 2023       |              |                   | 2024       |              |                   | 2025       |              |                   |
|--------------------------------|--|------|------------|--------------|-------------------|------------|--------------|-------------------|------------|--------------|-------------------|
|                                |  |      | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| COD (Chemical Oxygen Demand)   |  | ton  | 7.53       | -            | 0.00              | 1.47       | -            | 0.00              | 1.14       | -            | 0.00              |
| BOD (Biological Oxygen Demand) |  | ton  | 2.41       | -            | 22.27             | 3.21       | -            | 22.50             | 2.59       | -            | 11.50             |
| TOC (Total Organic Carbon)     |  | ton  | 3.12       | -            | 39.92             | 0.89       | -            | 49.00             | 2.95       | -            | 41.70             |
| SS (Suspended Solids)          |  | ton  | 6.80       | -            | 0.75              | 8.28       | -            | 2.40              | 5.95       | -            | 1.20              |
| T-N (Total Nitrogen)           |  | ton  | 8.19       | -            | 4.81              | 5.72       | -            | 5.44              | 6.95       | -            | 5.38              |
| T-P (Total Phosphorus)         |  | ton  | 0.11       | -            | 0.00              | 0.08       | -            | 0.02              | 0.08       | -            | 0.02              |

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix
  - ESG Data
  - GRI Index
  - SASB Index
  - ESRS Index
  - Third-Party Assurance Statement

# ESG Data

| Air Pollutants        |      |            |              |                   | * SeAH Steel figures are based on data from the Pohang, Gunsan, Suncheon, and Changwon plants. |              |                   |            |              |                   |
|-----------------------|------|------------|--------------|-------------------|------------------------------------------------------------------------------------------------|--------------|-------------------|------------|--------------|-------------------|
| Category              | Unit | 2023       |              |                   | 2024                                                                                           |              |                   | 2025       |              |                   |
|                       |      | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel                                                                                     | Dong-A Steel | SeAH Coated Metal | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| PM (Particulates)     | ton  | 1.99       | -            | 2.19              | 5.31                                                                                           | -            | 4.68              | 6.23       | -            | 1.99              |
| NOx (Nitrogen oxides) | ton  | 17.95      | -            | 27.67             | 17.84                                                                                          | -            | 20.87             | 23.85      | -            | 31.21             |
| SOx (Sulfur oxides)   | ton  | 0.54       | -            | 7.78              | 0.01                                                                                           | -            | 12.55             | 0.51       | -            | 9.16              |

| Chemical Substances                          |         |            |              |                   | * SeAH Steel figures are based on data from the Pohang, Gunsan, Suncheon, and Changwon plants. |              |                   |            |              |                   |
|----------------------------------------------|---------|------------|--------------|-------------------|------------------------------------------------------------------------------------------------|--------------|-------------------|------------|--------------|-------------------|
| Category                                     | Unit    | 2023       |              |                   | 2024                                                                                           |              |                   | 2025       |              |                   |
|                                              |         | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel                                                                                     | Dong-A Steel | SeAH Coated Metal | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| Chemical emissions                           | ton     | 1.7        | 0.0          | 487.0             | 1.7                                                                                            | 0.0          | 487.0             | 2.4        | 0.0          | 519.0             |
| Number of hazardous chemical substances used | Type(s) | 6          | 0            | 11                | 6                                                                                              | 0            | 11                | 6          | 0            | 11                |
| Amount of hazardous chemical substances used | ton     | 2,295      | 0            | 707               | 2,347                                                                                          | 0            | 756               | 2,369      | 0            | 788               |
| Amount of hazardous chemical spills          | ton     | 0          | 0            | 0                 | 0                                                                                              | 0            | 0                 | 0          | 0            | 0                 |

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix
  - ESG Data
  - GRI Index
  - SASB Index
  - ESRS Index
  - Third-Party Assurance Statement

# ESG Data

| Waste                                                  |                |      |            |              |                   |            |                 |                    |            |              |                   |
|--------------------------------------------------------|----------------|------|------------|--------------|-------------------|------------|-----------------|--------------------|------------|--------------|-------------------|
|                                                        |                |      | 2023       |              |                   | 2024       |                 |                    | 2025       |              |                   |
| Category                                               |                | Unit | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel | Dong-A Steel    | SeAH Coated Metal  | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| Waste generation targets                               |                | ton  | 10,355     | -            | -                 | 10,054     | -               | -                  | 10,054     | -            | -                 |
| Total waste generated                                  |                | ton  | 13,891     | 169          | 2,542             | 10,365     | 265             | 2,865 <sup>1</sup> | 10,084     | 257          | 2,677             |
| General waste generated                                | Total          | ton  | 5,944      | 85           | 700               | 5,055      | 93              | 816                | 4,371      | 179          | 810               |
|                                                        | Incineration   | ton  | 81         | 0            | 157               | 27         | 0               | 170                | 18         | 0            | 134               |
|                                                        | Landfill       | ton  | 2,560      | 0            | 356               | 1,612      | 0               | 284                | 958        | 0            | 252               |
|                                                        | Miscellaneous  | ton  | 0          | 0            | 0                 | 6          | 0               | 0                  | 0          | 0            | 0                 |
|                                                        | Recycling      | ton  | 3,303      | 85           | 187               | 3,411      | 93 <sup>2</sup> | 362                | 3,394      | 179          | 424               |
|                                                        | Recycling rate | %    | 55.6       | 100.0        | 26.7              | 67.5       | 100.0           | 44.4               | 77.7       | 100.0        | 52.3              |
| Construction waste generated                           | Total          | ton  | 3,068      | 0            | 0                 | 208        | 0               | 0                  | 178        | 0            | 0                 |
|                                                        | Incineration   | ton  | 0          | 0            | 0                 | 0          | 0               | 0                  | 0          | 0            | 0                 |
|                                                        | Landfill       | ton  | 0.0        | 0.0          | 0.0               | 0.5        | 0.0             | 0.0                | 0.0        | 0.0          | 0.0               |
|                                                        | Miscellaneous  | ton  | 3,068      | 0            | 0                 | 207        | 0               | 0                  | 178        | 0            | 0                 |
|                                                        | Recycling      | ton  | 0          | 0            | 0                 | 0          | 0               | 0                  | 0          | 0            | 0                 |
|                                                        | Recycling rate | %    | 0          | 0            | 0                 | 0          | 0               | 0                  | 0          | 0            | 0                 |
| Designated waste generated                             | Total          | ton  | 4,898      | 85           | 1,842             | 5,102      | 172             | 2,049              | 5,533      | 78           | 1,867             |
|                                                        | Incineration   | ton  | 516        | 74           | 314               | 298        | 144             | 338                | 172        | 12           | 243               |
|                                                        | Landfill       | ton  | 0          | 0            | 0                 | 0          | 0               | 0                  | 1          | 0            | 0                 |
|                                                        | Miscellaneous  | ton  | 0          | 0            | 0                 | 0          | 0               | 0                  | 11         | 0            | 0                 |
|                                                        | Recycling      | ton  | 4,382      | 11           | 1,528             | 4,804      | 28              | 1,711              | 5,347      | 66           | 1,624             |
|                                                        | Recycling rate | %    | 89.5       | 12.7         | 82.9              | 94.2       | 16.1            | 83.5 <sup>3</sup>  | 96.6       | 84.6         | 87.0              |
| Percentage of designated waste                         |                | %    | 35.26      | 49.98        | 72.46             | 49.22      | 64.77           | 71.52              | 54.87      | 30.20        | 69.74             |
| Total waste recycled (by-product recycled)             |                | ton  | 7,685      | 96           | 1,715             | 8,215      | 121             | 2,073              | 8,742      | 245          | 2,048             |
| Total waste recycling rate (by-product recycling rate) |                | %    | 55.3       | 56.4         | 67.5              | 79.3       | 45.7            | 72.4 <sup>4</sup>  | 86.7       | 95.4         | 76.5              |

1), 2), 3), 4) Data has been corrected due to an input error.

Overview

Sustainability Framework

Sustainability Priorities

Environmental

Social

Governance

Appendix

ESG Data

GRI Index

SASB Index

ESRS Index

Third-Party Assurance Statement

# ESG Data

## Social

| Employees                              |             |           |                     |            |                           |                   |                     |            |                           |                   |                     |            |              |                   |
|----------------------------------------|-------------|-----------|---------------------|------------|---------------------------|-------------------|---------------------|------------|---------------------------|-------------------|---------------------|------------|--------------|-------------------|
| Category                               |             | Unit      | 2023                |            |                           |                   | 2024                |            |                           |                   | 2025                |            |              |                   |
|                                        |             |           | SeAH Steel Holdings | SeAH Steel | Dong-A Steel <sup>2</sup> | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel <sup>3</sup> | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| Total number of employees <sup>1</sup> |             | Person(s) | 45                  | 762        | 27                        | 202               | 42                  | 796        | 27                        | 212               | 45                  | 805        | 29           | 214               |
| Employees (Executive)                  | Total       | Person(s) | 3                   | 13         | 1                         | 4                 | 3                   | 14         | 1                         | 4                 | 2                   | 14         | 1            | 4                 |
|                                        | Male        | Person(s) | 3                   | 13         | 1                         | 4                 | 3                   | 14         | 1                         | 4                 | 2                   | 14         | 1            | 4                 |
|                                        | Female      | Person(s) | 0                   | 0          | 0                         | 0                 | 0                   | 0          | 0                         | 0                 | 0                   | 0          | 0            | 0                 |
|                                        | Under 30    | Person(s) | 0                   | 0          | 0                         | 0                 | 0                   | 0          | 0                         | 0                 | 0                   | 0          | 0            | 0                 |
|                                        | 30 to 49    | Person(s) | 1                   | 0          | 0                         | 0                 | 1                   | 0          | 0                         | 0                 | 1                   | 0          | 0            | 0                 |
|                                        | 50 and over | Person(s) | 2                   | 13         | 1                         | 4                 | 2                   | 14         | 1                         | 4                 | 1                   | 14         | 1            | 4                 |
|                                        |             |           |                     |            |                           |                   |                     |            |                           |                   |                     |            |              |                   |
| Employees (General manager)            | Total       | Person(s) | 5                   | 42         | 2                         | 12                | 5                   | 39         | 4                         | 12                | 8                   | 41         | 5            | 14                |
|                                        | Male        | Person(s) | 3                   | 42         | 2                         | 12                | 3                   | 39         | 4                         | 12                | 6                   | 41         | 5            | 14                |
|                                        | Female      | Person(s) | 2                   | 0          | 0                         | 0                 | 2                   | 0          | 0                         | 0                 | 2                   | 0          | 0            | 0                 |
|                                        | Under 30    | Person(s) | 0                   | 0          | 0                         | 0                 | 0                   | 0          | 0                         | 0                 | 0                   | 0          | 0            | 0                 |
|                                        | 30 to 49    | Person(s) | 2                   | 6          | 0                         | 3                 | 2                   | 4          | 2                         | 3                 | 4                   | 3          | 3            | 4                 |
|                                        | 50 and over | Person(s) | 3                   | 36         | 2                         | 9                 | 3                   | 35         | 2                         | 9                 | 4                   | 38         | 2            | 10                |
| Employees (Deputy general manager)     | Total       | Person(s) | 3                   | 45         | 4                         | 16                | 2                   | 49         | 3                         | 16                | 3                   | 58         | 3            | 14                |
|                                        | Male        | Person(s) | 3                   | 44         | 4                         | 16                | 2                   | 48         | 3                         | 16                | 2                   | 57         | 3            | 14                |
|                                        | Female      | Person(s) | 0                   | 1          | 0                         | 0                 | 0                   | 1          | 0                         | 0                 | 1                   | 1          | 0            | 0                 |
|                                        | Under 30    | Person(s) | 0                   | 0          | 0                         | 0                 | 0                   | 0          | 0                         | 0                 | 0                   | 0          | 0            | 0                 |
|                                        | 30 to 49    | Person(s) | 3                   | 36         | 4                         | 16                | 2                   | 42         | 3                         | 16                | 3                   | 53         | 3            | 14                |
|                                        | 50 and over | Person(s) | 0                   | 9          | 0                         | 0                 | 0                   | 7          | 0                         | 0                 | 0                   | 5          | 0            | 0                 |

1) SeAH Steel’s total employees exclude inside directors.  
2), 3) Some data for Dong-A Steel for the relevant years has been corrected due to an input error.



Overview

Sustainability Framework

Sustainability Priorities

Environmental

Social

Governance

Appendix

ESG Data

GRI Index

SASB Index

ESRS Index

Third-Party Assurance Statement

ESG Data

| Employees                     |             |           |                     |            |                           |                   |                     |            |                           |                   |                     |            |              |                   |
|-------------------------------|-------------|-----------|---------------------|------------|---------------------------|-------------------|---------------------|------------|---------------------------|-------------------|---------------------|------------|--------------|-------------------|
| Category                      |             | Unit      | 2023                |            |                           |                   | 2024                |            |                           |                   | 2025                |            |              |                   |
|                               |             |           | SeAH Steel Holdings | SeAH Steel | Dong-A Steel <sup>1</sup> | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel <sup>2</sup> | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| Employees (Manager)           | Total       | Person(s) | 10                  | 85         | 4                         | 13                | 13                  | 85         | 5                         | 11                | 10                  | 79         | 5            | 14                |
|                               | Male        | Person(s) | 9                   | 85         | 4                         | 13                | 10                  | 85         | 4                         | 11                | 6                   | 79         | 4            | 14                |
|                               | Female      | Person(s) | 1                   | 0          | 0                         | 0                 | 3                   | 0          | 1                         | 0                 | 4                   | 0          | 1            | 0                 |
|                               | Under 30    | Person(s) | 0                   | 0          | 0                         | 0                 | 0                   | 0          | 0                         | 0                 | 0                   | 0          | 0            | 0                 |
|                               | 30 to 49    | Person(s) | 10                  | 84         | 4                         | 13                | 13                  | 84         | 5                         | 11                | 10                  | 78         | 5            | 14                |
|                               | 50 and over | Person(s) | 0                   | 1          | 0                         | 0                 | 0                   | 1          | 0                         | 0                 | 0                   | 1          | 0            | 0                 |
| Employees (Assistant manager) | Total       | Person(s) | 7                   | 52         | 4                         | 9                 | 5                   | 65         | 3                         | 12                | 8                   | 71         | 3            | 13                |
|                               | Male        | Person(s) | 2                   | 49         | 2                         | 9                 | 1                   | 62         | 2                         | 12                | 4                   | 66         | 2            | 10                |
|                               | Female      | Person(s) | 5                   | 3          | 2                         | 0                 | 4                   | 3          | 1                         | 0                 | 4                   | 5          | 1            | 3                 |
|                               | Under 30    | Person(s) | 0                   | 2          | 0                         | 3                 | 0                   | 1          | 0                         | 1                 | 0                   | 2          | 1            | 0                 |
|                               | 30 to 49    | Person(s) | 7                   | 49         | 4                         | 6                 | 5                   | 63         | 3                         | 11                | 8                   | 68         | 2            | 13                |
|                               | 50 and over | Person(s) | 0                   | 1          | 0                         | 0                 | 0                   | 1          | 0                         | 0                 | 0                   | 1          | 0            | 0                 |
| Employees (Associate)         | Total       | Person(s) | 9                   | 525        | 12                        | 147               | 9                   | 544        | 11                        | 161               | 9                   | 542        | 12           | 154               |
|                               | Male        | Person(s) | 3                   | 487        | 10                        | 139               | 3                   | 495        | 10                        | 153               | 3                   | 490        | 9            | 148               |
|                               | Female      | Person(s) | 6                   | 38         | 2                         | 8                 | 6                   | 49         | 1                         | 8                 | 6                   | 52         | 3            | 6                 |
|                               | Under 30    | Person(s) | 7                   | 113        | 7                         | 55                | 7                   | 125        | 5                         | 73                | 5                   | 120        | 5            | 38                |
|                               | 30 to 49    | Person(s) | 2                   | 169        | 3                         | 76                | 2                   | 185        | 4                         | 72                | 4                   | 204        | 5            | 89                |
|                               | 50 and over | Person(s) | 0                   | 243        | 2                         | 16                | 0                   | 234        | 2                         | 16                | 0                   | 218        | 2            | 27                |

1), 2) Some data for Dong-A Steel for the relevant years has been corrected due to an input error.

Overview

Sustainability Framework

Sustainability Priorities

Environmental

Social

Governance

Appendix

ESG Data

GRI Index

SASB Index

ESRS Index

Third-Party Assurance Statement

ESG Data

| Employees                         |                     |           |                     |            |                           |                   |                     |            |                           |                   |                     |            |              |                   |
|-----------------------------------|---------------------|-----------|---------------------|------------|---------------------------|-------------------|---------------------|------------|---------------------------|-------------------|---------------------|------------|--------------|-------------------|
| Category                          |                     | Unit      | 2023                |            |                           |                   | 2024                |            |                           |                   | 2025                |            |              |                   |
|                                   |                     |           | SeAH Steel Holdings | SeAH Steel | Dong-A Steel <sup>1</sup> | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel <sup>2</sup> | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| Special appointment               | Total               | Person(s) | 8                   | 0          | 0                         | 1                 | 5                   | 0          | 0                         | 1                 | 5                   | 0          | 0            | 1                 |
|                                   | Male                | Person(s) | 2                   | 0          | 0                         | 1                 | 1                   | 0          | 0                         | 1                 | 2                   | 0          | 0            | 1                 |
|                                   | Female              | Person(s) | 6                   | 0          | 0                         | 0                 | 4                   | 0          | 0                         | 0                 | 3                   | 0          | 0            | 0                 |
|                                   | Under 30            | Person(s) | 4                   | 0          | 0                         | 0                 | 0                   | 0          | 0                         | 0                 | 0                   | 0          | 0            | 0                 |
|                                   | 30 to 49            | Person(s) | 4                   | 0          | 0                         | 0                 | 5                   | 0          | 0                         | 0                 | 5                   | 0          | 0            | 0                 |
|                                   | 50 and over         | Person(s) | 0                   | 0          | 0                         | 1                 | 0                   | 0          | 0                         | 1                 | 0                   | 0          | 0            | 1                 |
| Employment type                   | Full-time employees | Person(s) | 41                  | 630        | 27                        | 201               | 38                  | 674        | 27                        | 211               | 41                  | 737        | 27           | 202               |
|                                   | Male                | Person(s) | 24                  | 603        | 23                        | 194               | 22                  | 645        | 24                        | 204               | 24                  | 704        | 23           | 194               |
|                                   | Female              | Person(s) | 17                  | 27         | 4                         | 7                 | 16                  | 29         | 3                         | 7                 | 17                  | 33         | 4            | 8                 |
|                                   | Temporary employees | Person(s) | 4                   | 132        | 0                         | 1                 | 4                   | 122        | 0                         | 1                 | 4                   | 68         | 2            | 12                |
|                                   | Male                | Person(s) | 1                   | 118        | 0                         | 0                 | 1                   | 98         | 0                         | 0                 | 1                   | 43         | 1            | 11                |
|                                   | Female              | Person(s) | 3                   | 14         | 0                         | 1                 | 3                   | 24         | 0                         | 1                 | 3                   | 25         | 1            | 1                 |
| Functions                         | Office work         | Person(s) | 45                  | 344        | 23                        | 77                | 42                  | 369        | 23                        | 78                | 45                  | 378        | 25           | 77                |
|                                   | Technical work      | Person(s) | 0                   | 418        | 4                         | 125               | 0                   | 427        | 4                         | 143               | 0                   | 427        | 4            | 137               |
| Non-employee workers <sup>3</sup> |                     | Person(s) | 3                   | 567        | 83                        | 0                 | 3                   | 506        | 85                        | 0                 | 2                   | 556        | 86           | 0                 |

1), 2) Some data for Dong-A Steel for the relevant years has been corrected due to an input error.

3) Non-employee workers refer to dispatched workers and business partner personnel who work at the company’s sites, performing tasks such as facility maintenance, logistics/loading and unloading, production support, and security/cleaning. Data is compiled as of the end of the reporting period (December 31, 2025); there were no significant changes during the reporting period.

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix
  - ESG Data
  - GRI Index
  - SASB Index
  - ESRS Index
  - Third-Party Assurance Statement

# ESG Data

| Employee Diversity            |                                                                        |           |                     |            |              |                   |                     |            |                  |                   |                     |            |              |                   |
|-------------------------------|------------------------------------------------------------------------|-----------|---------------------|------------|--------------|-------------------|---------------------|------------|------------------|-------------------|---------------------|------------|--------------|-------------------|
| Category                      |                                                                        | Unit      | 2023                |            |              |                   | 2024                |            |                  |                   | 2025                |            |              |                   |
|                               |                                                                        |           | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel     | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| Socially disadvantaged groups | Number of foreign nationals                                            | Person(s) | 0                   | 1          | 0            | 0                 | 0                   | 1          | 0                | 0                 | 0                   | 1          | 0            | 0                 |
|                               | Number of employees with disabilities                                  | Person(s) | 0                   | 19         | 0            | 2                 | 0                   | 17         | 0                | 2                 | 0                   | 17         | 0            | 2                 |
|                               | Percentage of employees with disabilities                              | %         | 0.0                 | 2.5        | 0.0          | 1.0               | 0.0                 | 2.1        | 0.0              | 0.9               | 0.0                 | 2.1        | 0.0          | 0.9               |
|                               | Number of employees who are veterans (and/or eligible individuals)     | Person(s) | 2                   | 10         | 0            | 2                 | 1                   | 10         | 0                | 2                 | 1                   | 11         | 0            | 3                 |
|                               | Percentage of employees who are veterans (and/or eligible individuals) | %         | 4.4                 | 1.3        | 0.0          | 1.0               | 2.4                 | 1.3        | 0.0              | 0.9               | 2.2                 | 1.4        | 0.0          | 1.4               |
| Female employees              | Number of female employees in management positions                     | Person(s) | 3                   | 1          | 0            | 0                 | 5                   | 1          | 1                | 0                 | 7                   | 1          | 1            | 0                 |
|                               | Percentage of female employees in management positions                 | %         | 14.3                | 0.5        | 0.0          | 0.0               | 21.7                | 0.5        | 7.7 <sup>1</sup> | 0.0               | 30.4                | 0.5        | 7.1          | 0.0               |

1) Data has been corrected due to an input error.

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix
  - ESG Data
    - GRI Index
    - SASB Index
    - ESRS Index
  - Third-Party Assurance Statement

ESG Data

| New Hires and Turnover   |                                      |           |                     |            |                           |                   |                     |            |                           |                   |                     |            |              |                   |
|--------------------------|--------------------------------------|-----------|---------------------|------------|---------------------------|-------------------|---------------------|------------|---------------------------|-------------------|---------------------|------------|--------------|-------------------|
| Category                 |                                      | Unit      | 2023                |            |                           |                   | 2024                |            |                           |                   | 2025                |            |              |                   |
|                          |                                      |           | SeAH Steel Holdings | SeAH Steel | Dong-A Steel <sup>1</sup> | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel <sup>2</sup> | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| Number of new hires      | Total                                | Person(s) | 13                  | 175        | 12                        | 26                | 7                   | 115        | 4                         | 43                | 11                  | 161        | 5            | 17                |
|                          | Male                                 | Person(s) | 5                   | 147        | 5                         | 24                | 2                   | 91         | 3                         | 42                | 7                   | 141        | 2            | 14                |
|                          | Female                               | Person(s) | 8                   | 28         | 7                         | 2                 | 5                   | 24         | 1                         | 1                 | 4                   | 20         | 3            | 3                 |
|                          | Under 30                             | Person(s) | 9                   | 80         | 8                         | 14                | 2                   | 61         | 2                         | 28                | 3                   | 64         | 2            | 11                |
|                          | 30 to 49                             | Person(s) | 4                   | 78         | 4                         | 11                | 5                   | 47         | 2                         | 15                | 7                   | 80         | 2            | 5                 |
|                          | 50 and over                          | Person(s) | 0                   | 17         | 0                         | 1                 | 0                   | 7          | 0                         | 0                 | 1                   | 17         | 1            | 1                 |
| Turnover <sup>3</sup>    | Total                                | Person(s) | 5                   | 69         | 13                        | 30                | 3                   | 41         | 6                         | 30                | 8                   | 42         | 3            | 14                |
|                          | Turnover rate                        | %         | 13.3                | 10.9       | 42.6                      | 15.4              | 7.6                 | 6.3        | 22.2                      | 14.6              | 20.3                | 6.0        | 11.1         | 6.8               |
|                          | Voluntary turnover <sup>4</sup>      | Person(s) | 4                   | 23         | 13                        | 29                | 0                   | 25         | 6                         | 30                | 4                   | 12         | 3            | 14                |
|                          | Voluntary turnover rate <sup>5</sup> | %         | 10.7                | 3.6        | 42.6                      | 14.9              | 0.0                 | 3.8        | 22.2                      | 14.6              | 10.1                | 1.7        | 11.1         | 6.8               |
| Average years of service | Total                                | Year(s)   | 3.5                 | 18.8       | 5.2                       | 10.2              | 4.0                 | 17.0       | 6.3                       | 10.0              | 4.5                 | 14.7       | 6.6          | 10.9              |
|                          | Male                                 | Year(s)   | 4.3                 | 19.2       | 5.4                       | 10.2              | 4.8                 | 17.4       | 6.2                       | 10.2              | 4.4                 | 15.1       | 6.8          | 11.1              |
|                          | Female                               | Year(s)   | 2.3                 | 9.7        | 4.5                       | 4.8               | 3.0                 | 7.1        | 6.9                       | 5.5               | 4.6                 | 6.4        | 5.1          | 2.7               |

1), 2) Some data for Dong-A Steel for the relevant years has been corrected due to an input error.  
3) Turnover figures exclude fixed-term (contract) employees.  
4), 5) Following a change in the definition of turnover, 2023-2024 data has been restated accordingly.

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix
  - ESG Data
  - GRI Index
  - SASB Index
  - ESRS Index
  - Third-Party Assurance Statement

ESG Data

| Employee Training                                        |                                     |             |                     |            |                   |                   |                     |            |                   |                   |                     |            |              |                   |
|----------------------------------------------------------|-------------------------------------|-------------|---------------------|------------|-------------------|-------------------|---------------------|------------|-------------------|-------------------|---------------------|------------|--------------|-------------------|
| Category                                                 |                                     | Unit        | 2023                |            |                   |                   | 2024                |            |                   |                   | 2025                |            |              |                   |
|                                                          |                                     |             | SeAH Steel Holdings | SeAH Steel | Dong-A Steel      | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel      | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| Training hours <sup>1</sup>                              | Total training hours                | Hour(s)     | 1,593               | 44,507     | 1,310             | 7,344             | 2,103               | 52,859     | 1,202             | 7,476             | 2,790               | 77,869     | 1,283        | 4,124             |
|                                                          | Training hours per employee         | Hour(s)     | 35.4                | 58.4       | 48.5              | 36.4              | 50.1                | 63.6       | 44.5              | 35.3              | 62.0                | 94.0       | 44.2         | 19.3              |
| Training costs                                           | Total training and development cost | KRW million | 87                  | 814        | 20                | 264               | 161                 | 1,026      | 24                | 329               | 164                 | 774        | 11           | 102               |
|                                                          | Average training cost per employee  | KRW million | 1.93                | 1.07       | 0.75 <sup>2</sup> | 1.31              | 3.83                | 1.29       | 0.90 <sup>3</sup> | 1.55              | 3.64                | 0.96       | 0.38         | 0.48              |
| Number of training participants by category <sup>4</sup> | Environment                         | Person(s)   | 5                   | 363        | 1                 | 194               | 3                   | 199        | 2                 | 221               | 5                   | 334        | 1            | 216               |
|                                                          | Fair trade                          | Person(s)   | 4                   | 141        | 36                | 12                | 4                   | 325        | 30                | -                 | 17                  | 135        | 17           | 17                |
|                                                          | Safety and health                   | Person(s)   | 40                  | 19,318     | 39                | 194               | 78                  | 17,494     | 35                | 221               | 85                  | 28,127     | 35           | 216               |
|                                                          | Ethics and anti-corruption          | Person(s)   | -                   | 339        | 36                | 194               | 15                  | 515        | 27                | 221               | 19                  | 569        | 36           | 247               |
|                                                          | Human rights                        | Person(s)   | 149                 | 1,096      | 36                | 194               | 136                 | 1,207      | 27                | 221               | 141                 | 2,334      | 30           | 216               |
|                                                          | Information security                | Person(s)   | 47                  | 348        | 31                | 194               | 44                  | 403        | 31                | 221               | 46                  | 679        | 29           | 216               |

1) SeAH Steel’s “total training hours” and “training hours per employee” have been restated for prior years, based on the number of employees who completed at least one training session during the given year.  
2), 3) Data has been corrected due to an input error.  
4) Sum of the number of participants for each training category.  
5) SeAH Steel’s 2023-2024 data has been corrected due to an aggregation error.



- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix
  - ESG Data
  - GRI Index
  - SASB Index
  - ESRS Index
  - Third-Party Assurance Statement

ESG Data

| Labor-Management Relations |                                                  |           |                     |            |              |                   |                     |            |              |                   |                     |            |              |                   |
|----------------------------|--------------------------------------------------|-----------|---------------------|------------|--------------|-------------------|---------------------|------------|--------------|-------------------|---------------------|------------|--------------|-------------------|
| Category                   |                                                  | Unit      | 2023                |            |              |                   | 2024                |            |              |                   | 2025                |            |              |                   |
|                            |                                                  |           | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| Number of strikes          |                                                  | Case(s)   | 0                   | 0          | 0            | 0                 | 0                   | 0          | 0            | 0                 | 0                   | 0          | 0            | 0                 |
| Labor union                | Employees eligible for unionization              | Person(s) | -                   | 363        | -            | -                 | -                   | 313        | -            | -                 | -                   | 298        | -            | -                 |
|                            | Number of unionized employees                    | Person(s) | -                   | 221        | -            | -                 | -                   | 245        | -            | -                 | -                   | 253        | -            | -                 |
|                            | Unionization rate                                | %         | -                   | 60.9       | -            | -                 | -                   | 78.3       | -            | -                 | -                   | 84.9       | -            | -                 |
|                            | Collective bargaining coverage rate <sup>1</sup> | %         | 0.0                 | 29.0       | 0.0          | 0.0               | 0.0                 | 30.8       | 0.0          | 0.0               | 0.0                 | 31.4       | 0.0          | 0.0               |

1) Collective bargaining coverage rate: Number of unionized employees at the Pohang Plant ÷ total number of employees × 100. Union membership is limited to technical professionals at the Pohang Plant (SeAH Steel Holdings, SeAH Coated Metal, and Dong-A Steel have no labor union).

| Retirement Pension              |                 |                     |            |                  |                   |                     |            |                  |                   |                     |            |              |                   |
|---------------------------------|-----------------|---------------------|------------|------------------|-------------------|---------------------|------------|------------------|-------------------|---------------------|------------|--------------|-------------------|
| Category                        | Unit            | 2023                |            |                  |                   | 2024                |            |                  |                   | 2025                |            |              |                   |
|                                 |                 | SeAH Steel Holdings | SeAH Steel | Dong-A Steel     | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel     | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| DB plan assets under management | KRW 100 million | 47                  | 566        | 0                | 138               | 67 <sup>*</sup>     | 578        | 0                | 146               | 85                  | 656        | 0            | 164               |
| DB plan participants            | Person(s)       | 45                  | 699        | 0                | 171               | 75                  | 603        | 0                | 172 <sup>*</sup>  | 76                  | 646        | 0            | 156               |
| DC plan assets under management | KRW 100 million | 0.0                 | 6.0        | 4.2 <sup>*</sup> | 0.8               | 0.0                 | 5.0        | 4.7 <sup>*</sup> | 0.7               | 0.2                 | 5.0        | 5.2          | 1.1               |
| DC plan participants            | Person(s)       | 0                   | 80         | 17               | 12                | 0                   | 63         | 18 <sup>*</sup>  | 14                | 2                   | 53         | 20           | 17                |

<sup>\*</sup> Data has been corrected due to an input error.

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix
  - ESG Data
  - GRI Index
  - SASB Index
  - ESRS Index
  - Third-Party Assurance Statement

# ESG Data

| Parental Leave                             |        |           |                     |            |              |                   |                     |            |              |                   |                     |            |              |                   |
|--------------------------------------------|--------|-----------|---------------------|------------|--------------|-------------------|---------------------|------------|--------------|-------------------|---------------------|------------|--------------|-------------------|
| Category                                   |        | Unit      | 2023                |            |              |                   | 2024                |            |              |                   | 2025                |            |              |                   |
|                                            |        |           | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| Employees on parental leave <sup>1</sup>   | Total  | Person(s) | 2                   | 4          | 0            | 0                 | 0                   | 3          | 0            | 0                 | 3                   | 1          | 1            | 0                 |
|                                            | Male   | Person(s) | 0                   | 3          | 0            | 0                 | 0                   | 1          | 0            | 0                 | 0                   | 1          | 0            | 0                 |
|                                            | Female | Person(s) | 2                   | 1          | 0            | 0                 | 0                   | 2          | 0            | 0                 | 3                   | 0          | 1            | 0                 |
| Returnees from parental leave <sup>2</sup> | Total  | Person(s) | 2                   | 3          | 0            | 0                 | 0                   | 1          | 0            | 0                 | 0                   | 0          | 0            | 0                 |
|                                            | Male   | Person(s) | 0                   | 2          | 0            | 0                 | 0                   | 0          | 0            | 0                 | 0                   | 0          | 0            | 0                 |
|                                            | Female | Person(s) | 2                   | 1          | 0            | 0                 | 0                   | 1          | 0            | 0                 | 0                   | 0          | 0            | 0                 |
| Parental leave return rate                 | Total  | %         | 100                 | 75         | 0            | 0                 | 0                   | 33         | 0            | 0                 | 0                   | 0          | 0            | 0                 |
|                                            | Male   | %         | 0                   | 67         | 0            | 0                 | 0                   | 0          | 0            | 0                 | 0                   | 0          | 0            | 0                 |
|                                            | Female | %         | 100                 | 100        | 0            | 0                 | 0                   | 50         | 0            | 0                 | 0                   | 0          | 0            | 0                 |

1) Number of employees who took parental leave during the reporting year.  
2) Number of employees who returned to work upon completion of parental leave during the reporting year.

Overview

Sustainability Framework

Sustainability Priorities

Environmental

Social

Governance

Appendix

ESG Data

GRI Index

SASB Index

ESRS Index

Third-Party Assurance Statement

ESG Data

| Employee Satisfaction           |          |                     |            |              |                   |                     |            |              |                   |                     |            |              |                   |
|---------------------------------|----------|---------------------|------------|--------------|-------------------|---------------------|------------|--------------|-------------------|---------------------|------------|--------------|-------------------|
| Category                        | Unit     | 2023                |            |              |                   | 2024                |            |              |                   | 2025                |            |              |                   |
|                                 |          | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| Organizational assessment score | Point(s) | 76.4                | 72.0       | -            | 69.8              | 74.8                | 72.7       | 68.2         | 75.5              | 74.7                | 71.6       | 73.2         | 76.9              |

| Performance Evaluation                                                            |           |                     |            |              |                   |                     |            |              |                   |                     |            |              |                   |
|-----------------------------------------------------------------------------------|-----------|---------------------|------------|--------------|-------------------|---------------------|------------|--------------|-------------------|---------------------|------------|--------------|-------------------|
| Category                                                                          | Unit      | 2023                |            |              |                   | 2024                |            |              |                   | 2025                |            |              |                   |
|                                                                                   |           | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| Number of employees who received regular performance evaluations <sup>1</sup>     | Person(s) | 31                  | 261        | 19           | 62                | 36                  | 291        | 20           | 62                | 34                  | 321        | 22           | 59                |
| Percentage of employees who received regular performance evaluations <sup>2</sup> | %         | 68.9                | 34.3       | 70.4         | 30.7              | 85.7                | 36.6       | 74.1         | 29.2              | 75.6                | 39.9       | 75.9         | 27.3              |

1) Eligible for regular performance evaluation: office employees, excluding those who joined during the reporting year as well as executives.  
2) Percentage of employees who received regular performance evaluations = employees eligible for regular performance evaluation ÷ total number of employees; prior-year data has been restated based on this calculation method.

| Social Contribution  |                                         |                     |            |                           |                   |                     |            |                           |                   |                     |            |              |                   |
|----------------------|-----------------------------------------|---------------------|------------|---------------------------|-------------------|---------------------|------------|---------------------------|-------------------|---------------------|------------|--------------|-------------------|
| Category             | Unit                                    | 2023                |            |                           |                   | 2024                |            |                           |                   | 2025                |            |              |                   |
|                      |                                         | SeAH Steel Holdings | SeAH Steel | Dong-A Steel <sup>1</sup> | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel <sup>2</sup> | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| Number of volunteers | Person(s)                               | 2                   | 149        | 19                        | 175               | 2                   | 81         | 19                        | 270               | 3                   | 316        | 19           | 254               |
| Volunteer hours      | Total volunteer hours                   | 4                   | 398        | 154                       | 528               | 4                   | 3,263      | 150                       | 898               | 6                   | 1,273      | 190          | 833               |
|                      | Volunteer hours per person <sup>3</sup> | 0.1                 | 0.5        | 5.7                       | 2.6               | 0.1                 | 4.1        | 5.6                       | 4.2               | 0.1                 | 1.6        | 6.6          | 3.9               |
| Community donations  | KRW 100 million                         | 2.00                | 1.14       | 0.02                      | 0.01              | 1.34                | 4.49       | 0.02                      | 0.10              | 0.31                | 5.60       | 0.02         | 0.11              |

1), 2) Some data for Dong-A Steel for the relevant years has been corrected due to an input error.  
3) Following a change in the basis for volunteer hours per person, 2023-2024 data has been restated accordingly.

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix
  - ESG Data
  - GRI Index
  - SASB Index
  - ESRS Index
  - Third-Party Assurance Statement

# ESG Data

| Responsible Supply Chain                             |                               |                 |                     |            |              |                   |                     |            |              |                   |                     |            |              |                   |
|------------------------------------------------------|-------------------------------|-----------------|---------------------|------------|--------------|-------------------|---------------------|------------|--------------|-------------------|---------------------|------------|--------------|-------------------|
| Category                                             |                               | Unit            | 2023                |            |              |                   | 2024                |            |              |                   | 2025                |            |              |                   |
|                                                      |                               |                 | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| Number of in-house business partners                 |                               | Number          | 0                   | 45         | 4            | 8                 | 0                   | 41         | 4            | 8                 | 0                   | 66         | 4            | 8                 |
| Procurement spend on in-house business partners      |                               | KRW 100 million | 0                   | 711        | 45           | 65                | 0                   | 345        | 45           | 85                | 0                   | 613        | 51           | 79                |
| Grievance resolution with in-house business partners | Number of grievances reported | Case(s)         | 0                   | 173        | 84           | 23                | 0                   | 137        | 72           | 61                | 0                   | 239        | 87           | 26                |
|                                                      | Number of grievances resolved | Case(s)         | 0                   | 170        | 80           | 23                | 0                   | 137        | 70           | 61                | 0                   | 238        | 84           | 26                |
|                                                      | Resolution rate               | %               | 0.0                 | 98.3       | 95.2         | 100.0             | 0.0                 | 100.0      | 97.2         | 100.0             | 0.0                 | 99.6       | 96.6         | 100.0             |
| Number of business partners evaluated on ESG         |                               | Number          | 0                   | 0          | 0            | 0                 | 0                   | 20         | 0            | 0                 | 0                   | 10         | 0            | 0                 |

Overview

Sustainability Framework

Sustainability Priorities

Environmental

Social

Governance

Appendix

ESG Data

GRI Index

SASB Index

ESRS Index

Third-Party Assurance Statement

ESG Data

| Occupational Safety and Health                                             |                           |           | 2023                |            |              |                   | 2024                |            |              |                   | 2025                |            |              |                   |
|----------------------------------------------------------------------------|---------------------------|-----------|---------------------|------------|--------------|-------------------|---------------------|------------|--------------|-------------------|---------------------|------------|--------------|-------------------|
| Category                                                                   |                           | Unit      | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| Occupational injury rate                                                   | Total                     | %         | 0.00                | 0.46       | 4.50         | 0.00              | 0.00                | 0.23       | 3.57         | 0.00              | 0.00                | 0.46       | 0.98         | 0.29              |
|                                                                            | Employees                 | %         | 0.00                | 0.26       | 0.00         | 0.00              | 0.00                | 0.00       | 0.00         | 0.00              | 0.00                | 0.64       | 0.00         | 0.46              |
|                                                                            | Business partners         | %         | 0.00                | 0.73       | 6.33         | 0.00              | 0.00                | 0.61       | 4.94         | 0.00              | 0.00                | 0.19       | 1.33         | 0.00              |
| Number of injuries                                                         | Total                     | Case(s)   | 0                   | 6          | 5            | 0                 | 0                   | 3          | 4            | 0                 | 0                   | 6          | 1            | 1                 |
|                                                                            | Employees                 | Case(s)   | 0                   | 2          | 0            | 0                 | 0                   | 0          | 0            | 0                 | 0                   | 5          | 0            | 1                 |
|                                                                            | Business partners         | Case(s)   | 0                   | 4          | 5            | 0                 | 0                   | 3          | 4            | 0                 | 0                   | 1          | 1            | 0                 |
| Number of injured workers                                                  | Total                     | Person(s) | 0                   | 6          | 5            | 0                 | 0                   | 3          | 4            | 0                 | 0                   | 6          | 1            | 1                 |
|                                                                            | Employees                 | Person(s) | 0                   | 2          | 0            | 0                 | 0                   | 0          | 0            | 0                 | 0                   | 5          | 0            | 0                 |
|                                                                            | Business partners         | Person(s) | 0                   | 4          | 5            | 0                 | 0                   | 3          | 4            | 0                 | 0                   | 1          | 1            | 0                 |
| Number of fatalities                                                       | Total                     | Person(s) | 0                   | 1          | 0            | 0                 | 0                   | 0          | 0            | 0                 | 0                   | 0          | 0            | 0                 |
|                                                                            | Employees                 | Person(s) | 0                   | 0          | 0            | 0                 | 0                   | 0          | 0            | 0                 | 0                   | 0          | 0            | 0                 |
|                                                                            | Business partners         | Person(s) | 0                   | 1          | 0            | 0                 | 0                   | 0          | 0            | 0                 | 0                   | 0          | 0            | 0                 |
| Fatality rate                                                              | Total                     | %         | 0.00                | 0.08       | 0.00         | 0.00              | 0.00                | 0.00       | 0.00         | 0.00              | 0.00                | 0.00       | 0.00         | 0.00              |
|                                                                            | Employees                 | %         | 0.00                | 0.00       | 0.00         | 0.00              | 0.00                | 0.00       | 0.00         | 0.00              | 0.00                | 0.00       | 0.00         | 0.00              |
|                                                                            | Business partners         | %         | 0.00                | 0.18       | 0.00         | 0.00              | 0.00                | 0.00       | 0.00         | 0.00              | 0.00                | 0.00       | 0.00         | 0.00              |
| Injury severity rate <sup>1)</sup>                                         | Total                     | ‰         | -                   | 2.68       | 3.16         | -                 | -                   | 0.07       | 2.08         | -                 | -                   | 0.36       | 1.41         | -                 |
|                                                                            | Employees                 | ‰         | -                   | 0.15       | 0.00         | -                 | -                   | 0.00       | 0.00         | -                 | -                   | 0.40       | 0.00         | -                 |
|                                                                            | Business partners         | ‰         | -                   | 5.89       | 3.97         | -                 | -                   | 0.16       | 2.63         | -                 | -                   | 0.31       | 1.79         | -                 |
| ISO 45001 (Occupational Health and Safety Management System) certification | Number of eligible sites  | Site(s)   | 0                   | 4          | 2            | 1                 | 0                   | 4          | 2            | 1                 | 0                   | 4          | 2            | 1                 |
|                                                                            | Number of certified sites | Site(s)   | 0                   | 4          | 0            | 1                 | 0                   | 4          | 0            | 1                 | 0                   | 4          | 0            | 1                 |
|                                                                            | Certification rate        | %         | 0                   | 100        | 0            | 100               | 0                   | 100        | 0            | 100               | 0                   | 100        | 0            | 100               |

1) Data for 2023-2024 has been corrected due to an input error.

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix
  - ESG Data
  - GRI Index
  - SASB Index
  - ESRS Index
  - Third-Party Assurance Statement

# ESG Data

## Governance

| Board of Directors                    |             |            |                     |            |              |                   |                     |            |              |                   |                     |            |              |                   |
|---------------------------------------|-------------|------------|---------------------|------------|--------------|-------------------|---------------------|------------|--------------|-------------------|---------------------|------------|--------------|-------------------|
| Category                              |             | Unit       | 2023                |            |              |                   | 2024                |            |              |                   | 2025                |            |              |                   |
|                                       |             |            | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| Total number of board members         | Total       | Person(s)  | 4                   | 5          | 3            | 4                 | 4                   | 7          | 3            | 4                 | 4                   | 7          | 3            | 4 <sup>1</sup>    |
|                                       | Male        | Person(s)  | 4                   | 4          | 3            | 4                 | 4                   | 6          | 3            | 4                 | 4                   | 6          | 3            | 4                 |
|                                       | Female      | Person(s)  | 0                   | 1          | 0            | 0                 | 0                   | 1          | 0            | 0                 | 0                   | 1          | 0            | 0                 |
|                                       | Under 30    | Person(s)  | 0                   | 0          | 0            | 0                 | 0                   | 0          | 0            | 0                 | 0                   | 0          | 0            | 0                 |
|                                       | 30 to 49    | Person(s)  | 1                   | 1          | 0            | 0                 | 2                   | 2          | 0            | 0                 | 2                   | 2          | 0            | 0                 |
|                                       | 50 and over | Person(s)  | 3                   | 4          | 3            | 4                 | 2                   | 5          | 3            | 4                 | 2                   | 5          | 3            | 4                 |
| Inside directors                      |             | Person(s)  | 3                   | 3          | 2            | 2                 | 3                   | 3          | 2            | 2                 | 3                   | 3          | 2            | 2                 |
| Outside directors                     |             | Person(s)  | 1                   | 2          | 0            | 0                 | 1                   | 4          | 0            | 0                 | 1                   | 4          | 0            | 0                 |
| Other non-executive directors         |             | Person(s)  | 0                   | 0          | 1            | 1                 | 0                   | 0          | 1            | 1                 | 0                   | 0          | 1            | 1                 |
| Number of board meetings held         |             | Meeting(s) | 12                  | 7          | 8            | 10                | 10                  | 9          | 10           | 12                | 10                  | 8          | 9            | 9                 |
| Board attendance rate                 |             | %          | 93                  | 100        | 83           | 83                | 93 <sup>2</sup>     | 97         | 97           | 100               | 93                  | 97         | 100          | 100               |
| Agenda items for resolution           |             | Item(s)    | 26                  | 16         | 10           | 22                | 22 <sup>3</sup>     | 23         | 15           | 21                | 26                  | 28         | 13           | 21                |
| Agenda items approved with amendments |             | Item(s)    | 0                   | 0          | 0            | 0                 | 0                   | 0          | 0            | 0                 | 0                   | 0          | 0            | 0                 |
| Agenda items for reporting            |             | Item(s)    | 9                   | 15         | 0            | 2                 | 9                   | 15         | 7            | 5                 | 9                   | 15         | 12           | 6                 |

1) SeAH Coated Metal’s total number of board members includes one auditor in addition to inside directors and other non-executive directors.  
2), 3) Data has been corrected due to an input error.

### Compliance Management System (ISO 37301) Certification

| Category                  |  | Unit    | 2023                |            |              |                   | 2024                |            |              |                   | 2025                |            |              |                   |
|---------------------------|--|---------|---------------------|------------|--------------|-------------------|---------------------|------------|--------------|-------------------|---------------------|------------|--------------|-------------------|
|                           |  |         | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| Number of eligible sites  |  | Site(s) | 1                   | 7          | 2            | 1                 | 1                   | 7          | 2            | 1                 | 1                   | 7          | 2            | 1                 |
| Number of certified sites |  | Site(s) | 1                   | 7          | 0            | 1                 | 1                   | 7          | 0            | 1                 | 1                   | 7          | 0            | 1                 |
| Certification rate        |  | %       | 100                 | 100        | 0            | 100               | 100                 | 100        | 0            | 100               | 100                 | 100        | 0            | 100               |



- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix
  - ESG Data
  - GRI Index
  - SASB Index
  - ESRS Index
  - Third-Party Assurance Statement

# ESG Data

| Regulatory Violations           |                                                                    |             |                     |            |              |                   |                     |            |              |                   |                     |                |                  |                   |
|---------------------------------|--------------------------------------------------------------------|-------------|---------------------|------------|--------------|-------------------|---------------------|------------|--------------|-------------------|---------------------|----------------|------------------|-------------------|
| Category                        |                                                                    | Unit        | 2023                |            |              |                   | 2024                |            |              |                   | 2025                |                |                  |                   |
|                                 |                                                                    |             | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel     | Dong-A Steel     | SeAH Coated Metal |
| Number of regulatory violations | Total                                                              | Case(s)     | 0                   | 2          | 0            | 1                 | 0                   | 3          | 1            | 0                 | 0                   | 3              | 0                | 1                 |
|                                 | Environmental violations                                           | Case(s)     | 0                   | 0          | 0            | 1                 | 0                   | 0          | 0            | 0                 | 0                   | 1 <sup>1</sup> | 0                | 0                 |
|                                 | Anti-competitive violations                                        | Case(s)     | 0                   | 0          | 0            | 0                 | 0                   | 0          | 0            | 0                 | 0                   | 0              | 0                | 0                 |
|                                 | Occupational health and safety violations                          | Case(s)     | 0                   | 2          | 0            | 0                 | 0                   | 3          | 1            | 0                 | 0                   | 2 <sup>2</sup> | 0                | 1                 |
|                                 | Cases convicted under the Anti-Corruption Act and Anti-Bribery Act | Case(s)     | 0                   | 0          | 0            | 0                 | 0                   | 0          | 0            | 0                 | 0                   | 0              | 0                | 0                 |
| Fines imposed                   | Total                                                              | KRW million | 0.0                 | 75.9       | 0.0          | 3.0               | 0.0                 | 13.9       | 0.0          | 0.0               | 0.0                 | 2.9            | 1.5 <sup>3</sup> | 0.5               |
|                                 | Environmental violations                                           | KRW million | 0.0                 | 0.0        | 0.0          | 3.0               | 0.0                 | 0.0        | 0.0          | 0.0               | 0.0                 | 0.8            | 0.0              | 0.0               |
|                                 | Anti-competitive violations                                        | KRW million | 0.0                 | 0.0        | 0.0          | 0.0               | 0.0                 | 0.0        | 0.0          | 0.0               | 0.0                 | 0.0            | 0.0              | 0.0               |
|                                 | Occupational health and safety violations                          | KRW million | 0.0                 | 75.9       | 0.0          | 0.0               | 0.0                 | 13.9       | 0.0          | 0.0               | 0.0                 | 2.1            | 1.5              | 0.5               |
|                                 | Fines under the Anti-Corruption Act and Anti-Bribery Act           | KRW million | 0.0                 | 0.0        | 0.0          | 0.0               | 0.0                 | 0.0        | 0.0          | 0.0               | 0.0                 | 0.0            | 0.0              | 0.0               |

※ No material regulatory violations meeting our materiality criteria (business suspension, fines/surcharges, or casualties) occurred during the reporting period.

1) Failure to conclude a technical guidance contract for construction projects valued at KRW 100 million or more, or lasting longer than 30 days (administrative fine).

2) Failure to comply with Process Safety Management (PSM) procedures and guidelines (administrative fine); violation of the Malodor Prevention Act (administrative fine).

3) The fine for Dong-A Steel's 2024 occupational safety violation was finalized and imposed in 2025.

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix
  - ESG Data
  - GRI Index
  - SASB Index
  - ESRS Index
  - Third-Party Assurance Statement

# ESG Data

| Information Security                                           |         |                     |            |              |                   |                     |            |              |                   |                     |            |              |                   |
|----------------------------------------------------------------|---------|---------------------|------------|--------------|-------------------|---------------------|------------|--------------|-------------------|---------------------|------------|--------------|-------------------|
| Category                                                       | Unit    | 2023                |            |              |                   | 2024                |            |              |                   | 2025                |            |              |                   |
|                                                                |         | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal | SeAH Steel Holdings | SeAH Steel | Dong-A Steel | SeAH Coated Metal |
| Number of violations of customer personal data protection laws | Case(s) | 0                   | 0          | 0            | 0                 | 0                   | 0          | 0            | 0                 | 0                   | 0          | 0            | 0                 |
| Percentage of information security investment                  | %       | -                   | 0.87       | -            | 0.00              | -                   | 1.00       | -            | 0.00              | -                   | 1.25       | -            | 0.00              |

## Membership Associations

|                                    |                                          |                                       |                        |                                    |
|------------------------------------|------------------------------------------|---------------------------------------|------------------------|------------------------------------|
| Korea In-house Counsel Association | The British Chamber of Commerce in Korea | Korea Exchange                        | Korea Britain Society  | Korea Listed Companies Association |
| The Owners Forum Membership        | SRA                                      | Korea International Trade Association | In-house Counsel Forum | Seoul Bar Association              |

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix
  - ESG Data
    - GRI Index
    - SASB Index
    - ESRS Index
    - Third-Party Assurance Statement

# ESG Data

## Social (Overseas Subsidiaries)

| Employees                 |        |           |                    |                     |                |            |                 |          |                |           |           |
|---------------------------|--------|-----------|--------------------|---------------------|----------------|------------|-----------------|----------|----------------|-----------|-----------|
| Category                  |        | Unit      | 2023               |                     |                |            |                 |          |                |           |           |
|                           |        |           | SeAH Steel America | State Pipe & Supply | SeAH Steel USA | SeAH Japan | SeAH Steel Vina | Vinapipe | SeAH Steel UAE | Inox Tech | SeAH Wind |
| Total number of employees |        | Person(s) | 37                 | 216                 | 334            | 11         | 395             | 113      | 106            | 168       | 30        |
| Full-time employees       | Male   | Person(s) | 22                 | 154                 | 310            | 8          | 351             | 103      | 106            | 136       | 25        |
|                           | Female | Person(s) | 15                 | 22                  | 24             | 3          | 44              | 10       | 0              | 27        | 5         |
| Temporary employees       | Male   | Person(s) | 0                  | 39                  | 0              | 0          | 0               | 0        | 0              | 5         | 0         |
|                           | Female | Person(s) | 0                  | 1                   | 0              | 0          | 0               | 0        | 0              | 0         | 0         |
|                           |        |           |                    |                     |                |            |                 |          |                |           |           |
| Category                  |        | Unit      | 2024               |                     |                |            |                 |          |                |           |           |
|                           |        |           | SeAH Steel America | State Pipe & Supply | SeAH Steel USA | SeAH Japan | SeAH Steel Vina | Vinapipe | SeAH Steel UAE | Inox Tech | SeAH Wind |
| Total number of employees |        | Person(s) | 37                 | 199                 | 332            | 13         | 395             | 110      | 126            | 177       | 187       |
| Full-time employees       | Male   | Person(s) | 22                 | 141                 | 310            | 10         | 349             | 100      | 126            | 142       | 166       |
|                           | Female | Person(s) | 15                 | 22                  | 22             | 3          | 43              | 10       | 0              | 29        | 21        |
| Temporary employees       | Male   | Person(s) | 0                  | 35                  | 0              | 0          | 2               | 0        | 0              | 5         | 0         |
|                           | Female | Person(s) | 0                  | 1                   | 0              | 0          | 1               | 0        | 0              | 1         | 0         |
|                           |        |           |                    |                     |                |            |                 |          |                |           |           |
| Category                  |        | Unit      | 2025               |                     |                |            |                 |          |                |           |           |
|                           |        |           | SeAH Steel America | State Pipe & Supply | SeAH Steel USA | SeAH Japan | SeAH Steel Vina | Vinapipe | SeAH Steel UAE | Inox Tech | SeAH Wind |
| Total number of employees |        | Person(s) | 36                 | 182                 | 348            | 13         | 396             | 105      | 120            | 153       | 373       |
| Full-time employees       | Male   | Person(s) | 22                 | 146                 | 321            | 9          | 343             | 95       | 120            | 121       | 335       |
|                           | Female | Person(s) | 14                 | 17                  | 27             | 3          | 33              | 10       | 0              | 25        | 38        |
| Temporary employees       | Male   | Person(s) | 0                  | 17                  | 0              | 0          | 9               | 0        | 0              | 4         | 0         |
|                           | Female | Person(s) | 0                  | 2                   | 0              | 1          | 11              | 0        | 0              | 3         | 0         |

\* Vietnam Steel Pipe Co., Ltd. (Vinapipe) was in operation as of the reference date for this report (December 31, 2025), but is scheduled for liquidation in May 2026. Accordingly, the entity will be excluded from the reporting boundary in the next report.

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix
  - ESG Data
  - GRI Index
  - SASB Index
  - ESRS Index
  - Third-Party Assurance Statement

# ESG Data

## Employee Diversity

| Category                                               | Unit      | 2023               |                     |                |            |                 |          |                |           |           |
|--------------------------------------------------------|-----------|--------------------|---------------------|----------------|------------|-----------------|----------|----------------|-----------|-----------|
|                                                        |           | SeAH Steel America | State Pipe & Supply | SeAH Steel USA | SeAH Japan | SeAH Steel Vina | Vinapipe | SeAH Steel UAE | Inox Tech | SeAH Wind |
| Number of female employees and executives              | Person(s) | 15                 | 23                  | 24             | 3          | 44              | 10       | 0              | 27        | 5         |
| Percentage of female employees and executives          | %         | 40.5               | 10.6                | 7.2            | 27.3       | 11.1            | 8.8      | 0.0            | 16.1      | 16.7      |
| Number of female employees in management positions     | Person(s) | 4                  | 1                   | 2              | 0          | 1               | 1        | 0              | 3         | 1         |
| Number of female employees in non-management positions | Person(s) | 11                 | 22                  | 22             | 3          | 43              | 9        | 0              | 24        | 4         |

| Category                                               | Unit      | 2024               |                     |                |            |                 |          |                |           |           |
|--------------------------------------------------------|-----------|--------------------|---------------------|----------------|------------|-----------------|----------|----------------|-----------|-----------|
|                                                        |           | SeAH Steel America | State Pipe & Supply | SeAH Steel USA | SeAH Japan | SeAH Steel Vina | Vinapipe | SeAH Steel UAE | Inox Tech | SeAH Wind |
| Number of female employees and executives              | Person(s) | 15                 | 23*                 | 22             | 3          | 44              | 10       | 0              | 30*       | 21        |
| Percentage of female employees and executives          | %         | 40.5               | 11.6*               | 6.6            | 23.1       | 11.1            | 9.1      | 0.0            | 16.9*     | 11.2      |
| Number of female employees in management positions     | Person(s) | 4                  | 1                   | 2*             | 0          | 1               | 1        | 0              | 2         | 1         |
| Number of female employees in non-management positions | Person(s) | 11                 | 22*                 | 20*            | 3          | 43*             | 9        | 0              | 28*       | 20        |

\* Data has been corrected due to an input error.

| Category                                               | Unit      | 2025               |                     |                |            |                 |          |                |           |           |
|--------------------------------------------------------|-----------|--------------------|---------------------|----------------|------------|-----------------|----------|----------------|-----------|-----------|
|                                                        |           | SeAH Steel America | State Pipe & Supply | SeAH Steel USA | SeAH Japan | SeAH Steel Vina | Vinapipe | SeAH Steel UAE | Inox Tech | SeAH Wind |
| Number of female employees and executives              | Person(s) | 14                 | 19                  | 27             | 4          | 44              | 10       | 0              | 28        | 38        |
| Percentage of female employees and executives          | %         | 38.9               | 10.4                | 7.8            | 30.8       | 11.1            | 9.5      | 0.0            | 18.3      | 10.2      |
| Number of female employees in management positions     | Person(s) | 4                  | 1                   | 3              | 0          | 1               | 1        | 0              | 3         | 2         |
| Number of female employees in non-management positions | Person(s) | 10                 | 18                  | 24             | 4          | 43              | 9        | 0              | 25        | 36        |

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix
  - ESG Data
  - GRI Index
  - SASB Index
  - ESRS Index
  - Third-Party Assurance Statement

# ESG Data

| New Hires and Turnover |           |                    |                     |                |            |                 |          |                |           |           |
|------------------------|-----------|--------------------|---------------------|----------------|------------|-----------------|----------|----------------|-----------|-----------|
| Category               | Unit      | 2023               |                     |                |            |                 |          |                |           |           |
|                        |           | SeAH Steel America | State Pipe & Supply | SeAH Steel USA | SeAH Japan | SeAH Steel Vina | Vinapipe | SeAH Steel UAE | Inox Tech | SeAH Wind |
| Number of new hires    | Person(s) | 3                  | 36                  | 110            | 1          | 74              | 3        | 17             | 11        | 23        |
| Voluntary turnover     | Person(s) | 0                  | 15                  | 48             | 0          | 74              | 8        | 8              | 10        | 2         |

| Category            | Unit      | 2024               |                     |                 |            |                 |          |                 |                 |                 |
|---------------------|-----------|--------------------|---------------------|-----------------|------------|-----------------|----------|-----------------|-----------------|-----------------|
|                     |           | SeAH Steel America | State Pipe & Supply | SeAH Steel USA  | SeAH Japan | SeAH Steel Vina | Vinapipe | SeAH Steel UAE  | Inox Tech       | SeAH Wind       |
| Number of new hires | Person(s) | 1                  | 20 <sup>1</sup>     | 59              | 2          | 43              | 3        | 33              | 27              | 157             |
| Voluntary turnover  | Person(s) | 1                  | 17 <sup>2</sup>     | 43 <sup>3</sup> | 1          | 42              | 6        | 16 <sup>4</sup> | 20 <sup>5</sup> | 12 <sup>6</sup> |

1) Data for 2024 has been corrected due to an input error.  
2), 3), 4), 5), 6) Following a change in the definition of turnover, 2023-2024 data has been restated accordingly.

| Category            | Unit      | 2025               |                     |                |            |                 |          |                |           |           |
|---------------------|-----------|--------------------|---------------------|----------------|------------|-----------------|----------|----------------|-----------|-----------|
|                     |           | SeAH Steel America | State Pipe & Supply | SeAH Steel USA | SeAH Japan | SeAH Steel Vina | Vinapipe | SeAH Steel UAE | Inox Tech | SeAH Wind |
| Number of new hires | Person(s) | 2                  | 24                  | 94             | 1          | 42              | 5        | 17             | 8         | 221       |
| Voluntary turnover  | Person(s) | 1                  | 11                  | 52             | 1          | 44              | 10       | 25             | 13        | 89        |

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix
  - ESG Data
  - GRI Index
  - SASB Index
  - ESRS Index
  - Third-Party Assurance Statement

# ESG Data

| Social Contribution |                 |                    |                     |                |            |                 |          |                |           |           |
|---------------------|-----------------|--------------------|---------------------|----------------|------------|-----------------|----------|----------------|-----------|-----------|
| Category            | Unit            | 2023               |                     |                |            |                 |          |                |           |           |
|                     |                 | SeAH Steel America | State Pipe & Supply | SeAH Steel USA | SeAH Japan | SeAH Steel Vina | Vinapipe | SeAH Steel UAE | Inox Tech | SeAH Wind |
| Community donations | KRW 100 million | 0.99               | 0.00                | 0.00           | 0.00       | 0.14            | 0.03     | 0.00           | 0.18      | 0.00      |

| Category            | Unit            | 2024               |                     |                |            |                 |          |                |           |           |
|---------------------|-----------------|--------------------|---------------------|----------------|------------|-----------------|----------|----------------|-----------|-----------|
|                     |                 | SeAH Steel America | State Pipe & Supply | SeAH Steel USA | SeAH Japan | SeAH Steel Vina | Vinapipe | SeAH Steel UAE | Inox Tech | SeAH Wind |
| Community donations | KRW 100 million | 3.51*              | 0.00                | 0.00           | 0.00       | 0.09*           | 0.02     | 0.00           | 0.18      | 0.00      |

\* Data has been corrected due to an input error.

| Category            | Unit            | 2025               |                     |                |            |                 |          |                |           |           |
|---------------------|-----------------|--------------------|---------------------|----------------|------------|-----------------|----------|----------------|-----------|-----------|
|                     |                 | SeAH Steel America | State Pipe & Supply | SeAH Steel USA | SeAH Japan | SeAH Steel Vina | Vinapipe | SeAH Steel UAE | Inox Tech | SeAH Wind |
| Community donations | KRW 100 million | 2.05               | 0.00                | 0.00           | 0.00       | 0.01            | 0.02     | 0.00           | 0.15      | 0.05      |



# GRI Index

| Statement of use                                                                                                                                                                        |                                                                                                    |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|
| SeAH Steel Holdings has reported its sustainability management activities and key achievements in accordance with the GRI Standards for the period from January 1 to December 31, 2025. |                                                                                                    |
| GRI 1 used                                                                                                                                                                              | GRI 1: Foundation 2021                                                                             |
| Applicable GRI Sector Standards                                                                                                                                                         | Not applicable (no Steel Sector Standard has been issued yet; GRI is developing a Sector Program). |

| Topic               | Metric | Description                                                                 | Page        | Remark |
|---------------------|--------|-----------------------------------------------------------------------------|-------------|--------|
| General Disclosures | 2-1    | Organizational details                                                      | p. 6        |        |
|                     | 2-2    | Entities included in the organization’s sustainability reporting            | p. 3        |        |
|                     | 2-3    | Reporting period, frequency and contact point                               | p. 3        |        |
|                     | 2-4    | Restatements of information                                                 | p. 3        |        |
|                     | 2-5    | External assurance                                                          | pp. 133-134 |        |
|                     | 2-6    | Activities, value chain and other business relationships                    | pp. 6-11    |        |
|                     | 2-7    | Employees                                                                   | pp. 108-110 |        |
|                     | 2-8    | Workers who are not employees                                               | p. 110      |        |
|                     | 2-9    | Governance structure and composition                                        | p. 92       |        |
|                     | 2-10   | Nomination and selection of the highest governance body                     | p. 94       |        |
|                     | 2-11   | Chair of the highest governance body                                        | p. 92       |        |
|                     | 2-12   | Role of the highest governance body in overseeing the management of impacts | p. 14       |        |
|                     | 2-13   | Delegation of responsibility for managing impacts                           | p. 14       |        |
|                     | 2-14   | Role of the highest governance body in sustainability reporting             | p. 15       |        |
|                     | 2-15   | Conflicts of interest                                                       | p. 92       |        |
|                     | 2-16   | Communication of critical concerns                                          | pp. 93-94   |        |

| Topic                | Metric | Description                                                                    | Page                                                      | Remark                   |
|----------------------|--------|--------------------------------------------------------------------------------|-----------------------------------------------------------|--------------------------|
| General Disclosures  | 2-17   | Collective knowledge of the highest governance body                            | p. 95                                                     |                          |
|                      | 2-18   | Evaluation of the performance of the highest governance body                   | p. 95                                                     |                          |
|                      | 2-19   | Remuneration policies                                                          | p. 95, The Annual Report, Sec. 2, Directors’ Remuneration |                          |
|                      | 2-20   | Process to determine remuneration                                              | p. 95, The Annual Report, Sec. 2, Directors’ Remuneration |                          |
|                      | 2-21   | Annual total compensation ratio                                                | -                                                         | Insufficient information |
|                      | 2-22   | Statement on sustainable development strategy                                  | p. 5                                                      |                          |
|                      | 2-23   | Policy commitments                                                             | pp. 18, 33, 34, 40, 81, 84, 88                            |                          |
|                      | 2-24   | Embedding policy commitments                                                   | pp. 18, 34-36, 40-43, 84-86, 88-90                        |                          |
|                      | 2-25   | Processes to remediate negative impacts                                        | pp. 37-39                                                 |                          |
|                      | 2-26   | Mechanisms for seeking advice and raising concerns                             | pp. 82-83                                                 |                          |
|                      | 2-27   | Compliance with laws and regulations                                           | pp. 120-121                                               |                          |
|                      | 2-28   | Membership associations                                                        | p. 121                                                    |                          |
|                      | 2-29   | Approach to stakeholder engagement                                             | p. 18                                                     |                          |
| Material Topics      | 2-30   | Collective bargaining agreements                                               | pp. 79, 114                                               |                          |
|                      | 3-1    | Process to determine material topics                                           | pp. 15-17                                                 |                          |
|                      | 3-2    | List of material topics                                                        | p. 17                                                     |                          |
| Economic Performance | 3-3    | Management of material topics                                                  | pp. 15-17                                                 |                          |
|                      | 201-1  | Direct economic value generated and distributed                                | p. 6                                                      |                          |
|                      | 201-2  | Financial implications and other risks and opportunities due to climate change | pp. 21-22                                                 |                          |
|                      | 201-3  | Defined benefit plan obligations and other retirement plans                    | p. 114, The Annual Report III-3-19                        |                          |

Overview

Sustainability Framework

Sustainability Priorities

Environmental

Social

Governance

Appendix

ESG Data

GRI Index

SASB Index

ESRS Index

Third-Party Assurance Statement

## GRI Index

| Topic                     | Metric | Description                                                                                        | Page      | Remark |
|---------------------------|--------|----------------------------------------------------------------------------------------------------|-----------|--------|
| Anti-corruption           | 205-2  | Communication and training about anti-corruption policies and procedures                           | pp. 37-39 |        |
|                           | 206-1  | Legal actions for anti-competitive behavior, antitrust, and monopoly practices                     | p. 120    |        |
| Anti-competitive Behavior | 207-1  | Approach to tax                                                                                    | p. 100    |        |
|                           | 207-3  | Stakeholder engagement and management of concerns related to tax                                   | p. 100    |        |
| Materials                 | 301-2  | Recycled input materials used                                                                      | p. 104    |        |
| Energy                    | 302-1  | Energy consumption within the organization                                                         | p. 102    |        |
|                           | 302-3  | Energy intensity                                                                                   | p. 102    |        |
| Water and Effluents       | 303-1  | Interactions with water as a shared resource                                                       | p. 63     |        |
|                           | 303-2  | Management of water discharge-related impacts                                                      | pp. 63-65 |        |
|                           | 303-3  | Water withdrawal                                                                                   | p. 105    |        |
| Biodiversity              | 101-4  | Identification of biodiversity impacts                                                             | pp. 70-71 |        |
| Emissions                 | 305-1  | Direct (Scope 1) GHG emissions                                                                     | p. 103    |        |
|                           | 305-2  | Energy indirect (Scope 2) GHG emissions                                                            | p. 103    |        |
|                           | 305-4  | GHG emissions intensity                                                                            | p. 103    |        |
|                           | 305-7  | Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions                    | p. 106    |        |
| Waste                     | 306-2  | Management of significant waste-related impacts                                                    | p. 59     |        |
|                           | 306-3  | Waste generated                                                                                    | p. 107    |        |
|                           | 306-4  | Waste diverted from disposal                                                                       | p. 107    |        |
|                           | 306-5  | Waste directed to disposal                                                                         | p. 107    |        |
| Employment                | 401-1  | New employee hires and employee turnover                                                           | p. 112    |        |
|                           | 401-2  | Benefits provided to full-time employees that are not provided to temporary or part-time employees | p. 78     |        |
|                           | 401-3  | Parental leave                                                                                     | p. 115    |        |

| Topic                           | Metric | Description                                                                                                   | Page            | Remark                             |
|---------------------------------|--------|---------------------------------------------------------------------------------------------------------------|-----------------|------------------------------------|
| Occupational Health and Safety  | 403-1  | Occupational health and safety management system                                                              | pp. 40-41       |                                    |
|                                 | 403-2  | Hazard identification, risk assessment, and incident investigation                                            | pp. 48-49       |                                    |
|                                 | 403-3  | Occupational health services                                                                                  | pp. 46-47       |                                    |
|                                 | 403-4  | Worker participation, consultation, and communication on occupational health and safety                       | pp. 44-46       |                                    |
|                                 | 403-5  | Worker training on occupational health and safety                                                             | pp. 45-46       |                                    |
|                                 | 403-6  | Promotion of worker health                                                                                    | pp. 46-47       |                                    |
|                                 | 403-7  | Prevention and mitigation of occupational health and safety impacts directly linked by business relationships | pp. 48-49       |                                    |
|                                 | 403-9  | Work-related injuries                                                                                         | p. 118          |                                    |
|                                 | 404-1  | Average hours of training per year per employee                                                               | p. 113          |                                    |
| Training and Education          | 404-2  | Programs for upgrading employee skills and transition assistance programs                                     | pp. 74-76, 113  | Transition assistance under review |
|                                 | 404-3  | Percentage of employees receiving regular performance and career development reviews                          | p. 116          |                                    |
| Diversity and Equal Opportunity | 405-1  | Diversity of governance bodies and employees                                                                  | pp. 92, 110-111 |                                    |
| Supplier Social Assessment      | 414-2  | Negative social impacts in the supply chain and actions taken                                                 | pp. 85-87       |                                    |

# SASB Index

| Topic                     | Code         | Metric                                                                                                                                                                                                                                         | Page   | Remark         |
|---------------------------|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|----------------|
| Greenhouse Gas Emissions  | EM-IS-110a.1 | Gross global Scope 1 emissions, percentage covered under emissions-limiting regulations                                                                                                                                                        | p. 103 |                |
|                           | EM-IS-110a.2 | Discussion of long-term and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets                                                                         | p. 24  |                |
| Air Emissions             | EM-IS-120a.1 | Air emissions of the following pollutants: (1) CO, (2) NOx (excluding N2O), (3) SOx, (4) particulate matter (PM10), (5) manganese (MnO), (6) lead (Pb), (7) volatile organic compounds (VOCs), and (8) polycyclic aromatic hydrocarbons (PAHs) | p. 106 |                |
| Energy Management         | EM-IS-130a.1 | (1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable                                                                                                                                                           | p. 102 |                |
|                           | EM-IS-130a.2 | (1) Total fuel consumed, (2) percentage coal, (3) percentage natural gas, (4) percentage renewable                                                                                                                                             | p. 102 |                |
| Water Management          | EM-IS-140a.1 | (1) Total freshwater withdrawn, (2) percentage recycled, (3) percentage in regions with High or Extremely High Baseline Water Stress                                                                                                           | p. 105 |                |
| Waste Management          | EM-IS-150a.1 | Amount of waste generated, percentage hazardous, percentage recycled                                                                                                                                                                           | p. 107 |                |
| Workforce Health & Safety | EM-IS-320a.1 | (1) Total recordable incident rate (TRIR), (2) fatality rate, and (3) near miss frequency rate (NMFR) for (a) full-time employees and (b) contract employees                                                                                   | p. 118 |                |
| Supply Chain Management   | EM-IS-430a.1 | Discussion of the process for managing iron ore and/or coking coal sourcing risks arising from environmental and social issues                                                                                                                 | -      | Not applicable |
| Activity Metric           | EM-IS-000.A  | Raw steel production, percentage from: (1) basic oxygen furnace processes, (2) electric arc furnace processes                                                                                                                                  | -      | Not applicable |
|                           | EM-IS-000.B  | Total iron ore production                                                                                                                                                                                                                      | -      | Not applicable |
|                           | EM-IS-000.C  | Total coking coal production                                                                                                                                                                                                                   | -      | Not applicable |

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix
  - ESG Data
  - GRI Index
  - SASB Index
  - ESRS Index
  - Third-Party Assurance Statement

# ESRS Index

## ESRS 2. General Disclosures

| Code         | Description                                                                                                                         | Page          | Remark |
|--------------|-------------------------------------------------------------------------------------------------------------------------------------|---------------|--------|
| ESRS 2 BP-1  | General basis for preparation of the sustainability statements                                                                      | p. 3          |        |
| ESRS 2 BP-2  | Disclosures in relation to specific circumstances                                                                                   | p. 3          |        |
| ESRS 2 GOV-1 | The role of the administrative, management and supervisory bodies                                                                   | pp. 3, 14-15  |        |
| ESRS 2 GOV-2 | Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies | pp. 3, 14-15  |        |
| ESRS 2 GOV-3 | Integration of sustainability-related performance in incentive schemes                                                              | -             |        |
| ESRS 2 GOV-4 | Statement on sustainability due diligence                                                                                           | pp. 34, 82    |        |
| ESRS 2 GOV-5 | Risk management and internal controls over sustainability reporting                                                                 | pp. 34, 98-99 |        |
| ESRS 2 SBM-1 | Market position, strategy, business model(s) and value chain                                                                        | pp. 6-11      |        |
| ESRS 2 SBM-2 | Interests and views of stakeholders                                                                                                 | p. 18         |        |
| ESRS 2 SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model(s)                                 | pp. 15-17     |        |
| ESRS 2 IRO-1 | Description of the processes to identify and assess material impacts, risks and opportunities                                       | pp. 15-17     |        |
| ESRS 2 IRO-2 | Disclosure Requirements in ESRS covered by the undertaking’s sustainability statements                                              | pp. 130-133   |        |

## ESRS E1. Climate Change

| Code      | Description                                                                                                         | Page      | Remark |
|-----------|---------------------------------------------------------------------------------------------------------------------|-----------|--------|
| ESRS E1-1 | Transition plan for climate change mitigation                                                                       | pp. 22-26 |        |
| ESRS E1-2 | Policies related to climate change mitigation and adaptation                                                        | p. 54     |        |
| ESRS E1-3 | Actions and resources in relation to climate change policies                                                        | pp. 22-26 |        |
| ESRS E1-4 | Targets related to climate change mitigation and adaptation                                                         | p. 30     |        |
| ESRS E1-5 | Energy consumption and mix                                                                                          | p. 102    |        |
| ESRS E1-6 | Gross Scopes 1, 2, 3 and Total GHG emissions                                                                        | p. 103    |        |
| ESRS E1-7 | GHG removals and GHG mitigation projects financed through carbon credits                                            | p. 24     |        |
| ESRS E1-8 | Internal carbon pricing                                                                                             | -         |        |
| ESRS E1-9 | Potential financial effects from material physical and transition risks and potential climate-related opportunities | pp. 21-22 |        |

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix
  - ESG Data
  - GRI Index
  - SASB Index
  - ESRS Index
  - Third-Party Assurance Statement

# ESRS Index

## ESRS E2. Pollution

| Code      | Description                                                                         | Page               | Remark |
|-----------|-------------------------------------------------------------------------------------|--------------------|--------|
| ESRS E2-1 | Policies related to pollution                                                       | p. 54              |        |
| ESRS E2-2 | Actions and resources related to pollution                                          | pp. 57-69          |        |
| ESRS E2-3 | Targets related to pollution                                                        | pp. 59, 62         |        |
| ESRS E2-4 | Pollution of air, water and soil                                                    | pp. 105-107        |        |
| ESRS E2-5 | Substances of concern and substances of very high concern                           | pp. 67-69, 105-107 |        |
| ESRS E2-6 | Potential financial effects from pollution-related impacts, risks and opportunities | -                  |        |

## ESRS E3. Water and Marine Resources

| Code      | Description                                                                                          | Page      | Remark |
|-----------|------------------------------------------------------------------------------------------------------|-----------|--------|
| ESRS E3-1 | Policies implemented to manage water and marine resources                                            | p. 54     |        |
| ESRS E3-2 | Actions and resources related to water and marine resources                                          | pp. 63-65 |        |
| ESRS E3-3 | Targets related to water and marine resources                                                        | p. 105    |        |
| ESRS E3-4 | Water consumption                                                                                    | -         |        |
| ESRS E3-5 | Potential financial effects from water and marine resources-related impacts, risks and opportunities | -         |        |

## ESRS E4. Biodiversity and Ecosystems

| Code      | Description                                                                                 | Page      | Remark |
|-----------|---------------------------------------------------------------------------------------------|-----------|--------|
| ESRS E4-1 | Transition plan on biodiversity and ecosystems                                              | -         |        |
| ESRS E4-2 | Policies related to biodiversity and ecosystems                                             | pp. 70-71 |        |
| ESRS E4-3 | Actions and resources related to biodiversity and ecosystems                                | -         |        |
| ESRS E4-4 | Targets related to biodiversity and ecosystems                                              | -         |        |
| ESRS E4-5 | Impact metrics related to biodiversity and ecosystems change                                | pp. 70-71 |        |
| ESRS E4-6 | Potential financial effects from biodiversity and ecosystem-related risks and opportunities | pp. 70-71 |        |

## ESRS E5. Resource Use and Circular Economy

| Code      | Description                                                                                                 | Page      | Remark |
|-----------|-------------------------------------------------------------------------------------------------------------|-----------|--------|
| ESRS E5-1 | Policies related to resource use and circular economy                                                       | p. 54     |        |
| ESRS E5-2 | Actions and resources related to resource use and circular economy                                          | pp. 61-63 |        |
| ESRS E5-3 | Targets related to resource use and circular economy                                                        | p. 107    |        |
| ESRS E5-4 | Resource inflows                                                                                            | p. 104    |        |
| ESRS E5-5 | Resource outflows                                                                                           | p. 107    |        |
| ESRS E5-6 | Potential financial effects from resource use and circular economy-related impacts, risks and opportunities | -         |        |

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix
  - ESG Data
  - GRI Index
  - SASB Index
  - ESRS Index
  - Third-Party Assurance Statement

# ESRS Index

ESRS S1. Own Workforce

| Code       | Description                                                                                                                                                                                      | Page                   | Remark |
|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|--------|
| ESRS S1-1  | Policies related to own workforce                                                                                                                                                                | pp. 18, 33, 34, 40, 81 |        |
| ESRS S1-2  | Processes for engaging with own workers and workers’ representatives about impacts                                                                                                               | pp. 79-80              |        |
| ESRS S1-3  | Processes to remediate negative impacts and channels for own workers to raise concerns                                                                                                           | pp. 37, 80             |        |
| ESRS S1-4  | Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions | p. 118                 |        |
| ESRS S1-5  | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities                                                                 | pp. 48-51              |        |
| ESRS S1-6  | Characteristics of the undertaking’s employees                                                                                                                                                   | pp. 108-110            |        |
| ESRS S1-7  | Characteristics of non-employee workers in the undertaking’s own workforce                                                                                                                       | p. 110                 |        |
| ESRS S1-8  | Collective bargaining coverage and social dialogue                                                                                                                                               | p. 114                 |        |
| ESRS S1-9  | Diversity indicators                                                                                                                                                                             | pp. 92, 110-111        |        |
| ESRS S1-10 | Adequate wages                                                                                                                                                                                   | p. 114                 |        |
| ESRS S1-11 | Social protection                                                                                                                                                                                | pp. 78, 82-83          |        |
| ESRS S1-12 | Persons with disabilities                                                                                                                                                                        | pp. 35, 111            |        |
| ESRS S1-13 | Training and skills development indicators                                                                                                                                                       | p. 113                 |        |
| ESRS S1-14 | Safety and Health indicators                                                                                                                                                                     | p. 118                 |        |
| ESRS S1-15 | Work-life balance indicators                                                                                                                                                                     | p. 115                 |        |
| ESRS S1-16 | Compensation indicators (pay gap and total compensation)                                                                                                                                         | p. 114                 |        |
| ESRS S1-17 | Incidents, complaints and severe human rights impacts and incidents                                                                                                                              | pp. 36-38, 82          |        |

ESRS S2. Workers in the Value Chain

| Code      | Description                                                                                                                                                                                                  | Page          | Remark |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|--------|
| ESRS S2-1 | Policies related to value chain workers                                                                                                                                                                      | pp. 18, 84    |        |
| ESRS S2-2 | Processes for engaging with value chain workers about impacts                                                                                                                                                | pp. 18, 85    |        |
| ESRS S2-3 | Processes to remediate negative impacts and channels for value chain workers to raise concerns                                                                                                               | pp. 37, 79-80 |        |
| ESRS S2-4 | Taking action on material impacts on value chain workers, and approaches to mitigating material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions | p. 87         |        |
| ESRS S2-5 | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities                                                                             | pp. 15-17     |        |



# ESRS Index

## ESRS S3. Affected Communities

| Code      | Description                                                                                                                                                                                                    | Page  | Remark |
|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
| ESRS S3-1 | Policies related to affected communities                                                                                                                                                                       | p. 88 |        |
| ESRS S3-2 | Processes for engaging with affected communities about impacts                                                                                                                                                 | p. 18 |        |
| ESRS S3-3 | Processes to remediate negative impacts and channels for affected communities to raise concerns                                                                                                                | p. 18 |        |
| ESRS S3-4 | Taking action on material impacts on affected communities, and approaches to mitigating material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions | -     |        |
| ESRS S3-5 | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities                                                                               | p. 90 |        |

## ESRS S4. Consumers and End-Users

| Code      | Description                                                                                                                                                                                                          | Page | Remark |
|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|--------|
| ESRS S4-1 | Policies related to consumers and end-users                                                                                                                                                                          | -    |        |
| ESRS S4-2 | Processes for engaging with consumers and end-users about impacts                                                                                                                                                    | -    |        |
| ESRS S4-3 | Processes to remediate negative impacts and channels for consumers and end-users to raise concerns                                                                                                                   | -    |        |
| ESRS S4-4 | Taking action on material impacts on consumers and end-users, and approaches to mitigating material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions | -    |        |
| ESRS S4-5 | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities                                                                                     | -    |        |

## ESRS G1. Business Conduct

| Code      | Description                                       | Page        | Remark |
|-----------|---------------------------------------------------|-------------|--------|
| ESRS G1-1 | Corporate culture and business conduct policies   | pp. 31-35   |        |
| ESRS G1-2 | Management of relationships with suppliers        | pp. 84-87   |        |
| ESRS G1-3 | Prevention and detection of corruption or bribery | pp. 33-35   |        |
| ESRS G1-4 | Confirmed incidents about corruption or bribery   | pp. 39, 120 |        |
| ESRS G1-5 | Political influence and lobbying activities       | -           |        |
| ESRS G1-6 | Payment practices                                 | -           |        |

|                                 |
|---------------------------------|
| Overview                        |
| Sustainability Framework        |
| Sustainability Priorities       |
| Environmental                   |
| Social                          |
| Governance                      |
| Appendix                        |
| ESG Data                        |
| GRI Index                       |
| SASB Index                      |
| ESRS Index                      |
| Third-Party Assurance Statement |

# Third-Party Assurance Statement

Dear Management and Stakeholders of SeAH Steel Holdings Corp.

• **Introduction**  
Korean Standards Association (“KSA”) was commissioned by SeAH Steel Holdings Corp. (“the Company”) to perform a third-party Assurance Engagement of ‘SeAH Steel Holdings Sustainability Report’ (“the Report”). KSA presents independent opinions as follows as a result of the feasibility of the data contained in this Report. The Company has sole responsibility for the content and performance contained in this Report.

• **Independence**  
As an independent assurance agency, KSA does not have any kind of commercial interest in businesses of the Company apart from undertaking a third-party assurance on the Report. KSA has no other contract with the Company that may undermine credibility and integrity as an independent assurance agency.

• **Assurance Standards:** AA1000AS v3

• **Assurance Level and Type:** Moderate, Type 1  
Note 1: Moderate assurance has a lower level of confidence than high assurance because it is based on limited evidence.  
Note 2: Type 1 assurance has a narrower scope of engagement than Type 2 assurance because it is limited to only adherence with the four principles of AA1000AP.

• **Assurance Scope**  
The assurance scope includes systems and activities such as sustainability management policies, goals, businesses, standards, and achievements of the Company during the reporting period. While the Company’s environmental and social data, as well as financial data in a broad sense, was verified, the scope of review concerning stakeholder engagement was limited to the materiality assessment process.

- in adherence with the four principles of AA1000AP(AccountAbility Principles) 2018

- in accordance with GRI Standards 2021 (Topic Standards)

101-4, 201-1, 201-2, 201-3, 205-2, 206-1, 207-1, 207-3, 301-2, 302-1, 302-3, 303-1, 303-2, 303-3, 305-1, 305-2, 305-4, 305-7, 306-2, 306-3, 306-4, 306-5, 401-1, 401-2, 401-3, 403-1, 403-2, 403-3, 403-4, 403-5, 403-6, 403-7, 403-9, 404-1, 404-2, 404-3, 405-1, 414-2

• **Assurance Methodology**  
KSA used the following methods to gather information, documents, and evidence with respect to the assurance scope.

· Confirmation of stakeholder engagement and materiality assessment process by the sustainability expert.

· Verification of environmental information disclosure data and information by the environmental expert.

· Examination of internal documents and basic materials.

• **Assurance Limitations**  
KSA assumed that the data and evidence provided by the Company were complete and sufficient. KSA provided limited assurance through data inquiry and analysis as well as limited sampling methods.

- Overview
- Sustainability Framework
- Sustainability Priorities
- Environmental
- Social
- Governance
- Appendix
  - ESG Data
  - GRI Index
  - SASB Index
  - ESRS Index
  - Third-Party Assurance Statement

# Third-Party Assurance Statement

• Assurance Results and Opinions

KSA reviewed the draft version of this Report within the scope of this assurance and presented our opinions as an assurance provider. Modifications were made to the Report content if deemed necessary. KSA was not aware of any suspicions of significant errors or inappropriate descriptions in this Report as a result of our Assurance Engagement. As such, KSA presents our opinions of the ‘SeAH Steel Holdings Sustainability Report’ as follows.

Four principles of AA1000AP (AccountAbility Principles) 2018

Inclusivity

- Has the Company engaged its stakeholders in strategically responding to sustainability?  
KSA believes the Company is aware of the importance of stakeholder engagement and is making an all-out effort to establish a process that will increase their engagement. The Company has selected stakeholders including customers, employees, business partners, local communities/NGOs, government/media, and shareholders/investors and has communication channels for each group to receive diverse feedback and opinions

Materiality

- Has the Company included material information in the Report to help stakeholders make informed decisions?  
KSA is not aware of any significant omissions or exclusions of data that are material to stakeholders. KSA verified that the Company conducted a materiality assessment with issues identified from analyses of internal and external environments and reported according to the result.

Responsiveness

- Has the Company appropriately responded to stakeholder requirements and interests in this Report?  
KSA verified that the Company responded to stakeholders’ needs and interests by reflecting stakeholders’ opinions in the Report. KSA is not aware of any evidence that the Company’s response to significant issues of stakeholders was reported inappropriately.

Impact

- Has the Company appropriately monitored its impact on the stakeholders?  
KSA verified that the Company is monitoring and assessing its impact on the stakeholders by conducting an enhanced verification of its standard business activities. Furthermore, it has been verified that the Company appropriately publishes its findings in the Report.

June 2026  
Dong Min Moon  
KSA Chairman & CEO

*Dongmin Moon*



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