

ESG Policy Book

Ver 2
(2025.12)

Hanwha TotalEnergies Petrochemical

1. Business Principles

We, Hanwha TotalEnergies Petrochemical, aim to become a global chemical & energy leader delivering customers delight through delivering the best products and services on the basis of safety, cost efficiency and quality competitiveness. To this end, we view "Challenge, Commitment and Integrity" as the core values (HTC Values) to be internalized and upheld by all employees. Furthermore, we set forth and implement the "Business Principles," as the standards of conduct for all employees over the course of performing all business activities for the purpose of complying with laws and ethics and fulfilling corporate social responsibilities. Moreover, we adhere to the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the Anti-Graft & Bribery Act.

Principle 1: Safety Health Environment (SHE)-driven Management Activities

- 1-1 Prioritize the safety and health of individuals.
- 1-2 Pursue eco-friendly management practices.

Principle 2: Compliance with Laws and Ethics

- 2-1 Respect the dignity and diversity of individuals
- 2-2 Conduct fair competition in adherence to laws and business ethics.
- 2-3 Maintain financial transparency through accurate accounting records.
- 2-4 Maintain political neutrality and refrain from political involvement.

Principle 3: Transparency in Organizational Culture

- 3-1 Maintain a strict distinction between public and private ones in all business activities.
- 3-2 Protect and respect the intellectual property of the company and others.
- 3-3 Foster a healthy organizational culture.

Principle 4: Respect for Customers, Shareholders and Employees

- 4-1 Make customers satisfaction the top priority.
- 4-2 Pursue management practices oriented to shareholders' value.
- 4-3 Strive to enhance the quality of life for employees.

Principle 5: Social Responsibility as a Global Corporate Citizen

- 5-1 Faithfully fulfill the fundamental obligations expected of a corporate citizen.
- 5-2 Respect local social and cultural characteristics and practice co-prosperity.
- 5-3 Establish mutually beneficial partnerships with our suppliers
- 5-4 Build a sustainable supply chain together with partner companies.

2. SHE Management

We prioritize SHE as the first and foremost value & task in business activities, striving to establish the top-tier safety culture.

Preamble

The company acknowledges that Safety, Health, Environment and Quality (SHEQ) not only enriches human society but also plays a key role in bringing prosperity and growth to a corporation. Accordingly, all employees pledge to act in adherence to SHEQ's strict rules and best practices while making endeavor to reflect the following principles into all activities.



SHEQ Management Policies

Compliance

We establish rigorous internal SHEQ standards in accordance with the requirements of relevant laws at domestic and international and are committed to identifying and applying best practices. Furthermore, we strictly monitor the internal standards and set an exemplary case in execution so as to constantly improve the SHEQ management system.

Continued Improvement

In ensuring that management activities for the provision of goods and services satisfy the need of customers and minimize the impact on resources, the environment and climate, we continue to make improvements via periodic monitoring, evaluation and review.

Accidents Prevention

We commit to preventing any possible injuries and property damage to employees, partners and stakeholders through fostering a safety culture. Also, working processes, process safety and a safe & clean working environment effectively manage and mitigate risks associated with products and services. It is critical to establish appropriate countermeasures against accidents and put in place regular updates and training sessions. Finally, we fully comply with the Serious Accidents Punishment Act in all business activities.

Full Participation

All employees and partners should complete training programs, recognize the importance of SHEQ and show active participation to foster voluntary participation in SHEQ management activities. We also establish and operate a system accepting proposals for improvement from employees and partners.

Transparent Management

We transparently disclose information regarding SHEQ activities to all employees, partners, customers, local communities and stakeholders for open communication. Additionally, we share the progress of activities and performance through annual ESG reports with stakeholders.

2-1. Environmental Management Policy

1. Purpose We are committed to minimizing the direct and indirect negative environmental impacts arising from our business activities through effective environmental management, while continuously improving our environmental performance. This Policy is established to clearly present the fundamental principles of environmental management and the operational standards for all employees.
2. Scope of Application This Policy applies to all employees, including those at our headquarters (Daesan site) and all branches. We also encourage our business partners and suppliers to comply with this Policy. Compliance with all applicable environmental laws, regulations, and internal rules shall take precedence. Where such laws, regulations, or internal rules do not address specific matters or provide explicit provisions, this Policy shall govern our environmental management practices.
3. Definitions
- 1) “Environment” refers to the natural and social elements that may be affected by our business activities, including air, water, soil, climate change, resources and energy, waste, noise, and vibration.
 - 2) “Environmental Management” refers to the systematic management activities undertaken throughout all management activities to promote sustainable development by considering environmental protection, resource conservation, and pollution prevention.
 - 3) “Employees” include all executives, full-time and non-regular employees.
 - 4) “Stakeholders” refer to individuals or organizations that may directly or indirectly affect or be affected by our environmental management activities, including shareholders, customers, suppliers, and local communities.

2-1. Environmental Management Policy

4. Principles

We are committed to minimizing adverse environmental impacts across all our activities, products, and services, and to fulfilling our social responsibilities.

1) Compliance with Laws and International Standards

- We shall fully comply with environmental laws and regulations in the countries where we operate and actively align our practices with internationally recognized standards such as ISO 14001.

2) Energy Consumption and Greenhouse Gas Management

- We shall reduce greenhouse gas emissions and improve energy efficiency across our operations to mitigate climate change.
- We shall also support our customers' decarbonization efforts by providing sustainable product solutions, including low-carbon and resource-circulating products.

3) Pollution and Chemical Management

- We shall minimize emissions of air pollutants, soil and water pollutants, and hazardous substances that may affect human health and the environment.
- We shall implement robust control measures to prevent and manage accidents that may lead to unintended releases, leaks, or environmental contamination.

4) Waste Management

- We shall monitor waste generation and recycling within our operations and implement measures to minimize waste generation and increase resource recovery and recycling rates.

5) Water Resource Management

- We shall monitor water usage and discharge to reduce water consumption and wastewater discharge, and implement measures to enhance water reuse and recycling.

6) Environmental Impact of Products Across Lifecycle

- We shall develop products that minimize negative environmental impacts throughout their entire lifecycle—from production to use and disposal.

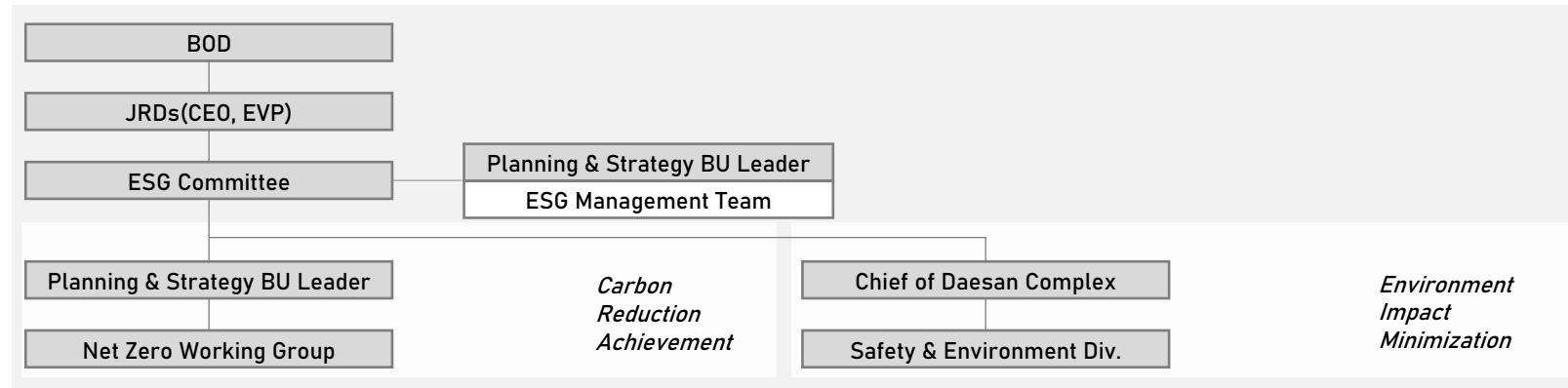
7) Customer Health and Safety

- We shall protect customer health and safety by preventing risks throughout the product lifecycle and strictly complying with applicable regulations and quality standards.
- We shall provide channels for receiving and addressing customer complaints and shall monitor and appropriately address health and safety-related concerns.

2-1. Environmental Management Policy

5. Governance

- 1) We designate the ESG Management Team as the responsible organization for the implementation of this Policy.



- 2) The responsible organization shall collaborate with relevant divisions—including Strategy Planning, Technology, R&D, Safety & Environment, Utility & Off-Site, and Business Divisions—to implement environmental management practices. Key matters, including performance, action plans, and significant issues, shall be reported to or approved by decision-making bodies such as the Board of Directors or ESG Committee.
- Greenhouse Gas Management, Environmental Impact of Products and Raw Materials: VP of Planning Div. (formerly Climate Change Response team)
 - Net Zero Initiatives (Energy Consumption): VP of Technology Div.
 - Net Zero Initiatives (R&D): VP of R&D Div.
 - Compliance, Pollution/Chemical Management, Waste Management: VP of Safety & Environment Div.
 - Water Resource Management: VP of Utility & Off-Site Div.
 - Customer Health & Safety (Complaint & Claim): Each BU for Energy/Chemical Products, R&D for Polymer Products
- 3) We shall manage environmental risks through our governance bodies and oversee overall performance improvement activities, including the review and approval of the establishment and revision of this Policy.

2-1. Environmental Management Policy

6. Implementation
- 1) The responsible organization, in collaboration with relevant divisions, shall review the effectiveness of this Policy at least annually, taking into account stakeholder requirements and regulatory changes. Where necessary, revisions shall be made through the ESG Committee.
 - 2) We shall establish and manage key performance indicators (KPIs) for environmental performance and target achievement through separate internal documentation, which shall be reviewed and updated annually.
 - 3) We shall disclose major environmental performance outcomes to stakeholders through an annual sustainability report and shall continuously promote employee awareness and engagement through internal training programs and campaigns based on this Policy.

2-2. Safety & Health Management Policy

1. Purpose
We are committed to minimizing the direct and indirect negative impacts of our business activities on safety and health through effective safety and health management, while continuously improving our safety and health performance. This Policy is established to clearly define the fundamental principles of safety and health management and the standards for business conduct for all employees.

2. Scope of Application
This Policy applies to all employees. We also encourage our business partners and suppliers to comply with this Policy. We shall prioritize compliance with all applicable safety and health laws, regulations, and internal rules. Where such laws, regulations, or internal rules do not address specific matters or provide explicit provisions, this Policy shall govern our safety and health management practices.

3. Principles
 - 1) Leadership Commitment
 - Our management shall lead the establishment of a strong safety culture by demonstrating exemplary behavior, strictly adhering to standards, maintaining constant vigilance, and applying professional expertise across all business activities.
 - 2) Compliance with Laws and International Standards
 - We shall fully comply with all applicable laws, regulations, and industry standards in our business activities and maintain safety and health management practices aligned with international standards such as ISO 45001.
 - 3) Risk Management
 - We shall systematically identify hazards that may impact people, the environment, and assets, assess associated risks, and establish and implement risk mitigation measures.
 - Risk levels and mitigation measures shall be reviewed periodically and reassessed whenever there are changes in activities or processes.
 - In particular, we shall proactively manage risks related to human health, technical operations, and the potential for significant environmental impacts.
 - 4) Clear Accountability for Safe Operations
 - All employees are responsible for identifying and managing risks within their scope of work and for taking necessary actions to minimize their impacts. Such accountability is considered a fundamental and integral component of our operational responsibility framework.

2-2. Safety & Health Management Policy

3. Principles

5) Contractor and Supplier Management

- We shall comprehensively evaluate contractors and suppliers based on their SHE performance, their capability to meet our SHE requirements, and their ability to control risks inherent in contracted activities.
- SHE-related obligations and responsibilities shall be clearly defined in contracts, and we shall monitor and supervise compliance with these requirements throughout the contract period.

6) Competence and Training

- We shall define the competencies required for all work activities from a SHE perspective and regularly assess employee capabilities.
- We shall establish and implement education, training, and development programs to ensure the necessary safety competencies for job performance and take additional measures where improvement is required.

7) Emergency Preparedness and Response

- We shall identify potential emergency situations that may significantly impact people, the environment, and assets based on risk assessments and establish preparedness measures.
- We shall maintain systems that enable immediate response, including emergency response plans, trained personnel, and necessary equipment.
- Emergency plans and external support procedures shall be regularly tested through drills and exercises and updated accordingly. Where necessary, we shall coordinate with local communities and competent authorities, and ensure that all employees, contractors, suppliers, and visitors are aware of required emergency response procedures.

8) Incident Investigation and Learning

- All incidents shall be promptly reported and thoroughly investigated to identify root causes.
- Corrective and preventive actions shall be established, prioritized, and systematically implemented.
- Findings and key lessons learned shall be utilized to prevent recurrence and improve SHE performance.
- All employees have a responsibility to immediately report unsafe conditions or violations of SHE requirements.

2-2. Safety & Health Management Policy

3. Principles

9) Monitoring, Audit, and Assessment

- Management is accountable for the implementation of this Policy and shall regularly evaluate performance through monitoring, audits, and assessments.
- Any gaps identified against established targets shall be analyzed, and corrective actions and improvement plans shall be developed, implemented, and tracked until completion.

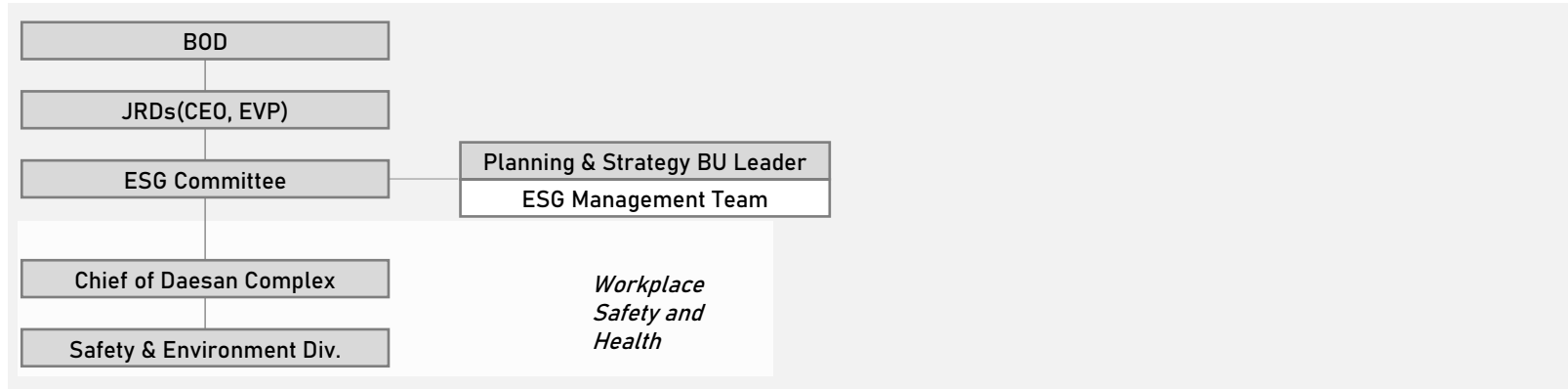
10) Performance Improvement

- We shall periodically review SHE action plans to ensure continuous improvement.
- The effectiveness of the SHE management system shall be regularly evaluated and monitored through management indicators.
- All actions shall be prioritized based on risk levels and potential impacts and reflected in the organization's SHE action plans for execution.

2-2. Safety & Health Management Policy

4. Governance

- 1) We designate the Safety & Environment division as the responsible organization for the implementation of this Policy.



- 2) The responsible organization shall oversee Safety and Health management and report on performance, action plans, and key issues to decision-making bodies—such as the Board of Directors, ESG Committee, or Safety and Health Management Committee—for review and approval.
 - Compliance with laws and international standards, risk management, clear accountability for safe operations, contractor and supplier management, competence and training, emergency preparedness and response, incident investigation and learning, monitoring, audit and assessment, and performance improvement: VP of Safety & Environment Div.
- 3) We shall manage Safety and Health management risks through governance bodies and oversee overall performance improvement activities, including the review and approval of the establishment and revision of this Policy.

2-2. Safety & Health Management Policy

5. Implementation
- 1) The responsible organization shall review the effectiveness of this Policy at least annually, taking into account stakeholder requirements and regulatory changes. Where necessary, revisions shall be made through the ESG Committee.
 - 2) We shall establish and manage key performance indicators (KPIs) for Safety and Health management performance and target achievement through separate internal documentation, which shall be reviewed and updated annually.
 - 3) We shall disclose major Safety and Health management performance outcomes to stakeholders through an annual sustainability report and continuously promote employee awareness and engagement through internal training programs and campaigns based on this Policy.

3. Human Rights Management

We seek to enrich human lives on the basis of "Passion and Challenge," "Efficiency and Rationality," and "Love and Trust." We also respect the human rights of stakeholders as well as those of employees and strive to implement human rights management. We back human rights-related international principles, such as the UN's Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the International Labor Organization (ILO) Declaration and observe domestic laws where these principles are applied. Moreover, we make an effort into preventing & removing factors prone to breach human rights, promptly addressing human rights issues and eliminating the root causes.

Discrimination-free Working Environment

We provide a work environment free of discrimination on the basis of race, ethnicity, nationality, religion, disability, gender, place of birth, political views, gender identity, sexual orientation, beliefs and age, etc., in all aspects of employment.

Wages and Benefits

We respect members' personalities and provide fair and reasonable treatment on the basis of competency and performance while complying with all the laws related to wages. We take the measures required for enhancing employees welfare and benefits.

Freedom of Association and Collective Bargaining

We respect the rights of employees to association and collective bargaining as guaranteed by labor laws. Employees are not disadvantaged for organizing or engaging in legitimate union activities. We also respect and faithfully implement the results of collective bargaining reached through mutual consultation.

Prohibition of Forced Labor and Management of Working Hours

We do not employ any form of forced labor whatsoever. Complying with labor-related laws and regulations on overtime and off-days, we do not force employees to work overtime.

Prohibition of Child Labor

We do not employ any form of child labor whatsoever.

Assurance of Industrial Safety

We establish systems to ensure the safety and health of all members, regularly conduct relevant training and comply with laws and internal rules related to safety, health, working hours, etc.

Responsible Management of Supply Chain Networks

We require all suppliers and partners to fulfill their obligations to protect human rights. In the case of breaching significant human rights within the operations of suppliers or partners, we can take necessary measures, such as a call for corrective actions.

Assurance of Environmental Rights

We comply with environmental laws and regulations and strive to achieve carbon neutrality, eco-friendliness and resource circulation.

Protection of Consumer Human Rights

To avoid causing harm to the life, health and safety of customers, we ensure due care need to be paid in providing products and services according to laws.

Protection of Personal Information

We respect the personal information of all stakeholders, including employees, investors, business partners, customers, and local communities, in accordance with relevant laws and regulations. A robust information security framework is in place, and no personal data is collected or used without the individual's prior consent, and ensure it is not used for any unauthorized purpose.

Responsibility to Protect Human Rights in Local Communities

As a responsible member of the communities in which we operate, respects and protects the fundamental rights of local residents. This includes the rights to life, property, safety, and a healthy environment, and we strive to ensure that our business activities do not infringe upon these rights.

3-1. Human Rights Management Policy

1. Purpose We are committed to minimizing the direct and indirect negative impacts of our business activities on human rights and to continuously improving our human rights performance. This Policy is established to clearly define the fundamental principles of human rights management and the standards for business conduct for all employees.
2. Scope of Application This Policy applies to all employees, including those at our headquarters (Daesan site) and all branches. We also encourage our business partners and suppliers to comply with this Policy. We shall take precedence in compliance with all applicable human rights-related laws, regulations, and internal rules. Where such laws, regulations, or internal rules do not address specific matters or provide explicit provisions, this Policy shall govern our human rights management practices.
3. Definitions
- 1) “Human Rights” refer to the fundamental rights and freedoms inherent to all human beings, based on dignity and equality.
 - 2) “Human Rights Management” refers to the management principles under which we operate our business in a manner that respects and protects human rights across all activities.
 - 3) “Employees” include all executives, full-time and non-regular employees.
 - 4) “Stakeholders” refer to individuals or organizations that directly or indirectly affect or be affected by our business activities, including shareholders, customers, suppliers, and local communities.

3-1. Human Rights Management Policy

4. Principles

1) Respect for Human Rights

- We support internationally recognized human rights principles, including the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work, and comply with applicable laws that reflect these principles.
- We strive to prevent and eliminate human rights risks and shall respond promptly to any human rights violations, taking appropriate measures to address root causes.

2) Humane Treatment

- We shall treat all employees with dignity and respect and prohibit any form of inhumane treatment, including physical or mental coercion, violence, threats, or unlawful restraint.
- We respect employees' privacy and implement appropriate technical and organizational measures to protect personal data.
- We strictly prohibit workplace harassment, sexual harassment, violence, verbal abuse, bullying, or any behavior that causes harm or creates a hostile work environment.

3) Non-Discrimination

- We shall not discriminate in employment, promotion, compensation, training, or other working conditions on the basis of race, ethnicity, nationality, religion, disability, gender, place of birth, education, age, family status (including marriage), political opinion, social status, pregnancy, childbirth, sexual orientation, or gender identity, without reasonable grounds.
- We shall ensure fair and reasonable treatment based on individual capability and performance and comply with all applicable labor laws regarding wages and working conditions.

4) Working Conditions

- We shall comply with applicable laws in the countries where we operate and ensure reasonable working hours and adequate rest periods, and we shall not require employees to work beyond statutory limits.
- We shall provide fair wages and legally mandated benefits in a timely and transparent manner.
- We shall regularly communicate with employees regarding working conditions, collect and reflect their feedback, and implement measures to enhance employee welfare.

3-1. Human Rights Management Policy

4. Principles

5) Freedom of Association and Collective Bargaining

- We respect employees' rights to freedom of association and collective bargaining as guaranteed by applicable labor laws.
- We shall not disadvantage employees for forming or joining labor unions or engaging in legitimate union activities.
- We shall not refuse collective bargaining without just cause and shall respect and faithfully implement the outcomes of such negotiations.

6) Prohibition of Forced Labor

- We strictly prohibit all forms of forced labor, including human trafficking and slavery.
- We shall not withhold personal identification documents such as passports or IDs, nor impose any form of physical or psychological coercion.
- We shall not require recruitment fees, deposits, or other financial burdens during hiring, nor restrict employees' freedom to resign or transfer employment beyond agreed contractual terms.

7) Prohibition of Child Labor

- We strictly prohibit the employment of individuals below the minimum legal age for employment, including children under the age of 15.
- Where child labor is exceptionally permitted under applicable laws, we shall apply strict standards to ensure the child's health, safety, education, and welfare.
- If any instance of child labor is identified, we shall take immediate remedial actions and prioritize the best interests of the child.

8) Occupational Safety and Health

- We shall prioritize the health and safety of all employees by providing a safe working environment and regularly identifying and managing workplace hazards.
- We shall establish systems and conduct regular training to prevent incidents and ensure employee safety and health.
- We shall comply with applicable safety and health laws and internal regulations and provide prompt response and appropriate support in the event of incidents.

3-1. Human Rights Management Policy

4. Principles

9) Employee Development and Career Management

- We shall provide fair and transparent recruitment opportunities and select talent based on capability and potential.
- We shall support employee growth through performance- and competency-based training and career development programs, contributing to sustainable organizational development.

10) Responsible Supply Chain Management

- We shall require our suppliers and business partners to fulfill their obligations regarding human rights protection.
- We shall identify human rights risks within our supply chain and establish responsible oversight systems, including recommending corrective actions where necessary.
- In cases of significant human rights violations within the supply chain, we shall take appropriate actions, including requesting remediation.

11) Rights of Local Communities

- We shall respect and protect the rights of local communities, including rights to life, property, and safety, in areas where we operate.
- We shall comply with environmental laws and contribute to environmental protection through preventive measures, carbon neutrality efforts, environmental-friendly operations, and resource circulation.
- We shall respect the rights of local communities and indigenous peoples to natural resources such as land, forests, and water, and prohibit forced relocation or eviction without prior consent.

12) Customer Human Rights

- We shall exercise due care in providing products and services to ensure that they do not harm customers' life, health, or safety, in compliance with applicable laws.
- We shall not engage in misleading or exaggerated advertising or marketing practices.

13) Personal Data Protection

- We respect the personal data of all stakeholders, including employees, investors, suppliers, customers, and local communities, and establish systems to ensure data security.
- We shall not use personal data without consent or for purposes other than those intended and shall implement appropriate technical and organizational measures in accordance with applicable data protection laws.

3-1. Human Rights Management Policy

5. Governance

1) We designate the HR & Admin. Business Unit as the responsible organization for the implementation of this Policy.



2) The responsible organization shall collaborate with relevant divisions to implement human rights management and report performance, plans, and key issues to decision-making bodies such as the Board of Directors or ESG Committee

- Human rights, humane treatment, non-discrimination, forced labor, child labor, employee development: HR Div.
- Organizational culture, external & community relations: Communication Div.
- Working conditions, freedom of association: Labor Management & General Affairs Div.
- Occupational Safety and Health: Safety & Environment Div.
- Responsible Supply Chain Management: Material & Purchasing Div.
- Customer Human Rights: Each BU
- Personal Data Protection: Information Security Div.

3) We shall manage human rights risks through governance bodies and oversee overall human rights performance, including the review and approval of the establishment and revision of this Policy.

3-1. Human Rights Management Policy

6. Implementation
- 1) The responsible organization, in collaboration with relevant divisions, shall review the effectiveness of this Policy at least annually, considering stakeholder expectations and regulatory changes. Where necessary, revisions shall be made through the ESG Committee.
 - 2) We shall establish and manage key performance indicators (KPIs) for human rights performance and target achievement through separate internal documentation, which shall be reviewed and updated annually.
 - 3) We shall disclose major human rights performance outcomes through an annual sustainability report and continuously promote awareness and integration of human rights management through internal training programs and campaigns.
7. Reporting Channels
- 1) Reporting and Intake
 - We operate secure and, where permitted by law, anonymous channels for internal and external stakeholders to report human rights violations or risks. Upon receipt of a report, the responsible department shall promptly investigate the facts and discuss appropriate resolution measures.
 - 2) Handling of Reports
 - Reported cases shall be reviewed with reference to applicable laws, court precedents, regulatory guidance, past internal cases, and industry practices. We shall work with relevant departments to identify appropriate remedies.
 - Website: https://www.htpchem.com/sustainability/code_of_conduct (Email: auditcom.htc@htpchem.com)
 - 3) Protection and Confidentiality
 - We strictly prohibit the disclosure of any information that may identify the reporter. All information related to the report—including victims, details, procedures, and outcomes—shall be treated as confidential. We shall ensure that reporters are protected from any form of retaliation or disadvantage.
 - 4) Disciplinary Actions
 - Where violations of this Policy occur, we shall conduct fair and impartial disciplinary procedures in accordance with applicable laws and internal regulations, ensuring the right to be heard. Disciplinary decisions shall consider the severity, intent, recurrence, and impact of the violation.
 - 5) Appeals
 - If there is an objection to the outcome of a report, a re-report may be submitted through the same channel, with clear justification provided.

4. Ethical Management - Compliance Management

We establish and operate an ethical management system in order to become a world-class chemical and energy leader commanding the respect and trust of our customers based on sound corporate ethics and a healthy organizational culture. By enacting business principles, a charter of ethics, a code of ethics and employee guidelines as the criteria for behavioral and value judgment, we strive to instill an ethical organizational culture through continuously conducting ethical training programs for employees.

Charter of Ethics

- 1 We put first customers satisfaction as the highest value and pursue mutual co-prosperity with employees, partners and shareholders as value-creation companion based on mutual trust and respect.
- 2 We respect the cultures and customs of all regions and countries doing business with us, comply with laws and ethics and fulfill the rights and obligations of a responsible corporate citizen through fair competition.
- 3 We put an emphasis on core values such as challenge, commitment and integrity and uphold the company's honor and dignity on the basis of trust and loyalty.
- 4 We are dedicated with integrity and sincerity, creating a healthy organizational culture on the basis of respectful and considerate human relationships and labor-management cooperation.

Code of Ethics

1. Safety, Health and Environment

All employees prioritize safety, health and the environment in business activities and strive to establish a world-leading safety culture.

- Strive to protect personal health and safety and to assist employees in protecting their colleagues through training and awareness initiatives.

2. Autonomy, Creativity and Spirit of Challenge

We respect individuals' autonomy, creativity and spirit of challenge.

- Autonomously judge and act in implementing duties and roles and take responsibility for the results.
- Always work with challenging and creative attitudes in order to create better values.
- Respect novel ideas and proposals and unceasingly develop yourself to be equipped with global level competitiveness.

3. Responsibility

In understanding corporate management philosophy, goals and values, each one faithfully carry out the duties assigned according to the policies.

- Implement given duties with best effort fairly and impartially and fully understand work related regulations and systems of the company.
- Actively share information and knowledge among higher/lower positions, colleagues and departments in order to enhance the effect and efficiency of works.
- Make sure to keep promises and act in accordance with social patterning based on ethics and morality.

4. Ethical Management - Compliance Management

Code of Ethics

4. Maintaining Clean Organization

Employees clearly distinguish between personal and public matters and do not pursue private interest by taking advantage of personal positions.

- Do not use the company's properties, facilities, machines or materials for personal purposes and act thinking the company's interest first when implementing duties.
- Do not conduct any dishonest acts such as indirectly or directly receiving money or articles, special favors, benefits or entertainments.
- Do not conduct any social activities or economic activities that are related with antisocial actions that threaten the order or safety of citizens' society or that are against the company's interest.
- Do not violate anti-trust, anti-bribery, anti-fraud and anti-corruption laws worldwide.

5. Respect for Intellectual Property

Employees recognize the importance of intellectual property rights, including trade secrets and respect and protect others' rights as well as both their own ones.

- Make effort to secure and maintain the company's intellectual property rights and provide the company's intellectual property rights to 3rd parties only after getting prior consent or approval of the company.
- Do not illegally obtain or use other persons' or other companies' confidential information.
- Respect 3rd parties' intellectual property rights such as patents, copyrights or trade mark rights and do not conduct any actions that do harm to the company such as intentionally infringing or unjustly using 3rd parties' intellectual properties.

6. Information and Security Recordkeeping

Employees record & hold any corporate information obtained in the workplace as intellectual property and ensure strict confidentiality.

- Accurately and clearly record and report various kinds of information related with business activities and control as the company's intellectual properties.
- Never disclose any information obtained while implementing duties without prior consent or approval while working in the company and even after retirement/resignation from the company.
- Do not use any information on the company or information obtained during the process of implementing duties dishonestly or unjustly.

7. Sound & Firm Coworkers Relationship

Employees maintain healthy relationships with coworkers.

- Superiors shall not give any unjust work instructions not related with the company or business purposes to inferior staffs.
- Do not conduct any speech or behavior that will impair sound relations between colleagues such as sexual harassment or insulting persons with disabilities.

4. Ethical Management · Compliance Management

Code of Ethics

8. Healthy Organizational Culture

Employees promote a cooperative labor-management culture on the basis of smooth communication, mutual trust and respect between seniors, subordinates and coworkers .

- Maintain and develop labor-management relations for coexistence and co-prosperity based on mutual trust
- Do not conduct any act to form a discord or alienation in the organization or impair sound organizational culture by establishing factions or private organizations based on kinship, regional background or academic lineage.

9. Political Involvement

Employees do not engage in political activities in the capacity of a corporate member.

- Respect individuals' political decisions; provided that, care must be used so that individuals' decisions would not be misunderstood as the company's standpoint.
- Do not directly/indirectly provide any illegal contributions or expenses to any candidates for officials to be elected, political parties or political committees.
- Do not conduct any political activities in the company or use any organization, manpower or properties of the company for political purposes.

10. Compliance with Business Principles

All employees must adhere to the business principles, and each organizational leader is held accountable for ensuring that their team members observe these principles.

- If any act of violating the Business principles has occurred, prevent recurrence through thorough investigation of the cause and education.
- All employees should faithfully observe the Business principles and anybody who violates the Business principles shall take responsibility for the relevant act by being subject to disciplinary actions.
- If anybody has been forced to conduct any act of violating the Business principles or perceived such acts, he/she shall report it to responsible officers or employees management/auditing departments and take actions after discussing with superiors or officers in advance in the case of any doubtful acts.

4. Ethical Management · Compliance Management

We set integrity management as the corporate key value, with us being cognizant of corporate social responsibility, fair competition and anti-corruption as key elements in management. After arranging a Compliance Team directly under CEO, the Team operates Compliance Programs (CP), including compliance system, compliance communication, compliance education and compliance checking, so that all employees could adhere to laws, regulations and compliance over the course of undertaking duties.

Compliance Program (CP)

The Compliance Team sets down and provides detailed operating standards, manuals and checklists to help employees readily understand and comply with duties-related laws at home and abroad. The team undertakes compliance checking activities on a periodic basis, and each employee also implements **self**-monitoring using the manuals and checklists provided. All employees should participate in compliance training programs annually and proactively attend other stratified, per-position and specialized training programs for enhanced compliance awareness. Besides, the team reports compliance activities and plans to the Board of Directors (BoD) once per year.

1. Compliance System
 - CP reporting for BoD, management of compliance risks and operation of compliance policies & standards
2. Compliance Communication
 - Dissemination of compliance management notices, organization of HTC's COMPLIANCE WEEK and distribution of compliance newsletters
3. Compliance Education
 - Implementation of common training programs for all employees and that of stratified/per-position/specialized training programs
4. Compliance Checking
 - Periodic checking at home and abroad led by the Compliance Team, employees' monitoring over autonomous checking and corrective actions

4-1. Ethical · Compliance Management Policy

- 1. Purpose** We establish this Policy to define the fundamental principles and obligations that all employees must follow to ensure compliance in the course of performing their duties. Through adherence to this Policy, we aim to promote ethical management grounded in laws and integrity, protect our employees, and support the sustainable growth and development of our organization.
- 2. Scope of Application** This Policy applies to us, including our overseas subsidiaries, and all employees, as well as all activities undertaken by them. We also encourage our business partners and suppliers to comply with this Policy. We shall prioritize compliance with all applicable laws, regulations, and internal rules. Where such laws, regulations, or internal rules do not address specific matters or provide explicit provisions, this Policy shall govern our ethics and compliance practices.
- 3. Definitions**
- 1) “Ethics” refers to the moral principles and values that guide individuals and organizations in making appropriate decisions and acting with integrity, including fairness, honesty, and accountability in business operations.
 - 2) “Compliance” refers to adherence to all applicable laws, regulations, and internal policies, as well as the implementation of systems and procedures necessary to protect both the organization and its employees.
 - 3) “Ethics and Compliance Management” refers to the management approach through which we pursue economic value while complying with laws and ethical standards and fulfilling our social responsibilities.
 - 4) “Employees” include all executives, full-time and non-regular employees.
 - 5) “Stakeholders” refer to individuals or organizations that may directly or indirectly affect or be affected by our business activities, including shareholders, customers, suppliers, and local communities.
 - 6) “Conflict of Interest” refers to a situation in which pursuing one interest may adversely affect another, including financial interests as well as personal relationships, reputation, or position.

4-1. Ethical · Compliance Management Policy

4. Principles

1) Compliance with Laws and Internal Regulations

- We shall fully understand and comply with all applicable domestic and international laws and internal regulations relevant to our duties.
- We shall not issue or follow any instructions that violate applicable laws or internal regulations. If such instructions are received, we shall refuse them. If such instructions persist, we shall promptly report them to Legal & Compliance Team in accordance with established procedures.
- Team leaders are responsible for supervising compliance within their teams and taking appropriate actions to prevent violations.

2) Obligation to Report Violations

- We shall promptly report any actual or suspected violations of applicable laws, internal regulations, or this Policy to Legal & Compliance Team in accordance with established procedures.
- Where there is uncertainty regarding potential violations, we shall seek prior consultation with Legal & Compliance Team.

3) Fair Competition and Transparent Management

- We shall respect fair market competition and compete fairly based on lawful and ethical practices.
- We shall comply with all applicable competition and antitrust laws and refrain from engaging in any unfair trade practices.
- We shall not enter into agreements or arrangements with competitors or other parties that restrict competition, including improper information exchanges or collusive practices.
- We shall comply with internationally accepted accounting standards and all applicable financial regulations and internal controls to ensure the reliability of financial information and enhance management transparency.
- We shall comply with subcontracting laws, treat business partners as valued partners, and refrain from making unfair demands or engaging in retaliatory acts by abusing a dominant position.

4) Anti-Corruption

- We strictly prohibit all forms of corruption, including the offering, giving, or receiving of bribes or improper benefits to or from public officials, government employees, or any individual who may influence business decisions.
- We shall comply with all applicable anti-corruption laws and regulations, including international standards such as the OECD Anti-Bribery Convention.

4-1. Ethical · Compliance Management Policy

4. Principles

5) Prevention of Conflicts of Interest

- We shall proactively avoid situations where personal interests may interfere with our professional responsibilities.
- Where employees have relationships with external stakeholders, such as relatives or related parties, they must disclose such relationships to the Company. Based on such disclosures, appropriate measures—including reassignment or recusal—shall be implemented.

6) Prevention of Fraud

- Company assets—including financial resources, information, and equipment—shall be used solely for legitimate business purposes.
- All financial, accounting, and business records must be accurate and based on factual information. False reporting, misrepresentation, or improper expense claims are strictly prohibited.

7) Protection of Information and Intellectual Property

- We shall comply with all applicable laws and internal policies regarding information security and intellectual property protection.
- We shall collect, process, and use customer information only for legitimate business purposes and in accordance with applicable laws, and prevent any unauthorized disclosure.
- We shall comply with applicable data protection laws and maintain appropriate systems to safeguard personal data.
- We shall not acquire competitors' information through improper means, infringe on third-party intellectual property rights, or use unauthorized software.

8) Other Compliance Requirements

- We shall comply with all applicable trade laws, including those related to anti-dumping, customs, and rules of origin.
- We shall also comply with anti-money laundering laws and take appropriate measures to prevent illicit funds from entering our operations or transactions.

4-1. Ethical · Compliance Management Policy

5. Governance

1) We designate Legal & Compliance team as the responsible organization for the implementation of this Policy.



2) The responsible organization shall collaborate with relevant teams —including Audit team and Information Security division —to implement ethics and compliance management and report performance, plans, and key issues to decision-making bodies such as the Board of Directors or ESG Committee.

- Compliance with laws and regulations, reporting obligations, fair competition and transparency, anti-corruption, other compliance matters: Legal & Compliance Team
- Anti-corruption, conflict of interest, fraud prevention: Audit team
- Information and intellectual property protection: Information Security Div.

3) We shall manage ethics and compliance risks through governance bodies and oversee overall performance, including the review and approval of the establishment and revision of this Policy.

4-1. Ethical · Compliance Management Policy

6. Implementation
- 1) The responsible organization shall review the effectiveness of this Policy at least annually, considering stakeholder expectations and regulatory changes. Where necessary, revisions shall be made through the ESG Committee.
 - 2) We shall establish and manage key performance indicators (KPIs) for ethics and compliance performance through separate internal documentation, which shall be reviewed and updated annually.
 - 3) We shall disclose major performance outcomes through an annual sustainability report and continuously promote awareness through internal training and campaigns.
 - 4) We shall ensure that all employees acknowledge their compliance obligations through formal compliance pledges and periodically verify adherence to such procedures.

4-1. Ethical · Compliance Management Policy

7. Reporting Channels

1) Reporting and Intake

- We operate reporting channels through which employees and external stakeholders may report violations or potential risks related to this Policy.
- All stakeholders who become aware of unethical conduct or legal violations are encouraged to report such matters through the Company's reporting channels.
 - Website: https://www.htpchem.com/sustainability/code_of_conduct
 - Email: (Audit team) auditcom.htc@htpchem.com / (Legal & Compliance team) compliance.htc@htpchem.com
- Upon receipt of a report, we shall promptly investigate the facts and determine appropriate corrective actions.

2) Handling of Reports

- Reports shall be reviewed with reference to applicable laws, judicial precedents, regulatory guidance, past internal cases, and industry practices.
- We shall collaborate with relevant departments to determine appropriate remedies.

3) Protection and Confidentiality

- We strictly prohibit the disclosure of any information that may identify the reporter.
- All information related to the report—including victims, details, procedures, and outcomes—shall be treated as confidential.
- We shall ensure that reporters are protected from any form of retaliation.

4) Disciplinary Actions

- In cases of violations, we shall conduct fair and impartial disciplinary procedures in accordance with applicable laws and internal regulations, ensuring the right to be heard.
- Disciplinary decisions shall consider the severity, intent, recurrence, and impact of the violation.

5) Rewards and Recognitions

- We may provide appropriate recognition or rewards to employees who demonstrate exemplary compliance or contribute to risk mitigation by proactively identifying or reporting violations, in accordance with internal regulations.

6) Appeals

- If there is an objection to the outcome of a report, a re-report may be submitted through the same channel, with clear justification provided.

4-1. Ethical · Compliance Management Policy

[Appendix] Template of Compliance Pledge

Compliance Pledge

As an employee of Hanwha TotalEnergies Co., Ltd. (the “Company”), I hereby pledge to comply with the Company’s Compliance Management Policy and to adhere to the following principles in performing my duties.

1. I recognize the Company’s corporate philosophy and core values and commit to performing my duties in a fair and transparent manner by practicing voluntary compliance based on high ethical standards and integrity-driven management.
2. I shall fully understand and comply with all applicable domestic and international laws and regulations, as well as the Company’s internal rules and policies in relation to my duties, and I shall not participate in, instruct, approve, assist, or tolerate any acts that violate such laws, regulations, or internal policies.
3. I shall respect free and fair market competition, fulfill my social responsibilities, and compete in a lawful and ethical manner. I shall actively prevent corruption, fraud, and any conduct that may raise suspicion of anti-competitive or improper behavior with competitors or other business partners.
4. I shall not offer or accept money, gifts, entertainment, or any other improper benefits to or from stakeholders, including domestic and foreign public officials and customers, in order to obtain business opportunities or personal convenience, and I shall strive to promote a sound organizational culture that upholds honor and integrity.
5. I shall strictly comply with all applicable laws, regulations, and Company policies related to information protection and intellectual property rights.
6. I shall immediately report any violations or potential violations of domestic or international laws, Company policies, or regulations in accordance with the procedures established by the Company.
7. I acknowledge that I will bear full responsibility, including legal liability, for any violations of applicable laws, Company policies, or this Compliance Pledge.

4-1. Ethical · Compliance Management Policy

[Appendix] Ethical Implementation Guidelines (Employee Practical Guidelines)

This Guideline provides practical standards for employees to follow in their daily operations to ensure compliance with the principles of ethical and compliance management. This Guideline is intended for reference purposes only, and applicable laws and regulations, as well as the Company's superior policies and regulations (including the Rules of Employment, Code of Ethics, and Information Security Policy), shall prevail in case of any inconsistency.

1) Gifts & Hospitality

- Employees shall not accept expensive gifts or excessive hospitality from customers or other stakeholders.
- If any gift or hospitality is received, employees shall immediately report it to their supervisor or Audit team and return it to the Company.
- All gifts and hospitality shall be reported and recorded in accordance with the designated procedures to ensure transparency.

[Practical Guidance Example]

Q) What should I do if I receive money or gifts against my will?

A) Cash or cash-equivalent assets must be returned immediately. If it is difficult to return physical gifts, the employee shall promptly report the matter to their direct supervisor and return the item to the Company.

2) Conflict of Interest Prevention and Management

- Employees shall proactively prevent situations in which personal interests may influence their job performance.
- If an external stakeholder, such as a business partner representative, is a relative or a related party of an employee, the employee shall immediately report the matter to Audit team or through the Conflict of Interest reporting channel.
- Based on the report, We determine appropriate measures, including duty exclusion, reassignment, or formal approval.
- Failure to report or concealment of a conflict of interest situation may result in accountability measures, and transparent reporting is the fundamental principle.

3) Anti-Money Laundering

- We and our employees shall comply with all applicable anti-money laundering laws and regulations and prevent illicit funds from entering our operations or business transactions.
- We and our employees conduct identity verification, KYC (Know Your Customer) procedures, and transaction monitoring for all financial transactions to prevent and continuously monitor risks related to money laundering involving customers, partners, suppliers, and other entities or individuals.

[Practical Guidance Example]

Q) A business partner requests a cash transaction. Is this allowed?

A) Cash transactions are, in principle, prohibited due to the high risk of money laundering. All transactions shall be processed through official corporate bank accounts.

5. Sustainable Supply Chain Policy

1. Purpose We establish this Policy to clearly define the fundamental principles and operational standards for building a sustainable supply chain ecosystem.
2. Scope of Application This Policy applies to us, including overseas subsidiaries, and all employees, as well as all business activities conducted by us. We also encourage all stakeholders within our value chain to comply with this Policy.
3. Principles
- 1) Fair Trade Practices
 - We establish and apply contract guidelines to promote fair and transparent transactions with our business partners and to ensure a sound and desirable trading environment.
 - We protect the legitimate rights and interests of our partners throughout the contract process and build rational and fair trade practices based on mutual trust and transparency.
 - 2) Purchasing Practices on Social Issues
 - We do not engage in unfair coercion or unfair trade practices by abusing a dominant bargaining position toward partners, including corruption, conflicts of interest, fraud, money laundering, and information security violations.
 - We provide transparent and reasonable transaction conditions to build responsible and mutually beneficial partnerships that promote shared growth and value creation.
 - In accordance with the Partners ESG Code of Conduct, we assess partner' compliance with social responsibility requirements, including labor and human rights, occupational health and safety, ethical management, and supply chain due diligence.
 - Through these efforts, We minimize potential social risks across the supply chain and strengthen monitoring and improvement activities to ensure responsible and sustainable procurement practices are effectively implemented.

5. Sustainable Supply Chain Policy

3. Principles

3) Purchasing Practices on Environmental Issues

- We pursue green procurement by collaborating with partners and prioritizing environmentally friendly products and services.
- In accordance with the Partners ESG Code of Conduct, we assess partners' compliance with environmental responsibility requirements, including environmental management and green procurement practices.
- Through these efforts, We minimize potential environmental risks across the supply chain and strengthen monitoring and improvement activities to ensure responsible and sustainable procurement practices are effectively implemented.

5. Sustainable Supply Chain Policy

3. Principles

4) Partners ESG Code of Conduct

- The Partners ESG Code of Conduct of Hanwha TotalEnergies Petrochemical (“the Company”) clearly defines the standards required in terms of labor/human rights, safety & health, environment and ethical management. The Company wishes all partners to engage in ESG management through making use of the code of conduct. This code applies to all forms of partners contracted to offer products & services or other services to the Company. Partners should require its lower-tier supply chains to observe the code while complying with it at the same time. The Company may demand improvements after conducting on-site inspections to partners’ business sites in order to ensure their compliance. The code is established in accordance with the international norms and standards and legal requirements and subject to revision according to changes in corporate partners’ management policies and standards.

☞ Details shall follow ‘Partners ESG Code of Conduct’

Labor and Human Rights: Partners shall protect the human rights of workers and ensure their dignity at a level recognized by the international community. This applies to all forms of workers, including directly employed workers, temporary workers, migrant workers, interns, and short-term contract workers. Workers must be guaranteed legal labor and protection of their rights in accordance with local laws and regulations.

Safety and Health: Partners must strive to establish and maintain a safe and healthy workplace in accordance with local laws and regulations to minimize work-related injuries and illnesses, improve the quality of products and services, reduce production disruptions, retain employees and boost morale.

Environment: Partners shall comply with environmental laws and regulations, including the management and disposal of chemicals and waste, recycling, industrial water management and reuse, and control of greenhouse gas and air emissions. Partners shall also identify the environmental impact of their business operations and strive to reduce it.

Ethical Management: Partners must comply with all local laws and regulations in their business activities and adhere to the highest standards of ethical conduct.

Eco-friendly Procurement: Partners shall contribute to greenhouse gas reduction and energy/resource conservation by expanding the purchase and use of eco-friendly products that minimize greenhouse gas emissions, energy/resource waste, and environmental pollution, and shall strive to prevent environmental pollution.

Supply Chain Due Diligence: Partners may identify potential or actual negative impacts that may occur within their operations through due diligence on new or existing suppliers, if necessary. For any identified negative impacts, partners must take necessary actions for mitigation, prevention, or correction

5. Sustainable Supply Chain Policy

4. Governance

1) We designate Material & Purchasing Div. as the responsible organization for the implementation of this Policy.



2) The responsible organization shall collaborate with relevant teams —including ESG Management Team, Legal & Compliance Team, HR Div., and Safety & Environment Div. —to implement this Policy and report performance, plans, and key issues to decision-making bodies such as the Board of Directors or ESG Committee for review and approval.

- Fair trade practices, social purchasing practices, and environmental purchasing practices: Material & Purchasing Div.
- Establishment of supply chain ESG management processes: ESG Management Team
- Risk management support and advisory: Legal & Compliance Team for ‘ethics and compliance’, HR Div. for ‘labor and human rights’, Safety & Environment Div. for ‘SHE’

3) We shall manage ESG risks within the supply chain through governance bodies and oversee overall activities, including the review and approval of the establishment and revision of this Policy.

5. Sustainable Supply Chain Policy

5. Implementation
- 1) The responsible organization shall review the effectiveness of this Policy at least annually, considering stakeholder expectations and regulatory changes. Where necessary, revisions shall be made through the ESG Committee.
 - 2) We shall establish and manage key performance indicators (KPIs) for ethics and compliance performance through separate internal documentation, which shall be reviewed and updated annually.
 - 3) We shall disclose major performance outcomes through an annual sustainability report and continuously promote awareness through internal training and campaigns.

Partners ESG Code of Conduct

The Partners ESG Code of Conduct of Hanwha TotalEnergies Petrochemical ("the Company") sets forth what the Company expects of partners from the aspect of labor human rights, safety & health, environment and ethical management. The Company wishes all partners to engage in ESG management through making use of the code of conduct. This code applies to all forms of partners contracted to offer products & services or other services to the Company. Partners should require its sub-supply chains to observe the code while complying with it at the same time. The Company may demand improvements after paying a visit to partners' business sites in order to ensure their compliance. The code is written down based on international norms and standards and legal requirements and subject to change according to changes in corporate partners' management policies and standards. If the code and local laws conflict, the stricter standard will take precedence.

1. Labor Human Rights

Partners must protect employees' human rights and dignity to the extent accepted by the international community. This applies to all types of workers, including direct workers, temporary workers, migrant workers, interns and short-term contracts. Workers should be guaranteed legal employment and rights protection according to local laws.

1.1 Voluntary Employment

Partners' work should be voluntary and workers are allowed to resign at their own will. Partners must not employ such workers as forced labor, confinement labor, involuntary prison labor and/or trafficked labor. This includes any act of moving, recruiting, or transferring vulnerable groups for the purpose of exploitation through threats, force, coercion, abduction, or fraud etc. Partners should record and deliver employment terms and conditions in the form of a language that workers can understand. Employers and their agents must not request workers to surrender government-issued identification cards, passports, or work permits or to pay placement fees or deposits on the condition of employment

1.2 Protection of Minor Workers

It is strictly banned to exploit child labor. A "child" is defined as a person below the highest age applicable among those under the age of 15, the age for completing compulsory schooling programs, or the minimum legal employment age stipulated by local law. Partners must comply with local laws and regulations if apprenticeship programs are to be conducted. Partners may employ young workers above the minimum employment age, but workers under 18 must not perform hazardous work, including overtime and night shifts from the aspect of safety & health.

1.3 Compliance with Working Hours

Working hours must not exceed the maximum set by local law. Partners must ensure that workers have at least one day off at an interval of seven days. Workers' right not to participate in such activities must be respected. Workers and their representatives must be able to communicate openly with management regarding working conditions and business practices without fear of discrimination, retaliation, intimidation, or harassment.

1.4 Wages and Benefits

Wages paid to workers must include minimum wages, overtime and legally stipulated benefits, and all applicable wage laws and rules should be observed. All overtime work must be voluntary under the consent of the worker and be compensated at a rate greater than the hourly-wage applicable to regular working hours. Standards and breakdown of wages payment must be provided in a language which can be understood among workers by means of pay slips or intra-nets.

1.5 Humanitarian Treatment

There should not be any forms of brutal and inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion and verbal abuse, not to mention any threats to give such treatments. After setting down the policies and procedures that assure workers humanitarian treatment, partners should provide notification to them.

1.6 Prohibition of Discrimination and Harassment

Partners should take action so that workers would not be harassed or be illegally discriminated against. In terms of employment practices like wages, promotion, rewards and training and so on, partners must not discriminate on the basis of race, skin color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political view, union membership and marriage status, etc. Partners cannot request a medical check-up that could be used as a ground for discrimination from workers or job seekers unless the request is made due to local laws or the safety of workplaces.

1.7 Freedom of Association

Partners must respect the rights of workers to gather, join labor unions and to freely form an association for collective bargaining and peaceful assemblies according to local laws. Also, they need to respect the rights of workers to refrain from such activities. Workers and their representatives must be able to openly discuss employment terms & conditions and business practices with management without fear of discrimination, retaliation, intimidation, or harassment.

Partners ESG Code of Conduct

2. Safety and Health

Partners must strive to establish and maintain a safe and healthy workplace in accordance with local laws and regulations to minimize work-related injuries and illnesses, improve the quality of products and services, reduce production disruptions, retain employees and boost morale.

2.1 Industrial Safety

Partners must identify and evaluate situations in which workers may be exposed to safety hazards (chemical substance, electrocution, fire, vehicles and falls, etc.). These hazards must be controlled and managed through appropriate designing, engineering and administrative measures, preventative maintenance and safe work procedures (such as locking/protective devices). Safety training must be provided on a continued basis. If the identified hazards cannot be adequately handled through the stated means above, partners must provide workers with appropriate personal protective gear. Partners must take reasonable measures to leave out pregnant or nursing women from hazardous working environments, eliminate or reduce health and safety risks and provide convenient facilities for nursing women.

2.2 Emergency Preparedness

Partners must identify and evaluate potential emergency situations and accidents in advance. They must provide reporting, notification and evacuation procedures in case of an emergency while establishing and implementing emergency plans, including evacuation drills for employees, exit facilities, fire detection, obtainment of fire extinguishing equipment and restoration plans in order to prevent possible emergencies from occurring.

2.3 Occupational Injury & Illness

Partners must have procedures and systems in place to prevent, manage, track and report occupational injuries & illnesses. These procedures must encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate and implement corrective actions to eliminate their causes and facilitate the return of workers to work after an injury or illness.

2.4 Industrial Hygiene

Partners must identify, evaluate and control the possibility of workers being exposed to chemical, biological and physical agents at the workplace. Workers must be protected through the elimination of hazards or improvement of production facilities either through technical controls or administrative controls as shown in legal and regulatory requirements. Where such measures do not adequately rein in hazards, partners must provide workers with appropriate personal protective gear and training programs

2.5 Physical Labor

Partners must identify, assess and control physically demanding tasks for workers, including repetitive tasks, heavy objects handling tasks and strenuous tasks.

2.6 Equipment Safety Management

Partners must evaluate the safety of production equipment and other machinery. If workers are prone to injury risks, partners must provide physical protection devices, safety interlocking devices and protection walls.

2.7 Hygiene, Food and Housing

Partners must provide workers with clean restroom facilities and drinking water, as well as space for hygienic food preparation, storage and consumption. Dormitories offered must be clean, safe and include adequate lighting, emergency exits, heating and cooling systems, ventilation, personal storage and reasonable personal space.

2.8 Safety and Health Education

Partners must provide appropriate safety and health training in the form of a language that can be understood by workers, covering all identified workplace hazards such as machinery, electricity, chemicals, fire and physical hazards. Safety and health information must be posted in plain view at the workplace. Training must be provided before job placement, and periodic training should be held even after the placement. Partners should create an environment in which workers are encouraged to raise safety concerns.

Partners ESG Code of Conduct

3. Environment

Partners must comply with environmental laws and regulations related to the management and disposal of chemical substances & waste, recycling, management & reuse of industrial water and control over greenhouse gases and air pollutant emissions. They should identify the environmental impact that resulted from the corporate operation and endeavor to reduce its likelihood

3.1 Environmental Licensing

Partners must obtain, maintain and manage all required environmental permits (e.g., discharge and prevention permits) and registrations. They must keep up-to-date with any revisions to applicable laws and comply with the operational and reporting requirements necessary over the course of obtaining licenses.

3.2 Pollution Prevention and Resource Reduction

Partners must minimize or eliminate the release of pollutants and the generation of waste through adding the equipment that restrains sources of pollution. Natural resources such as water, fossil fuels, minerals, and virgin forest products must be conserved through improved production process, maintenance enhancement, substitutes use, resource conservation and material reuse & recycling.

3.3 Hazardous Substance Management

Partners must implement separate control through identification marks or labeling so that chemicals and other substances that do harm to humans or the environment could be safely handled, moved, stored, used, recycled/reused and disposed of.

3.4 Solid Waste Management

Partners must systematically identify, manage, reduce and responsibly dispose of or recycle non-hazardous solid waste.

3.5 Air Pollutants Emission

Partners must characterize, routinely monitor, control and treat volatile organic compounds (VOCs), aerosols, corrosive gases, particulates, ozone-depleting substances and combustion by-products generated from operations and discharge them as required by local laws. Partners should regularly monitor the working efficiency of air pollution-preventing equipment.

3.6 Restriction on Substances

Partners must comply with the Company's requirements and all the local laws & regulations related to the prohibition or restriction of specific substances, including display of their information during the recycling and disposal phases.

3.7 Water Management

Partners must implement a water management program that documents, monitors and controls water usage & discharge and explores water conservation opportunities. All wastewater must be characterized, monitored, controlled and treated prior to discharge or disposal, and the performance of wastewater treatment and containment systems must be monitored to ensure optimal performance and compliance with relevant regulations.

3.8 Energy Consumption and Greenhouse Gas Emissions

Partners should endeavor to set up a system which can measure, estimate and manage energy consumption amount and greenhouse gas emissions. Also, at the request of the Company, partners must provide information about their energy consumption and greenhouse gas emissions. Partners should set a target to bring down greenhouse gas emissions and continually seek ways to achieve these reductions.

Partners ESG Code of Conduct

4. Ethical Management

Partners must comply with all local laws and regulations in their business activities and the highest standards of ethical conduct.

4.1 Business Integrity

Partners must uphold the highest standards of integrity in all business interactions. They must adopt a zero-tolerance policy against all forms of bribery, corruption, extortion and embezzlement.

4.2 Prohibition of Unjust Enrichment

Partners must not promise, offer, authorize, give, or accept bribes or other means of obtaining an improper or unfair advantage. This includes directly or indirectly offering, promising, giving, or accepting anything of value to obtain or retain business or to gain an improper advantage. Suppliers must comply with anti-corruption laws and implement monitoring and procedures to ensure compliance.

4.3 Information Disclosure

All business dealings of partners must be transparently performed and accurately reflected in their accounting books and records. Information regarding labor, health and safety, environmental control practices, business activities, governance, financial status and performance must be disclosed in accordance with applicable laws and industry practices.

4.4 Intellectual Property Protection

Partners must respect intellectual property rights and safeguard the transfer of technology and know-how in a manner that protects intellectual property rights. Confidential information regarding the company learned through business dealings must be securely protected.

4.5 Fair Trade, Advertising and Competition

Partners must comply with fair trade, advertising and competition standards.

4.6 Protection of Identity and Non-Retaliation

Except as prohibited by law, partners must implement a program to protect the identity of whistleblowers (confidentiality and anonymity) to ensure that workers can raise concerns without fear of retaliation.

4.7 Responsible Sourcing of Minerals

Partners must ensure that minerals sourced from specific regions, which the international community restricts (such as tantalum, tungsten, tin and gold), are not used in the company's supply chain. They must strive to source minerals in a manner that complies with international regulations and national laws.

4.8 Privacy Protection

Partners must make efforts to protect the personal information of all individuals involved in their business operations, including partners, clients, consumers and employees. They must comply with privacy and information security laws regarding the collection, storage, processing, transmission and sharing of personal information.

