

1. Purpose

The purpose of this document is to solve and improve issues such as human rights violations and environmental destruction that arise when Hyosung Heavy Industries (hereinafter referred to as the “Company”) engages in conflict or responsible mineral mining by establishing a responsible mineral supply chain and encouraging business partners to participate.

2. Definition of Terms

- 2.1 The term “conflict minerals” refers to minerals such as tin, tungsten, tantalum, and gold that are mined in ten African regions afflicted by armed conflict (the Democratic Republic of the Congo, the Republic of the Congo, Sudan, Rwanda, Burundi, Uganda, Zambia, Angola, Tanzania, and Central Africa).
- 2.2 The term “responsible minerals” refers to cobalt, nickel, copper, zinc, and mica that are extracted in a socially responsible manner with respect to human rights and the environment.
- 2.3 The term “RMAP” is an acronym for the Responsible Minerals Assurance Process, the due diligence and assurance program of the Responsible Minerals Initiative for smelters that do not use conflict or responsible minerals.
- 2.4 The term “Article 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act” refers to the provisions pertaining to conflict minerals among the bills enacted by the US Congress to strengthen the accountability and transparency of the financial system and improve the financial stability of the United States. This provision requires manufacturers of products containing conflict minerals from the Congo to disclose whether or not the minerals used have contributed to the conflict in the Congo.
- 2.5 The term “OECD Due Diligence Guidance” refers to recommendations that, when implemented, enable businesses to prevent and address a variety of negative impacts on workers, human rights, the environment, bribery, consumers, and corporate governance that are associated with business operations, supply chains, and other business relationships.

3. Scope of Application

- 3.1 This Policy applies to all employees within the Company’s financial consolidation scope, which includes the Company’s headquarters, domestic and overseas production and sales corporations and branches, and subsidiaries.
- 3.2 Even when interacting with business partners, agencies, and outsourcing partners, employees shall encourage compliance with this Policy.
- 3.3 However, if the recommended actions in this Policy conflict with the laws of the relevant country, the laws of the country in question shall take precedence.

4. Philosophy

The Company shall ensure a responsible mineral supply chain to prevent issues such as human rights violations and environmental destruction resulting from conflict and responsible mineral

mining.

5. Principles

Conflict minerals cause human rights and environmental problems, such as the use of sales proceeds to fund war and the exploitation of labor during mining. The Dodd-Frank Wall Street Reform and Consumer Protection Act of the US Congress and the OECD Due Diligence Guidance mandate the establishment of a responsible mineral supply chain to safeguard human rights and the environment. Therefore, the Company shall manage the supply chain for conflict and responsible minerals transparently.

- 5.1 The Company shall only handle minerals from smelters with RMAP certification.
- 5.2 The Company shall assist business partners in trading with RMAP-certified smelters by providing regular training and conflict and responsible mineral management guidelines.
- 5.3 The Company shall verify that no business partners deals with conflict or responsible minerals by using questionnaires and written confirmation.
- 5.4 When identifying conflict and responsible mineral risks within a business partner’s supply chain, the Company shall request improvements to build a responsible supply chain.
- 5.5 If a business partner is uncooperative in conflict and responsible mineral risk investigations and improvement measures, or provides false information, the Company may suspend its transaction with the business partner.
- 5.6 Each year, the Company shall disclose the list of conflict and responsible minerals handled.

6. Conflict & Responsible Minerals management system

- 6.1 The Company designates the Purchasing Department as the responsible department (hereinafter referred to as the “Responsible Department”) to oversee the smooth implementation of this policy.
- 6.2 The Responsible Department identifies and manages supply chain risks, reports significant issues to the Supply Chain Management Committee, and, after conducting a materiality assessment of the identified key issues, reports the findings to the ESG Management Promotion Committee, which is the top decision-making body, for final review and decision-making.

Responsible Department	Interim Reporting	Decision-Making Body
Purchasing Department	Supply Chain Management Committee	ESG Management Promotion Committee

7. Implementation Plans and Goals

- 7.1 The Company aims to eradicate the practice of deliberately acquiring and supplying conflict & responsible minerals or engaging in practices that provide direct or indirect benefits to organizations involved in human rights abuses by encouraging all domestic and international partners to include the 「Partner Code of Conduct」 in their contracts and to avoid handling

Conflict & Responsible Minerals Policy

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conflict & responsible minerals by 2025.

7.2 The Company shall add procedures for identifying conflict & responsible mineral risks to the new partner registration manual by 2025 and will take measures to ensure that partners found to handle conflict or responsible minerals are ineligible for registration and business transactions.