

# Human Rights Management Operational Guidelines

Business Support Division, Human Resources Team.

Enacted December 3, 2025.

## CHAPTER 1 GENERAL PROVISIONS

### Article 1 (Purpose)

The purpose of these guidelines is to establish and implement policies regarding the protection and promotion of human rights for all stakeholders, including employees of Hanssem Co., Ltd., to respond to human rights violations in accordance with relevant laws and regulations, and to stipulate other necessary matters.

### Article 2 (Definitions)

The meanings of terms used in these guidelines are as follows:

1. "Human Rights" refers to the freedoms and rights of human beings as dignified beings, guaranteed by the Constitution of the Republic of Korea and laws, or recognized by international human rights treaties to which the Republic of Korea is a party and international customary law.
2. "Human Rights Management" means respecting the human rights of all persons encountered in all corporate management activities. Specifically, it refers to preventing human rights violations by the company, conducting management activities based on human rights, issuing a corporate human rights policy declaration, fulfilling human rights due diligence obligations, and providing redress procedures for victims of human rights violations.
3. "Officers and Employees" means executives and employees (including non-regular workers) working at Hanssem Co., Ltd.
4. "Stakeholders" means all entities or individuals connected to Hanssem Co., Ltd., such as officers and employees, partner companies, shareholders and investors, local residents, government and public institutions, who are affected by or may affect Hanssem Co., Ltd.'s management activities.
5. "Business Partner" refers to a company that has a business relationship with Hanssem Co., Ltd., including subsidiaries, affiliates, distributors, suppliers, service providers, and subcontractors.
6. "Human Rights Violation" refers to human rights violations occurring in connection with Hanssem Co., Ltd.'s business activities.

7. "Sexual Harassment" includes not only gender discrimination, sexual harassment, and sexual violence, but also any secondary harm resulting therefrom.
8. "Gender Discrimination" refers to any words or actions contrary to "gender equality" as defined in Article 3, Item 1 of the Framework Act on Gender Equality.
9. "Sexual Harassment" means any act by an employer, superior, or employee toward another employee that falls under any of the following subparagraphs, as defined in Article 2, Item 2 of the Act on Equal Employment Opportunity and Support for Work-Family Balance and Article 3, Item 2 of the Framework Act on Gender Equality:
  - a. Using one's position or in connection with work, etc., making sexual remarks or demands that cause the other person to feel sexual humiliation or disgust
  - b. Imposing disadvantages in working conditions or employment because the other person refused sexual remarks or demands, or expressing an intention to grant benefits conditional upon compliance
10. "Sexual violence" refers to acts constituting crimes defined in Article 2, Paragraph 1 of the Special Act on the Punishment of Sexual Violence Crimes.
11. "Secondary harm" refers to suffering harm corresponding to any of the disadvantageous measures listed in Article 34 of this guideline.
12. "Workplace harassment" refers to acts falling under the provisions of Article 76-2 of the Labor Standards Act.
13. "Person in a position of authority" refers to an individual who holds a position of team leader or higher, is responsible for an organization, and can influence the work and working environment of its members.

### **Article 3 (Scope of Application)**

This guideline applies to all employees of Hanssem Co., Ltd., stakeholders related to Hanssem Co., Ltd.'s business activities, and partner companies. Particularly regarding victim protection, it applies not only to victims but also to those claiming to have suffered harm, whistleblowers, supporters, and representatives.

## **CHAPTER 2 HUMAN RIGHTS MANAGEMENT GENERAL PRINCIPLES**

### **Article 4 (Basic Principles)**

① Hanssem Co., Ltd. supports and complies with domestic and international human rights standards and norms.

② Hanssem Co., Ltd. strives to prevent human rights violations in advance and provide active remedies.

#### Article 5 (Respect for Diversity and Prohibition of Discrimination)

① Hanssem Co., Ltd. prohibits discrimination in employment, promotion, training, and other areas against any employee based on gender, age, race, nationality, religion, disability, educational background, social status, political views, or other factors without reasonable justification.

② Hanssem Co., Ltd. does not discriminate based on the form of employment without reasonable justification.

#### Article 6 (Protection of Employee Human Rights)

Hanssem Co., Ltd. protects all members, including partner companies, from workplace violence such as sexual harassment and bullying. It actively fulfills its duty to protect human rights, including the right to personality, health, and rest, to foster a supportive working environment.

#### Article 7 (Remedial Measures)

Hanssem Co., Ltd. provides prompt and appropriate remedial measures for human rights violations occurring in its management and business processes.

#### Article 8 (Guarantee of Freedom of Association and Collective Bargaining)

① Hanssem Co., Ltd. guarantees workers' freedom to form labor unions and does not disadvantage them for union membership or activities.

② Hanssem Co., Ltd. guarantees workers the right to engage in collective bargaining through labor unions to reach agreements on working conditions. Furthermore, it shall not refuse collective bargaining without just cause and must respect and faithfully fulfill the right to collective bargaining.

③ Hanssem Co., Ltd. provides labor unions with the information and resources necessary for conducting union activities.

#### Article 9 (Gender Equality and Work-Life Balance)

Hanssem Co., Ltd. shall improve gender-discriminatory systems and practices in employment, promotion, and other working conditions, and shall strive to protect the maternity rights of female workers and support work-life balance.

#### **Article 10 (Industrial Safety and Health)**

- ① Hanssem Co., Ltd. shall provide workers with a safe and hygienic working environment, guarantee their right to safety, and provide separate safety equipment and safety training when workers are employed in hazardous working environments.
- ② Prompt measures, including treatment and compensation, shall be provided for accidents or illnesses occurring in the workplace.
- ③ Hanssem Co., Ltd. shall establish systems and environments that ensure the safety of all stakeholders in the course of conducting its business.

#### **Article 11 (Prohibition of Forced Labor and Child Labor)**

- ① Hanssem Co., Ltd. prohibits forced labor against the free will of workers.
- ② Hanssem Co., Ltd. shall not, under any circumstances, employ children under the age of 15 for labor.
- ③ When Hanssem Co., Ltd. legally employs minors, it shall guarantee educational opportunities and provide special consideration for their safety.

#### **Article 12 (Children's Rights)**

- ① Hanssem Co., Ltd. shall fulfill its responsibility to respect children's rights in its management and business activities.
- ② Hanssem Co., Ltd. shall fulfill its duty to protect children's safety and realize their rights at its business sites.

#### **Article 13 (Protection of Information Rights)**

Hanssem Co., Ltd. protects personal information obtained during business operations in accordance with relevant laws and regulations, including the 「Personal Information Protection Act」 and the 「Act on Promotion of Information and Communications Network Utilization and Information Protection, etc.」.

#### **Article 14 (Responsible Supply Chain Management)**

- ① Hanssem Co., Ltd. shall take appropriate measures to ensure all business partners practice human rights management.
- ② Hanssem Co., Ltd. guarantees equal opportunities to all business partners and conducts transparent and fair transactions.
- ③ Hanssem Co., Ltd. may suspend transactions if a business partner commits a serious human rights violation that remains uncorrected.
- ④ Hanssem Co., Ltd. communicates its human rights management policy to various stakeholders and supports and cooperates with them for its implementation.

#### **Article 15 (Guarantee of Environmental Rights)**

- ① Hanssem Co., Ltd. establishes and maintains an environmental management system and continuously discloses relevant information internally and externally.
- ② Hanssem Co., Ltd. shall adhere to the principle of a preventive approach to environmental issues and shall establish plans to prevent, mitigate, and control serious environmental damage and natural disasters.

#### **Article 16 (Protection of Local Residents' Human Rights)**

- ① Hanssem Co., Ltd. shall respect and protect the right to life, freedom of movement, the right to safety, and property rights of local residents in areas where its business activities are conducted.
- ② Hanssem Co., Ltd. shall follow due process when expropriating, using, or restricting property rights for public interest purposes.

#### **Article 17 (Partners for the Future Society)**

Hanssem Co., Ltd. shall coexist harmoniously with society as a responsible member and strive for a sustainable future.

### **Chapter 3 Human Rights Management System**

### **Article 18 (Human Rights Management Charter)**

Hanssem Co., Ltd. proclaims the Human Rights Management Charter to guarantee human dignity and value in all management activities. Employees shall practice this Charter as the code of conduct and value judgment standard for human rights management.

### **Article 19 (Establishment of Basic Plan)**

① The Chief Executive Officer shall establish a basic plan to effectively promote human rights management. The plan shall include the following items:

1. Objectives and fundamental direction of human rights management
2. Tasks and implementation strategies for advancing human rights management
3. Matters concerning the obligation to practice and monitor human rights, including human rights surveys and human rights impact assessments
4. Other necessary matters for the protection and promotion of human rights

② When establishing the basic plan pursuant to Paragraph 1, the Chief Executive Officer shall gather and reflect the opinions of stakeholders in the plan.

### **Article 20 (Human Rights Management Responsible Organization)**

① The Chief Executive Officer shall designate a dedicated organization responsible for human rights management to efficiently oversee and execute human rights management. The head of the responsible organization shall be in charge of all human rights management affairs, including the matters listed in each item of Article 19.

② The human rights management responsible organization pursuant to Paragraph 1 shall be the Personnel Team of the Management Support Headquarters. The Head of the Management Support Headquarters shall serve as the Human Rights Management Officer and perform the following roles:

1. Establishing and overseeing the implementation of the human rights management plan
2. Planning and conducting human rights practice and monitoring obligations, including human rights status surveys and human rights impact assessments
3. Matters concerning the implementation of human rights education
4. Receiving and investigating human rights violation incidents

5. Providing administrative support for the deliberations of the Human Rights Management Committee pursuant to Article 35 regarding human rights violation incidents
6. Administrative support for the Human Rights Management Committee pursuant to Article 24
7. Oversight of other matters related to human rights management

#### **Article 21 (Human Rights Education)**

- ① The Head of the Management Support Division shall conduct systematic human rights education at least once per year to enhance the human rights awareness of all employees.
- ② Hanssem Co., Ltd. shall conduct human rights education for stakeholders, such as partner companies, when necessary to spread a culture of respect for human rights.
- ③ The human rights education under Paragraphs 1 and 2 may be conducted through appropriate methods, such as online or in-person training, considering Hanssem Co., Ltd.'s annual training schedule and timing. However, human rights education must be included in training for new employees, promoted employees, and managers.

#### **Article 22 (Support for Partner Companies' Human Rights Respect Obligations Implementation)**

- ① Hanssem Co., Ltd. shall require partner companies to practice human rights management and provide necessary support.
- ② Hanssem Co., Ltd. may verify partner companies' compliance with human rights respect through methods such as surveys or on-site visits.

#### **Article 23 (Disclosure of Information Regarding Human Rights Management)**

Hanssem Co., Ltd. shall regularly disclose information regarding human rights management through its website or annual reports (such as sustainability reports).

### **CHAPTER 4 HUMAN RIGHTS MANAGEMENT COMMITTEE**

#### **Article 24 (Establishment and Functions)**

① Hanssem Co., Ltd. shall establish a Human Rights Management Committee (hereinafter referred to as the "Committee") to protect and promote the human rights of employees and other stakeholders. The Committee serves as the highest decision-making body for determining key matters related to the promotion of human rights management and performs the following roles:

1. Deliberation and decision on matters concerning the establishment and modification of plans, systems, and policies related to human rights management
2. Decision on matters concerning human rights practices and monitoring obligations, including human rights impact assessments
3. Deliberation on received human rights violation cases and decision on remedial measures
4. Deliberating and deciding on other matters deemed necessary for review by the Chief Executive Officer or the Chairperson.

② The Human Rights Management Committee shall consist of at least five members, including the Chairperson (Head of the Management Support Headquarters), with at least three external members. External members shall include diverse stakeholders such as human rights experts, legal experts, supply chain representatives, and community representatives to ensure objectivity and expertise.

③ One secretary shall be appointed to handle committee affairs, and the secretary shall be the head of the team responsible for human rights management.

#### **Article 25 (Convening)**

① The committee shall hold regular meetings at least once a year. The committee may be convened for deliberation when deemed necessary by the Chairperson or when a human rights violation incident occurs.

② Committee meetings shall be convened with the attendance of a majority of the total members and decisions shall be made by a majority vote of the attending members. Decisions on disciplinary actions shall require the approval of at least two-thirds of the attending members. To ensure the independence and objectivity of cases, the committee may be composed and operated primarily with external members.

③ The chairperson of the committee shall have a vote.

④ Deliberations and resolutions of the committee shall strictly adhere to the principle of confidentiality to protect the privacy of victims and related parties and ensure the fairness of the case.

#### **Article 26 (Prohibition of Disclosure of Confidential Information)**

Committee members and relevant personnel attending committee meetings shall not disclose to third parties or publicly reveal any confidential information learned in the course of their duties. However, upon request from public institutions such as courts or police, the committee may decide whether to disclose such information through deliberation and resolution.

## **Chapter 5 Human Rights Impact Assessment**

### **Article 27 (Conducting Human Rights Impact Assessments)**

- ① Hanssem Co., Ltd. shall conduct a human rights impact assessment at least once a year as part of its human rights practice and monitoring obligations.
- ② Hanssem Co., Ltd. may conduct human rights impact assessments on matters affecting the human rights of employees and stakeholders, such as company operations, the enactment or amendment of specific laws and regulations, policies, or business activities.
- ③ The Human Rights Management Officer shall oversee the human rights impact assessment and may request relevant materials from each department.
- ④ Human rights impact assessments may be outsourced to external specialized agencies when deemed necessary.
- ⑤ The Human Rights Management Committee reviews and adopts the results of human rights impact assessments, including the findings from the human rights status survey under Article 28 and the human rights risk due diligence under Article 29.
- ⑥ Detailed procedures and methods for human rights impact assessments shall be established and implemented by the head of the responsible organization based on the specific matter.

### **Article 28 (Human Rights Status Survey)**

- ① Hanssem Co., Ltd. shall conduct a human rights status survey at least once a year targeting employees, partner companies, stakeholders, etc., to review the status of human rights management.
- ② The human rights status survey shall be administered by the department responsible for human rights management. If deemed necessary, it may be outsourced to an external specialized agency.
- ③ The results of the human rights status survey shall be reported to the Committee and reflected in the human rights management promotion plan and improvement activities.

## **Article 29 (Human Rights Risk Due Diligence)**

- ① Hanssem Co., Ltd. shall conduct human rights risk due diligence at least once a year to identify, prevent, and mitigate risks of human rights violations that may arise in its overall business activities and among its stakeholders.
- ② If risks of human rights violations are identified during the human rights risk assessment, recommendations for improvement may be made to the relevant organization.
- ③ The results of the human rights risk assessment shall be reported to the Committee and disclosed in external reports such as the Sustainability Report.

## **CHAPTER 6 REMEDY PROCEDURES FOR HUMAN RIGHTS VIOLATIONS**

### **Article 30 (Remedy Procedures for Human Rights Violations)**

Hanssem Co., Ltd. operates the following procedures for remedying human rights violations.

1. Hanssem Co., Ltd. shall establish and publicize remedial procedures, including the Grievance Consultation Center under Article 31, the Investigation Department under Article 32, and deliberation by the Human Rights Management Committee under Article 33, to ensure victims of human rights violations can freely consult and report while their identity is protected.
2. All stakeholders affected by Hanssem Co., Ltd.'s management activities may utilize the consultation and reporting system to seek redress if their human rights, as guaranteed by international human rights norms including the "Hanssem Co., Ltd. Human Rights Management Charter," the Constitution of the Republic of Korea, and laws, have been violated.
3. Hanssem Co., Ltd. provides the necessary human and financial resources to ensure the effective operation of the consultation and reporting system.
4. The consultation and reporting system must be easily accessible and usable by thoroughly eliminating barriers to its use, such as protection of the victim's identity, language barriers, costs, and fear of retaliation.
5. Detailed procedures and methods for redressing human rights violations shall apply or be applied mutatis mutandis to this guideline based on the content of the human rights violation report. Depending on the case, the Chief Executive Officer may separately determine them.

### **Article 31 (Consultation and Reporting)**

- ① Hanssem Co., Ltd. shall establish and operate a Grievance Consultation Center within its human rights management organization to handle consultations and reports regarding human rights violations.
- ② Hanssem Co., Ltd. shall actively communicate various reporting methods, including online reporting channels (such as the Cyber Audit Office), both within and outside the organization, to ensure employees and stakeholders recognize the role of the Grievance Consultation Center and can freely access it.
- ③ Any person who has suffered a human rights violation or becomes aware of such a violation may report it through various methods, including verbally, in writing, via email, or through online reporting channels, and anonymous reporting is guaranteed.
- ④ If a supervisor becomes aware of a human rights violation occurring within their responsible organization, they must report it immediately to the Grievance Counseling Center or the Human Rights Management Department.
- ⑤ During counseling sessions with victims, care must be taken to ensure the victim does not experience sexual humiliation or shame. Counseling must be conducted in a separate space, such as a counseling room, to allow the victim to consult in a comfortable atmosphere.

### **Article 32 (Receipt and Initiation of Investigation)**

- ① Upon receiving a consultation or report, the Grievance Counseling Center shall schedule a consultation with the victim within 3 days of the date of receipt, conduct the consultation within 7 days, and initiate an investigation without delay. However, if there are substantial reasons making it difficult to proceed with the consultation, the above deadlines may be extended.
- ② When requesting an investigation, the Grievance Counseling Center shall transfer all consultation records, consultation content confirmation documents, and other relevant materials to the investigating department.
- ③ If the human rights violation involves sexual harassment, sexual violence, assault, etc., the investigation must be requested from the investigation department without delay. However, for specific violation cases, it shall be referred to the designated department.
- ④ If the human rights violation does not fall under the examples in the preceding three paragraphs, the investigation shall, in principle, be requested from the investigation department. However, if the victim explicitly expresses unwillingness or refuses to cooperate with the investigation, the investigation may not be requested.

⑤ The investigation department shall respect the victim's wishes when conducting an investigation. However, an investigation may be initiated even if the victim does not wish for one in any of the following cases:

When the severity and repetition of the human rights violation are deemed to seriously undermine organizational order

When there is concern about additional victims occurring or when multiple victims are involved

When objective fact-finding is essential for the fair exercise of disciplinary authority against the perpetrator

When it is unavoidable for the company to fulfill its legal obligations

Other cases equivalent to the above items

⑥ Consultations (reports) received anonymously shall be handled according to the following criteria.

When the consultation (report) contains specific factual details

a. If the victim's statement is confirmed and they wish to proceed with the case, an investigation shall be initiated.

b. If the victim's statement cannot be verified or the victim explicitly declines case processing, the case shall be closed.

If the consultation (report) content consists solely of conjecture or suspicion, the applicant (reporter) shall be requested to submit supporting evidence to verify the facts within a period of 10 days or more.

a. If the submitted materials allow for the ascertainment of the facts and the victim's statement and desire for case processing are confirmed, an investigation shall commence.

b. If the conditions in subparagraph a above are not met, the case may be closed.

However, if the specific facts correspond to any of the items in Article 32, Paragraph 5, an investigation may commence even if the victim's statement is not confirmed.

### **Article 33 (Conduct of Investigation)**

① The investigation of human rights violation cases shall be conducted by the human rights management organization and designated departments.

② The investigation shall, in principle, be completed within 20 days from the date of report receipt; however, it may be extended within a 10-day range if necessary.

- ③ When the investigating department conducts the investigation directly, an investigator of the same gender as the victim or perpetrator, if possible, shall be assigned.
- ④ If investigative agencies such as the police or prosecution conduct an investigation regarding a human rights violation case, the company shall actively cooperate with the investigative agency's requests regardless of whether the company's investigation has commenced or concluded. If necessary, the company may suspend its own investigation until the results of the investigative agency's inquiry are confirmed.
- ⑤ If the victim requests investigation or handling by another agency in accordance with laws and regulations during an ongoing investigation, or explicitly opposes the investigation, the investigation department may suspend the investigation. However, this may not apply if the matter falls under any of the items in Article 32, Paragraph 5.
- ⑥ During the investigation process, care must be taken to avoid damaging the victim's dignity and reputation, and all information learned during the investigation must be kept confidential.
- ⑦ If the matter is deemed serious or requires a fair and professional investigation, the Committee may involve external experts in the investigation process or request an external specialized agency to conduct the investigation.
- ⑧ Upon completion of the investigation, the investigator shall prepare an investigation report and report it to the Committee without delay.

#### **Article 34 (Protection of Victims and Prevention of Secondary Harm)**

- ① Hanssem Co., Ltd. shall respect the victim's wishes during the investigation and deliberation period and take appropriate protective measures, such as changing the victim's work location, granting paid leave, or separating the victim from the perpetrator in terms of work duties and physical space.
- ② All company members shall not engage in any acts that cause secondary harm to the victim or others, including the following:
  1. Attempting to conceal or minimize the incident
  2. Coercing the victim to withdraw the report or reach a settlement against their will
  3. Disclosing details about the incident, personal information, or reputation to others
  4. Blaming the victim or shifting responsibility
  5. Defending or supporting the perpetrator without justifiable reason
  6. Other acts equivalent to or similar to the above that cause secondary harm

③ Hanssem Co., Ltd. shall not impose any disadvantage, such as dismissal, disciplinary action, or unfair treatment, on victims or others based on reporting human rights violations, making statements, or submitting materials.

### **Article 35 (Review and Resolution of Human Rights Violation Cases)**

① Based on the investigation report, the Committee may deliberate and resolve on the following matters:

1. Determination of the existence of a human rights violation (sexual harassment, workplace bullying, secondary harm, etc.)
2. Decision on disciplinary action (including measures against the perpetrator)
3. Protective measures for the victim
4. Measures to prevent recurrence
5. Other matters requiring deliberation related to human rights violation cases

② The Human Rights Management Committee may decide on the following dispositions based on the investigation results, and multiple dispositions may be imposed concurrently.

1. Dismissal: The report is dismissed if the investigation finds no human rights violation or if the facts of a human rights violation are not substantiated. In this case, the disposition decision is notified to the victim.
2. Mediation: Based on the confirmed facts, if the perpetrator and victim are identified and the victim requests or applies for it, a mediation decision may be made.
3. Apology: Subject to the perpetrator's consent, the perpetrator may be required to apologize to the victim. However, this shall not proceed if the victim does not consent or explicitly refuses.
4. Referral to Disciplinary Committee: If the investigation concludes a human rights violation occurred, the Human Rights Management Committee may resolve to refer the perpetrator to the Disciplinary Committee. However, referral to the Disciplinary Committee may be omitted if a decision under Item 2 or Item 3 is made.
5. Recommendation for Judicial Action: If the matter is deemed extremely serious, the Committee may recommend judicial action to the Chief Executive Officer or the head of the legal affairs department, in addition to the disciplinary action under Item 4.

③ Hanssem Co., Ltd. shall respect the Committee's decision and implement it without delay unless there are special reasons.

- ④ The Committee may hear the victim's opinion regarding the measure before taking action against the perpetrator.
- ⑤ If a resolution concerning a human rights violation involves a specific committee member, that member shall not participate in the deliberation of that case.
- ⑥ The investigation department shall notify the victim and the perpetrator of the deliberation results within three days after the Human Rights Management Committee concludes its deliberation.
- ⑦ The deliberation result shall be considered final unless there are special reasons. However, a party (victim, perpetrator, etc.) who objects to the deliberation result may request a rehearing in writing to the responsible organization within 10 days of receiving notification of the result if the case falls under any of the following subparagraphs. Each party is permitted only one rehearing request.
  1. New evidence related to the case has been discovered
  2. The existence of a reasonable basis for the request
  3. Procedural issues were present in the original deliberation process
  4. Other substantial reasons exist that necessitate a request for reconsideration
- ⑧ Upon receiving a request for reconsideration, the responsible organization shall review the content and related materials and report to the Chairperson.
- ⑨ If the grounds for the retrial application fall under any of the items in Paragraph 7, the Committee Chairperson may convene the Human Rights Management Committee for the retrial and, if necessary, instruct the investigation department to conduct a re-investigation. However, if the grounds for the application are merely dissatisfaction with the deliberation result or are not deemed reasonable, the application may be dismissed within 7 days of its receipt.
- ⑩ The investigation department shall promptly complete the reinvestigation and report the results to the Human Rights Management Committee.
- ⑪ If the Committee Chairperson does not dismiss the request for reconsideration, they shall convene the Human Rights Management Committee within 20 days of receiving the request, or within 20 days of receiving the reinvestigation results if a reinvestigation is conducted.
- ⑫ The results of the reconsideration shall be notified to the applicant in writing, and the results of the reconsideration shall be considered final.
- ⑬ The Chief Executive Officer shall ensure that the Committee can deliberate on human rights violation cases independently and fairly and shall take necessary measures.

## **CHAPTER 7 Protection of Victims, etc.**

### **Article 36 (Prohibition of Disadvantageous Measures)**

The company and its organizational members shall not take disadvantageous measures ('secondary harm') against victims, reporters, assistants, or representatives for reasons such as consulting on human rights violations, requesting investigations, or cooperating, as specified in the following items.

1. Dismissal, removal, termination, or other disadvantageous measures resulting in loss of status
2. Disciplinary action, suspension, reduction in salary, demotion, restriction on promotion, or other unfair personnel measures
3. Failure to assign duties, reassignment of duties, or other personnel measures against the individual's will
4. Discrimination in performance evaluations or peer assessments, or resulting discriminatory payment of wages or bonuses
5. Restriction of opportunities for education and training for professional development and improvement, or other discriminatory measures negatively impacting working conditions
6. Acts causing mental or physical harm, such as collective exclusion, assault, or verbal abuse, or acts of neglect allowing such acts to occur (including harm caused by acts using information and communications networks)
7. Other unfavorable treatment against the will of the victim, reporter, helper, or representative

### **Article 37 (Victim's Request for Protective Measures)**

The victim may request the company to take the following measures:

1. Separation of duties or workspace from the perpetrator
2. Leave or suspension of duties during the investigation period
3. Transfer to a third department or position with guaranteed equal pay and status
4. Other reasonable measures necessary to prevent the victim from suffering unfair harassment due to applying for human rights violation counseling, reporting, or making a complaint

### **Article 38 (Company Protective Measures)**

① The company may take appropriate measures to protect the victim, such as changing the workplace, ordering remote work, granting paid leave, or providing counseling for psychological stress. However, measures contrary to the victim's wishes shall not be taken.

② When an investigation confirms the occurrence of a human rights violation, the company shall take appropriate measures, considering the victim's wishes if necessary, such as changing the workplace, reassigning duties, granting leave, or providing medical and psychological counseling support.

### **Article 39 (Confidentiality)**

① The company shall ensure the victim's identity remains undisclosed throughout the entire process of handling human rights violation cases. However, if anonymity is difficult to guarantee, the victim must be notified in advance.

② No person who becomes aware of a human rights violation shall disclose such facts to anyone else within the workplace (including other superiors) or outside the workplace, except by reporting it to the designated reporting office.

### **Article 40 (Exceptions to Confidentiality)**

The confidentiality provisions of these guidelines shall not apply in the following cases:

1. When providing necessary information to the Chief Executive Officer, Head of Management Support Headquarters, investigating department, expert advisors, Human Rights Management Committee members, Disciplinary Committee members, etc., for the investigation or handling of the case.
2. When requested by relevant authorities such as courts, police, or public institutions.
3. Other cases equivalent to the above items.

## **CHAPTER 8 PREVENTION OF SECONDARY DAMAGE**

### **Article 41 (Company's Responsibilities)**

① The company shall devise and implement all necessary measures to prevent secondary harm in human rights violation cases, including the following:

1. Conducting secondary harm prevention training
  2. Establishing protective measures for secondary victims
  3. Establishing disciplinary or other sanctions against those who cause secondary harm to victims
  4. Establishing a grievance handling procedure for secondary harm
  5. Preparation of a Manual for Secondary Harm Prevention and Handling Procedures
  6. Development of measures to prevent recurrence of secondary harm
  7. Efforts to establish an equitable organizational culture, such as regular surveys on the status of secondary harm and satisfaction with prevention training
- ② To implement the measures under Paragraph 1, the company shall include content related to secondary harm prevention in its human rights training.
- ③ If the company determines that an external expert or other non-member has caused secondary harm to a victim during the investigation or deliberation of a human rights violation case, the company shall immediately remove them from the relevant investigation or deliberation committee.

#### **Article 42 (Responsibilities of Officials)**

- ① An official shall report any awareness of secondary harm arising from a human rights violation case to the reporting office immediately upon becoming aware of it.
- ② The responsible officer shall endeavor to protect the victim until the case is resolved to prevent secondary harm.
- ③ The responsible officer shall actively cooperate with the following measures:
1. Victim protection measures during the grievance handling process
  2. Measures to prevent secondary harm by members
  3. Measures to listen to and resolve the victim's grievances
- ④ After the grievance resolution is concluded, the responsible officer shall observe whether the victim has suffered secondary harm and shall make efforts to prevent secondary harm, such as establishing an organizational culture that prevents acts causing secondary harm by members.

#### **Article 43 (Responsibilities of Members)**

Members of the company (including perpetrators) shall not engage in any of the following acts that could cause secondary harm in relation to human rights violation incidents.

1. Acts to conceal or downplay the incident
2. Acts to withdraw a grievance application against the victim's will or to coerce or pressure the victim into reaching an agreement with the perpetrator of workplace sexual harassment or bullying
3. Disclosing the details of the grievance, the victim's personal information, or matters concerning the victim's reputation to others (including acts using information and communications networks)
4. Blaming the victim or attempting to shift responsibility onto the victim
5. Defending or supporting the perpetrator without justifiable reason
6. Mentioning the facts of the harm to the victim and surrounding individuals or attempting to confirm the facts of the harm without justifiable reason
7. Spreading malicious rumors about the victim and their supporters
8. Other acts causing secondary harm to the victim that are equivalent to the above

#### **Article 44 (Duties of the Grievance Counselor and Others)**

- ① The Grievance Counselor shall provide the victim with a detailed explanation of the company's secondary harm prevention procedures to ensure the victim fully understands and can utilize the internal company procedures.
- ② The grievance counselor shall monitor the implementation of secondary harm prevention measures requested by the victim and support measures to minimize harm, such as reporting the results to the head of the investigating department after counseling the victim.
- ③ The grievance counselor shall ensure that personal information learned during the secondary harm handling process is not disclosed to other members.
- ④ Grievance counselors, case investigators, and deliberation/decision-makers shall not engage in any of the following acts that cause secondary harm to the victim during the investigation, deliberation, or decision-making process:
  1. Acts such as blaming or intimidating the victim
  2. Acts such as mentioning the victim's responsibility without justifiable reason
  3. Acts such as questioning the victim's intent in filing the grievance without justifiable reason
  4. Holding a preconceived judgment to deny the victim's harm without justifiable reason or treating it as trivial
  5. Inappropriately questioning the victim's past words or actions without justifiable reason

6. Defending or supporting the perpetrator without justifiable reason
7. Having the perpetrator present against the victim's will
8. Coercing witnesses or obstructing statements from the victim's perspective
9. Informally discussing the incident without justifiable reason.
10. Any other act causing secondary harm equivalent to the above.

## **CHAPTER 9 MEASURES AGAINST THE PERPETRATOR**

### **ARTICLE 45 (Suspension from Duty etc.)**

① When an investigation into a human rights violation incident begins, the Company may take appropriate measures against the perpetrator, such as suspension from duty. However, even before the investigation begins, the company may take measures such as suspension from duty as necessary.

② When the Human Rights Management Committee confirms the occurrence of a human rights violation through its deliberation, the company shall promptly take necessary measures against the perpetrator, such as disciplinary action, suspension from duty, or change of workplace. In such cases, the company may hear the victim's opinion regarding the measures.

### **Article 46 (Resignation Restriction)**

The company may restrict resignation within legal limits to prevent the perpetrator from evading disciplinary action through resignation, and shall make its best efforts to conclude and resolve the case within the restriction period.

## **CHAPTER 10 PREVENTION OF HUMAN RIGHTS VIOLATIONS**

### **Article 47 (Public Notice of Handling Details)**

The company may, upon the request of the victim and only to prevent recurrence of similar incidents and to prevent secondary harm to the victim caused by the spread of false rumors, publicly

announce the details of the handling of the human rights violation incident (including disciplinary facts) anonymously, based on a resolution of the Human Rights Management Committee.

#### **Article 48 (Measures to Prevent Recurrence)**

- ① The company may take necessary measures to prevent recurrence, such as issuing warnings to the perpetrator of the human rights violation and providing recurrence prevention training.
- ② The company may utilize all or part of the details of the human rights violation case handling as educational materials. However, this excludes cases where the victim objects.

#### Supplementary Provisions

Article 1 (Effective Date) This guideline shall take effect immediately upon approval by the Chief Executive Officer.

Article 2 (Relationship with Other Regulations) When establishing or revising other regulations concerning the human rights of stakeholders, including employees, or establishing related systems and policies, they shall be consistent with this guideline.

Article 3 (Revision of Guideline) Any revision to the content of this guideline shall require a resolution by the Human Rights Management Committee.