

Samsung C&T

Human Rights Policy



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Human Rights Management Principle

Samsung C&T (hereinafter “SCT” or “Company”) respects human rights, which are universal values of humanity. The Five Samsung Business Principles, proclaimed in 2005, prioritize respect for human rights, and SCT’s Compliance Code of Conduct and Code of Ethics reaffirm the Company’s policy of upholding human dignity and diversity, including human rights.

Grounded in the Company’s principles and policies, SCT respects not only the laws and regulations of the countries where it operates but also the social and cultural contexts of local communities and strives to coexist harmoniously with the communities. SCT identifies adverse impacts on human rights associated with its business activities and takes measures to prevent and mitigate such impacts. As a global company, SCT remains committed to fulfilling its corporate responsibilities and duties to the countries and communities where it operates.

Scope

This Human Rights Policy applies to all stakeholders of SCT, including employees, business partners, customers, governments, and local communities, and conducts stakeholder engagement activities accordingly.

Compliance with International Standards and Principles

SCT upholds internationally recognized human rights standards, including the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.

Key Aspects of Human Rights Management

- Prohibiting all forms of forced labor—including human trafficking and modern slavery—and child labor, complying with the minimum employment age specified by applicable laws of the countries where the Company operates
- Respecting the right to freedom of association and collective bargaining and prohibiting any form of unfair treatment or discrimination based on formation of a union or participation in union activities, including joining and leaving a union
- Complying with applicable wage laws, including minimum wage standards and fair compensation for overtime and holiday work, of the countries and regions where the Company operates
- Complying with the ILO Conventions on working hours (No. 1, No. 14, and No. 106) and regulations on regular and overtime working hours and days off in the countries where the Company operates
- Prohibiting discrimination in recruitment, promotion, compensation, training, or benefits

based on gender, race, ethnicity, nationality, religion, age, education, place of origin, marital status, gender identity, sexual orientation, political views, etc.

- Strictly prohibiting all forms of workplace bullying, sexual harassment, violence, rude and inappropriate behavior, and retaliation; and operating protection and monitoring channels and counseling services for both internal and external workers
- Minimizing human rights violations and adverse environmental impacts in the raw material procurement process and ensuring its traceability; and continuously monitoring conflict and responsible minerals
- Minimizing risks that may have social or environmental impacts on local communities, including conserving biodiversity and local cultural heritage; and engaging in community protection activities through collecting feedback and communicating with local residents
- Protecting personal information of stakeholders that may be collected during business operations; and complying with the applicable laws of the countries where the Company operates throughout the entire lifecycle of personal information, from collection to disposal
- Establishing and reinforcing the Company's occupational health and safety management system to prevent accidents and create safe working environment

Governance and Management System

SCT operates a company-wide governance system to effectively implement human rights management. The Board of Directors and the ESG Committee provide final approval for key objectives and action plans related to human rights management. Executives of each business group establish human rights management strategies and plans, conduct performance evaluations, and take necessary actions. HR teams identify and execute human rights-related tasks. SCT implements this Human Rights Policy together with all of its stakeholders. The Company monitors the implementation of human rights management through regular policy reviews and human rights risk management. It discloses the results of stakeholder engagement activities and related endeavors through its Sustainability Report.

Human Rights Risk Management Process

SCT undertakes the following activities to identify, prevent, and address human rights risks.

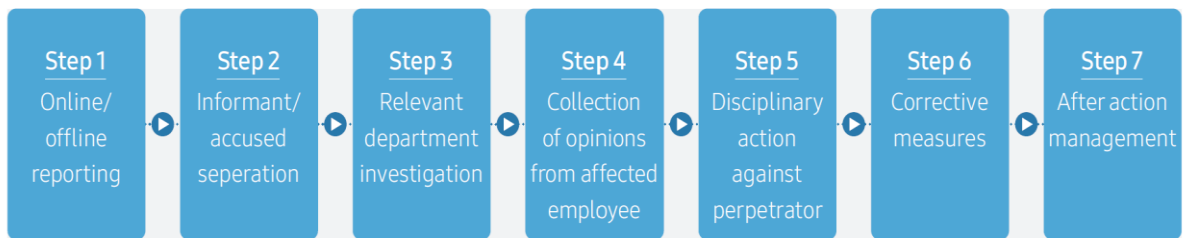
1) Human Rights Impact Assessment (HRIA)

- Human rights risk identification: Assess human rights risks at business sites of each business group by comprehensively analyzing various factors, such as results of self-assessment and on-site due diligence, news articles, NGO reports, stakeholder dialogue, and grievances from employees and stakeholders
- Human rights risk assessment and prioritization: Following identification of human rights risks, prioritize them based on their severity and likelihood
- Mitigation and remediation measures: Implement mitigation and remediation measures for risks identified through human rights due diligence at business sites; this includes monitoring of each measure, including addressing actual risks and preventing potential risks

2) Grievance Mechanism

SCT operates a grievance mechanism to address grievances related to human rights violations, and the mechanism applies not only to the employees of SCT but also to external stakeholders, including business partners, customers, governments, and communities.

SCT operates multiple reporting channels to identify the human rights issues of internal stakeholders, and the channels guarantee the anonymity of the reporter. Upon receipt of a report, the Company investigates the reporter, alleged perpetrator, and any witnesses. A deliberation committee and disciplinary committee—with participation of a legal expert, HR executive, employee representative, etc.—review the case and determine disciplinary measures. Moreover, an ombudsman is designated within the employee council to provide consultation at all times.



SCT has intake and processing procedures to address human rights issues of external stakeholders (business partners, customers, communities, etc.). Upon receipt of a report, the details of the complaint are reviewed and forwarded to the relevant department, and an investigation is conducted and corrective measures are implemented if necessary. After all procedures have been completed, the reporter is notified of the results, and each step of the process is transparently communicated through the reporting channel.

Reporting channels: e-mail: sr.samsungcnt@samsung.com

3) Stakeholder Engagement

SCT communicates key details of human rights risks identified and addressed through the HRIA and grievance mechanism to its stakeholders. The Company discloses major adverse human rights issues and corresponding corrective measures through its report, and shares step-by-step updates on the handling process with reporters via the grievance channel.