

[Appendix 1] Samsung C&T Supply Chain Code of Conduct

1. Overview

1) Purpose

This Code of Conduct was established to clarify the ethical, environmental, and social standards that all business partners of Samsung C&T (hereinafter “SCT”) must meet across their supply chains. It is grounded in internationally recognized standards, including the UN Universal Declaration of Human Rights, the ILO International Labour Standards, the OECD Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights. This Code specifies requirements related to labor and human rights, health and safety, environment, ethics, and management systems. By adhering to this Code, business partners are expected to enhance their business operations and thereby build trust-based relationships with SCT and achieve mutually beneficial growth.

2) Scope

This Code applies to all business partners—and their workers—that share interests or have a direct/indirect business relationship with SCT. All partners must comply with this Code in every aspect of their business activities with SCT and must also ensure that their suppliers adhere to the same standards. If the Code conflicts with local laws, the stricter standard is applied.

3) Responsibilities and Roles of Business Partners

Business partners must fully comply with the requirements of this Code in their management decisions and daily operations. SCT or a third party designated by SCT may assess compliance with this Code to the extent permitted by law. Based on assessment results, SCT may require improvement measures for any non-compliance identified, and partners must develop and implement improvement and mitigation measures.

This Code does not cover all requirements and may be updated or strengthened through periodic reviews. This Code is available on the SCT website.

2. Labor and Human Rights

SCT's business partners must protect and uphold the human rights and dignity of all types of workers in accordance with internationally recognized standards. All workers must be guaranteed the legal rights and working conditions stipulated under applicable local laws.

1) Prohibition of Forced Labor

All work must be conducted on a voluntary basis, and forced labor of any kind is strictly prohibited.

Business partners must not engage in any employment practices that exploit vulnerable individuals, including forms of modern slavery that occurs for the purpose of human trafficking and debt repayment (debt bondage). Unless required by law, partners must not request and retain, destroy, or conceal workers' identity documents or work permits, nor demand recruitment fees or deposits during the recruitment process. Terms and conditions of employment must be provided in writing, in a language that workers can understand, and they must be clearly delivered in a written document. Workers must be guaranteed freedom of movement and the right to resign their employment. Furthermore, partners must not procure goods or services from suppliers involved in forced labor, and upon confirmation of such practices, they must take appropriate corrective actions, such as improving the recruitment process.

2) Prohibition of Child Labor

The employment of child labor is strictly prohibited.

A "child" refers to the oldest of the following: (1) 15 years of age, (2) the age at which compulsory education ends, and (3) the minimum legal employment age defined by local laws. Adolescents above the legal minimum working age but under 18 may be employed, but must not perform hazardous work, including overtime or nights shifts, from a safety and health perspective, and measures must be taken to ensure that their educational opportunities are not limited due to work. Moreover, partners must not procure goods or services from suppliers involved in child labor, and upon confirmation of such practices, they must take appropriate corrective actions, such as strengthening age-verification procedures.

3) Compliance with Working Hours

Partners must adhere to all legal requirements on working hours.

They must comply with statutory regular working hours, such as the number of working days and overtime limits, and manage working hours, including rest breaks. Overtime work must be voluntary to the extent possible, and when unavoidable, workers must receive fair compensation. Partners must ensure workers receive legally mandated rest days. Special consideration must be given to pregnant or breastfeeding workers by eliminating overtime work and ensuring a safe working environment.

4) Wages and Benefits

Partners must pay wages in full compliance with applicable laws and regulations.

Wages provided to workers include minimum wages pursuant to the legal standards of each country, overtime pay, and benefits stipulated by the laws. Wages must be paid on a predetermined schedule together with a wage statement written in a language workers can understand. Overtime work must be compensated at a rate higher than the regular hourly wage, in accordance with local laws and regulations. Wage deductions as a form of punishment is prohibited.

5) Humane Treatment

All workers must be treated with dignity and respect.

Inhumane treatment—including sexual harassment or abuse, corporal punishment, mental or physical coercion, or the use of abusive language—or intimidation is strictly prohibited. Partners must establish and communicate policies and procedures that ensure humane treatment.

6) Prohibition of Discrimination and Harassment

Any form of discrimination or harassment is strictly prohibited.

Discrimination in recruitment, wage, promotion, compensation, training opportunities, etc. based on race, color, age, gender, gender identity, ethnicity, disability, pregnancy, religion, political views, union membership, marital status, etc. is not permitted. Partners must provide reasonable accommodations for workers' religious practices or disabilities. Partners must not require workers or candidates for medical tests that could be used for discriminatory purposes, except when legally required or necessary for safety. Moreover, workplace harassment that occurs by taking advantage of hierarchy, relationship, etc., goes beyond the scope of what is reasonable at work, and makes physical or psychological harm to other workers must be prohibited.

7) Freedom of Association and Collective Bargaining

Partners must respect workers' legal rights to freedom of association and collective bargaining.

Partners must respect workers' right to form or join worker councils or labor unions, right to freely associate with other workers for collective agreement or peaceful assembly, and the right to not engage in such activities, in accordance with applicable national laws. Partners must guarantee the right to collective bargaining, and at the same time, negotiate in good faith with the workers representatives on matters of collective bargaining. Workers and their representatives must be able to freely raise their thoughts and concerns about working conditions and management policy, without fear of discrimination, retaliation, intimidation, harassment, etc.

8) Contribution to Local Communities

Partners must support the sustainable development of local communities impacted by their operations.

This includes respecting residents' right to a healthy living environment and working to minimize adverse impacts on land, forests, and water resources, as well as impacts caused by noise, dust, etc. Moreover, partners must also respect and recognize the economic, social, and cultural rights of minority groups and indigenous peoples living near their operations, in alignment with the UN Declaration on the Rights of Indigenous Peoples.

3. Health and Safety

Partners must recognize that activities to safeguard workers' health and safety are essential for sustainable business operations. Partners must strive to maintain safe and healthy workplaces in compliance with applicable national laws and regulations.

1) Establishment of Health and Safety Management System

Partners must comply with all applicable health and safety laws and regulations of the country where it operates and manage relevant permits and licenses required for business operations.

To prevent health and safety accidents, partners must establish a health and safety management system that includes organization, strategy, processes, inspections, and training. Partners must actively protect workers who may be exposed to potential hazards and ensure that all permits and registrations related to health and safety are obtained, maintained, and updated in line with legal requirements.

2) Emergency Response

Partners must anticipate potential emergencies and accidents and take preventive measures in advance.

A documented emergency response plan—including reporting procedures, worker mobilization, and response protocols—must be in place for emergency events such as natural disasters, mass infection, fires, and other safety incidents. Partners must conduct regular emergency drills in accordance with applicable national laws, and routinely inspect fire detectors, fire alarms, firefighting equipment, evacuation routes, and emergency exits to minimize damage in the event of an emergency.

3) Occupational Accident and Illness Management

Partners must maintain a system to manage records of workers' occupational accidents and illnesses and support affected workers.

In case of an accident or illness, partners must take immediate action, such as suspending work, evacuating workers, and providing appropriate medical support. Root causes must be identified, and corrective measures must be established to prevent recurrence.

Workers must be granted mandated sick leave in accordance with legal standards or internal policies to ensure proper recovery from accidents and illnesses.

4) Risk Assessment

Partners must conduct regular and systematic risk assessments for all potential workplace hazards and risks that may affect workers' health and safety.

Assessment results must be documented and include detailed management plans, such as preventive and protective measures, training programs, and provision of protective equipment. Workers must be able to participate in hazard and risk reporting and assessments, and information on the accident risks and hazardous factors in workplace based on the assessment results must be provided to workers. Reassessments must be conducted promptly when changes occur—such as new processes, equipment modifications, or incidents. The information must be written in a language workers can understand and placed where it can be easily accessed. Workers must be free of retaliation or threat when reporting hazardous risk factors.

5) Reduction of Exposure to Hazardous Agents

Partners must identify and control exposure to hazardous agents—including chemicals, pathogen viruses, extreme temperatures, and radiation—that can have impacts on human health.

Partners must eliminate and prevent potential risks based on technological controls—such as correction and improvement of production facilities—as well as administrative controls according to legal and institutional requirements. When risks cannot be fully eliminated, appropriate protection equipment must be provided, and workers must be trained to recognize and safely handle hazardous agents.

6) Management of Physically Demanding Tasks

Partners must identify and control tasks that are physically demanding to workers.

To minimize the risks of physically strenuous tasks—including manual labor, heavy or repetitive lifting, task with long standing hours, or repetitive and energy-draining assembly work—partners must establish preventive measures such as optimizing workflow, using assistive equipment, and providing adequate rest breaks.

7) Health Management

Partners must monitor and promote the health of their workers.

Regular medical examinations for workers must be conducted in accordance with national laws and internal policies. When examination results indicate the need for improved working conditions, partners must take appropriate actions such as workspace modifications, job reassignment, or adjustment of working hours. Pregnant or breastfeeding workers must be excluded from tasks that may pose health or safety risks and must be provided with appropriate facilities and accommodations.

8) Provision of Sanitary Facilities and Accommodation

Companies must ensure workers have access to safe and sanitary working and living conditions and provide appropriate accommodations, if needed.

They must provide clean restrooms and drinking water, as well as areas for hygienic food preparation, storage, dining, and rest, and maintain them in safe, sanitary conditions. When accommodations such as dormitories are provided in consideration of the business characteristics or needs, they must be safe, clean, and equipped with adequate ventilation, lighting, hot water, and emergency exits. Moreover, workers must be ensured sufficient personal space and reasonable freedom of movement.

9) Health and Safety Education

Partners must provide appropriate health and safety trainings relevant to workplace hazards.

Training must be provided before assignment of duties, as well as through subsequent regular and ad hoc sessions. All training materials must be delivered in a language workers can understand. Information on workplace health and safety must be posted in visible locations.

10) Verification of Worker Job Suitability

Partners must verify workers' suitability and assign appropriate workers.

Major risks associated with each job—including location, time, and machinery, equipment, and facility used—must be identified, and management plans must be established. Suitable workers must be assigned considering factors such as age and health condition. Particularly, tasks requiring substantial knowledge or skills, or harmful or hazardous tasks must be performed by workers with the required qualifications, licenses, experiences, or competences.

4. Environment

Partners must comply with all applicable national laws and regulations and must thoroughly manage environmental pollutants generated from their operations. They must strive to minimize the environmental footprint of their products and services.

1) Establishment of Environmental Management System

Partners must comply with all applicable environmental laws and regulations of the country where they operate and manage the required environmental permits and licenses.

To mitigate environmental impacts from business activities, partners must establish an environmental management system—including organization, strategy, processes, assessments, and training—and proactively protect stakeholders who may be exposed to environmental risks. All required environmental permits and registrations must be obtained, maintained, and updated in accordance with the latest regulatory requirements.

2) Resource Conservation

Partners must reduce environmental impacts by minimizing resource consumption and improving efficiency.

Partners must regularly monitor their use of natural resources—including water, fossil fuels, minerals, and wood—as well as energy consumption. Reduction targets must be established and actively managed. Partners

must be dedicated to achieving the reduction targets and conserving resources through various measures, such as improving production process, enhancing maintenance, redesigning processes, adopting alternatives, and recycling and reusing.

3) Waste Management

Partners must minimize waste generation and manage unavoidable waste safely and legally.

Partners must establish systems to measure and track waste generation, regularly measure the emissions, and set and manage reduction targets. In particular, partners must increase reusing and recycling to minimize landfill and incineration. Proper procedures for waste storage, transportation, and disposal must be established to prevent environmental contamination throughout the waste management process.

4) Hazardous Chemical Management

Partners must safely manage hazardous chemicals handled during operations.

Use and emissions of hazardous chemicals must be regularly monitored, and reduction targets must be established and managed. Workers must be trained on the dangers of chemical leaks and safe handling procedures, and provided with appropriate protective equipment. Partners must have emergency response systems to address potential spills or leaks and manage chemicals in accordance with strict management standards to prevent adverse impacts on surrounding communities. Partners must strictly control the use of chemical substances that are banned or restricted under international conventions and national laws.

5) Atmospheric Environment and Air Pollution Control

Partners must manage air pollutant emissions generated during business operations and contribute to protecting air quality through reduction efforts.

Air pollutant use and emissions must be regularly measured by major emission source, and reduction targets must be established and monitored. Partners must install pollution control equipment—such as dust collectors, scrubbers, or filters—to meet applicable emission standards under international guidelines and national laws. Continuous monitoring must be conducted to ensure equipment efficiency.

6) Water and Wastewater Management

Partners must use water resources efficiently and prevent water pollution by treating wastewater safely.

Partners must regularly measure water use and wastewater discharge and set and manage reduction targets. Wastewater treatment systems must be installed to comply with effluent standards under international guidelines and national laws. Continuous monitoring must be performed to ensure that equipment is efficient and pollutants are not released into the drainage system.

7) Compliance with Substance Regulations

Partners must prevent the use of substances harmful to human health or the environment in all materials used in their products and components.

Partners must comply with international conventions and national laws regarding restricted or banned substances and ensure such materials are not used. Information on the substances contained in products or components must be disclosed transparently, and relevant documentation, certifications, etc. must be provided upon request.

8) Climate Change Response

Partners must improve energy efficiency and reduce greenhouse gas (GHG) emissions as part of climate change mitigation.

Partners must regularly measure energy use and Scope 1 and 2 GHG emissions for each business site, and are encouraged to measure Scope 3 emissions across their value chains. These measurements must be transparently disclosed. Partners must establish reduction targets aligned with international standards and establish and manage action plans to achieve them. Additionally, partners must cooperate with SCT's requests to provide data related to energy use and GHG emissions relevant to their business activities with SCT.

5. Ethics

Partners must comply with all applicable local laws and regulations in all business operations, and SCT requires its business partners to uphold the highest level of ethical standards.

1) Integrity and Anti-Corruption

Partners must conduct all business activities with honesty and integrity and must not tolerate any form of corruption or bribery.

They must establish their own anti-corruption policies and prevent corruption risks through internal whistleblowing channels and training programs. In accordance with applicable national laws, partners must not offer or receive any improper benefit—including bribes, monetary gifts, entertainment, or preferential treatment—to or from public officials, customers, or third parties.

2) Prohibition of Conflicts of Interest

Personal interests must not conflict with the fair interests of the company.

Potential conflicts of interest—such as transactions with family members or relatives or personal shareholding interests—must be disclosed in advance. Regular monitoring must be conducted to prevent conflicts, and any actual conflict must be reported immediately and reviewed through an independent process.

3) Accuracy of Disclosure and Reporting

All transactions must be transparent and accurately recorded in ledgers and business records.

Accounting, taxation, expense reimbursement, etc. must comply with international accounting standards and applicable national laws. Information related to labor and human rights, health and safety, environment, governance, financial status, business activities, and business performance must be disclosed in accordance with applicable national laws and common industry practices. Falsification or concealment of records regarding the status and practices relating to relevant areas within the supply chain is strictly prohibited.

4) Intellectual Property Protection

Partners must respect intellectual property rights and must not unlawfully or unethically use or infringe upon them.

Technology and know-how transfers must be conducted in a manner that protects intellectual property. Information belonging to all business-related parties must be securely protected.

5) Personal Information Protection

Partners must make reasonable efforts to protect the personal information of workers, customers, and stakeholders.

They must comply with applicable national personal information protection and information security laws when collecting, storing, processing, transferring, or sharing personal information. Collected personal information must be safely stored and managed by minimizing access, and measures must be taken to prevent data leakage, misuse, and abuse.

6) Fair Trade and Competition

Partners must adhere to the principles of fair and free competition and ensure transparency and integrity in all transactions and promotional activities.

They must comply with applicable national fair trade laws and standards and must not engage in practices that restrict fair market competition, including abuse of superior bargaining power, price fixing, monopoly, or deceptive or misleading advertising.

7) Confidentiality and Non-Retaliation

Partners must protect the identity of whistleblowers who report unlawful or unethical conduct, except where disclosure is required by law.

Partners must have anonymous reporting channels accessible to everyone. Reports must be promptly investigated through independent and fair procedures, and results and corrective actions must be communicated transparently. The identity of whistleblowers must be kept confidential, and whistleblowers

must be protected from disadvantageous actions such as retaliation. To ensure the credibility of the reporting system, its operational performance must be regularly reviewed.

8) Responsible Management of Raw Materials

Applying responsible procurement standards throughout their supply chains, partners must not handle raw materials or inputs associated with human rights or environmental violation in the production process or those produced to finance conflicts.

In line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, partners sourcing minerals such as 3TG (tin, tungsten, tantalum, gold), cobalt, or lithium from conflict-affected or high-risk areas must establish procedures to trace smelters and origins. Moreover, partners using raw materials such as palm oil, wood, fur, leather, or fiber must establish procedures to verify origins. Through these procedures, partners must monitor for potential involvement in social or environmental issues, including serious human rights violations, ethics breaches, or adverse environmental impacts. If there is reasonable doubt that there may be adverse environmental impacts or that the materials were sourced unethically, partners must establish policies prohibiting the use of such materials. Upon SCT's request, documentation such as certificates of origin must be provided.

9) Anti-Counterfeiting

Partners must not use, manufacture, or sell unauthorized or counterfeit raw materials or inputs.

All materials and components must be procured from credible sources. Partners must reduce counterfeiting risks by establishing traceability systems that can verify the authenticity of items and through internal audits and external verifications. Upon identification of counterfeit items, they must be immediately reported, recalled, and blocked.

10) Legal and Regulatory Compliance

Partners must comply with all applicable national laws and international conventions related to import and export controls and economic sanctions.

They must not engage in transactions with countries, regions, companies, groups, individuals, etc. subject to export restrictions or economic sanctions. Changes in the laws must be regularly monitored, and internal policies and processes must be updated accordingly. Through preliminary assessments and training, partners must monitor potentially unlawful activities and take preventive measures.

6. Management Systems

Partners must establish management standards for labor and human rights, health and safety, environment, and ethics, at a level consistent with this Code or an equivalent standard. They must build sustainable management systems that integrate these standards into decision-making processes.

1) Management Responsibilities and Leadership

Senior management must demonstrate commitment to social and environmental responsibilities and promote this commitment internally and externally.

They must approve management standards and systems aligned with this Code or an equivalent standard, and communicate their commitment to comply with and improve them. They must establish strategies and targets to comply with the standards and systems, strengthen implementation by designating responsible organizations and managers, and regularly monitor and enhance progress.

2) Compliance with Regulatory Requirements and Stakeholder Expectations

Partners must strictly comply with all applicable laws and regulations across their operations and supply chains, as well as this Code and stakeholder expectations.

They must systematically analyze relevant requirements of each area in this Code, as well as national laws and regulations, and incorporate them into their management systems. Partners must regularly monitor regulatory updates and evolving stakeholder expectations and adjust their systems accordingly.

3) Risk Management

Partners must thoroughly manage risks associated with their business operations.

They must identify risks related to the requirements in this Code, as well as national laws and stakeholder expectations for each area. Companies must establish and manage a series of processes, including assessing the potential impact of the identified risks and establishing appropriate mitigation measures. Moreover, they must regularly monitor the implementation of these processes.

4) Supply Chain Management

Partners must communicate the requirements of this Code to their subcontractors and oversee their compliance.

They must encourage subcontractors involved in planning, engineering, selling, or manufacturing products and services to meet the standards in labor and human rights, health and safety, environment, and ethics required by this Code. In addition, systems must be established to promote participation of subcontractors in corporate responsibility initiatives aligned with this Code, and appropriate support must be provided. If violations or risks are identified, etc., subcontractors must be required to take corrective actions.

5) Training and Capacity Building

Partners must provide training to workers on the requirements of this Code and relevant laws.

They must implement the strategies and targets for each area, and develop and implement regular training programs to raise awareness of workers to ensure compliance with the laws and regulations. Moreover, the effectiveness of such programs must be periodically reviewed and improved as needed.

6) Communication and Stakeholder Engagement

Partners must transparently disclose performance in each area to stakeholders.

Strategies, targets, and performance results must be regularly communicated to various stakeholders, including workers, business partners, local communities, and customers. Partners must also operate channels for collecting stakeholder feedback.

7) Assessment and Monitoring

Partners must verify implementation performance through regular assessments.

They must conduct regular self-assessments to confirm compliance with targets and performance of each area, requirements in this Code, applicable laws, and stakeholder expectations. Partners must fully cooperate with assessments requested by customers or third-party organizations, if required.

Furthermore, timely corrective procedures must be established to address discrepancies identified through internal or external evaluations and assessments, investigations, or reviews.

8) Documentation and Records

Partners must maintain documentation and records that demonstrate compliance with this Code.

Strategies, targets, and outcomes must be documented and managed in a manner that enables verification. Records must be created, maintained, and disclosed in accordance with national legal standards and internal policies, with appropriate safeguards in place to protect confidentiality of the company and personal information. Partners must endeavor to provide relevant information when requested by SCT in relation to the implementation of this Code.

9) Grievance Mechanism

Partners must operate a grievance mechanism that enables workers to file a report if they confirm or recognize violations of laws or infringement of their rights or interests in the areas of labor and human rights, health and safety, environment, and ethics.

Workers must be protected against unfair treatment—such as dismissal, threats, retaliation, or ridicule—for filing a report, etc. Their identity and anonymity must be strictly safeguarded.

10) Compliance with the Code of Conduct

Partners must provide information on their compliance and implementation level to this Code during self-assessments or on-site due diligence conducted by SCT or its designated third-party verification body.

They must prepare and maintain factual documentation demonstrating compliance with this Code. Partners must develop plans to improve flaws or non-conformities identified through self-assessments or on-site due diligence and make diligent efforts to implement these plans.