

# Kumho Petrochemical ESG Policy and Guidelines

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## **Management Guidelines for 'Kumho Petrochemical ESG Policy and Guidelines'**

The purpose of the guidelines is to define a clear framework for the enactment, revision, abolition, and operation of all documents governed by the 'Kumho Petrochemical ESG Policy and Guidelines' (hereinafter referred to as the 'ESG policy'), as well as to stipulate unified procedures, ensuring a consistent approach to management.

### **Chapter 1 Scope of Policy**

#### Article 1 Scope

- 1) These guidelines apply to the enactment, revision, abolition, and operation and management of all documents included in the ESG policy, including charters, policies, and guidelines.

### **Chapter 2 Document Classification System**

#### Article 2 Definition of Document Classification

- 1) With the objective of clarifying the principles and procedures pertaining to the company-wide approach to ESG management, the ESG policy is classified into the following categories.
  - (1) Charter  
A top-level declaration document that outlines the organization's values, goals, authority, and responsibilities
  - (2) Policy  
A document that sets forth the organization's official stance on specific ESG issues and establishes criteria for decision-making
  - (3) Guidelines  
A document that sets out concrete procedures and implementation methods for executing policies

#### Article 3 Document Classification Number

- 1) To enhance document identification and streamline management, classification numbers are organized into three levels, main category, subcategory, and document code, as follows:
  - (1) Main Category: Assign 'K,' representing the first letter of 'Kumho Petrochemical' in English
  - (2) Subcategory: Use the first letter of the applicable ESG domain based on the document's content area  
  
E for Environment, S for Social, and G for Governance
  - (3) Document Code: Documents are structured according to the document hierarchy system and classified as primary and supplementary documents. Primary documents are assigned serial numbers, while supplementary documents, if present, are denoted separately using a hyphen along with an additional serial number.

Primary Document: Charter & Policy (format: 001~100), Supplementary Document: Guidelines (format: 000-1)

Example: K E 001 - 1

Main Category / Subcategory / Document Code (Primary Document – Supplementary Document)

Article 4 Policy Composition and Structure

- 1) Policy and guideline documents are composed of the following sections.
  - (1) Foreword: Outline the purpose, background, and objectives of the policy
  - (2) Main Body: Detail the concrete terms and contents of each policy article
  - (3) ADDENDUM: Specify the enactment, revision, and enforcement dates, along with any other supplementary information

**Chapter 3 Operations and Approval Process**

Article 5 Governance and Responsibility Structure

- 1) All ESG policy documents must undergo an approval process overseen by the ESG Committee prior to enactment. Revisions must also go through the same approval process.
- 2) Departments responsible for the ESG policy are accountable for executing the contents of the respective documents. The department in charge of ESG policy management monitors stakeholder demands as well as changes in applicable regulations and guidelines to continuously review the policy's appropriateness. If deemed necessary, enactment and revision are carried out through the ESG Committee's approval process.

■ Table. History of ESG Policy Enactments and Revisions

Document No.	Document Name	Enactment (YYY.MM.DD)	Revision History (YYY.MM.DD)				Notes
			1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	4 <sup>th</sup>	
KG001-1	Management Guidelines for 'Kumho Petrochemical ESG Policy and Guidelines'	2025.05.29					
KE001	Environmental Management Policy	2021.04.06	2022.06.24	2023.06.21	2024.05.28	2025.05.29	
KE002	Biodiversity Conservation Policy	2021.04.06	2022.06.24	2023.06.21	2024.05.28	2025.05.29	
KE003	No Deforestation Policy	2024.05.28	2025.05.29				
KS001	Safety and Health Management Policy	2021.04.06	2022.06.24	2023.06.21	2024.05.28	2025.05.29	
KS002	Human Rights Management Policy	2020.11.16	2022.06.16	2024.05.28	2025.05.29		
KS003	Supply Chain ESG Policy	2022.06.16	2023.06.21	2024.05.28	2025.05.29		
KS003-1	Supplier ESG Guidelines (Code of Conduct)	2020.11.09	2022.06.16	2024.05.28	2025.05.29		
KS004	Local Community Engagement Policy	2024.05.28	2025.05.29				
KG002	Ethical Management Policy	2021.06.29	2022.06.16	2024.05.28	2025.05.29		
KG002-1	Ethical Management Guidelines	2021.06.29	2022.06.16	2024.05.28	2025.05.29		
KG003	Anti-corruption and Compliance Policy	2025.05.29					
KG004	Information Security Policy	2025.05.29					
KG005	Corporate Governance Charter	2024.05.28	2025.05.29				
KG006	Policy on the Composition of the Board of Directors	2022.06.16	2023.06.21	2024.05.28	2025.05.29		
KG007-1	Reporting and Whistleblower Protection Guidelines	2023.06.21	2024.05.28	2025.05.29			

KG008	ESG Investment Policy	2023.06.21	2025.05.29				
KG009	Tax Policy	2022.06.16	2023.06.21	2024.05.28	2025.05.29		

## ADDENDUM

1. These guidelines came into effect on May 29, 2025.

# Environmental Management Policy

## **Foreword**

Kumho Petrochemical Co., Ltd. (hereinafter referred to as 'Kumho Petrochemical') hereby formulates this Environmental Management Policy (hereinafter referred to as 'the policy') with the aim of conserving the intrinsic natural and environmental assets of the Earth, thereby fostering a symbiotic relationship between humanity and the environment.

This policy sets out the scope and impact areas of Kumho Petrochemical's environmental efforts, encompassing both direct and indirect impacts across all business activities, including the full supply chain. It also establishes clear principles and standards for environmental management, with the goal of minimizing negative environmental impacts.

## **Chapter 1 Scope of Policy**

### Article 1 Scope

- 1) The policy applies to all executives and employees of Kumho Petrochemical. Additionally, all stakeholders involved in the entire supply chain, including partner companies and suppliers, are encouraged to implement 'the policy'.

## **Chapter 2 Risk Management**

### Article 2 Environmental Risk Management

- 1) In compliance with the provisions delineated within the policy, Kumho Petrochemical undertakes endeavors aimed at mitigating the adverse effects of its operations on the environment, while proactively identifying prospective environmental risks. The company institutes measures of mitigation or prevention in response to the identified risks and proactively forestalls potential hazards through continual management and surveillance.

## **Chapter 3 Governance**

### Article 3 Environmental Governance

- 1) Kumho Petrochemical executes environmental management initiatives in collaboration with pertinent departments, with a focal point on the Safety and Environment Planning Office, designated as the specialized entity overseeing environmental affairs. For substantial environmental concerns, approval is obtained from, or reports are submitted to, The Board of Directors and the ESG Committee, which serve as the highest decision-making bodies.

## **Chapter 4 Environmental Management Principles**

### Article 4 Establishment of Environmental Management Plan

- 1) Kumho Petrochemical establishes this Environmental Management Plan based on its ISO 14001-certified Environmental Management System, proactively and voluntarily striving to mitigate the environmental risks and negative impacts of its operations.

### Article 5 Compliance with Environmental Regulations and Permit Acquisition

- 1) Kumho Petrochemical diligently adheres to environmental regulations in the respective countries where its business sites are situated. In the event of any violations, and takes prompt and proactive measures to address and rectify the issue.

#### Article 6 Sustainable Products and Processes

- 1) With a commitment to reducing its environmental footprint, Kumho Petrochemical strives to bolster sustainable management practices by incorporating recycled and bio-based raw materials, minimizing resource utilization, and innovating low-carbon products.

#### Article 7 Greenhouse Gas and Energy Management

- 1) Consistent with its climate change mitigation strategy and objectives, Kumho Petrochemical endeavors to attain carbon neutrality by reducing reliance on fossil fuels and raw materials while progressively increasing the utilization of clean energy sources and optimizing energy efficiency.
- 2) Kumho Petrochemical regularly aggregates and monitors greenhouse gas emissions across Scope 1 to Scope 3 categories, along with energy consumption, to evaluate the environmental implications stemming from greenhouse gas emissions.

#### Article 8 Management of Pollutants

##### 1) Air Pollution Management

Kumho Petrochemical rigorously adheres to the Clean Air Conservation Act and associated regulations, ensuring that air pollutant emissions are maintained within limits set by applicable environmental regulations. Additionally, the company assesses the adoption of emission reduction facilities and technologies, process enhancements, and other measures to minimize and monitor emissions of air pollutants resulting from its operations.

##### 2) Soil Management

Kumho Petrochemical complies with the Soil Environment Conservation Act and associated regulations, employing strategies such as the installation of soil pollution prevention facilities, conducting inspections for soil contamination, and implementing monitoring practices to forestall soil pollution.

##### 3) Water Pollution Management

Kumho Petrochemical adheres to the Water Environment Conservation Act and applicable regulations, ensuring that water pollutant levels are remained within the limits established by applicable environmental regulations.

##### 4) Odor Management

Kumho Petrochemical adheres to the Odor Prevention Act and relevant regulations, managing odor levels to remain within legally permitted limits. Additionally, the company evaluates the implementation of odor prevention facilities, technologies, process improvements, and other measures to minimize and monitor odors resulting from its operations.

##### 5) Noise and Vibration Management

Kumho Petrochemical adheres to the Noise and Vibration Control Act and relevant regulations, ensuring that noise and vibration levels remain below the legally permissible standards. Furthermore, the company evaluates the implementation of noise and vibration prevention facilities, technologies, process improvements, and other measures to minimize and monitor noise and vibration levels resulting from its operations.

#### Article 9 Water Resource Management

- 1) Kumho Petrochemical acknowledges the critical importance of conserving water resources for sustainable use and undertakes initiatives to reduce and recycle water usage, assessing process improvements and facility investments to support these efforts.
- 2) Kumho Petrochemical identifies whether its business sites are situated in water-stressed areas, continuously monitors both water intake and usage in these regions, and considers water conservation activities in locations where business operations may pose risks.

#### Article 10 Chemical Management

- 1) To minimize the environmental impact of chemicals, Kumho Petrochemical identifies the chemicals utilized in its operations and products, and establishes and complies with appropriate management standards in accordance with the Chemical Substances Control Act and applicable regulations for each substance.

#### Article 11 Waste Management

- 1) To minimize waste generated from its operations, Kumho Petrochemical manages waste in accordance with the standards mandated by the Waste Management Act and related laws, and explores recycling options.
- 2) Kumho Petrochemical develops and administers waste management standards for each business site, and establishes and implements standards for the storage and transportation of waste to promote recycling.

#### Article 12 Raw and Ancillary Materials Procurement

- 1) Kumho Petrochemical endeavors to enhance the efficiency of raw and ancillary materials utilized in its business operations to mitigate environmental impact and avert unnecessary resource waste, while contemplating the procurement of environmentally friendly raw and ancillary materials. To achieve this, it institutes a system for the periodic tracking and monitoring of the usage status of raw and ancillary materials, and for the assessment of the environmental impact of procured materials and products.

#### Article 13 Product Environmental Impact Management

- 1) Kumho Petrochemical identifies and seeks to minimize the environmental impact of its products throughout their entire life cycle, from production to disposal, by conducting Life Cycle Assessments.
- 2) Kumho Petrochemical engages in activities aimed at minimizing the environmental impact of its products, such as enhancing product durability and developing technologies for recycling and reuse.

#### Article 14 Environmental Impact on Local Communities

- 1) Kumho Petrochemical strives to minimize and prevent any adverse environmental impacts on local communities resulting from its business activities, maintaining ongoing communication with the community to address and mitigate adverse environmental impacts.

### **Chapter 5 Internalizing Environmental Management**

#### Article 15 Grievance Handling and Reporting

- 1) Any individual can report instances of negative environmental impacts or risks through the Online Reporting Center (Online Friends) or internal reporting procedures established by the relevant department.
- 2) Further guidance on environmental management-related grievance handling and reporting, including the underlying principles and procedures, is provided in the 'Reporting Policy'.

Article 16 Education and Communication

- 1) Kumho Petrochemical consistently organizes educational activities and campaigns to raise the awareness of environmental significance among executives, employees, and stakeholders, and to internalize awareness of the need for environmental management.
- 2) Kumho Petrochemical ensures effective communication of key environmental management issues with executives, employees and stakeholders, and discloses information through various accessible channels.

## ADDENDUM

1. This policy came into effect on April 6, 2021.
2. This policy was revised and came into effect on June 24, 2022.
3. This policy was revised and came into effect on June 21, 2023.
4. This policy was revised and came into effect on May 28, 2024.
5. This policy was revised and came into effect on May 29, 2025.

## **Biodiversity Conservation Policy**

### **Foreword**

Kumho Petrochemical Co., Ltd. (hereinafter referred to as 'Kumho Petrochemical') hereby institutes the Biodiversity Conservation Policy (hereinafter referred to as 'the policy') to mitigate adverse effects on biodiversity arising from its business activities and to foster biodiversity conservation and the sustainable use of resources impacted by human activities.

The policy is based on relevant domestic and international laws and regulations, including the UN Convention on Biological Diversity and the protection area management categories of the International Union for Conservation of Nature, and aims to clearly define the scope and guiding principles of activities designed to prevent and minimize negative environmental impacts, as well as to conserve and restore ecosystems and biodiversity affected by business operations.

### **Chapter 1 Scope of Policy**

#### Article 1 Scope

- 1) The policy applies to all executives and employees of Kumho Petrochemical. Additionally, all stakeholders involved in the entire supply chain, including partner companies and suppliers, are encouraged to implement 'the policy'.

### **Chapter 2 Principles for Biodiversity Conservation**

#### Article 2 Biodiversity Impact Assessment and Conservation

- 1) Kumho Petrochemical identifies and mitigates the impact of its business activities on ecosystems and biodiversity, making efforts to prevent or minimize negative impacts. In cases where adverse impacts are anticipated or confirmed, measures are taken to conserve and restore ecosystems and biodiversity.

#### Article 3 Identification and Compliance with Regulations

- 1) Kumho Petrochemical identifies protected areas designated by the International Union for Conservation of Nature (such as World Heritage areas and IUCN Category I-IV protected areas) as well as the main biodiversity region. If any business site is located within such areas, the company ensures compliance with all applicable national and regional regulations.

#### Article 4 Minimization of Biodiversity Loss

- 1) If the business sites are located in or near areas of significant biodiversity, Kumho Petrochemical strives to prevent and minimize adverse impacts on biodiversity, pursuing a No Net Loss approach, and undertakes mid- to long-term conservation and restoration efforts with the goal of achieving a Net Positive Impact on ecosystems and biodiversity.

### **Chapter 3 Internalization**

#### Article 5 Internalization and Communication for Biodiversity Conservation

- 1) Kumho Petrochemical endorses and supports initiatives aimed at biodiversity conservation and protection. Additionally, the company provides education to executives and employees on the importance of ecosystems and biodiversity, as well as the potential impacts of business activities. The company also engages with key stakeholders, including those in the supply chain and local communities, to promote shared understanding of the value and significance of ecosystems and biodiversity.

## **ADDENDUM**

1. This policy came into effect on April 6, 2021.
2. This policy was revised and came into effect on June 24, 2022.
3. This policy was revised and came into effect on June 21, 2023.
4. This policy was revised and came into effect on May 28, 2024.
5. This policy was revised and came into effect on May 29, 2025.

# No Deforestation Policy

## Foreword

Kumho Petrochemical Co., Ltd. (hereinafter referred to as 'Kumho Petrochemical') sets forth the No Deforestation Policy (hereinafter referred to as 'the policy') with the aim of preventing and reducing potential forest destruction in the course of its business operations and promoting forest conservation.

This policy aligns with global standards such as the UN Strategic Plan for Forests and GFGs, along with pertinent domestic and international laws and regulations, including the UN REDD+ initiative and the protection area management categories of the International Union for Conservation of Nature, and aims to explicitly outline the scope and principles guiding endeavors to prevent and minimize forest destruction resulting from business activities while advancing the cause of forest conservation and restoration.

## Chapter 1 Scope of Policy

### Article 1 Scope

- 1) The policy applies to all executives and employees of Kumho Petrochemical. Additionally, all stakeholders involved in the entire supply chain, including partner companies and suppliers, are encouraged to implement 'the policy'.

## Chapter 2 Principles of Forest Destruction Prevention

### Article 2 Prevention of Forest Destruction and Conservation

- 1) Kumho Petrochemical prevents or minimizes forest destruction resulting from its business operations. When adverse impacts are anticipated or confirmed, the company promptly identifies and addresses them, actively working to conserve and restore affected forests.

### Article 3 Identification and Compliance with Regulations

- 1) Kumho Petrochemical identifies deforestation prevention and protected areas designated by the International Union for Conservation of Nature (such as World Heritage areas and IUCN Category I-IV protected areas). If any business site is located within such areas, the company ensures compliance with all applicable national and regional regulations.

### Article 4 Achievement of Net Deforestation Zero

- 1) Kumho Petrochemical aims to achieve Net Deforestation Zero by undertaking initiatives such as eliminating gross deforestation and reforestation activities within and surrounding its business sites.

## Chapter 3 Internalization and Communication

### Article 5 Internalization and Communication for Forest Destruction Prevention

- 1) Kumho Petrochemical endorses and supports initiatives aimed at forest destruction prevention and conservation. Additionally, it educates executives and employees on the significance of forest conservation and the effects of the company's activities on forests, while maintaining communication with key stakeholders, including supply chain and local communities, to convey the importance and value of forests.

## **ADDENDUM**

1. This policy came into effect on May 28, 2024.
2. This policy was revised and came into effect on May 29, 2025.

## **Safety and Health Management Policy**

### **Foreword**

Kumho Petrochemical Co., Ltd. (hereinafter referred to as 'Kumho Petrochemical') establishes and announces the Safety and Health Management Policy (hereinafter referred to as 'the policy') under the vision of being 'a Healthy Company Putting Safety First, Pursuing Shared Happiness,' and fulfills its social responsibility through a commitment to prioritizing and implementing safety and health management.

The policy is formulated based on the ILO Guidelines on Occupational Safety and Health Management Systems, the certification standards of the Safety and Health Management System (ISO 45001), and the Responsible Business Alliance Code of Conduct.

The policy aims to define the principles and scope of Kumho Petrochemical's safety and health management, to prevent occupational illnesses, various accidents, and industrial disasters among stakeholders, and to achieve the three main goals of 'Achieving ZERO Serious Accidents,' 'Setting an Autonomous Culture of Safety and Health,' and 'Establishing the Infrastructure for an Optimal Safety and Health Work System.'

### **Chapter 1 Scope of Policy**

#### Article 1 Scope

- 1) The policy applies to all stakeholders involved in Kumho Petrochemical's business activities and processes, including employees, partner companies, and contractors (hereinafter referred to as 'the stakeholders').
- 2) Kumho Petrochemical specifically identifies stakeholders vulnerable to safety and health risks, providing them with special attention and implementing all necessary measures to ensure they are not exposed to such risks.

### **Chapter 2 Risk Management**

#### Article 2 Safety and Health Risk Management

- 1) In accordance with the policy, Kumho Petrochemical undertakes safety and health management activities, such as developing safety and health infrastructure and fostering a culture of safety and health management, and conducts regular risk assessments to identify stakeholders likely to be exposed to safety and health risks, including potential major industrial accidents, serious injuries, and near-misses. Kumho Petrochemical implements mitigation or preventive measures for identified safety and health risks, evaluates the effectiveness of these measures, and proactively prevents risks through ongoing management, monitoring, while continually improving its safety and health enhancement measures.

### **Chapter 3 Governance**

#### Article 3 Safety and Health Governance

- 1) Kumho Petrochemical executes safety and health management via its Safety and Environment Planning Office, in cooperation with essential pertinent departments. Significant safety and health issues and accomplishments, policies, risk management strategies, and other critical aspects are

either approved by or reported to the highest governing body, such as the Board of Directors or the ESG Committee.

#### **Chapter 4 Safety and Health Management Principles**

##### Article 4 Compliance with Occupational Safety and Health Regulations

- 1) To protect the safety of its employees, partner companies, Kumho Petrochemical must strictly adhere to relevant laws and regulations, including the Occupational Safety and Health Act and the Serious Accident Punishment Act in the countries where its business sites are located.
- 2) Kumho Petrochemical actively rectifies any violations in accordance with these laws.

##### Article 5 Child Labor and Work of Pregnant or Nursing Female Workers

- 1) Kumho Petrochemical strictly prohibits the employment of children under the age of 15. Additionally, the company forbids adolescent workers under the age of 18, as well as pregnant or nursing female workers, from engaging in work that may be morally inappropriate or pose risks to their health and safety, including but not limited to, overtime, night or holiday shifts, and tasks involving the handling of hazardous substances.
- 2) Kumho Petrochemical must ensure the provision of suitable facilities for pregnant or nursing female employees.

##### Article 6 Safety and Health Management Within Business Sites and Workshops

- 1) Kumho Petrochemical must endeavor to establish a safe working environment for stakeholders while supporting the mental well-being and health of its employees and stakeholders.
- 2) Kumho Petrochemical must identify workers who may be exposed to safety and health risks and take measures such as facility enhancements, maintenance, and educational programs to mitigate or eliminate these risks.
- 3) Kumho Petrochemical must prevent health hazards and chemical-related accidents for stakeholders by implementing and adhering to appropriate management standards for a variety of chemicals used in each business site.

##### Article 7 Education and Risk Assessment

- 1) Kumho Petrochemical must provide regular safety and health training for all executives and employees to enhance their capabilities in safety and health management and prevent major accidents.
- 2) Following safety and health risk assessments, Kumho Petrochemical must take actions to prevent the recurrence of similar accidents by raising awareness of the assessment outcomes.

##### Article 8 Preparedness and Response to Emergencies

- 1) Kumho Petrochemical must identify potential emergencies at each stage of the process and prepare effectively to prevent and minimize damages. The company must establish and execute emergency response plans and related business processes, including suitable response scenarios for major incidents such as industrial accidents or fatalities.

##### Article 9 Industrial Accident and Disease Preparedness and Response

- 1) Kumho Petrochemical must establish protocols for preventing, managing, tracking, and reporting industrial accidents and work-related illnesses among workers, and implements suitable systems.

#### Article 10 Customer Safety and Health Management

- 1) In compliance with the Occupational Safety and Health Act, Kumho Petrochemical must provide Material Safety Data Sheets (MSDS) to customers for products manufactured using chemicals or mixtures containing them, aiming to prevent potential safety accidents during product handling processes.
- 2) Products containing hazardous substances must be equipped with appropriate warning signs, labels, and precautions on containers or packaging before shipment to ensure customers are not exposed to safety and health risks.

#### Article 11 Safety and Health Management for Partner Companies

- 1) Kumho Petrochemical must endeavor to prevent safety accidents at partner companies that are directly or indirectly affected by risks associated with the company's safety and health environment. Safety and health assessment, audit, and inspection plans for partner companies must be established and periodically executed to identify improvement measures.
- 2) To elevate the safety and health management standards of partner companies, Kumho Petrochemical must offer a safety and health cooperation program providing safety and health education support and incentives to partner companies, offers training on occupational safety and health rules for outsourced workers at each business site, and issues education certificates.

#### Article 12 Community Safety and Health Management

- 1) Upon receiving safety and health-related complaints from community members, Kumho Petrochemical must actively verify the content, select and review relevant matters and response strategies, and reports them to the designated personnel.
- 2) In the event of accidents threatening the safety and health of community members, appropriate measures, including emergency actions, must be promptly taken, and root causes and preventive measures for incidents and accidents must be determined.
- 3) Kumho Petrochemical communicates with local residents regarding the outcomes of community complaints and conducts satisfaction surveys.

### **Chapter 5 Safety and Health Management Internalization**

#### Article 13 Grievance Handling and Reporting

- 1) Any individual can report safety and health-related violations or identified risks through the Online Reporting Center (Online Friends) or the internal reporting procedures established by the relevant department.
- 2) Further guidance on safety and health management-related grievance handling and reporting, including the underlying principles and procedures, is provided in the 'Reporting Policy'.

#### Article 14 Education and Communication

- 1) Kumho Petrochemical consistently organizes educational activities and campaigns to raise the awareness of significance of safety and health management among executives, employees, and stakeholders, and to internalize this awareness.
- 2) Kumho Petrochemical ensures effective communication of key issues of safety and health management with executives, employees and stakeholders, and discloses information through various accessible channels.

- 3) Kumho Petrochemical establishes procedures that enable all employees, including their representatives, to raise safety and health concerns and provide feedback, fostering their active participation in enhancing safety and health management.

## **ADDENDUM**

1. This policy came into effect on April 6, 2021.
2. This policy was revised and came into effect on June 24, 2022.
3. This policy was revised and came into effect on June 21, 2023.
4. This policy was revised and came into effect on May 28, 2024.
5. This policy was revised and came into effect on May 29, 2025.

## Human Rights Management Policy

### **Foreword**

Kumho Petrochemical Co., Ltd. (hereinafter referred to as 'Kumho Petrochemical') is dedicated to nurturing a culture centered on the core value of "respect," wherein diverse stakeholders' viewpoints are honored, fostering trusting relationships. The company endeavors to uphold and advocate for fundamental human rights and human dignity. Kumho Petrochemical applies the Human Rights Management Policy (hereinafter referred to as 'the policy') across all its business sites and among its members, persistently working to establish operational frameworks for identifying and managing potential human rights risks and implementing human rights management practices.

Kumho Petrochemical respects and aligns with standards such as 'the UN Guiding Principles on Business and Human Rights (UNGPs)', 'the Universal Declaration of Human Rights', 'International Labour Organization standards', 'OECD Guidelines for Multinational Enterprises on Responsible Business Conduct', and 'the 10 Principles of the UN Global Compact', as well as domestic regulations such as 'the Labor Standards Act'.

The policy is formulated based on the aforementioned guidelines and standards, including the UN Global Compact's 'Guidance on Human Rights Due Diligence' and the Responsible Business Alliance's 'Global Code of Conduct,' with the aim of articulating the fundamental principles of human rights management that all Kumho Petrochemical members uphold and advance.

### **Chapter 1 Scope of Policy**

#### Article 1 Scope

- 1) The policy applies to all stakeholders, including executives, employees, contractors, supply chain, partner companies, customers, and members of the local community, with whom Kumho Petrochemical directly or indirectly engages in its business activities.

### **Chapter 2 Risk Management**

#### Article 2 Human Rights Risk Management

- 1) Kumho Petrochemical conducts human rights management activities in accordance with this policy and continuously improves human rights risks by identifying them.
- 2) Particularly, the company pays special attention to stakeholders vulnerable to human rights risks and takes all possible measures to prevent such risks.

### **Chapter 3 Principles of Human Rights Management**

#### Article 3 Respect for Human Rights

- 1) Kumho Petrochemical must respect the human rights of all members and stakeholders associated with the company, and takes care to prevent any acts that violate or abuse these rights. To this end, the company strictly prohibit any form of sexual discrimination, harassment, or bullying, as well as physical or mental coercion, including verbal abuse, and inhumane treatment, and strives to enhance awareness of human rights among its members through annual education on sexual harassment, workplace bullying, and disability awareness.

#### Article 4 Respect for Diversity, Equity & Inclusion (DEI) and Non-Discrimination

- 1) Kumho Petrochemical must prohibit all forms of discrimination based on gender, nationality, ethnicity, race, region, education, pregnancy or childbirth, age, disability, religion, gender identity, or political affiliation in recruitment, wages and compensation, promotion, welfare benefits, and education.
- 2) Kumho Petrochemical must provide equal opportunities to individuals who satisfy the required qualifications and criteria aligned with the company's talent profile, recognizes, and respects the diverse differences among its members.

#### Article 5 Prohibition of Child Labor

- 1) Kumho Petrochemical must strictly prohibit all forms of child labor. Accordingly, the company must not employ children under the age of 15, and comply with the standards for child and adolescent labor defined by the laws and regulations of the countries and regions where its business sites are located.
- 2) When employing adolescents under the age of 18, Kumho Petrochemical must not, under any circumstances, assign work that may be morally inappropriate or pose risks to their health and safety, including but not limited to, overtime, night or holiday shifts, and tasks involving the handling of hazardous substances.

#### Article 6 Prohibition of Forced Labor

- 1) Kumho Petrochemical must not engage in forced labor, slavery, human trafficking, debt bondage, or any form of labor that restrains individuals physically or mentally and deprives them of their freedom of choice.
- 2) Kumho Petrochemical must not require the transfer of personal identification, passports, or labor permits as a prerequisite for employment.

#### Article 7 Wage and Compensation

- 1) Kumho Petrochemical complies with minimum wage laws in all countries and regions of operation, ensuring workers are paid at or above the legal minimum. Where overtime is unavoidable, the company provides compensation in accordance with applicable regulations.
- 2) Kumho Petrochemical ensures that workers in equivalent roles receive equal payment without discrimination based on gender, employment status, disability, or any other factors, and routinely monitors adherence to this principle. Additionally, Individual performance and capabilities are evaluated fairly, and compensation is provided equitably based on the evaluation results.

#### Article 8 Annual Paid Leave

- 1) Kumho Petrochemical grants annual paid leave to workers in accordance with Article 52 of the company's employment regulations.

#### Article 9 Working Hours

- 1) Kumho Petrochemical must adhere to the maximum working hours and rest periods stipulated by the laws and regulations of the countries and regions where its business sites are located, ensuring that employees are not compelled to work beyond these limits.

#### Article 10 Advance Notice of Dismissal

- 1) In the event of dismissal due to organizational restructuring or other business-related reasons, Kumho Petrochemical commits to providing affected employees with a minimum of 30 days' advance notice. All related procedures will be carried out in full compliance with the applicable domestic Labor Standards Act.

#### Article 11 Prohibition of Workplace Harassment

- 1) Kumho Petrochemical must enforce a comprehensive prohibition against all forms of workplace harassment, including sexual harassment, violence, physical or mental coercion, humiliation, and verbal abuse, which inflict physical or mental distress on others and degrade the work environment. It must proactively strive to prevent such occurrences, particularly those exploiting positions or relational hierarchies.
- 2) Employees may report incidents of workplace harassment through established grievance channels. Detailed reporting procedures follow the 'Reporting Policy.'

#### Article 12 Freedom of Association

- 1) Kumho Petrochemical must respect worker's rights to freedom of association and collective bargaining as enshrined in the laws of the countries and regions where its business sites are located, abstaining from any unfair treatment or discrimination against workers engaged in the formation, participation, or activities of labor unions.
- 2) Kumho Petrochemical does not refuse collective bargaining without justifiable cause and faithfully implements agreements reached between the company and its employees. Furthermore, it should foster effective labor-management communication through regular and ad hoc meetings at each business site.

#### Article 13 Safety and Health

- 1) Kumho Petrochemical must remain committed to its safety and health management policy, conducting routine inspections and maintenance of facilities and equipment to ensure a safe working environment for executives and employees. Alongside providing preventive measures such as protective equipment and safety education to mitigate accidents, it must establish protocols for investigating, addressing and preventing work-related illnesses and accidents, subject to periodic review.

#### Article 14 Environment

- 1) Kumho Petrochemical must implement an Environmental Management Policy dedicated to preserving Earth's natural environment and fostering harmonious coexistence between humanity and its surroundings, diligently deploying measures to mitigate and prevent risks linked to its business operations.

#### Article 15 Supply Chain

- 1) Kumho Petrochemical must adhere to the principles and codes of conduct outlined in the 'Supply Chain ESG Policy' and the Supplier ESG Guidelines.' (hereinafter referred to as the 'Supply Chain Sustainable Management Policy') to ensure respect for human rights in the supply chain and fulfill its social responsibility.

- 2) Kumho Petrochemical must continuously monitor to prevent human rights risks, including child labor, forced labor, discrimination and bullying, conflict minerals, and responsible mineral procurement, which may arise within the supply chain.
- 3) In instances where human rights risks emerge or are anticipated within the supply chain, Kumho Petrochemical must develop and implement improvement measures.
- 4) Kumho Petrochemical must hold regular communication meetings within the supply chain and strive to enhance human rights standards throughout the supply chain by transparently disclosing the status of human rights risks and improvement outcomes.

#### Article 16 Customers

- 1) Kumho Petrochemical must ensure that it does not provide products and services that pose threats to the safety and health of customers by adequately considering customer safety and health in its business activities.
- 2) Kumho Petrochemical must handle and safeguard personal information in accordance with the Personal Information Protection Act and internal processing guidelines that reflect applicable regulations. Prior consent must be obtained from the data subject, especially when using the information for purposes beyond the original intent or when altering the purpose of use or retention period.
- 3) Kumho Petrochemical must establish relevant systems for customer information protection and must enhance security management to prevent information leakage.

#### Article 17 Local Communities

- 1) Kumho Petrochemical must identify, mitigate, and prevent human rights issues and risks that may arise in local communities as a result of its business activities. Additionally, the company must endeavor to address human rights issues faced by members of the local communities.

### **Chapter 4 Internalization of Human Rights Management**

#### Article 18 Grievance Handling and Reporting

- 1) Any individual can report instances of human rights violations arising from Kumho Petrochemical's business activities through the Online Reporting Center (Online Friends) or the internal reporting procedures established by the relevant department.
- 2) The responsible department disseminates information about the Online Reporting Center and enhances accessibility by providing employees with training on its use and procedures.
- 3) Further guidance on human rights management-related grievance handling and reporting, including types of reports and principles, is provided in the 'Reporting Policy'.

#### Article 19 Human Rights Impact Assessment

- 1) Kumho Petrochemical conducts human rights impact assessments to identify and evaluate human rights risks that may directly or indirectly affect stakeholders arising from its business activities, and formulates and implements mitigation and prevention measures for identified risks.
- 2) Kumho Petrochemical regularly monitors the effectiveness of its human rights risk mitigation and prevention measures and establishes future goals based on the assessment results.

#### Article 20 Internalization of Human Rights Management and Communication

- 1) Kumho Petrochemical consistently conducts educational activities and campaigns to internalize the respect for human rights and raise the sense of human rights management.
- 2) Kumho Petrochemical ensures effective communication of key human rights management issues with executives, employees and stakeholders, and discloses information through various accessible channels.

## **ADDENDUM**

1. This policy came into effect on November 16, 2020.
2. This policy was revised and came into effect on June 16, 2022.
3. This policy was revised and came into effect on May 28, 2024.
4. This policy was revised and came into effect on May 29, 2025.

## Supply Chain ESG Policy

### **Foreword**

Kumho Petrochemical Co., Ltd. (hereinafter referred to as 'Kumho Petrochemical'), guided by its the coexistence management philosophy to fulfill its corporate vision of being a "Solution Partner Creating Value Beyond Chemistry," fosters a culture of transparent and fair trade, which aligns with international standards and norms. In pursuit of sustainable growth, Kumho Petrochemical is committed to adhering to principles and fundamentals with a responsible attitude toward society and the company, striving for sustainable procurement in collaboration with supply chain stakeholders.

The policy is established in accordance with the Responsible Business Alliance's Code of Conduct, the Global Automotive Sustainability Practical Guidance by Drive Sustainability, and the European Union's Corporate Sustainability Due Diligence Directive. In cases where the provisions stipulated in the policy and the 'Supplier ESG Guidelines of Kumho Petrochemical' differ from the laws and regulations of the countries where its business sites and partner companies are located, the stricter standards shall take precedence.

### **Chapter 1 Supply Chain Sustainable Management Framework**

#### Article 1 Decision-Making Structure

- 1) The CEO bears the ultimate responsibility for overseeing and supervising the performance of sustainable management and activities within the supply chain at Kumho Petrochemical.
- 2) The key departments responsible for driving sustainable management in the supply chain include the ESG Management Team and the Procurement Department. These teams collaborate to discuss and implement various tasks related to managing sustainability within the supply chain. However, for support systems related to environmental, social, and governance (ESG) areas, relevant departments may also collaborate to promote related activities.

#### Article 2 Scope of Policy and Stakeholder Communication

- 1) The policy applies to executives and employees of Kumho Petrochemical and, in principle, extends to all supply chain-related organizations and activities, including procurement and sourcing, both within Kumho Petrochemical and its partner companies.
- 2) To effectively convey Kumho Petrochemical's fundamental stance and guidelines on supply chain sustainability to various stakeholders, the company ensures that the policy is communicated in an accessible manner, including publication on the company website
- 3) Kumho Petrochemical must regularly monitor relevant laws in the countries where its business sites and partner companies are located to proactively prevent compliance risks. The company must actively promote activities aimed at establishing and improving sustainable supply chain systems, including considering participation in domestic and international sustainability initiatives in the future.

#### Article 3 Documentation and Performance Management

- 1) Kumho Petrochemical conducts a comprehensive review of the policy's objectives and strategic direction at least annually. However, depending on domestic and international sustainability initiatives and developments in applicable laws and regulations, the policy may undergo periodic reviews. The policy may be updated at any time as necessary in response to significant changes.

- 2) Kumho Petrochemical manages the communication and implementation of the policy and transparently discloses the results through mediums such as its website and sustainability management reports to stakeholders.

## **Chapter 2 Supply Chain Sustainable Management Promotion**

### Article 4 Selection of New Partner Companies

- 1) When selecting new partner companies, Kumho Petrochemical assesses sustainability risks alongside financial factors such as delivery compliance and quality.
- 2) Upon entering into contracts with new partner companies, Kumho Petrochemical requires them to review and pledge their compliance with this policy and the Supplier ESG Guidelines.

### Article 5 Support for the Sustainable Management Promotion of Partner Companies

- 1) Kumho Petrochemical periodically assesses the financial and non-financial capabilities of its partner companies, including their sustainable management practices, and considers providing support programs to enhance their capacity for social responsibility and positive environmental impact.
- 2) Kumho Petrochemical conducts regular surveys among its partner companies to evaluate the effectiveness of these support programs, identify areas for improvement, and develop action plans accordingly.

### Article 6 Responsible Procurement of Raw and Ancillary Materials

- 1) Kumho Petrochemical may prioritize the purchase of eco-friendly products for the entire supply chain, including the company itself, as part of its ESG initiatives. The Procurement Team actively promotes the expansion of eco-friendly product purchases by conducting comprehensive investigations, education, and procurement planning, and continuously manages the performance of eco-friendly product purchases.

The classification criteria for eco-friendly products are as follows. However, they may be revised if a separate management system is established:

- (1) Products obtained authentication of Eco-Label under the "Environmental Technology and Industry Support Act"
  - (2) Products with high recyclability under the "Act on the Promotion of Saving and Recycling of Resources"
  - (3) Green products under the "Act on the Promotion of Purchase of Green Products"
  - (4) High-efficiency energy equipment and products rated Grade 1 or 2 under the "Energy Use Rationalization Act"
- 2) Kumho Petrochemical must verify whether conflict minerals and responsible minerals are included in the raw materials procured or received and proactively prevent related risks by conducting traceability investigations into their origin and distribution routes.
  - 3) If human rights or environmental risks are identified in the raw materials procured by Kumho Petrochemical's partner companies, the company may request that they take appropriate actions, such as replacing the current source of supply.

### Article 7 Communication of ESG Data and Information from Partner Companies

- 1) To clearly understand the ESG status across the entire supply chain, Kumho Petrochemical may request environmental and social data from its partner companies.
- 2) Based on the information and data received, Kumho Petrochemical may develop plans to enhance sustainable management within supply chain and require its partner companies to comply accordingly.

### **Chapter 3 Supply Chain Risk Identification and Response**

#### Article 8 Mechanism for Handling Grievance

- 1) Kumho Petrochemical operates an 'Online Friends' platform (justice.kkpcgroup.com) to enable stakeholders to proactively report risk factors experienced by partner company employees, including environmental concerns, labor practices, unfair trade, and unfair competition.
  - (1) Kumho Petrochemical's 'Online Friends' operates on the principle of anonymity.
  - (2) Kumho Petrochemical guarantees strict confidentiality for whistleblowers and implements all measures to prevent any form of disadvantage or retaliation against them.
  - (3) Kumho Petrochemical diligently addresses reported cases and transparently communicates the resolution outcomes to the reporter.

#### Article 9 Supply Chain Risk Management

- 1) To ensure supply chain stability and sustainable management, Kumho Petrochemical identifies partner companies according to supply chain categories and establishes a classification system based on risk levels.
  - (1) Risk is assessed based on key supply chain factors such as industry, scale, transaction frequency, substitutability, and region. Based on the analysis results, criteria for ESG assessments and on-site inspections are established.
  - (2) The selection criteria for on-site inspections may be adjusted as necessary in response to evolving sustainable management environments, including developments in domestic and international regulations, policies, and industry trends.
- 2) Kumho Petrochemical regularly conducts supply chain ESG assessments to proactively identify and prevent sustainability risks.
  - (1) Supply chain ESG assessments are conducted using criteria that include compliance with Supply Chain ESG Guidelines and relevant legal requirements.
  - (2) Kumho Petrochemical periodically reviews the evaluation system's appropriateness by monitoring relevant global and legal developments, making modifications and improvements as necessary.
  - (3) The assessment primarily follows a self-survey approach and includes on-site inspections, when necessary, with high-risk companies or those requiring further review subject to such inspections.
  - (4) Kumho Petrochemical continuously expands the scope of assessments and on-site inspections of partner companies over the mid to long term.
- 3) Kumho Petrochemical develops and implements short-term, medium-term, and long-term management improvement measures for the environmental, social, and governance (ESG) risk factors of partner companies identified through the supply chain ESG assessments.

- (1) Kumho Petrochemical may provide benefits to partner companies demonstrating outstanding performance in the supply chain ESG assessment
- (2) For high-risk partner companies where risks are identified or anticipated, Kumho Petrochemical may request improvement measures or offer additional support.
- (3) Kumho Petrochemical monitors the implementation status of improvement measures for high-risk partner companies. In cases where compliance is inadequate, Kumho Petrochemical may reserve the right to take measures such as restricting bidding or terminating trading relationships as deemed necessary.

## **ADDENDUM**

1. This policy came into effect on June 16, 2022.
2. This policy was revised and came into effect on June 21, 2023.
3. This policy was revised and came into effect on May 28, 2024.
4. This policy was revised and came into effect on May 29, 2025.

## Supplier ESG Guidelines (Code of Conduct)

### Foreword

To promote sustainable management and ensure effective communication of related commitments, Kumho Petrochemical Co., Ltd. (hereinafter referred to as 'Kumho Petrochemical') has established the 'Supplier ESG Guidelines' (hereinafter referred to as 'the guidelines'). These guidelines set forth the principles, standards, and implementation measures that must be observed by all stakeholders (hereinafter referred to as 'partner companies') engaged in direct or indirect business with Kumho Petrochemical.

Kumho Petrochemical aims to become a socially respected company by fostering understanding and cooperation regarding these guidelines and requiring compliance from partner companies, thereby supporting their adherence to relevant regulations. By doing so, the company advances sustainable management throughout the supply chain and pursues mutual growth.

These guidelines apply to all partner companies and their members engaged in transactions with Kumho Petrochemical. Kumho Petrochemical requires new partner companies to review these guidelines and pledge their compliance upon the initiation of a contract. Partner companies are also encouraged to ensure that their own suppliers and subcontractors comply with these guidelines.

Kumho Petrochemical periodically assesses compliance with these guidelines through supply chain ESG assessments. If any related risks are identified, the company may require partner companies to implement appropriate corrective or preventive measures. Partner companies are expected to develop a thorough understanding of Kumho Petrochemical's ESG policy and Guidelines and make sincere efforts to comply with them. Kumho Petrochemical believes that faithful adherence to and implementation of these guidelines in collaboration with its partners will serve as a catalyst for mutual growth across the entire supply chain.

### Chapter 1 Labor Rights

#### Article 1 Humane Treatment of Workers

- 1) Partner companies are strictly prohibited from engaging in any form of physical or mental coercion, including verbal or physical abuse and sexual violence, as well as any cruel and inhuman treatment such as discrimination, and harassment.
- 2) Partner companies establish policies to prevent inhumane treatment of workers, including human rights violation, and communicate fair disciplinary policies and procedures to workers to ensure proper resolution and continuous improvement in the event of such occurrences.

#### Article 2 Voluntary Employment

- 1) Partner companies ensure the voluntary employment of individual workers and must not compel them to perform labor against their free will. This entails prohibiting forced labor, bonded labor, human trafficking, exploitative forced labor, and contemporary forms of slavery.

- 2) Partner companies do not restrict workers' freedom of movement by arbitrarily retaining, confiscating, concealing, or destroying legal documents such as passports, identification, work permits or immigration documents without the workers' consent.
- 3) Partner companies prepare employment contracts, including working conditions, in a clear and understandable manner based on agreement with the workers, and any arbitrary changes to these contracts after workers arrive in the country are prohibited without the workers' consent.
- 4) All work performed by workers in partner companies must be voluntary, and workers are free to resign as long as it does not violate the contract.

#### Article 3 Child Labor and Youth Labor

- 1) Kumho Petrochemical strictly prohibits any form of child labor. Under relevant laws, labor by minors under 15 years of age in Korea or under 16 years of age in China is considered child labor. In addition, partner companies comply with the laws and regulations of the countries and regions where their business sites are located regarding child and adolescent labor, and strictly prohibit such child labor practices at all stages of employment.
- 2) Partner companies prohibit workers under 18 years of age, from engaging in work that may be morally inappropriate or pose risks to their health and safety, including but not limited to, overtime, night or holiday shifts, and tasks involving the handling of hazardous substances.
- 3) Partner companies provide appropriate job-related and safety and health education and training to all child and student workers.

#### Article 4 Compliance with Working Hours

- 1) Working hours of workers within partner companies must not exceed the limits set by the labor laws of the country or region where the business site is located, except in emergency or exceptional circumstances. In Korea, the standard workweek is an average of 40 hours. However, under a flexible work hour system, up to 48 hours per week may be permitted for periods of up to 3 months, and up to 52 hours for periods within 6 months.
- 2) All overtime work performed by workers in partner companies must be voluntary, and partner companies must provide workers with appropriate rest periods for overtime work as well as legally mandated overtime pay.

#### Article 5 Welfare Benefits and Remuneration

- 1) Partner companies comply with all applicable laws and regulations related to remuneration in the countries or regions where their business sites are located.
- 2) Partner companies establish wage levels to ensure that workers can afford a decent standard of living.

#### Article 6 Non-Discrimination

- 1) Partner companies do not subject workers to unfair treatment, discriminatory practices, or any form of harassment based on race, skin color, ethnicity, national origin, religion, gender, marital status, disability, union membership, political affiliation, throughout all stages of employment, including hiring, compensation, promotion, and other personnel processes.

#### Article 7 Freedom of Assembly and Association

- 1) Partner companies guarantee workers' freedom of assembly and association.

- (1) Freedom of Assembly and Association includes the right to form and participate in trade unions, collective bargaining rights, and the right of workers to freely choose to join or not join trade unions and to participate in peaceful assemblies.
- 2) Partner companies ensure that workers can communicate openly with management regarding working conditions or management practices, without fear of harassment, disadvantage, or retaliation.

## **Chapter 2 Occupational Safety and Health**

### Article 8 Occupational Safety

- 1) Partner companies shall create an environment where workers can labor in safe and comfortable conditions.
  - (1) If workers are potentially exposed to safety hazards such as chemicals, electric shock, fire, hazardous facilities, or falls, partner companies must take appropriate measures to eliminate, prevent or minimize these risks through facility improvement and maintenance, as well as providing relevant education.
  - (2) In unavoidable circumstances where such measures are not feasible, partner companies must take appropriate actions to minimize risks, including providing appropriate personal protective equipment and educating workers about the risks.
- 2) Partner companies shall prioritize the safety of pregnant or nursing female workers by exempting them from hazardous job duties, implementing measures to mitigate health and safety risks, and providing suitable facilities for nursing needs.

### Article 9 Emergency Response and Preparedness

- 1) Partner companies shall identify potential emergency situations and minimize damages by establishing and implementing appropriate procedures and emergency plans.
- 2) These procedures and emergency plans include reporting mechanisms during emergencies, timely communication of emergencies to workers and evacuation procedures, emergency training and education for workers, easy-to-access exit facilities, fire detection and extinguishing equipment, and recovery plans.

### Article 10 Industrial Accidents and Diseases

- 1) Partner companies shall establish procedures and systems for the prevention, management, tracking, and reporting of industrial accidents and occupational diseases. This includes encouraging worker reporting, classifying and recording cases of injury or illness, providing necessary medical treatment, conducting investigations and corrective actions to eliminate causes, and facilitating the return-to-work process.

### Article 11 Reduction of Hazardous Exposures

- 1) Partner companies shall identify and control worker exposure to hazardous chemicals used during operational processes.
  - (1) It is imperative to address potential hazards through technical controls such as risk elimination or regular inspection, maintenance, and improvement of production facilities, and administrative controls, all in compliance with legal mandates and institutional regulations.

Appropriate measures must be taken to prevent the above hazards from causing any safety or health risks to workers.

- (2) In unavoidable circumstances where the aforementioned measures are not feasible, partner companies must take appropriate actions to minimize risks, including furnishing workers with suitable protective gear and educating executives and employees on pertinent matters.

#### Article 12 Physical Strain Work

- 1) Partner companies shall identify and control factors related to physical labor, such as repetitive manual work performed over long periods of time, heavy lifting or standing tasks, highly repetitive or physically demanding assembly work, to ensure they are within reasonable limits.

#### Article 13 Safety of Machinery and Equipment

- 1) Physical protection equipment, safety devices, and protective barriers shall be installed and maintained appropriately. Kumho Petrochemical shall assess the safety of machinery and equipment used during operational processes.
- 2) Physical protection equipment, safety devices, and protective barriers shall be installed and maintained appropriately.

#### Article 14 Dormitories and Hygiene Facilities

- 1) Partner companies shall ensure that workers have access to clean restrooms, drinking water, hygienic food preparation and storage facilities, and dining areas.
- 2) Worker dormitories must maintain cleanliness and safety, providing adequate lighting, emergency evacuation facilities, heating and ventilation systems, personal item storage, and access control that do not unduly restrict workers' freedom of movement and privacy, while providing adequate personal space.

#### Article 15 Worker Training and Communication

- 1) Partner companies shall provide education on industrial safety-related risk factors identified in the business site in the workers' native language or a language they understand.
- 2) Education shall be provided to all workers before job assignments, and regular training sessions are conducted thereafter.
- 3) Health and safety information should be posted in an easily accessible location for workers to check, and they should be able to voice their opinions on related issues when they identify relevant risk factors.

### **Chapter 3 Environment**

#### Article 16 Environmental Permits Acquisition

- 1) Partner companies shall obtain environmental permits, approvals, and registrations required for business activities and periodically report their status to Kumho Petrochemical.

#### Article 17 Discharge of Pollutants and Waste

- 1) Partner companies shall confirm the characteristics of air, water, and soil pollutants according to applicable regulations before discharge and regularly monitor the discharge status. Additionally, measures such as the addition of pollution control facilities shall be taken to eliminate or minimize the discharge of pollutants.

- 2) Partner companies must responsibly dispose of or recycle waste through appropriate methods, and are encouraged to use raw materials that can be reused or recycled.
- 3) Partner companies shall continuously monitor the discharge of pollutants and waste, as well as the recycling · reuse status and the efficiency of pollution prevention facilities.
- 4) Partner companies shall periodically verify whether hazardous chemicals are included in the raw materials used during operational processes.

#### Article 18 Handling of Hazardous Chemicals

- 1) Partner companies must manage hazardous chemicals and substances containing them separately, ensuring their safe handling, transportation, storage, use, recycling, or disposal through proper identification, labeling, and other appropriate measures

#### Article 19 Material Regulations

- 1) Partner companies shall comply with the Act on the Control of Manufacture of Specific Substances, as well as any restrictions and requirements set forth by relevant stakeholders.

#### Article 20 Water Resource Management

- 1) Partner companies shall assess the current status of water intake sources and the usage and recycling rates of water resource by location, aggregating their performance accordingly.
- 2) Partner companies must implement appropriate treatment measures for wastewater before discharge by establishing relevant systems, and the efficiency of wastewater treatment facilities must be continuously monitored to maintain their performance and suppress wastewater generation.

#### Article 21 Energy Use and Greenhouse Gas Emissions

- 1) Partner companies must verify the status of direct and indirect greenhouse gas emissions (Scope 1, 2) based on energy usage data and aggregate related performance to enable traceability.
- 2) Partner companies shall continue to make efforts to improve energy efficiency and reduce greenhouse gas emissions.

#### Article 22 Environmentally Friendly Products Procurement and Sourcing

- 1) Partner companies may consider prioritizing the purchase of environmentally friendly products to minimize environmental impact.
- 2) The classification of environmentally friendly products shall align with the criteria outlined in 'Article 6, Responsible Procurement of Raw and Ancillary Materials' of 'Supply Chain ESG Policy'.

### **Chapter 4 Business Ethics**

#### Article 23 Transparency, Ethical Management, and Prevention of Corruption and Unfair Competition

- 1) Employees of partner companies shall adhere to the highest standards of integrity in all business activities. Any form of bribery, corruption, embezzlement, or misappropriation is strictly prohibited under any circumstances.
- 2) Partner companies must not receive, promise, offer, authorize or provide any means to obtain unfair or inappropriate benefits indirectly or directly, such as acquiring or retaining business rights or granting business rights to specific individuals.
- 3) Employees of partner companies shall approach their work with a sense of responsibility. Executives and employees of partner companies must not exploit their position for personal gain contrary to

the interests of the company, nor should they promise, offer, authorize, or provide money or any other improper benefits to a third party for this purpose.

- 4) Partner companies must not engage in activities that impede fair trade using their market dominance or superior position in transactions.

#### Article 24 Protection of Information and Intellectual Property Rights

- 1) Partner companies shall respect and protect the intellectual property rights of technology and know-how held by their own suppliers and subcontractors with whom they have business relationships.
- 2) Partner companies shall handle personal information within the scope of collection, use purposes, and retention periods. Prior consents must be obtained from the data subject if there are changes to the predetermined purposes and periods.
- 3) Partner companies do not store or use information from their partner companies for purposes other than those stipulated in the contract, and do not disclose trade secrets or confidential information without authorization.

#### Article 25 Responsible Procurement and Sourcing

- 1) Partner companies shall establish systems to clearly identify the origin and distribution channels of raw and ancillary materials used in goods supplied to Kumho Petrochemical.
- 2) Partner companies shall verify whether conflict minerals or other responsible minerals are contained in the raw and ancillary materials they procure and must conduct thorough due diligence to trace the origin and distribution channels of such materials.
- 3) Partner companies must not use raw and ancillary materials that negatively impact ecosystems and biodiversity or contribute to deforestation or forest degradation, and shall establish procedures to review, identify, and manage such risks in advance.

#### Article 26 Information Disclosure

- 1) Partner companies shall conduct all business activities and with transparency and ensure accurate reflection in business records and all relevant documentation.

### **Chapter 5 Management System**

#### Article 27 Compliance Commitment of Partner companies

- 1) Partner companies shall demonstrate their commitment to compliance with the requirements or recommendations outlined in the guidelines and their willingness for continuous improvement.
- 2) Partner companies shall establish policies on their social and environmental responsibility and prepare a formal policy statement, approved by the management, and post it in the local language at the business site. It is recommended to transparently disclose the policy statement to external stakeholders through channels such as the company's website or annual reports.

#### Article 28 Implementation Framework

- 1) Partner companies shall designate a senior executive in the policy statement who is responsible for establishing and overseeing the sustainable management system and the implementation of related programs. This executive regularly reviews the operational status to ensure the system's effectiveness.
- 2) Partner companies shall appoint a practical department or personnel responsible for communication with Kumho Petrochemical regarding faithful adherence to the guidelines and related matters.

Additionally, they shall appoint managers to supervise the implementation of the guidelines and evaluate related outcomes.

#### Article 29 Risk Assessment

- 1) Partner companies should make efforts to identify and monitor relevant laws and regulations and requirements of stakeholders such as customers, including the guidelines.
- 2) Partner companies shall strive to mitigate significant risk factors in the areas outlined above and develop and implement measures to prevent their recurrence if identified.

#### Article 30 Education and Communication

- 1) Partner companies shall actively participate in the support programs for sustainable management provided by Kumho Petrochemical and endeavor to apply them to their business activities.
- 2) Partner companies shall educate their executives and employees on the requirements or recommendations outlined in the guidelines and related regulations.
- 3) Partner companies shall faithfully adhere to the requirements or recommendations outlined in the guidelines and periodically share the outcomes and achievements with executives, employees, and Kumho Petrochemical.
- 4) Partner companies shall periodically aggregate the performance, outcomes, and data related to social, environmental, and business ethics areas, and document these results to transparently communicate with Kumho Petrochemical.

#### Article 31 Mechanism for Handling Grievance

- 1) Partner companies shall establish grievance handling channels through which stakeholders, including workers, can report risks in areas such as labor practices, occupational safety and health, corruption, or risks of unfair or unethical competition when identified.
- 2) Partner companies shall establish grievance reporting channels through appropriate means, such as company websites, email, postal mail, or in-person communication, to ensure easy access for a broad range of stakeholders, including workers at their own suppliers and subcontractors.
- 3) Partner companies shall operate the grievance reporting channels anonymously to ensure that reporters can access them without fear of retaliation, disadvantages or harassment.
- 4) Partner companies shall diligently handle reported issues, aiming for continuous improvement, and communicating the outcomes to the reporters.

#### Article 32 Remedial Measures

- 1) When business activities of partner companies cause adverse impacts on supply chain sustainability and result in affected parties, appropriate remedial procedures should be established, considering the scale and severity of the harm.

#### Article 33 Audit and Evaluation

- 1) Partner companies shall actively participate in Kumho Petrochemical's supply chain ESG assessments and transparently disclose relevant information to Kumho Petrochemical.
- 2) Additionally, plans to address identified deficiencies in the supply chain ESG assessments shall be developed, implemented, and transparently shared with Kumho Petrochemical.

#### Article 34 Partner Company Management

- 1) Kumho Petrochemical encourages its partner companies to comply with the guidelines, especially their own suppliers and subcontractors in a trading relationship with them.
- 2) If suppliers and subcontractors of partner companies violates the guidelines outlined in this document or related laws and regulations, or poses significant risks in this regard, partner companies shall endeavor to recommend or induce the specific suppliers and subcontractors to take corrective actions.

## **ADDENDUM**

1. These guidelines came into effect on November 9, 2020.
2. These guidelines were revised and came into effect on June 16, 2022.
3. These guidelines were revised and came into effect on May 28, 2024.
4. These guidelines were revised and came into effect on May 29, 2025.

## Local Community Engagement Policy

### **Foreword**

Kumho Petrochemical Co. Ltd. (hereinafter referred to as 'Kumho Petrochemical') establishes and implements a community engagement policy (hereinafter referred to as 'the policy') to fulfill the corporate social responsibility and obligations.

The policy aims to clearly outline the scope and principles of activities aimed at respecting the rights of community members, fostering mutual development with the local community, and contributing to the creation of social value.

### **Chapter 1 Scope of Policy**

#### Article 1 Scope

- 1) The policy applies to all employees of Kumho Petrochemical. Additionally, all stakeholders involved in the entire supply chain, including partner companies and suppliers, are encouraged to implement the policy.

#### Article 2 Scope of Local Community

- 1) Kumho Petrochemical recognizes the following stakeholder types as subjects of this policy:
  - (1) Indigenous peoples as defined in International Labour Organization (ILO) Convention No. 169 or the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)
  - (2) Stakeholders residing in areas where Kumho Petrochemical's business sites are located, and who are affected by business activities conducted at its business sites concerning social, environmental, and economic impacts

### **Chapter 2 Risk Management**

#### Article 3 Local Community Risk Management

- 1) Kumho Petrochemical strives for sustainable growth and development in collaboration with local communities and works to identify, minimize, and mitigate potential risks that may have a significant negative impact on local communities arising from its business activities.

### **Chapter 3 Principles of Local Community Engagement**

#### Article 4 Respect and Coexistence with Local Communities

- 1) Kumho Petrochemical demonstrates respect for and protection of local communities, and sets forth social responsibility, trust, coexistence, and growth with local communities as guiding principles for community engagement, reviewing and implementing activities that can positively impact local communities.

#### Article 5 Local Community Engagement and Activities

- 1) Kumho Petrochemical endeavors to communicate with local community members to discover and undertake community engagement activities related to the nature of its business.
- 2) Executives and employees of Kumho Petrochemical actively participate in activities aimed at coexisting with and benefiting local communities. They strive to incorporate the expectations of community members into management activities to achieve mutual prosperity and coexistence.

## **Chapter 4 Internalization of Community Engagement**

### Article 6 Grievance Handling and Reporting

- 1) Anyone affected by Kumho Petrochemical's business activities can report negative impacts on local communities through the Online Reporting Center (Online Friends) or internal reporting procedures.
- 2) Further guidance on handling and reporting grievances related to local communities, including types of reports and principles, is provided in the 'Reporting Policy'.

### Article 7 Education and Communication

- 1) Kumho Petrochemical continuously conducts educational programs and campaigns to enhance awareness among executives, employees, and stakeholders about the importance of social responsibility, trust, coexistence, and growth with local communities, and to internalize this awareness.
- 2) Kumho Petrochemical ensures effective communication of key local communities' issues with executives, employees, and stakeholders, and discloses information through various accessible channels.

## **ADDENDUM**

1. This policy came into effect on May 28, 2024.
2. This policy was revised and came into effect on May 29, 2025.

## Ethical Management Policy

### **Foreword**

Kumho Petrochemical Co., Ltd. (hereinafter referred to as 'Kumho Petrochemical') is committed to fulfilling its responsibilities to society and the company with a responsible attitude towards customers, shareholders, executives, employees, humanity, and the environment. The company adheres strictly to fundamental values and principles, prioritizing corporate ethics above all else and striving to achieve and exceed the highest values, by establishing an ethical code of conduct that all executives and employees must follow as a standard for desirable behavior and value judgment.

### **Chapter 1 Scope of Policy**

#### Article 1 Scope

- 1) All executives and employees shall act in accordance with this policy when dealing with all stakeholders of the company, including customers, shareholders, business partners, members, local communities, and government entities.

### **Chapter 2 Obligations of Executives and Employees**

#### Article 2 Compliance Obligations

- 1) All executives and employees must understand their roles and comply with laws, ethical standards, and related regulations and guidelines while performing their duties. Any violations may be subject to disciplinary action according to relevant regulations and procedures.

#### Article 3 Reporting Obligations

- 1) All executives and employees are required to promptly report any breaches of ethical standards they witness, or any pressure they experience to violate such standards, to their superior or the department responsible for ethics management in accordance with the prescribed procedures.

#### Article 4 Familiarity with and Inquiries About Ethical Standards

- 1) All executives and employees must acknowledge that ignorance of ethical standards and related regulations does not exempt them from responsibility, and they should consult their superiors or the department responsible for ethics management if they have any uncertainties related to the interpretation or possible breaches of the policy.

### **Chapter 3 Ethics Towards Customers and Business Partners**

#### Article 5 Respect for Customers

- 1) Kumho Petrochemical must prioritize customer satisfaction and actively listen to and respect customers' opinions with sincerity and integrity.
- 2) Kumho Petrochemical must protect customer information with the same level of care as the company's assets, and must not use such information for any purposes other than its intended use without the customer's prior approval.

#### Article 6 Fair Transactions

- 1) Kumho Petrochemical conducts all transactions fairly, ensuring equal footing for all parties involved by engaging in full discussions and reaching mutual agreement on terms and procedures, without making unjust alterations to the agreed-upon conditions.
- 2) When new suppliers wish to engage in transactions with Kumho Petrochemical, they must be selected and registered based on fair evaluation criteria, ensuring equal opportunities.
- 3) Kumho Petrochemical prohibits employees from abusing their position of authority to make unreasonable demands on business partners or to solicit, promise, or accept improper benefits. If such items are unavoidably received, they must be reported to the department responsible for ethics management.
- 4) Kumho Petrochemical will provide fair compensation to business partners for damages attributable to the company, in accordance with relevant laws, company regulations, and contractual agreements.
- 5) All executives and employees should not burden customers or business partners with personal events or requests for private purposes.
- 6) Kumho Petrochemical regularly collects feedback from its partners and ensures it is appropriately reflected in its operations.
- 7) Kumho Petrochemical must refrain from any unfair practices prohibited by laws related to fair trade.
- 8) Kumho Petrochemical adheres to international standards and applicable laws regarding marketing and labeling and avoids misleading that could cause customer confusion.

#### Article 7 Pursuit of Free Competition

- 1) Kumho Petrochemical endeavors to bolster the fairness and dependability of transactions by preventing corruption and fostering fair competition, thus aiding in the advancement of a corruption-free society and eradicating anti-competitive practices.

#### Article 8 Pursuit of Mutual Growth

- 1) All executives and employees must endeavor to transfer know-how to the fullest extent possible to help partner companies grow alongside the company.
- 2) Kumho Petrochemical respects the intellectual property rights of the technology and know-how possessed by partner companies, and securely protects and manages their information.

### **Chapter 4 Ethics Towards Shareholders**

#### Article 9 Protection of Interests and Guarantee of Rights

- 1) All executives and employees must strive to maximize shareholder value by diligently selecting and focusing on profit-maximizing strategies.
- 2) Kumho Petrochemical conducts management decisions and operations, along with financial reporting, fairly and transparently in accordance with relevant laws and generally accepted accounting standards.
- 3) Kumho Petrochemical must respect shareholders' right to be informed and diligently discloses information regarding company management.

### **Chapter 5 Ethics Towards Executives and Employees**

#### Article 10 Respect for Members

- 1) Kumho Petrochemical must respect human dignity and diversity.

- 2) Kumho Petrochemical must aim to establish sound labor-management relations and seek a conflict-free environment.
- 3) Kumho Petrochemical must create a workplace that is safe and comfortable for executives and employees, supporting the improvement of their quality of life and promoting a harmonious balance between work and home life.

#### Article 11 Fair Treatment

- 1) Kumho Petrochemical prohibits any form of discrimination against employees, based on gender, education, age, religion, region of origin, disability or other irrational criteria in recruitment, promotion, compensation, and education.
- 2) Kumho Petrochemical must offer equal opportunities to its employees and establish clear evaluation criteria based on employees' abilities and performance, ensuring fair treatment and compensation to enhance motivation for achievement.

#### Article 12 Nurture of Talent

- 1) Kumho Petrochemical must nurture talents by assigning roles based on aspirations, aptitude, and abilities, providing continuous education and training to cultivate individuals capable of contributing to society, the nation, and the company.

#### Article 13 Basic Ethics of Members

- 1) All executives and employees are expected to conduct themselves with integrity, maintaining the respect and trust of stakeholders, while upholding the company's reputation and their own dignity as members of the organization, thus fostering a positive image and earning the respect of their stakeholders.
- 2) All executives and employees must strive to foster a culture of basic courtesy, mutual respect, and consideration by adhering to the principles of etiquette.
- 3) All executives and employees must refrain from unfair work orders, verbal abuse, physical violence, fraud, harassment, or any form of workplace bullying, as well as engaging in inappropriate behaviors such as drinking, gambling, or other unsound conduct within the business site.
- 4) All executives and employees must refrain from engaging in financial transactions, joint guarantees, or the exchange of gifts among themselves, except within the bounds of socially accepted norms for occasions such as congratulations or condolences.

#### Article 14 Fulfillment of Mission

- 1) All executives and employees should engage in fair and honest competition both internally and externally, demonstrating their capabilities through legitimate means and actively completing assigned tasks with a proactive attitude and creative thinking.
- 2) All executives and employees should strive to maximize work performance and efficiency by actively collaborating with colleagues and relevant departments, fostering smooth communication and cooperation.
- 3) All executives and employees must consistently strive to establish sound values and engage in continuous self-improvement efforts to align with the company's ideal talent profile.

#### Article 15 Fair Performance of Duties

- 1) All executives and employees must refrain from conducting all tasks accurately and honestly, refraining from intentional manipulation of documents or figures or making false reports.
- 2) All executives and employees must recognize their authority and responsibilities, performing their duties diligently and taking responsibility for the results.

#### Article 16 Avoidance of Conflicts of Interest

- 1) All executives and employees must refrain from conducting business transactions with the company in their own name or in the name of those with whom they have a conflict of interest unless approved by the company in advance. However, exceptions are made in cases where prior approval from the company has been obtained.
- 2) All executives and employees should not involve themselves in the management or investment of businesses that have transactions, direct or indirect.
- 3) All executives and employees must avoid unfairly receiving assets, money, or other benefits from stakeholders or engaging in transactions that may conflict with their duties.

#### Article 17 Protection and Maintenance of Company Assets

- 1) All executives and employees must use all tangible and intangible assets of the company only for business activities and approved purposes.
- 2) All executives and employees must refrain from using company property, equipment, materials, or any other resources for personal purposes.
- 3) All executives and employees shall actively safeguard and uphold the confidentiality of all information acquired during business dealings with customers, trading partners, and other relevant parties, in accordance with security management regulations, even after departing from the company.
- 4) All executives and employees must not disclose important information about the company that could affect its stock price or investors' decision-making without prior approval from the company.
- 5) All executives and employees must make every effort to prevent the leakage of company information resulting from the use of computers and various devices.

### **Chapter 6 Ethics Regarding the Nation and Society**

#### Article 18 Rational Business Development

- 1) Kumho Petrochemical must respect social values, customs, and order, and create social wealth through ethical business activities.

#### Article 19 Contributing to Social Development

- 1) Kumho Petrochemical must contribute to national development through job creation and diligent tax payment, and actively considers the welfare of socially vulnerable groups.
- 2) Kumho Petrochemical should strive to accommodate the legitimate demands of various social strata and local residents, and to address and resolve their concerns.
- 3) Kumho Petrochemical may engage in charitable donations, sponsorships, and contributions for local community development and must adhere to related internal processes.

#### Article 20 Prohibition of Political Activities

- 1) Kumho Petrochemical does not support or sponsor specific political parties or politicians and strictly prohibits its executives and employees from being coerced into supporting or sponsoring them.

However, it may express its stance on policy formulation or legislation related to its management and interests.

#### Article 21 Environmental and Safety Measures

- 1) Kumho Petrochemical must adhere to environmental regulations and international agreements, striving to minimize environmental destruction, pollution, and degradation resulting from its business activities.
- 2) Kumho Petrochemical must secure and operate pollution prevention facilities and personnel to prevent environmental pollution.
- 3) Kumho Petrochemical must strictly comply with relevant laws and standards for safety operations and strive to proactively prevent safety hazards in advance.
- 4) All executives and employees are encouraged to maintain cleanliness and orderliness throughout the workplace to foster a pleasant and safe working environment.

### **Chapter 7 Ethical Management Operations**

#### Article 22 Responsibility Division

- 1) At Kumho Petrochemical, the executive in charge of ethical management oversees the establishment, implementation, direction, and supervision of ethical management practices on behalf of the management.
- 2) At Kumho Petrochemical, the executive and organization responsible for ethical management must perform the company's overall ethical management tasks, including the formulation, adjustment, operation, and supervision of ethical management systems and policies.

#### Article 23 Ethics Management Education and Evaluation

- 1) At Kumho Petrochemical, the ethics management executive and organization must implement necessary measures, such as establishing systems and providing ethics management education, guidance, and evaluation, to enable executives and employees to fulfill their duties in a fair manner.

#### Article 24 Implementation

- 1) All executives and employees must comply with the policy and Ethics Management Guidelines, and violations may be subject to disciplinary action in accordance with relevant laws and internal regulations.

## **ADDENDUM**

1. This policy came into effect on June 29, 2021.
2. This policy was revised and came into effect on June 16, 2022.
3. This policy was revised and came into effect on May 28, 2024.
4. This policy was revised and came into effect on May 29, 2025.

## Ethical Management Guidelines

### Chapter 1 General Provisions

#### Article 1 Scope of Application

- 1) These guidelines apply to all executives and employees of Kumho Petrochemical.

#### Article 2 Guidelines

- 1) These guidelines aim to establish the criteria for decision-making and behavior in ethical conflict situations that may arise during the performance of duties by all executives and employees.

#### Article 3 Principles for Ethical Decision-Making and Behavior

- 1) All executives and employees should independently reflect and make decisions based on the following questions during their work process:
  - (1) How does this decision affect others internally and externally?
  - (2) Can I take responsibility for this decision?
  - (3) Does this decision comply with relevant laws and the Ethical Management Policy.

#### Article 4 Definitions of Terms

##### 1) Gifts and Benefits

- (1) Monetary or non-monetary benefits, including but not limited to cash, securities, real estate, goods, accommodation vouchers, memberships, admission tickets, discount coupons, invitations, viewing rights, and usage rights for properties.
- (2) Entertainment such as meals, drinks, golf, or conveniences such as transportation and accommodation.
- (3) Other economic benefits, including debt forgiveness, job offers, granting of rights, and similar advantages.

##### 2) Facilitation Payment

- (1) Informal payments made to public officials to expedite the processing of standard procedures.

##### 3) Interested Party

- (1) A person who, although not a party to a specific factual or legal act, is affected by that act in terms of rights or interests, including relatives within the fourth degree of kinship to oneself and one's spouse.

##### 4) Stakeholder

- (1) Individuals or groups whose rights or interests may be directly or indirectly affected by their work, including customers, members, shareholders, business partners, communities, and countries.

##### 5) Embezzlement

- (1) The unauthorized use or appropriation of company property for personal purposes.

##### 6) Sexual Harassment

- (1) Actions that entail sexual humiliation or aversion to another party through sexual behavior or remarks, or actions leading to employment disadvantages due to refusal to comply with sexual demands.
- 7) Personal Information
  - (1) Information pertaining to a living individual that can facilitate identification, such as names, resident registration numbers, images, and other relevant identifiers (including data that, when combined with other information, can lead to the identification of a specific individual even if the data alone cannot identify the individual).
  - (2) Information concerning deceased individuals is not classified as personal information under Article 2, Paragraph 1 of the Personal Information Protection Act, yet details revealing relationships with surviving family members are considered personal information concerning those relatives who are alive.
- 8) Workplace Bullying
  - (1) Acts by employers or employees that exploit their superior position or work relationship to inflict physical or mental suffering on other employees beyond the appropriate scope of work, or to degrade the work environment.

## **Chapter 2 Practice Guidelines**

### Article 5 Prohibition of Accepting and Providing Gifts and Benefits

- 1) All executives and employees are prohibited from offering or accepting gifts, facilitation payments, or engaging in financial transactions (including loans, guarantees, or providing collateral) with stakeholders. Exceptions are granted for gifts distributed within the customary range to an unspecified number of people and condolence money within socially accepted norms among members.
- 2) All executives and employees must not accept, promise, or solicit any form of direct or indirect benefits, such as gifts from specific stakeholders as compensation for acquiring or maintaining business rights; in unavoidable circumstances, such acceptance must be promptly reported to the department responsible for ethics management.
- 3) At Kumho Petrochemical, the department responsible for ethics management must establish and operate a system for the return of received gifts or benefits.
- 4) All executives and employees are prohibited from informing stakeholders of personal or colleague-related congratulatory events. However, an exception is made for notification through the company's intranet.

### Article 6 Prohibition of Hospitality

- 1) All executives and employees must not accept, offer, promise, or solicit any form of hospitality to stakeholders. Nonetheless, in circumstances where it is unavoidable within socially accepted business norms, executives must seek approval from the CEO, while employees below executive level must seek prior approval from their respective executives.

### Article 7 Avoidance of Conflicts of Interest and Transactions with Former Employees Involved in Misconduct

- 1) All executives and employees are required to refrain from conducting business transactions with the company under their own or stakeholders' names. Exceptions may be granted with prior

approval from the department responsible for ethics management, following proper procedures akin to those of other stakeholders' transactions.

- 2) All executives and employees are prohibited from engaging in joint investments with stakeholders or acquiring property with stakeholders. Nevertheless, exceptions may be granted with prior approval from the department responsible for ethics management.
- 3) In the event that an employee's relative is identified as a stakeholder of the company, all executives and employees must notify the department responsible for ethics management and take appropriate measures to prevent conflicts of interest, such as adjusting job responsibilities if the relationship is relevant to the employee's duties.
- 4) All executives and employees are strictly prohibited from engaging in transactions with individuals who resigned due to misconduct during their employment

#### Article 8 Prohibition of Personal Use of Non-Public Information

- 1) All executives and employees must refrain from trading property interests, such as stocks, using non-public information acquired during their employment, and they should not advise or engage in activities that could influence such matters.

#### Article 9 Restriction on Holding Concurrent Employment in Other Companies

- 1) All executives and employees are prohibited from simultaneously holding positions as executives or employees in other companies unless they have obtained prior approval from the department responsible for ethics management. Nevertheless, exceptions may be granted with prior approval from the department responsible for ethics management

#### Article 10 External Lectures

- 1) All executives and employees must report to and obtain approval from the department responsible for ethics management before delivering external lectures.

#### Article 11 Prohibition of Asset and Information Leakage

- 1) All executives and employees must be prohibited from engaging in any actions that lead to the loss of company assets, such as embezzlement or misappropriation of funds, leakage of property, or misuse of company resources.
- 2) Disclosing or providing the company's information and trade secrets to internal or external parties without prior approval is prohibited.

#### Article 12 Transparent Handling of Company Expenses

- 1) All executives and employees must ensure that only expenses directly related to business activities are transparently processed. Expenses that are not directly related must not be charged to the company or recorded under inappropriate expense accounts solely based on arbitrary judgment or because they were incurred during or around the period of business operations.

#### Article 13 Prohibition of Negligence and Poor Work Ethics

- 1) All executives and employees are prohibited from negligence, poor attendance, lack of supervision, unreasonable handling of tasks, failure to fulfill personal responsibilities, and overstepping authority, all of which result in losses to the company.

#### Article 14 Anti-Money Laundering

- 1) All executives and employees are prohibited from engaging in activities that disguise the origins of funds related to illegal activities, such as slush funds, crime, tax evasion, or bribery, thereby making it difficult to trace the source of the money.

Article 15 Prohibition of Unfair Conduct Among Members including Sexual Harassment and Workplace Bullying

- 1) All executives and employees must not engage in discrimination, unfair work orders, verbal abuse, physical violence, sexual harassment, and workplace bullying, nor participate in drinking, gambling, or any other improper activities within the business site.

Article 16 Maintaining Personal Dignity and Prohibition of Defamation

- 1) All executives and employees must bear in mind that their conduct reflects upon the company and endeavor to uphold its trust and reputation.
- 2) All executives and employees must refrain from indecent behavior or attire that undermines the company's dignity.

Article 17 Prohibition of Using Illegal Software

- 1) All executives and employees are strictly prohibited from using illegal software.

Article 18 No Smoking

- 1) All executives and employees must comply with the company's personnel regulations by refraining from smoking within business sites to ensure a pleasant environment across all business sites.

### **Chapter 3 Guidelines for Violating Regulations**

Article 19 Reporting Obligation

- 1) All executives and employees must not engage in any form of unethical behavior under any circumstances, including situation that may involve the loss of potential business opportunities, no unethical behavior shall be conducted. All stakeholders who become aware of such behavior or violations of ethical norms must report them through channels such as 'Online Friends' or the department responsible for ethics management.

Article 20 Protection of Whistleblowers

- 1) Kumho Petrochemical guarantees the confidentiality of whistleblowers who report misconduct through channels such as 'Online Friends' and actively safeguards them from any inconvenience retaliation or harassment.
- 2) If a whistleblower requests a change in department or position to avoid discomfort or retaliation due to the report, Kumho Petrochemical should accommodate this request to the fullest extent possible.
- 3) In cases where the reported content involves the whistleblower, such circumstances may be considered as grounds for mitigating disciplinary action.

Article 21 Discipline and Rewards

- 1) In cases of non-compliance with the ethical management policy by executives or employees, the department responsible for ethics management promptly investigates the circumstances, reports to the CEO, and may recommend disciplinary measures or personnel actions against the violator.
- 2) Kumho Petrochemical may reward or provide appropriate compensation to members who have made significant contributions to achieving ethical goals.

## **Chapter 4 Role of Executives and Team Leaders**

### Article 22 Role of Executives and Team Leaders

- 1) Lead by example through actions, not just words.
- 2) Ensure that employees understand that ethical behavior takes precedence over business results.
- 3) Create an open environment where all employees feel comfortable expressing their opinions.

## **ADDENDUM**

1. These guidelines came into effect on June 29, 2021.
2. These guidelines were revised and came into effect on June 16, 2022.
3. These guidelines were revised and came into effect on May 28, 2024.
4. These guidelines were revised and came into effect on May 29, 2025.

# Kumho Petrochemical Group Anti-corruption and Compliance Policy

## Foreword

Kumho Petrochemical establishes a clear anti-corruption policy that ensures employees and all relevant stakeholders act in accordance with anti-corruption laws in every jurisdiction where the company operates, and perform their duties with integrity, grounded in strong ethical principles. With the aim to become a trusted company, Kumho Petrochemical enacts a Code of Conduct and Standards for Behavior that guide all its employees in preventing corruption, identifying and addressing potential risks, thereby embedding a transparent and sound corporate culture into every corner of the organization.

## Chapter 1 General Provisions

### Article 1 Scope of Application

- 1) This policy applies to all employees (the entire workforce, regardless of contract type or role, collectively referred to as 'employees'), suppliers, and all individuals or entities involved in Kumho Petrochemical's business, including affiliated companies and related parties.

### Article 2 Definitions of Terms

- 1) Terms used in this policy are defined as follows.
  - (1) 'Bribe' refers to money or valuables given in an illegitimate or improper manner to a public official or related party in a position of authority, for the purpose of gaining or maintaining business advantage.
  - (2) 'Corruption' includes bribery and improper solicitations made for the purpose of obtaining unlawful or unfair benefits.
  - (3) 'Public official, etc.' refers to a public official who falls under any of the following categories, or a person engaged in public duties.
    1. Persons legally recognized as public officials under the laws of the countries where Kumho Petrochemical operates
    2. Persons engaged in legislative, administrative, or judicial duties in those countries
    3. Employees of entities established with a majority of capital contributions from the relevant government or under its de facto control
    4. Persons working for public organizations, institutions, or media agencies established under national law to serve the public interest, such as in education, healthcare, or journalism
    5. Candidates for public office, political parties, or staff of political parties in those countries
    6. Individuals working for other public international organizations
    7. Persons regarded as public officials under the relevant country's anti-corruption laws
  - (4) 'Money or valuables, etc.' refers to any of the following.
    1. Any form of financial or material benefit, such as cash, securities, goods, corporate credit cards, accommodation vouchers, memberships, airline tickets, meal coupons, entry tickets, discount passes, invitations, and rights to use real estate
    2. Entertainment or hospitality, including meals, alcohol, golf, or adult entertainment, and convenience benefits such as transportation and lodging

3. Other forms of tangible or intangible economic benefit, such as debt assumption or cancellation, job offers, granting of business rights, monetary loans, provision of collateral, guarantees, vehicle rentals, or payment of taxes on behalf of another
- (5) 'Gift' refers to goods provided without compensation, covering all types of goods except for cash and food
- (6) 'Improper solicitation' refers to any conduct that induces a public official to break laws, misuse their authority, or act against fair and legitimate business practices
- (7) 'Improper Solicitation Act' refers to 「Improper Solicitation and Graft Act」
- (8) 'Related party' includes individuals or entities doing business with Kumho Petrochemical or performing duties on its behalf, such as suppliers, dealers, distributors, agents, and intermediaries
- (9) 'Department responsible for ethical management' refers to the Human Resources Team
- (10) Any terms not defined herein follow definitions under the anti-corruption legislation of the respective jurisdiction

## **Chapter 2 Practical Guidance for Compliance**

### Article 3 Compliance with Laws and Regulations Pertaining to Anti-Corruption

- 1) All employees of Kumho Petrochemical recognize their responsibilities in performing their duties and are committed to the faithful observance of anti-corruption laws and this policy across all jurisdictions where the company operates.
- 2) Korea's anti-corruption legislation includes the Criminal Act, the Act on the Aggravated Punishment, etc. of Specific Crimes, the Act on the Aggravated Punishment of Specific Economic Crimes, the Improper Solicitation and Graft Act, and the Act on Combating Bribery of Foreign Public Officials in International Business Transactions.
- 3) Overseas, the company ensures strict compliance with applicable legislation in all countries where it operates, including the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act (UKBA), and global conventions such as the OECD Anti-Bribery Convention and the United Nations Convention Against Corruption, as well as other relevant foreign laws and local regulations governing regions of business activity.
- 4) Employees must never compel or direct subordinates or colleagues to perform actions that may breach anti-corruption laws or this policy. If an employee inevitably violates or is compelled to violate these laws or policy, or becomes aware that another person in the company is complicit in such activities, or if there is a risk of a potential or actual breach, they must immediately report it to their supervisor and the department in charge of ethical management, following the established procedures.
- 5) Lack of awareness of applicable laws or this policy, or reliance on socially accepted business practices, does not exempt any employee from accountability for violations.
- 6) If employees have questions regarding proper compliance with anti-corruption laws and this policy, or if they are uncertain whether a particular act may constitute a breach, they must promptly consult their supervisor or the department responsible for ethical management.

### Article 4 Prohibition of Improper Solicitation

- 1) Employees must not engage in any of the following acts of improper solicitation, either personally or through third parties, including related parties, while carrying out their duties, pursuant to Article 5(1) of the Improper Solicitation and Graft Act.
  - (1) Illegitimate handling of various licenses, permits, and approvals

- (2) Attempting to influence the reduction or cancellation of administrative sanctions or criminal penalties
  - (3) Intervening in personnel decisions
  - (4) Affecting the appointment or dismissal of individuals in decision-making positions within public institutions
  - (5) Intervening in the selection or disqualification of recipients of awards, honors, or commendations
  - (6) Leaking confidential information related to bidding, or auction
  - (7) Intervening in the selection or exclusion of contracting parties
  - (8) Intervening in the allocation of subsidies or incentives
  - (9) Influencing transactions involving public sector assets or services, such as disposition or exchanges
  - (10) Tampering with school admissions, or grading
  - (11) Engaging in unlawful actions related to draft physical examination, assignments, or duty designations
  - (12) Manipulating the outcomes of official evaluations or assessments conducted by public institutions
  - (13) Interfering in decisions regarding the selection or exclusion of individuals or entities subject to administrative supervision, enforcement, or audit
  - (14) Influencing legal investigations, court trials, or formal judgments through illegitimate means
  - (15) Engaging in any conduct that compels a public official to act beyond their official status or authority, or to misuse their position in relation to any of the 14 aforementioned acts
- 2) Any improper request made to a public official is banned, even if it does not involve money or goods.
  - 3) Even if an action does not constitute improper solicitation, any behavior that may compromise the impartiality of official duties is also prohibited.

#### Article 5 Ban on Offering Money or Valuables

- 1) Employees must not offer, suggest, or promise any form of money or valuables, regardless of purpose, to public officials or their relatives.
- 2) However, if the items in question are not expressly listed as banned under relevant domestic or international anti-bribery laws, and all legal conditions are met, such provision may be permissible. In such cases, employees are encouraged to consult the Legal Affairs Team for legal advice on whether the provision in question constitutes a violation.

#### Article 6 Guidance for Gift Giving

- 1) Even when an employee offers a small-value gift in the course of their duties, whether to foster a friendly business relationship or as a token of goodwill, they must adhere to the following standards.
  - (1) Employees must comply with all applicable laws, including the Improper Solicitation and Graft Act.
  - (2) Gift-giving must align with the regulations of the recipient's organization.
  - (3) The gift must be solely for the purpose of facilitating smooth business operations, and must be appropriate within generally accepted social norms.
  - (4) The value and frequency of gifts must be reasonable and consistent with acceptable customary practices. (Gifts must not be extravagant or luxurious to the extent that they could influence the recipient's decision-making or cause embarrassment if disclosed. They should be modest and not repetitive.)
  - (5) Employees must not seek or accept any form of benefit in return (favor or advantage) as a result of giving a gift.
  - (6) All gift-related expenses must be accurately recorded in the company's relevant ledger.
- 2) Both gift providers and recipients must recognize that a gift may be considered a bribe depending on its value, the presence of an expected return or compensation, and its relevance to official duties, even if there is no intent to offer a bribe. They must remain vigilant and exercise caution.

- 3) If an employee intends to offer a gift to a public official involved in job-related matters, and is unsure whether this may fall under Paragraph 1) of this Article, they must consult with the department responsible for ethical management in advance to determine whether the action would constitute a violation.

#### Article 7 Facilitation Payment

- 1) Bribes, such as cash or valuables provided directly or indirectly to public officials to accelerate the legitimate performance of routine or repetitive tasks, are, in principle, prohibited.
- 2) If an employee is asked for facilitation payment, they must reject the request and clearly communicate this policy. However, if refusal would result in a direct threat or impending harm to personal safety due to coercion or intimidation, reasonable measures may be taken exceptionally to prevent harm. In such cases where a bribe is paid, the incident must be reported to the CEO immediately.

#### Article 8 Related Parties' Compliance with Anti-corruption Laws

- 1) Employees must not enter into contracts or engage in business activities upon recognizing that suppliers acting on behalf of the company, those in a business relationship with the company, distributors, agents, intermediaries, or bidding companies (related parties) have paid, or are highly likely to pay, part or all of the transaction amount received from the company as a bribe to public officials.
- 2) Employees must communicate this policy when engaging in transactions with related parties and ensure their compliance with both domestic and international anti-corruption laws. Any actual or potential violation may result in company-led investigations, early termination of contracts, and claims for damages. These consequences must be clearly stipulated in the contract, and the contract details must be reported to the department responsible for ethical management. However, if there is a reasonable justification, such as the nature of the contract or negotiation development, this clause may be omitted.
- 3) If an employee identifies any of the following risks related to a related party's noncompliance with domestic or international anti-corruption laws, they must immediately report the matter to the department responsible for ethical management.
  - (1) Whether a related party is connected to a current or former public official (selected based on a request or recommendation from such an official)
  - (2) If a related party is known to be closely associated with a public official, or voluntarily discloses such a relationship
  - (3) If an excessively high payment is made, far above corporate standards, market prices, or industry practices, or if goods or services are offered at unusually low prices
  - (4) If a shell company with no actual business operations or assets is included among the related parties
  - (5) If a related party requests payment to a bank in a country other than where they are based, to another individual, under a different business name inconsistent with their actual operations, or other non-standard payment methods
  - (6) If a related party proposes to provide confidential information obtained from unclear sources or through unverifiable channels
  - (7) If a related party appears to lack the necessary qualifications, experience, or resources (equipment and workforce) to perform the work
  - (8) If there are any indications of potential violations of this policy or anti-corruption laws, including the related party's negative reputation in the market
- 4) Based on the notifications provided under Paragraph 3), the department responsible for ethical management may, if necessary, consult with the Legal Affairs Team to assess the risk of anti-corruption law

violations. It may also request the responsible employee to conduct further due diligence or take additional anti-corruption measures regarding the related party, and may submit its opinion to the relevant department or management concerning the conclusion of the contract with the related party.

#### Article 9 Money or Valuables for Family Events

- 1) Money or valuables provided for family events may be offered under the principles outlined in Article 6 of this policy, if they remain within a reasonable range in line with socially accepted norms.
- 2) The amount of money or valuables offered to public officials for family events must comply with the Improper Solicitation and Graft Act and other applicable anti-corruption laws in each country.

#### Article 10 Restriction on Honoraria for Lectures and Similar Engagements

- 1) Employees must not provide public officials with honorarium exceeding the amount prescribed by the Enforcement Decree of the Improper Solicitation and Graft Act for lectures, speeches, written contributions, or other activities (hereinafter referred to as 'lectures or others') conducted in connection with their official duties, including but not limited to education, publicity, forums, seminars, public hearings, or other meetings.

#### Article 11 Offering of Personal Monetary or Other Benefits

- 1) The company does not pay for or be held responsible for any money or valuables that employees provide or intend to provide to public officials for personal purposes.

#### Article 12 Prohibition on Receiving Money or Valuables and Involvement in Business Interests

- 1) Employees must not directly or indirectly receive, request, suggest, or promise any money or valuables from related parties, persons involved in their jobs, or any parties currently engaged or seeking to engage in business with the company, in return for providing or maintaining business opportunities or advantages.
- 2) Employees must not use their position to obtain unfair benefits for themselves or enable others to do so.
- 3) Employees must not use or allow others to use the company's name or their position for personal gain.

#### Article 13 Donations and Sponsorships

- 1) The company may make donations for charitable, public interest, or social contribution purposes, provided such donations comply with the relevant laws of the countries in which it operates to the extent within socially acceptable norms.
- 2) The company may provide lawful charitable donations or sponsorships to reliable organizations or institutions, but such contributions must not be made with the intent to gain unfair advantage or exert influence, and must follow the company's internal procedures.
- 3) When the company makes donations, the value of the donated items must be appropriate and reasonable in light of local customs and cultural norms.
- 4) The company is strictly prohibited from making any donations using company assets for unlawful political purposes.

#### Article 14 Mergers and Acquisitions

- 1) The company must recognize that, when acquiring another company, it may inherit the acquired company's past legal liabilities, and if the acquired company continues to engage in acts that violate anti-corruption laws after the acquisition, the company may be held legally accountable. Therefore, prior to any acquisition, the company must thoroughly review and identify legal risks to prevent and address such issues in advance.

- 2) The company must embed its internal control processes into the acquired company by implementing compliance training and inspections for employees, and by conducting third-party due diligence when necessary.
- 3) Employees of the acquired company must actively cooperate in the establishment of internal control processes and the implementation of necessary compliance measures during the merger or acquisition.

### **Chapter 3 Guidelines for Handling Policy Violations**

#### Article 15 Reporting Obligations, Procedures, and Whistleblower Protection

- 1) In the event that an employee becomes aware of a violation or attempted violation of this policy, the employee must immediately preserve all relevant evidence (including but not limited to documents, voice recordings, and electronically stored data) and report the matter without delay to the department responsible for ethical management.
- 2) When reporting under Paragraph 1), employees may use the Group's whistleblowing channels, including the online reporting system, email, telephone, or in-person visits.
- 3) Upon receipt of a report under Paragraph 2), the department responsible for ethical management must review the report and, if necessary, consult the Legal Affairs Team for legal review to determine whether the reported conduct constitutes a violation of this policy. If it is determined to be a violation, the matter must be reported to the CEO.
- 4) Upon receiving such a report, the CEO must take appropriate action, including disciplinary measures against the employee concerned, if deemed necessary.
- 5) Anyone who becomes aware of the content of a report or the identity of the whistleblower must protect the confidentiality of both the report and the whistleblower.
- 6) The whistleblower is protected from any personnel disadvantages resulting from the report. If the whistleblower requests a separation from the reported person, a change in duties, or other protective measures to avoid discomfort or disadvantage, such requests must be honored unless there is a compelling reason to refuse.

#### Article 16 Disciplinary Action and Rewards

- 1) If an employee violates the Improper Solicitation and Graft Act, other applicable anti-corruption laws, or this policy, or becomes aware of a violation but fails to take reasonable measures to prevent it, the company may take disciplinary or personnel action against the employee in accordance with its rules of employment and HR regulations. However, if the employee voluntarily reports the violation in advance, such action may be taken into consideration in determining the level of disciplinary measures.
- 2) If an employee orders or instructs a subordinate or colleague to commit an act that violates the Improper Solicitation and Graft Act, other anti-corruption laws, or this policy, or becomes aware of such violations by others but fails to report them to the company without delay, the employee may be subject to disciplinary action under the company's regulations.
- 3) If an employee is fined or penalized under the Improper Solicitation and Graft Act or other anti-corruption laws, the company is not held liable on behalf of the employee. The employee is not entitled to any reimbursement or compensation from the company for such fines, penalties, or any related damages.
- 4) If a related party violates the Improper Solicitation and Graft Act or other anti-corruption laws in connection with a business relationship with the company, the company may take action in accordance with its internal

policies. In the case of a serious violation, this may include contract termination or separate civil or criminal action.

- 5) The company may grant appropriate rewards to employees who have made significant contributions to the achievement of this policy's objectives.

#### **Chapter 4 Training and Assessments**

##### Article 17 Anti-corruption Training

- 1) The company regularly provides anti-corruption training to employees to ensure their understanding and compliance with applicable anti-corruption laws and this policy.
- 2) Employees must faithfully attend the anti-corruption training sessions conducted by the company on a regular basis.
- 3) The company must retain documented information on the content and results of the training, including the date and location of the training, participants, and training content.

##### Article 18 Risk Assessment

- 1) The department responsible for ethical management regularly reviews whether employees and related parties are faithfully complying with applicable anti-corruption laws and this policy, conducts preventive training and risk assessments, and reports the results to the CEO.
- 2) If the department responsible for ethical management requests cooperation for reviewing compliance with anti-corruption laws and this policy by employees and related parties, the relevant departments and employees must respond in a prompt and faithful manner.

##### Article 19 Implementation

- 1) Employees must understand and comply with this policy. Any employee who violates this policy may be subject to disciplinary action in accordance with company regulations, and may also face civil or criminal legal action.
- 2) Taking into account the nature of business operations, the company may establish and enforce detailed rules as necessary to ensure the appropriate implementation of this policy.
- 3) The company regularly reviews domestic and international anti-corruption laws and may revise this policy as needed to reflect any required updates.

## **ADDENDUM**

1. This policy came into effect on May 29, 2025.

# Information Security Policy

## **Foreword**

Kumho Petrochemical Co., Ltd. (hereinafter referred to as 'Kumho Petrochemical') is committed to earning the trust of its customers and society by establishing a robust information security management system to safeguard both the company's information assets and customer information. In addition, Kumho Petrochemical strictly complies with applicable information security laws and regulations with the aim of preventing technology leakage and protecting personal information from loss, theft, leakage, alteration, or damage.

## **Chapter 1 Scope of the Policy**

### Article 1 Scope

- 1) This policy, in principle, applies to all employees of Kumho Petrochemical. The scope of application includes all tangible and intangible information assets owned by the company, as well as information assets and activities derived from employees.
- 2) Partner companies of Kumho Petrochemical must also comply with the third-party information security requirements set forth in this policy. The company may specify these requirements through contracts or security agreements and require partner companies to adhere to them.

## **Chapter 2 Operation of the Information Security Organization**

### Article 2 Composition and Operation of the Information Security Organization

- 1) The company's information security is divided into administrative, physical, and technical securities. The responsible security organizations are as follows.
  - (1) Human security and personal information protection, under administrative security: Human Resources Team
  - (2) Physical security: General Affairs & Administration Team at the Headquarters and Business Administration Teams at each business site
  - (3) Technical security (hereinafter referred to as IT security): IT Planning Team
  - (4) Matters related to administrative security other than human security and personal information protection shall be determined through consultation among relevant security departments.

## **Chapter 3 Responsibilities and Obligations for Information Security**

### Article 3 Responsibilities of Employees Regarding Information Security

- 1) All employees of the company are responsible for maintaining the security of the company's information assets and information systems in the course of their work. Employees should be familiar with the company's information security policy and related guidelines and faithfully comply with them. They must act in accordance with the following principles.
  - (1) Protecting critical company information while appropriately sharing useful information
  - (2) Ensuring strict protection against the leakage or unauthorized access of the company's confidential information
  - (3) Communicating important information immediately upon recognition to the relevant personnel or those who require it to perform their duties

- (4) Avoiding distortion of information or the spread of false information
- (5) Fully understanding and consistently following the company's information security rules and detailed guidelines
- 2) All members of the company are responsible for practicing and maintaining information security. It is essential to stay aware of information security in their daily work and to follow the security guidelines outlined below.
  - (1) Confidentiality: Avoiding disclosure of sensitive information, such as customer information and internal company materials, to outside parties
  - (2) Password management: Refraining from sharing passwords with others and regularly changing them
  - (3) Access control: Avoiding access to systems or information without proper authorization
  - (4) Email and link vigilance: Avoiding clicking on suspicious emails or links that may involve phishing or malware
  - (5) Device security: Keeping work devices such as laptops, tablets, and mobile phones locked and secure against loss
  - (6) Policy compliance: Faithfully following the company's information security policies, guidelines, and training
- 3) If an employee causes a information security incident through intent or negligence, they may be held accountable. In the event that an employee becomes aware of an information security violation, incident, or potential risk, they must immediately report it to their supervisor or the person in charge of information security.

#### **Chapter 4 Monitoring and Response to Data Security Threats**

##### Article 4 Constant Monitoring and Response to Data Security Threats

- 1) The company safeguards its information assets and tightens its cyber threat response system by operating the third-party Intelligent Cyber Security Center, which provides 24/7 real-time monitoring against cyberattacks, malware or ransomware infections, phishing emails, personal information breaches, and vulnerabilities in information security.
- 2) In the event of a cybersecurity incident, the responsible information security organization must promptly respond in accordance with the Cyber Attack Response Manual by classifying the situation into five levels; Normal, Attention, Caution, Alert, and Critical. The organization takes prompt action in cooperation with operational departments, verifies the results, and establishes measures to prevent recurrence.

#### **Chapter 5 Data Integrity and Protection**

##### Article 5 Data Integrity and Secure Protection

- 1) Employees are granted access to and use of the company's information assets, and in return, bear the responsibility of safeguarding such information.
- 2) Employees must prevent the alteration, leakage, or deletion of information and data during storage, transmission, or processing caused by hacking, system failures, or other disruptions. To this end, they must continuously take measures for information security, including access control, encryption, and backup.
- 3) Employees must not inappropriately expose the company's information assets, or allow unauthorized individuals to gain access by intent or negligence.

- 4) When disclosing information assets classified as confidential to external parties, employees must obtain prior approval from both the information asset owner and the relevant executive.
- 5) The company controls the risk of personal information leakage by encrypting documents containing personal information and restricting printing in accordance with personal information protection standards.

## **Chapter 6 Information Security Investment and Improvement**

### Article 6 Ongoing Investment in Information Systems and Information Protection

- 1) The company makes continuous investments in information security systems to ensure they remain up to date, safeguard organizational assets and information, and comply with legal regulations, thereby effectively responding to evolving cyber threats.
- 2) The company uses vulnerability assessment tools for annual internal audits and conducts web application penetration testing to prevent security incidents in information systems and mitigate the risk of leakage of material business information and personal information.
- 3) The company transparently discloses its current information security status, including investments, personnel, and relevant certifications, each year through the Korea Internet & Security Agency's official information security disclosure portal.

## **Chapter 7 Third-party Requirements**

### Article 7 Confidentiality and Data Protection Agreement by Third Parties

- 1) Pursuant to the information use agreement, third parties must comply with the following requirements as well as the company's information security regulations in order to maintain the confidentiality of information obtained during their use of Kumho Petrochemical's information assets, systems, and related facilities. A written 'Data Security Pledge' confirming their compliance must be submitted to the company.
  - (1) Not attempt to access unauthorized information or circumvent any security equipment or facilities installed for protective purposes
  - (2) Not use the company's information systems for personal business or profit, and use them solely for authorized work-related purposes
  - (3) Not alter or damage the company's information assets without proper authorization
  - (4) Not disclose or leak any information acquired during work, whether owned by Kumho Petrochemical or third parties, without prior approval from the company or the rightful owner
  - (5) Not possess or distribute unauthorized software or documents that may infringe copyright through Kumho Petrochemical's network
  - (6) Not attempt to access the networks or systems of other institutions that prohibit outside access by using Kumho Petrochemical's network

## **ADDENDUM**

1. This policy came into effect on May 29, 2025.

## Corporate Governance Charter

### **Foreword**

Kumho Petrochemical Co. Ltd. (hereinafter referred to as 'the company') strives to protect the interests of stakeholders and achieve sustainable growth by harmonizing humanity and the environment based on the vision of being a "Solution Partner Creating Value Beyond Chemistry."

Recognizing that the establishment of fair and transparent corporate governance is essential for sustainable management and co-prosperity with stakeholders, the company hereby establishes the 'Corporate Governance Charter of Kumho Petrochemical Co. Ltd.,' setting forth the direction of sound corporate governance.

In alignment with the charter, the company shall safeguard the rights of stakeholders, establish, and oversee the Board of Directors and audit organization with professionalism and independence in mind, and cultivate and fortify sound corporate governance practices.

### **Chapter 1 Shareholders**

#### Article 1 Rights of Shareholders

- 1) Shareholders have the fundamental rights guaranteed by the Commercial Act and related laws, and these basic rights of shareholders cannot be deprived or restricted by the Articles of Incorporation, resolutions of the General Meeting of Shareholders, or the Board of Directors.
- 2) Matters that significantly affect the existence of the company and shareholders' rights must be decided at the General Meeting of Shareholders in a manner that maximizes shareholder rights in accordance with relevant laws and the Articles of Incorporation.
- 3) The company shall provide shareholders with sufficient notice of the date, venue, and agenda of the General Meeting of Shareholders well in advance, and the timing and location of the General Meeting of Shareholders shall be determined to allow maximum shareholder participation.
- 4) Shareholders may propose agenda items for the General Meeting of Shareholders and may question and request explanations on agenda items at the General Meeting of Shareholders.
- 5) The company shall ensure that shareholders are free to exercise their voting rights, and resolutions of the General Meeting of Shareholders based on the exercise of shareholders' voting rights shall be conducted fairly and transparently.

#### Article 2 Fair Treatment of Shareholders

- 1) Each shareholder shall have one voting right per ordinary share, and the fundamental rights of shareholders shall not be infringed upon. However, restrictions on voting rights for specific shareholders or types of shares may be limited in accordance with the law.
- 2) Shareholders should be able to receive necessary information from the company in a timely and fair manner, and the company shall provide all shareholders with fair access to information, even when disclosure obligations do not exist.
- 3) The company shall operate a systematic and effective internal control system to protect shareholder rights from unfair insider transactions and self-dealing by controlling shareholders and others.

#### Article 3 Responsibilities of Shareholders

- 1) Shareholders should recognize that their exercise of voting rights may affect the company's management and strive to actively exercise their voting rights for the company's development.
- 2) Controlling shareholders who exercise influence over the company's management should act in the interests of the company and all shareholders, and should strive to prevent harm to the company and other shareholders by avoiding actions contrary to this principle.

## **Chapter 2 Board of Directors**

### Article 4 Functions of the Board of Directors

- 1) The Board of Directors shall have comprehensive authority over the management of the company within the scope of relevant laws and shall perform functions of decision-making and management supervision related to the company's management. The main contents resolved by the Board of Directors are as follows:
  - (1) Major matters specified as matters requiring the approval of the Board of Directors under laws and the Articles of Incorporation
  - (2) Major matters related to the fundamental guidelines and business policies for company management
  - (3) Major financial matters such as the acquisition/disposal of major investments and assets
  - (4) Non-financial matters such as the establishment of ESG policies and strategies
  - (5) Matters related to the appointment/dismissal of the CEO, and the assignment and duties of directors, including the appointment of the Chair of the Board
  - (6) Matters delegated by the General Meeting of Shareholders
  - (7) Other major matters recognized as necessary by the CEO
- 2) Among matters requiring resolution by the Board of Directors, the board may delegate authority to the CEO or committees within the board, except for significant matters stipulated in laws, the articles of incorporation, or the 'Board of Directors Regulations.'

### Article 5 Board Composition and Appointment of Directors

- 1) The board shall be of a size that enables effective and rational decision-making for corporate governance, and it shall be composed of a sufficient number of directors to facilitate the activation of committees established within the board.
- 2) The board shall include independent directors who can function independently from management and controlling shareholders. The number of these independent directors should constitute a majority of the directors to ensure its substantive independence.
- 3) The board shall not include individuals who pose risks to the company's values or infringe upon shareholders' rights.
- 4) The board shall be composed of competent individuals with expertise to contribute substantially to corporate management, and the terms of appointed directors shall be respected unless there are specific disqualifying reasons. However, the total term of office for independent directors shall not exceed six years.
- 5) The board shall be structured to achieve diversity in age, knowledge, experience, and gender to fulfill its roles and responsibilities.
- 6) Internal directors are appointed by the shareholders' meeting upon recommendation by the board, while independent directors are appointed through recommendation by the independent director

candidate recommendation committee to ensure fairness and independence in the director nomination process.

- 7) The company shall ensure that shareholders have sufficient information and time to exercise their voting rights regarding director candidates.

#### Article 6 Independent Directors

- 1) According to the 'Policy on the Composition of the Board of Directors', independent directors must have no material conflicts of interest with the company and must be capable of making independent decisions from management and controlling shareholders.
- 2) The company shall confirm and disclose that independent director candidates have no material conflicts of interest with the company. Furthermore, independent directors must submit a confirmation letter to the company stating that they have no material conflicts of interest with the company upon acceptance of their appointment.
- 3) Independent directors shall avoid excessive concurrent positions to ensure faithful performance of their duties.
- 4) Independent directors may request necessary information from the company for their duties, and the Company shall adequately provide the information required for the performance of their duties.
- 5) Independent directors shall dedicate sufficient time to perform their duties and shall collect and review relevant materials before attending board meetings.
- 6) If necessary, independent directors may receive support from executives, employees or external experts through appropriate procedures, and the company shall support the costs incurred for this purpose.

#### Article 7 Board Operations

- 1) The board shall hold regular meetings at least once per quarter, and if necessary, it shall convene ad hoc meetings.
- 2) To ensure the smooth operation of the board, the company shall establish and operate the 'Board of Directors Regulations,' specifying the authority, responsibilities, and operational procedures of the board.
- 3) The board shall prepare minutes for each meeting, detailing the discussions as comprehensively and clearly as possible for proper maintenance and preservation.
- 4) The company shall disclose the attendance rate of individual directors at board meetings and the voting results of each director on major disclosure items.
- 5) The board, if necessary, shall utilize remote communication methods that allow simultaneous voice transmission and reception for all directors to maximize their participation in board meetings.

#### Article 8 Board Committees

- 1) The board shall establish and operate committees within the board composed of an appropriate number of members with specific functions and roles to enhance professionalism and efficiency in performing duties.
- 2) The majority of members on board committees shall be independent directors as a principle, but the composition of directors may be adjusted depending on the function and role of the committee. Audit, Compensation, Independent Director Nomination Committee, and Internal Transaction Committees shall consist entirely of independent directors.

- 3) All matters regarding the organization, operation, and authority of committees shall comply with separately established operational regulations, and resolutions passed by committees delegated by the board shall have the same effect as those passed by the board and shall be reported to the board.
- 4) Independent directors should avoid belonging to more than three committees simultaneously to ensure they have sufficient time and effort for effective board activities.

#### Article 9 Duties of Directors

- 1) Directors must perform their duties with the care of a prudent manager. Additionally, they must make reasonable decisions based on sufficient information, investing adequate time and effort.
- 2) Directors should not exercise their authority for their own or third-party interests, but should always pursue outcomes that are in the best interest of the company and its shareholders.
- 3) Directors must not disclose or exploit the company's secrets for personal or third-party gain.

#### Article 10 Responsibilities of Directors

- 1) If directors collect reliable data and information and carefully review them before making decisions based on sincere and rational judgments, their management decisions should be respected. However, if directors violate laws, the articles of incorporation, or neglect their duties, resulting in company losses, they are liable for damages. Particularly in cases of malice or gross negligence, they are also liable for damages to third parties.
- 2) The company may opt to secure directors' liability insurance to ensure the effectiveness of holding the directors accountable, and to attract qualified personnel.
- 3) Independent directors must regularly participate in internal and external educational programs to enhance efficient performance, and newly appointed directors are recommended to participate in training related to duties and corporate governance.

#### Article 11 Evaluation and Compensation

- 1) The activities of independent directors should be fairly evaluated, and the evaluation results should be reasonably and appropriately reflected in decisions regarding directors' compensation and reappointment.
- 2) The board should craft compensation policies for key management personnel with a focus on aligning with the long-term interests of shareholders and ensuring the sustainable management of the company, while also ensuring that such compensation is disclosed in compliance with applicable disclosure regulations and legal requirements.
- 3) The board must fairly evaluate the management activities of the executive team and appropriately reflect the evaluation results in directors' compensation.

### **Chapter 3    **Audit Organization****

#### Article 12 Internal Audit Organization

- 1) The company, as a large corporate group, shall establish an Audit Committee within the Board of Directors as its internal audit organization.
- 2) The Audit Committee shall be composed entirely of independent directors to maintain independence and expertise, and in accordance with the Commercial Act and related laws, at least one member of the committee must be an accounting or financial expert.

- 3) The board shall stipulate regulations regarding the objectives, organization, authority, responsibilities, and duties of the Audit Committee. Additionally, the Audit Committee shall annually evaluate the validity of these regulations and ensure that the company discloses the evaluation results.
- 4) The Audit Committee shall faithfully perform designated accounting and audit tasks in accordance with specified laws, the Articles of Incorporation, the Board of Directors Regulations, and the Audit Committee Regulations.
- 5) The Audit Committee shall convene quarterly as a principle, with ad hoc meetings convened as necessary, and may require the attendance of management, financial executives, heads of internal audit departments, and external auditors for the performance of its duties.
- 6) The Audit Committee shall document minutes of each meeting, detailing major discussions and resolutions.
- 7) The Audit Committee shall have unrestricted access to information necessary for the performance of its duties, with the ability to seek advice from external experts when needed.
- 8) The Audit Committee shall report its assessment of its own independence and key activities to the shareholders' meeting, and the CEO shall disclose this information through the annual report.
- 9) The Audit Committee members must be independent from the management and controlling shareholders. Therefore, the Audit Committee members may only receive compensation as directors and may not receive any other remuneration.
- 10) The Audit Committee members must receive audit-related training at least once annually.

#### Article 13 External Auditors

- 1) The external auditor must maintain legal and substantive independence from the company, management, and controlling shareholders.
- 2) The external auditor should make efforts to ascertain any fraudulent or illegal activities of the company during the audit.
- 3) Reporting significant matters identified during external audit activities to the Audit Committee is a responsibility of the external auditor.
- 4) The external auditor shall be liable for compensating the company for any losses incurred and for covering damages sustained by users of audit information resulting from negligent or intentional deficiencies in the accounting audits and must verify the presence of information corresponding to audit results in the audited financial statements and periodic disclosure information.
- 5) The external auditor shall, in accordance with the Act on External Audit of Stock Companies and other relevant laws, consider the company's viability as a going concern during the audit.
- 6) Attendance at the shareholders' meeting to explain shareholder inquiries regarding the audit report is required of the external auditor.

## **Chapter 4 Stakeholder**

#### Article 14 Protection of Stakeholder Rights

- 1) The company shall endeavor to protect the rights of various stakeholders and avoid infringing upon them.
- 2) The company shall fulfill its social responsibilities, such as consumer protection and environmental conservation.
- 3) Efforts shall be made to protect the rights of workers and enhance their quality of life.

- 4) By complying with laws related to fair trade, the company shall promote the establishment of a fair market order and contribute to the balanced development of the national economy.
- 5) Regarding matters such as mergers, reductions of capital, and divisions that significantly affect the rights of creditors, the company shall comply with creditor protection procedures in accordance with Article 527-5 of the Commercial Act.
- 6) If stakeholders simultaneously hold positions as shareholders, the company shall ensure that their respective rights as stakeholders and shareholders shall be protected and exercisable.

#### Article 15 Participation of Stakeholders in Corporate Governance Oversight

- 1) The board and management should heed the demands or concerns of shareholders and stakeholders to foster the company's ongoing and steady growth, making concerted efforts to engage in communication with them on diverse matters as needed.
- 2) The form and extent of employee participation in management decisions shall be determined to promote the sound development of the company.
- 3) Within the limits allowed by laws and contracts with third parties, the company shall disclose information in an accessible and user-friendly manner to protect the rights of stakeholders and actively respond to requests for additional information.

### **Chapter 5 Market-Oriented Corporate Governance**

#### Article 16 Disclosure

- 1) In addition to the disclosures required by law, the company must faithfully disclose matters that may have a significant impact on the decisions of shareholders and stakeholders, or may have such an impact.
- 2) Furthermore, the company is required to promptly and accurately disclose comprehensive information regarding significant decisions in addition to its routine disclosure obligations.
- 3) The company is required to disclose the stock ownership status of the controlling shareholder and their closely related individuals.
- 4) The company must establish an 'Ethical Management Policy and Guidelines' and disclose it.
- 5) The company's disclosures must be written in a manner that is easily understandable and accessible to stakeholders.
- 6) The CEO and the Chief Financial Officer must certify the accuracy and completeness of financial reporting.

#### Article 17 Corporate Control Market

- 1) Acts leading to changes in corporate control, such as acquisitions, mergers, divisions, and significant transfers of business operations, must be conducted through transparent and fair procedures.
- 2) Actions to defend the company's management rights should not be conducted in a manner that sacrifices the interests of the company and shareholders for the maintenance of the management rights of some shareholders or management.

## **ADDENDUM**

1. This policy came into effect on May 28, 2024.
2. This policy was revised and came into effect on May 29, 2025.

## Policy on the Composition of the Board of Directors

The Board of Directors of Kumho Petrochemical Co., Ltd. (hereinafter referred to as 'Kumho Petrochemical') aims to enhance corporate value by fostering value creation and sustainable growth for the company and its stakeholders. It determines management objectives and strategies, effectively performing core decision-making functions and managerial oversight.

The board resolves significant management matters related to the fundamental guidelines and policies for management, financial matters such as major investments and acquisitions/disposals of assets, appointments/dismissals of the CEO, the appointment of the Chair of the Board, matters delegated by the Board of Directors and shareholders' meetings, and other matters stipulated by laws and the articles of incorporation. It aims to maximize corporate value from a continuous and long-term perspective. To achieve this, the board is structured to efficiently make decisions and oversee management, appointing directors through transparent procedures to reflect a wide range of stakeholder opinions.

### **Article 1**    **Diversity**

Kumho Petrochemical endeavors to promote diversity in the appointment of directors from an inclusive standpoint, ensuring that the board conducts equitable decision-making processes devoid of prejudice or the exclusive representation of particular stakeholders based on factors including nationality, cultural background, gender, age, religion, race, ethnicity, or socio-economic status. Consequently, fair and transparent directors appointment procedures are mandated to uphold diversity within the board's composition.

In constituting the Board, Kumho Petrochemical takes diversity into account to foster reasoned decision-making processes.

- 1) Multiculturalism: Identifying candidates with diverse nationalities or cultural backgrounds to establish a globally advanced corporate governance structure.
- 2) Age: Balancing flexibility and experience to enhance the efficiency of the board of directors.
- 3) Gender: Appointing at least one female director to operate the board from various perspectives.
- 4) Experience: Considering the characteristics of the petrochemical industry and Korean society.
- 5) Embracing diversity from an inclusive perspective, including religion, race, ethnicity, among others.

### **Article 2**    **Expertise**

Kumho Petrochemical constitutes its Board of Directors with individuals possessing expertise in various fields such as management, finance and accounting, law, ESG, and industry understanding, to ensure substantive contributions to corporate governance. Accordingly, candidates with practical experience and specialized knowledge in diverse sectors are selected to enhance the board's expertise and strengthen its oversight functions. Additionally, when necessary, the company actively supports the board in making decisions based on expertise by providing external expert advice, education, and other resources.

Kumho Petrochemical, in composing its Board of Directors, considers the following to ensure rational decision-making based on expertise:

- 1) Essential expertise (5 areas): Industry, Management (Leadership), Finance/Accounting/Risk, Legal/Policy/Compliance, ESG
- 2) Detailed expertise (4 areas): Environment/Safety/Health, R&D, Strategy/M&A, International Relations
- 3) Registration of executive experience: Understanding of directorial duties

### **Article 3 Independence**

Kumho Petrochemical appoints independent directors in compliance with or stricter application of the Commercial Act to ensure that the board of directors functions independently from management and controlling shareholders, while maintaining independent directors as a majority of the board. Furthermore, to secure independence for decision-making, committees within the board, such as the Audit Committee, Independent Director Nomination Committee, Internal Transactions Committee, and Compensation Committee, are composed entirely of independent directors.

Independent directors are verified fairly whether candidates meet the qualification requirements as stipulated in relevant laws and regulations from the nomination stage, whether they have no direct contracts or transactional relationships with the company or related parties, whether there are no conflicts of interest that compromise independence, such as domination by the same individual governing subsidiaries, affiliated companies, or corporate groups, and whether they align with the interests of shareholders, considering the candidates' capabilities in their respective fields, and ultimately decide through the Independent Director Nomination Committee whether they are suitable candidates for the company. Additionally, relevant information is disclosed through the electronic disclosure system and the company's website to ensure that shareholders receive sufficient information to review director candidates.

When composing the board of directors, Kumho Petrochemical considers the following to ensure reasonable decision-making based on independence:

- 1) Independent director candidates must meet the requirements of Article 382(3) and Article 542-8(2) of the Commercial Act and the following subparagraphs.
- 2) Independent director candidates must independently participate in decisions regarding the company's important management matters and be capable of supervising and supporting management as members of the Board of Directors.
- 3) If there are no disqualifying factors under the Commercial Act, an independent director candidate may be considered to hold an independent position from the company if they satisfy the requirements of each subparagraph below.
  - (1) The candidate shall not have been an executive officer of the company or its subsidiary (including non-profit organizations) within the past five years
  - (2) Nor shall their immediate family members, including direct descendants, direct relatives, or spouse, have held executive positions in the company or its subsidiary within the past three years
  - (3) Neither the candidate nor their immediate family members shall have received compensation exceeding one hundred million Korean won annually from the company or its subsidiary within the past three years

- (4) The candidate shall not have been an employee of the company's external auditor within the past three years
  - (5) The candidate shall not serve as an advisor or consultant to the company or its management
  - (6) The candidate shall not concurrently hold positions as a director, executive officer, or auditor in two or more companies other than the company
  - (7) The candidate must not have entered into commercial transactions, such as primary advisory or technology partnership agreements, with other companies that have significant relationships with the company, including major customers or suppliers
  - (8) The candidate shall not have been an executive or an employee of another company that entered into a single transaction agreement equivalent to or exceeding 10% of the company's total sales revenue during the recent fiscal year
  - (9) The candidate shall not have been an executive or an employee of another company with transaction performance totaling more than 10% of the company's total assets or revenue during the past three fiscal years
  - (10) The candidate shall not have any significant conflicts of interest concerning matters determined by the Board of Directors
- 4) In addition to the above requirements, the Independent Director Nomination Committee may comprehensively consider the independence of the independent director candidates, taking into account both domestic and international environments, as well as the overall relationship between directors and the company, including any significant affiliations between them.
  - 5) the Independent Director Nomination Committee should request and review as much information as possible from the company to confirm the independence of the independent director candidates, and the secretariat of the Board of Directors supports this process.
  - 6) The number of independent directors within the board shall be a minimum of three individuals, comprising over 60% of the total directors.

## ADDENDUM

1. This policy came into effect on June 16, 2022.
2. This policy was revised and came into effect on June 21, 2023.
3. This policy was revised and came into effect on May 28, 2024.
4. This policy was revised and came into effect on May 29, 2025.

# Reporting and Whistleblower Protection Guidelines

## Foreword

Kumho Petrochemical Co., Ltd. (hereinafter referred to as 'Kumho Petrochemical') considers the valuable input of informants as the cornerstone of transparency in management, ensuring that all stakeholders directly or indirectly associated with the company, including employees, competitors, customers, suppliers, partner companies, shareholders and investors, and the local community, do not suffer any disadvantage due to reporting, and endeavors to take all necessary measures and efforts.

All informants are strictly guaranteed anonymity, and reporting can be done through various channels including online submissions, telephone calls, fax transmissions, and direct visits. Additionally, the process and outcomes of the report is transparently disclosed to informants, who are also provided with the opportunity to submit further opinions and inquiries regarding the reported matters.

## Chapter 1 General Provisions

### Article 1 Purpose

- 1) The purpose of these guidelines is to establish the basic principles necessary to efficiently operate and activate Kumho Petrochemical's reporting channels, including the reporting process and whistleblower protection system.

### Article 2 Scope of Application

- 1) Kumho Petrochemical respects all reports collected from stakeholders, including employees, competitors, customers, suppliers, partner companies, shareholders, investors, and the local community, directly or indirectly related to the company. The stakeholders, including whistleblowers, can review the 'Reporting and Whistleblower Protection Guidelines' of Kumho Petrochemical for information on the reporting process, prompt and fair investigation and handling, whistleblower protection, and investigation procedures and processes.

### Article 3 Exceptions to Application:

- 1) These guidelines do not apply to the following types of reports.
  - (1) Acts of disclosing report contents to external agencies for personal gain without intending to improve internal business operations
  - (2) Acts of reporting with malicious intent, falsifying all or a substantial part of the content without factual basis (malicious false reporting)
  - (3) Reporting on an executive's or an employee's personal life unrelated to the company's business operations (however, unethical behavior among executives and employee such as adultery, assault, gambling, fraud, etc., is subject to reporting)
  - (4) Reports deemed "not eligible for investigation" by the responsible officer at the reporting center due to a lack of specificity to initiate an investigation or because the potential benefits of investigation are deemed significantly limited.
  - (5) Reports which, despite having sufficient specificity and potential investigative value, are deemed inappropriate for handling as reportable cases by the responsible officer at the reporting center in accordance with the Reporting Management Regulations.

#### Article 4 Definitions of Terms

1) The definitions of terms used in these guidelines are as follows:

(1) Whistleblower

A "whistleblower" refers to a person who provides or formally submits information on unethical conduct, illegal activities, or violations related to an employee's job performance through the company's reporting channels.

(2) Reporting System

The "reporting system" refers to a management system or process designed to effectively collect, process, and ensure the anonymity of reported information and transmit it to relevant departments for handling.

(3) Reporting Center

The "reporting center" refers to a specific department or organization responsible for managing and overseeing the entire process of receiving, processing, investigating, and providing feedback on reports.

(4) Investigating Officer

An "investigating officer" is a person responsible for conducting formal investigations into reported information and analyzing the results.

(5) Reporting Center Head

A "reporting center head" is a person responsible for managing and overseeing the entire process of receiving and processing reports, as well as reporting investigation stages and presenting investigation results to decision-makers. Additionally, they have the authority to instruct or conduct additional investigations into specific reports when necessary.

## **Chapter 2 Reporting and Handling Process**

#### Article 5 Reporting Obligation

1) All executives and employees must report to the reporting center in the following circumstances, in accordance with these guidelines:

(1) When, in the course of performing their duties, they are forced to engage in illegal or unethical conduct as specified in these guidelines.

(2) When they become aware of illegal or unethical conduct by any other stakeholder.

#### Article 6 Reporting Subjects

- 1) Acts in violation of relevant laws and regulations.
- 2) Acts that violate company rules and internal standards.
- 3) Acts of illegality, fraud, or acts that hinder fair competition.
- 4) Acts of human rights violations.
- 5) Unjust acts that impede business activities.
- 6) Other acts equivalent to items 1 through 5.

#### Article 7 Reporting Methods

- 1) Reporting Channels: Kumho Petrochemical Group Reporting Center
- 2) Reports can be made through main reporting channels, including the website, phone, fax, email, and mail. All reported content is independently handled under the management of Kumho Petrochemical's responsible department.

- (1) Website: Kumho Petrochemical Group Online Friends(Korean/English version), 24- hour operation (<https://justice.kkpcgroup.com/>)
- (2) Phone: +82-2-6961-1018
- (3) Fax: +82-2-6961-1017, 24 hours
- (4) E-mail: [hotline@kkpc.com](mailto:hotline@kkpc.com), 24 hours
- (5) Mail: Management Audit Team, Kumho Petrochemical, 12th floor, East Wing, Signature Tower, 100 Cheonggyecheon-ro, Jung-gu, Seoul, South Korea (Postal Code: 04542), 24-hour operation
- (6) Reporting Instructions
  - ① Real-name Reporting: Provide the personal details of both the reporter and the reported party, and report based on the six principles (who, what, where, when, why, how).  
Submit the report content and relevant evidence.
  - ② In urgent cases involving ongoing misconduct at the time of reporting, it is possible to report based on a factual statement alone without evidence. Anonymous Reporting: If the reporter does not wish to disclose their identity, anonymous reporting is possible.
  - ③ In urgent cases involving ongoing misconduct at the time of reporting, it is possible to report based on a factual statement alone without evidence.

#### Article 8 Report Receipt and Investigation

- 1) Upon receiving reports through channels other than phone, the head of the reporting center must notify the reporter of the receipt of the report, except in cases where the reporter is anonymous or difficult to identify. However, for real-name reports received via the online reporting center, an automatic notification of receipt will be sent to the reporter, and for anonymous reports, the receipt can be individually notified to the anonymous reporter through the comment function within the report.
- 2) The head of the reporting center assigns an investigator to each report, and multiple investigators can be assigned depending on the case.
- 3) The assigned investigator must verify the contents of the report, ascertain basic facts, and report to the head of the reporting center.
- 4) The head of the reporting center must report the receipt of the report to the responsible executive of the reporting center to obtain approval for the fact of receipt and the commencement of the investigation. The responsible executive verifies whether the case falls under the Article 3, "Exceptions to Application" of Chapter 1, "General Provisions" and Article 6, "Reporting Subjects" of Chapter 2, "Reporting and Handling Process" to decide on the commencement of the investigation.
- 5) If an immediate investigation is not possible at the time of report receipt, the start of the investigation may be postponed with the approval of the responsible executive of the reporting center at the time of reporting.

#### Article 9 Withdrawal of Reports

- 1) Upholding the principle of respecting the whistleblower's intention, the whistleblower may withdraw the report until the investigation is concluded.
- 2) In the event of withdrawal, the reporting center must delete the whistleblower's personal information in accordance with relevant laws, including the Personal Information Protection Act.

- 3) However, if the contents of the report are deemed beneficial to the company and necessary for auditing purposes, or if the reported illegal activities are likely to be true, the contents of the report, including the whistleblower's personal information, may be retained and used. Nonetheless, the whistleblower's personal information must be deleted according to the statutory destruction time set by relevant laws.

#### Article 10 Duty of Cooperation

- 1) If the reporting center requires verification of facts during the investigation and requests related parties such as the respondent or their relevant organizations to submit relevant materials, conduct interviews, or provide explanations, the requested parties must not refuse without justifiable reasons.
- 2) If it is found that the investigation is obstructed without justifiable reasons, such as delaying the submission of requested materials or deliberately avoiding interviews and explanations, the matter must be referred to the Personnel Committee through the Human Resources Team in accordance with these guidelines and personnel regulations to ensure appropriate disciplinary action against those responsible.

#### Article 11 Processing and Notification of Results

- 1) If the investigation reveals that the reported individual has violated relevant laws, company regulations, or engaged in fraudulent or improper conduct, appropriate actions will be taken in accordance with relevant company regulations.
- 2) However, if the report is found to have been made for personal reasons, such as slander or falsehoods, the whistleblower may be dealt with according to relevant company regulations.
- 3) If the investigation concludes that the reported individual did not commit any violations, including illegal, fraudulent, or improper conduct, the matter will be internally closed.
- 4) Whistleblowers can review the process and results of their reports through the online reporting center, where they may also submit further opinions and inquiries within the reporting center.

### **Chapter 3 Protection of Whistleblowers**

#### Article 12 Confidentiality of Whistleblowers

- 1) Kumho Petrochemical must protect the confidentiality of the report's contents and the personal details of the whistleblower, as well as all stakeholders involved, including executives and employees.
  - (1) Security  
The whistleblower and the contents of the report must be strictly confidential and handled as top secret, and the reporting system must be secured to prevent the exposure of the whistleblower.
  - (2) Prohibition of Disclosure of Whistleblower Identity  
Executives and employees who become aware of the whistleblower's identity through their duties or by chance must not disclose the whistleblower's identity.
  - (3) Prohibition of Whistleblower Identification  
The respondent, their department, and other relevant departments must not inquire about the whistleblower's identity, conduct investigations aimed at uncovering the whistleblower, or engage in any activities that could reveal the whistleblower's identity.
  - (4) Prohibition of Disclosure by the Reporting Center

The department handling the reporting tasks (reporting center) must not disclose or imply the whistleblower's identity without the whistleblower's consent.

(5) Protection of Cooperators

Persons who cooperate with the investigation by providing statements or submitting materials, in addition to the whistleblower, are entitled to protection in accordance with confidentiality and non-retaliation provisions applicable to whistleblowers.

(6) Disciplinary Action for Violation of Confidentiality Obligations

The company may take discipline action against executives and employees of the reporting center, those involved in personnel matters, and any individuals who have the duty to protect the whistleblower's identity, as well as any other employees who violate the "security" or "protection of cooperators" provisions related to protecting the whistleblower's identity.

Article 13 Prohibition of Retaliation Against Whistleblowers

- 1) The reporting center must ensure that all stakeholders, including executives and employees, do not suffer any economic or personnel disadvantages in the course of transactions with the company due to their reporting, and company executives and employees must also not impose any disadvantages on the whistleblower. However, for whistleblowers who voluntarily report their own faults, the Personnel Committee may, after considering the circumstances, reduce or waive disciplinary measures.
- 2) The whistleblower must promptly report to the reporting center any disadvantage suffered due to their report from the respondent, related third parties, or the relevant company.
- 3) If an internal whistleblower requests separation from the reported individual or a change in workplace or position, appropriate measures must be taken to respect the whistleblower's wishes and protect their identity.
- 4) The company must protect employees who cooperate with the investigation by providing statements or other means in the same way as internal whistleblowers if they suffer or are likely to suffer disadvantages.
- 5) Those who cause disadvantages to whistleblowers or individuals cooperating with the investigation may also be referred to the Personnel Committee for disciplinary action.

Article 14 Notice to Investigator

- 1) During the course of the investigation process, investigators must refrain from presenting or disclosing personal opinions regarding resolution strategies, courses of action, or any other matters related to the report to the subject of the investigation or to the supervisor or executive of the subject or the subject's department until the investigation is concluded. They should focus on securing relevant information and verifying facts.

## ADDENDUM

1. These guidelines came into effect on June 21, 2023.
2. These guidelines were revised and came into effect on May 28, 2024.
3. These guidelines were revised and came into effect on May 29, 2025.

## ESG Investment Policy

### **Foreword**

Kumho Petrochemical Co., Ltd. (hereinafter referred to as 'Kumho Petrochemical') is committed to realizing the vision of ESG by practicing social and environmental values and striving for sustainable management. Even in investment decisions, the company seeks to minimize risks by considering issues and impacts related to environmental, social, and governance factors, while also seeking opportunities for the benefit of all stakeholders. Through its commitment to the UN 'Principles for Responsible Investment' (UN PRI) and the implementation of the UN 'Sustainable Development Goals' (SDGs), Kumho Petrochemical will contribute to not only its own sustainable development but also that of society.

1. Kumho Petrochemical incorporates ESG issues into the establishment of investment policies and processes to protect the rights and interests of all shareholders and investors.
2. Kumho Petrochemical transparently discloses information regarding ESG investment policies and compliance measures for communication with stakeholders.
3. Assessing and managing significant risks and opportunities related to sustainability, including climate, environmental, safety, and health risks, Kumho Petrochemical continuously pursues business development for sustainable management.
4. Kumho Petrochemical maintains consistent, independent, and responsible investment practices in compliance with relevant regulations and guidelines associated with ESG.
5. Upholding the company's ESG vision, Kumho Petrochemical prioritizes investments that not only enhance corporate value and financial performance but also positively impact social and environmental governance structures, aiming to contribute positively to society and the environment.
6. Avoiding investment decisions that contradict UN SDGs and emphasizing social value, Kumho Petrochemical steers clear of investments that negatively impact society and the environment.<sup>1)</sup>
7. Kumho Petrochemical formulates ESG Investment Guidelines based on ESG Investment Policy and incorporates them into the investment process.
8. Through the internalization of ESG investments, Kumho Petrochemical continuously improves and enhances governance structures, investment policies, and processes.

<sup>1)</sup> Investments that are traditionally excluded (those conflicting with economic order and public morals), or investments involving human rights violations and poor labor conditions, contravene the fundamental dignity of human existence, and investments cause direct and irreversible harm to the environment.

## ADDENDUM

1. This policy came into effect on June 21, 2023.
2. This policy was revised and came into effect on May 29, 2025.

## Tax Policy

### **Foreword**

Kumho Petrochemical Co., Ltd. (hereinafter referred to as 'Kumho Petrochemical') complies with the following matters in order to fulfill its social responsibility in the tax sector, transparently communicate with stakeholders, and implement strategies for tax compliance, cooperation with tax authorities, tax risk management, adherence to global agreements, and contribution to local communities through tax management strategies.

### **Article 1 Fulfillment of Tax Obligations**

Kumho Petrochemical must comply with tax regulations in each country where its domestic and overseas operations are located, fulfill its obligations for diligent tax reporting and payment, and refrain from engaging in transactions lacking business substance aimed at tax evasion.

### **Article 2 Cooperation with Tax Authorities**

Kumho Petrochemical strives to cooperate transparently and honestly with tax authorities, providing relevant information promptly upon their request and striving for mutual understanding through adequate communication in case of differences of opinion with tax authorities.

### **Article 3 Tax Risk Management**

Kumho Petrochemical identifies and manages tax issues that may arise during its business activities in a timely manner. The company conducts regular monitoring activities to manage the occurrence of tax risks and transparently discloses tax information according to reporting criteria for shareholders and society.

Kumho Petrochemical collaborates with external experts, when necessary, and communicates with tax authorities to resolve risks. Additionally, it timely recognizes the enactment and revision of domestic and international tax laws and regulations, and proactively responds to any potential problems and risks.

### **Article 4 Compliance with International Agreements**

Kumho Petrochemical refrains from engaging in transactions or contracts aimed at transferring income between countries to lower tax jurisdictions by exploiting differences in tax laws or treaties, and it does not utilize tax havens for this purpose. In transactions between related parties, taxation should be adjusted based on the accepted price calculated using a reasonable method that is or is believed to be applied in ordinary transactions. Through this standard tax structure, appropriate taxes are verified and paid in each tax jurisdiction where business sites are located.

### **Article 5 Contribution to Local Communities**

Kumho Petrochemical secures local finances, creates job opportunities, and revitalizes economies in its business sites, contributing to the development of local communities by faithfully fulfilling tax obligations in accordance with each country's tax policy.

## ADDENDUM

1. This policy came into effect on June 16, 2022.
2. This policy was revised and came into effect on June 21, 2023.
3. This policy was revised and came into effect on May 28, 2024.
4. This policy was revised and came into effect on May 29, 2025.