

SUPPLIER CODE OF CONDUCT

Posco Yamato Vina's Supplier Code of Conduct regulates the basic contents that suppliers include goods and services (following herein collectively referred to as “Suppliers”) must comply.

All provisions in this regulation are important for all suppliers to comply with and are divided into 7 contents

I. RESPECT FOR HUMAN RIGHTS

1. Work voluntarily
2. Prohibit child labor
3. Prohibition of discrimination
4. Working time
5. Salary and benefits
6. Humane treatment
7. Freedom to join associations, bargain collectively

II. HEALTH AND LABOR SAFETY

1. Comply with laws on health and labor safety
2. Safe operation
3. Supervision
4. Communication

III. BUSINESS ETHICS AND FAIRNESS

1. Business integrity
2. Fair competition
3. Anti-corruption
4. Conflict of interest
5. Information security and data security
6. Intellectual property protection
7. Complaints, identity protection and prohibition of retaliation

IV. COMMUNITY AND SOCIETY

1. Support local development
2. Supply chain development
3. Minimize Negative Impacts
4. Community benefits

V. ENVIRONMENT

1. Environmental permits and licenses
2. Hazardous substances
3. Wastewater, solid waste and air pollution
4. Prevent pollution and reduce resource use
5. Propagate and raise awareness of environmental protection

VI. SUPPLY CHAIN COOPERATION

1. Customer regulations and requirements
2. Training
3. Communicate information

VII. QUALITY MANAGEMENT SYSTEM

1. Quality control
2. Information

I. RESPECT FOR HUMAN RIGHTS

Suppliers must protect, respect and treat employees' human rights fairly

1. Work voluntarily

- All duties and jobs are voluntary, employees can quit after giving notice of termination in accordance with the law.
- Suppliers cannot force employees to hand over work permits as well as government-issued ID cards, passports, etc. as a condition of employment

2. Prohibit child labor

- Suppliers must comply with the Minimum Age Convention of article 138 of the International Labor Organization (ILO) and state minimum working age regulations.
- In other words, suppliers should not employ employees under 15 years of age (14 years in the case of developing countries exempted from the Minimum Age Convention of article 138 of the International Labor Organization (ILO) or less than the minimum working age according to national regulations.
- All rules and regulations must be followed for interns as well.
- Workers under 18 years of age must not perform work that is dangerous in terms of safety and health.

3. Prohibition of discrimination

- Must be treated equally, without discrimination based on race, skin color, religion, gender, sexual orientation, age, health status, political opinion, nationality, ethnicity or Marital status for recruitment and promotion, bonuses, training opportunities.

4. Working time

- Except in emergencies, working hours must comply with legal working hours requirements including overtime work.
- All overtime work must be voluntary, and comply with all applicable laws, especially those relating to minimum wage and overtime payment.

5. Salary and benefits

- Wages paid to employees must comply with all applicable wage laws including minimum wages and statutory benefits such as overtime, etc.

6. Humane treatment

- Treat employees fairly and equally, and do not discriminate against employees due to differences in race, nationality, language, religion or gender in activities.
- There should not be any harsh, inhumane treatment including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or ill-treatment of human beings, nor should there be any threat to such treatment.

7. Freedom to join associations, bargain collectively

- Open communication and direct contact between employees and management are the most effective ways to resolve issues of working conditions and wages.
- Suppliers must respect the rights of employees to freely associate, bargain collectively, join or not join a union, seek representation and join workers' councils in accordance with local laws.
- Suppliers must allow employees to openly discuss and share with management their grievances about working conditions and management without fear of retaliation, intimidation or harassment.

II. HEALTH AND LABOR SAFETY

1. Comply with laws on health and labor safety

- Suppliers must comply with laws related to occupational health and safety as prescribed by state law.
- Suppliers must ensure the working environment meets necessary standards, improve working conditions, and provide health care for workers; and propose measures to eliminate and minimize dangers and harms related to occupational health and safety.
- The supplier must appoint a person in charge of labor safety and hygiene with appropriate expertise to be a specialized officer in charge of occupational safety and hygiene.

2. Safe operation

- Implement measures to ensure occupational safety and hygiene to prevent accidents and injuries related to work or activities at workplaces.
- The supplier must have an operational management system that complies with safety standards, to ensure the safety of its employees and other parties (subcontractors).
- Suppliers must provide a safe and healthy work environment to minimize and control potential work-related injuries, illnesses and accidents.
- Equipped with signs, protective devices and control panels that must be placed in the workplace, work processes, machinery and equipment to ensure safety.
- Disseminate and conduct regular drills on labor safety procedures for workers.
- Provide training on correct use and provision of appropriate personal protective equipment.

3. Supervision

- Suppliers must report all information related to occupational health and safety with transparency and accountability, and continuously improve the performance of their activities.
- Supervise the use of machines, equipment, and materials with strict safety requirements. Safety inspection, safe operation instructions.

- Regularly inspect and supervise the implementation of occupational safety and hygiene when workers and contractors are constructing and producing.

4. Communication

- Suppliers must promote a safety culture and provide adequate training on risk assessment, control measures and safety laws and regulations to their employees and subcontractors.
- Increase the use of media (banners, slideshows in the company lobby, etc.) to spread information in the work area.

III. BUSINESS ETHICS & FAIR TRADING

To meet social responsibility and achieve sustainable growth, Posco Yamato Vina and its suppliers must comply with the following.

1. Business integrity

- Suppliers must maintain the highest standards of integrity in all business activities.
- Suppliers must have a zero-tolerance policy against all forms of bribery, corruption, extortion and embezzlement (including promising, soliciting, giving or receiving bribes).
- The Supplier shall conduct all business transactions in a transparent manner and these transactions shall be accurately reflected on the Supplier's documents.
- Suppliers must not carry out illegal payment activities themselves or through third parties (or agents).
- Suppliers must implement monitoring and enforcement processes to ensure compliance with anti-corruption laws.

2. Fair competition

- Suppliers must treat competitors according to a fair competition framework.
- Suppliers shall not fraudulently or improperly seek confidential information from or about competitors.

3. Anti-corruption

- All suppliers, subcontractors, agents, customers, etc. must comply with all terms and conditions set forth in the Foreign Corrupt Practices Act of 1977 (FCPA) or any other applicable laws relating to anti-corruption, bribery and other similar crime.
- In case of violation of any terms of the FCPA, POSCO YAMATO VINA will apply appropriate sanctions or may terminate the transaction contract immediately without prior notice to the violating party.
- In addition, POSCO YAMATO VINA has the right to permanently ban all future transactions with the violating party.

4. Conflict of interest

- Suppliers must refrain from any actions that cause conflicts and/or conflicts of interest.

5. Information security and data security

- Suppliers must protect customers' confidential information and not misuse this information for personal benefit or for the benefit of other parties.

6. Intellectual property protection

- Suppliers must respect intellectual property rights and protect related rights when transferring technology and/or know-how. Supplier must securely and actively protect all information (technical data, information, intellectual property, etc.) of Posco Yamato Vina obtained through transactions.
- Furthermore, Supplier shall not infringe or misappropriate the intellectual property, such as patents, software, designs or trademarks of others when providing products and services to Posco Yamato Vina.

7. Complaints, identity protection and prohibition of retaliation

- The supplier must establish a complaint system and process in which relevant parties can complain and take appropriate measures while keeping the complainant's information confidential. Suppliers must also inform their officers and employees of relevant procedures and allow them to raise concerns without fear of retaliation.

IV. COMMUNITY AND SOCIETY**1. Support for local development:**

- Suppliers must respect the interests and rights of local communities, prioritize creating employment conditions for indigenous people, people in difficult circumstances, people with disabilities...

2. Supply chain development:

- Suppliers must develop comprehensive local sourcing programs in purchasing activities.

3. Minimize Negative Impacts:

- Suppliers must seek to avoid, minimize and overcome any negative impacts and risks that may arise from their activities.

4. Community benefits:

- Suppliers must make efforts to implement or actively participate in supporting projects that bring common benefits to the community, encourage employees to participate in community activities and contribute to improving social security in the locality direction.

V. ENVIRONMENT

Must comply with provided environmental protection laws and regulations, and recognize that environmental protection is a fundamental corporate social responsibility.

Suppliers must identify environmental impacts and minimize adverse impacts on communities, the environment and natural resources of their production operations while protecting the health and safety of the public.

1. Environmental permits and licenses

- Supplier must obtain, maintain and manage all necessary environmental related permits, licenses (e.g. installation, operation, discharge facility change notification) and registration necessary for business operations, while reflecting the latest legal amendments and complying with current legal regulations, reporting obligation.

2. Toxic substances

- Chemicals and other substances that have the potential to pollute the environment must be clearly understood and managed to ensure reuse and disposal as well as safe handling, transportation, storage, use, and reuse.

3. Wastewater, solid waste and air pollution

- Wastewater and solid waste generated from the operation of equipment, industrial processes and sanitation facilities and, volatile organic chemicals, aerosols, corrosives, fine powders, decompressants Ozone reduction and flammable by-products generated during the production process must clearly understand their characteristics to control and handle within the scope allowed by law.

4. Prevent pollution and reduce resource use

- Suppliers should strive to reduce or eliminate pollutant emissions and waste discharges through process improvement, raw material substitution, preventive maintenance, resource conservation, recycling, reuse use, etc. Additionally, Suppliers should make efforts to reduce electricity and fuel consumption and minimize greenhouse gas (GHG) emissions by improving energy efficiency.
- The use of natural resources, including water, fossil fuels, minerals and primary forest products, must be conserved through improved production processes.

5. Propagate and raise awareness of environmental protection

- Suppliers must communicate and raise awareness of environmental responsibility to all employees and subcontractors.

VI. SUPPLY CHAIN COOPERATION

Suppliers should apply or develop a management system related to the Code of Conduct. The management system must be designed to ensure compliance with applicable laws, regulations and customer needs. It must be consistent with the Code of Conduct and identify relevant operational risks. It will also facilitate continuous improvement.

1. Customer regulations and requirements

- Suppliers must have processes in place to identify, monitor and understand applicable laws, regulations and customer requirements, including Code of Conduct requirements.

2. Training

- Suppliers must have training programs in place for managers, officers and employees to implement their policies, procedures and improvement objectives and comply with legal and regulatory requirements and current regulations.

3. Communicate information

- Suppliers must have processes for clearly and accurately communicating information about their policies, practices, expectations and performance to employees, suppliers and customers.

VII. QUALITY MANAGEMENT SYSTEM

Suppliers should strive to create the World's Best Supply Chain by providing the highest quality products and services to Posco Yamato Vina.

1. Quality control

- Suppliers strive to provide quality products so that Posco Yamato Vina can produce and supply world-class products.

2. Information

- The supplier must notify Posco Yamato Vina in advance and prevent errors if there are factors that may affect quality due to changes in equipment, raw materials and working methods.