

<b>Last Edited</b>	June 28, 2024
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## **Anti-Workplace Bullying, Anti-Sexual Harassment, and Anti-Violence Policy**

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**Rev.0**

## Article 1. Purpose

The purpose of SeAH Steel Corporation's Anti-Workplace Bullying, Anti-Sexual Harassment, and Anti-Violence Policy (hereinafter referred to as "this Policy") is to prevent the occurrence of bullying, sexual harassment, and violence in the workplace by all employees (including non-regular workers) of SeAH Steel Corporation (hereinafter referred to as the "Company") and to determine matters necessary to take appropriate measures in the event of such acts. The Company shall comply with the workplace related laws on workplace bullying, sexual harassment, and violence such as Equal Employment Opportunity and Work-Family Balance Assistance Act(hereinafter "Equal Protection Act"), Labor Standards Act, Occupational Safety and Health Act, and Industrial Accident Compensation Insurance Act.

## Article 2. Definitions

- ① Workplace Bullying refers to any act in which an employee uses his/her superior position or relationship in the workplace to cause physical and mental suffering to other employees beyond the reasonable scope of their work or to worsen the work environment.
- ② Workplace Sexual Harassment refers to any act in which an employer, supervisor, or employee takes advantage of his/her position in the workplace or makes another employee feel sexually humiliated or disgusted by sexual remarks or other sexual behavior in connection with his/her work, or disadvantages him/her in working conditions or employment for failing to comply with sexual remarks or other requests.
- ③ Violence refers to any act of physical or tangible violence that causes injury, assault, threats, confinement, property damage, or physical and tangible violence that may not result in injury but imply an intention on injury.

## Article 3. Roles and Responsibilities of Employees

- ① **(All members)** The Company and all employees of the Company shall cherish and respect their colleagues and have the role and responsibility to protect each other's physical and mental safety and health and shall not engage in workplace bullying, workplace sexual harassment, or violence.
- ② **(Managers)** Managers, including department heads, executives, and other senior managers shall conduct an objective investigation to confirm the facts of workplace bullying, workplace sexual harassment, or violence without delay, and shall take appropriate measures, such as changing the workplace and ordering paid-leave, if necessary to protect the victim or the employee who claims to have been affected (hereinafter referred to as the "Victim"). In this case, managers shall not judge or seek to resolve the case based on personal judgment but shall listen to the Victim and encourage the Victim to utilize the Company's procedure to handle such cases.
- ③ **(Employees)** All employees of the Company aware of workplace bullying, workplace sexual harassment, or violence may report to the managers and shall advise the Victim to report to the Company or a manager.

## Article 4. Case Handling Procedures



- ① The Company shall follow the following procedures for handling cases of workplace bullying, workplace sexual harassment, and violence:
  - 1) Submit a case from Victims
  - 2) Conduct a formal investigation (3<sup>rd</sup> party investigation) based on the intention of the Victims
  - 3) Identify, report, and determine workplace bullying, workplace sexual harassment, and violence based on the results of the formal investigation
  - 4) Decide on disciplinary actions against the perpetrator and protection measures for Victims, etc.
- ② Instances in which the Company receives a submission under the preceding paragraph or is aware of the occurrence of workplace bullying, workplace sexual harassment, and violence, the Company shall conduct an investigation to confirm the facts without delay.
- ③ If the Company confirms the facts of workplace bullying, workplace sexual harassment, and violence, the Company shall ensure that the perpetrators are appropriately dealt with, including disciplinary action, in accordance with a zero-tolerance policy.

## Article 5. Confidentiality

- ① The Company shall not take any adverse or disadvantageous action against the Victims and those who cooperate with the investigation.
- ② The Company shall take appropriate protective measures to protect the safety and security of the Victims, such as separating the workplace from the perpetrator or granting paid leave, taking into account the best interest of the Victims.
- ③ Anyone who becomes aware of a matter related to the workplace bullying, workplace sexual harassment, or violence shall not disclose the identity of the person involved in the case or the contents of the case. However, this excludes reporting the contents related to the investigation to the manager or providing necessary information at the request of relevant authority.

## Article 6. Training

- ① The Company shall conduct training to prevent workplace bullying, workplace sexual harassment, and violence at least once a year.

- ② The Company shall always post or make available to employees the main contents of training to prevent workplace bullying, workplace sexual harassment, and violence.

#### **Article 7. Measures for Prevention of Recurrence**

- ① The Company shall establish and implement measures to prevent the recurrence of workplace bullying, sexual harassment, and violence at the conclusion of the case.
- ② The Company may take necessary actions, such as department transfers or preventive training for the perpetrator. Such measures or actions shall not be disadvantageous to the Victims or those who cooperate in the investigation.

#### **Addendum**

This Policy is enacted and takes effect as of June 28, 2024.