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Managed by	Safety Planning Team

Occupational Safety and Health Policy

Rev. 1

Chapter 1. General Provisions

Article 1. Purpose

SeAH Steel Corporation (hereinafter referred to as the "Company") implements this policy to prevent potential disasters across all aspects of its operations, including its supply chain, workplaces, distribution networks, and sales channels, while also ensuring a safe and healthy working environment that upholds the sustainable value of life. This policy has been established based on domestic and international laws and regulations concerning occupational safety and health management standards and guidelines, including ISO 45001.

Article 2. Scope of Application

- ① This policy applies to all business sites of the Company.
- ② The Company also ensures that stakeholders engaged in business relationships, such as suppliers, business partners, and distribution networks, comply with this policy or with policies of a comparable standard. The Company also drives joint efforts to expand safety and health inspections, internalize a safe culture, and adopt advanced safety technologies.
- ③ All officers and employees of the Company are expected to encourage compliance with this policy when engaging with business partners across all stages of operation, such as contractors, subcontractors, suppliers, and service providers.

Article 3. Objectives

The Company's goal in relation to occupational safety and health is to establish an accident-free workplace and to strive toward achieving zero serious accidents.

Article 4. Basic Principles

- ① Comply with occupational safety and health laws and regulations related to business activities and drive continuous improvement activities through the occupational safety and health management system.
- ② Maintain a clean workplace to ensure that facilities and the working environment remain safe and pleasant as well as establish and strictly adhere to workplace safety rules.
- ③ Implement systematic occupational health activities for all employees, operate mental health and psychological counseling programs to prevent and manage job-related stress, and provide support for treatment and counseling as needed.
- ④ Enhance employees' safety and health awareness and capabilities through continuous education and training, establish an autonomous safety system, and create a safe work

environment through proactive prevention by identifying and eliminating potential hazards before beginning work.

- ⑤ Prioritize occupational safety and health as the highest value in all business activities and faithfully implement the Safety and Health Management Guidelines.

Chapter 2. Implementation of the Occupational Safety and Health System

Article 5. Establishment of Occupational Safety and Health Objectives and Management Guidelines

- ① The Company designates the Chief Safety and Health Officer as the Chief Executive Officer and operates an Occupational Safety and Health Committee to deliberate and decide on key matters related to occupational safety and health.
- ② The Occupational Safety and Health Committee is composed of an equal number of employer and employee representatives. The Committee is responsible for planning and reviewing various activities related to the safety and health of employees, and it discusses and resolves safety and health-related agendas on a quarterly basis.
- ③ The Company communicates its management guidelines, which reflects the management's safety and health objectives and commitment to improvement, and establishes and manages quantifiable targets to measure the level of implementation of the safety and health management system.
- ④ The Company's Safety and Health Management Guidelines and objectives are developed by incorporating feedback from on-site workers and by establishing measurable objectives. These objectives are disclosed to ensure company-wide recognition and implementation, and are reported to and approved by the Board of Directors in accordance with applicable laws and regulations.

Article 6. Operation of the Occupational Safety and Health Management System

- ① The safety and health management system shall be established, documented, implemented, and maintained based on the requirements of ISO 45001 and the Company's management guidelines.
- ② For effective on-site occupational safety and health management, the Company shall establish and comply with operational management standards and work procedures in areas such as goal setting, risk assessment, education and training, document and record management, and internal audits, as set out in relevant procedures and instructions.

Article 7. Participation of Workers

The Company enables employees to participate in all stages of the occupational safety and health management system by operating an Occupational Safety and Health Committee that includes worker representatives and by establishing procedures and fostering a culture in which individual employees can raise occupational safety and health issues or propose ways for improvement.

Article 8. Identification, Elimination, Substitution, and Control of Hazards

- ① The Company conducts risk assessments to identify hazards and evaluate risk levels associated with all activities, products, and services, including hazardous locations, machinery, equipment, and facilities, in order to determine their acceptability.
- ② The Company prioritizes areas for improvement and corresponding countermeasures and establishes comprehensive plans to eliminate, substitute, and control identified hazards.

Article 9. Preparation and Response to Emergency Measures

- ① The Company operates a comprehensive process covering all stages, including emergency planning by risk type, training and drills, and follow-up measures, in order to prepare for emergencies that may arise from production activities, products, personnel, equipment, or services at the workplace and to minimize harm to employees and property.
- ② The Company conducts regular emergency education and training programs.

Article 10. Ensuring Occupational Safety and Health in Subcontracting, Outsourcing, and Commissioned Work

- ① The Company aims to ensure occupational safety and health not only for its own employees but also for all workers present at the workplace.
- ② The Company evaluates the occupational safety and health standards of potential contractors to select business partners with strong capabilities in preventing industrial accidents. The Company includes necessary conditions for ensuring occupational safety and health through standardized safety and health clauses in contracts.
- ③ The Company promotes mutual growth through regular evaluations of occupational safety and health activities, as well as through budgetary and technical support.

Article 11. Evaluation and Improvement

- ① The Company conducts annual internal and external audits to ensure that all safety and

health activities are carried out in a systematic and documented manner in accordance with the safety and health management system.

- ② The Company evaluates the performance of the occupational safety and health management system in achieving its occupational safety and health goals and implements corrective actions for incidents and nonconformities related to the system, thereby continuously improving its effectiveness and efficiency.
- ③ The Company continuously improves its occupational safety and health management system in accordance with domestic and international developments of occupational safety and health.

[Appendix] SeAH Steel's Occupational Safety and Health Management Guidelines

Occupational Safety and Health Management Guidelines

Under the management philosophy of "Creating Value, Respecting Humanity, and Contributing to Human Society", SeAH Steel Corporation has established the vision, "The Promise to Create a Beautiful World," and thus practices management oriented towards customer satisfaction and putting people at the center of our approach. We practice the following to create a safe and pleasant work environment and protect the safety and health of all our employees.

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| 1 We implement safety and health as the top priority of our management activities. | To effectively implement these guidelines, SeAH Steel Corporation establishes and implements the following objectives. |
| 2 We comply with laws, regulations, and management systems related to safety and health. | ✓ Achieve zero industrial accidents across all business sites |
| 3 We proactively identify hazards and risks in the workplace and continuously implement improvement measures. | ✓ Implement occupational safety and health promotion activities for employees |
| 4 We ensure the active participation and collaboration of employees in safety and health management activities. | ✓ Ensure compliance with work standards and safety procedures |
| 5 We systematically educate all employees about the safety and health management system and ensure effective communication. | ✓ Gradually achieve a "mature" level of safety culture |
| 6 We implement systematic health promotion activities to enhance the health and well-being of all employees. | |
| 7 We ensure that all suppliers and contractors comply with the safety and health guidelines and safety requirements. | |

January 2, 2026
Mangi Hong, CEO of SeAH Steel Corporation

Addendum

This policy is enacted and takes effect as of June 20, 2025.

This policy is amended and takes effect as of January 6, 2026.