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Managed by	Purchasing Team 1

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## Responsible Minerals Policy

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Rev. 0

## **Chapter 1. General Provisions**

### **Article 1. Purpose**

The purpose of this policy is to establish fundamental principles and implementation measures to ensure that minerals extracted in accordance with internationally recognized standards for human rights and environmental protection are used. The policy is in compliance with the global regulations related to conflict and responsible minerals, including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the Dodd-Frank Act in the U.S., and the EU Conflict Minerals Regulation. Accordingly, SeAH Steel Corporation (hereinafter referred to as the "Company") prohibits the use of conflict minerals—such as tin (Sn), tantalum (Ta), tungsten (W), and gold (Au), collectively known as the 3TG which are often exploited by armed groups in conflict zones including the Democratic Republic of the Congo, other African nations, and Myanmar. The policy also extends its scope of responsible minerals to cobalt, nickel, and aluminum, which may pose significant human rights and environmental risks during their extraction. With this policy, the Company seeks to stop any financial contributions that may inadvertently support conflict-affected or high-risk regions. The Company reaffirms its commitment to responsible mineral sourcing and provides clear principles and actionable measures to uphold this commitment throughout the supply chain.

### **Article 2. Scope of Application**

Based on this policy, the Company encourages all parties involved in its business activities, including all officers and employees, business sites, affiliates, as well as business partners such as contractors, suppliers, and service providers, to comply with this policy or a policy of equivalent standard.

### **Article 3. Basic Principles**

The Company establishes and recommends the following processes by which its business partners can identify the origin and smelters of all minerals and raw materials used in products, including conflict and responsible minerals. Through these processes, the Company strives to assess and address serious social and environmental issues such as human rights violations, ethical breaches, and negative environmental impacts that may arise at the origin or smelting stage. The Company also aims to verify, either internally or through third-party certifications, that the mining and processing of minerals and raw materials are free from such concerns. The Company encourages adherence to the following principles:

- ① The Company strives to prevent human rights abuses, including child labor and forced labor, and to minimize environmental destruction in the mineral extraction process. It seeks to ensure that its supply chain does not include minerals linked to armed groups operating in conflict zones, thereby avoiding any negative social or environmental impact and fulfilling its role as a responsible business.
- ② In line with the OECD Due Diligence Guidance, the Company applies international

standards governing conflict and responsible minerals, establishes internal processes and procurement policies for compliance, and actively supports initiatives such as those led by the Responsible Minerals Initiative (RMI) under the Responsible Business Alliance (RBA).

- ③ The Company requires its upstream partners to source minerals only from smelters certified under the Conflict-Free Smelter program and the Responsible Minerals Assurance Process (RMAP).
- ④ Also, the Company seeks to thoroughly investigate and manage the status of conflict and responsible minerals and smelters across its supply chain by utilizing templates provided by the RMI, such as the Conflict Minerals Reporting Template (CMRT), the Extended Minerals Reporting Template (EMRT), and/or the Pilot Reporting Template (PRT).
- ⑤ The Company will enhance information-sharing and communication with its partners and manage 3TGs, cobalt, and other minerals' usage in a manner that complies with the global standards of reporting and disclosure, thereby strengthening its efforts to promote a responsible sourcing framework throughout the value chain.

## **Chapter 2. Conflict and Responsible Minerals Management Framework**

### **Article 4. Responsibilities of the Company**

For responsible sourcing, the Company manages minerals in a manner that respects human rights and protects the environment based on the five-step framework set forth in the OECD Due Diligence Guidance, as follows:

- ① Maintain internal data to manage risks associated with minerals mined from conflict-affected or high-risk areas.
- ② Identify and assess risks arising from the mining, trade, or export of minerals from conflict-affected or high-risk areas.
- ③ Establish and implement risk management frameworks and strategies to address identified risks, monitor their effectiveness, and continuously improve the management frameworks and strategies.
- ④ Identify smelters in the supply chain that are located in conflict-affected or high-risk areas to promote future due diligence and verification.
- ⑤ When risks or areas requiring improvement are identified in the supply chain through due diligence, request the supplier to implement corrective actions and consequently verify the results of such actions.

## **Article 5. Recommendations to Business Partners regarding Conflict and Responsible Minerals**

To ensure consistent application of the Company's conflict and responsible minerals policy across the supply chain, the Company encourages all business partners to fully understand relevant international standards and the laws of major jurisdictions such as the United States and the European Union, and to strictly comply with the Company's policy. To this end, business partners are expected to make ongoing efforts to carry out the following:

- ① **Establishment of Conflict/Responsible Minerals Policy and Procedures:** Business partners are to establish and document internal policies and procedures to ensure that their products supplied to the Company do not contain minerals that contribute to the interests of armed groups in the Democratic Republic of the Congo, Myanmar, or adjacent countries. Any updates or corrective measures must be reported to the Company.
- ② **Identification of the Origin of Supplied Products:** Business partners are to identify the names and locations of all smelters within their supply chain where conflict and responsible minerals have been sourced.
- ③ **Timely Submission of Conflict and Responsible Minerals Reporting Templates:** When requested by the Company, business partners must accurately complete and submit the relevant conflict and responsible minerals reporting templates issued by the RMI, such as the CMRT or EMRT, in a timely manner. If the partner does not use any conflict or responsible minerals, the Company may request written confirmation to that effect, and the partner must provide such confirmation upon request.
- ④ **Compliance with Notification Obligations:** A business partner is to promptly notify the Company if, in the course of their business relationship, they 1) become aware that conflict or responsible minerals are present in their products, 2) discover reasonable grounds to suspect such minerals may be present, 3) become aware of issues related to responsible minerals, or 4) discover reasonable grounds to suspect such issues exist.
- ⑤ **Timely Implementation of Corrective Actions:** If any risks are identified within the supply chain, a business partner is to implement corrective action without delay. If the Company 1) does not receive sufficient information from the partner to verify the use of conflict or responsible minerals, 2) determines that the partner has provided false or misleading information, and 3) identifies risks in the partner's supply chain and the partner fails to implement appropriate corrective actions, the Company may suspend transactions with the business partner or terminate or rescind existing contracts. In such cases, the business partner is liable for all damages incurred by the Company as a result.

## **Addendum**

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