

# Inspired by SeAH

SeAH Steel Sustainability Report 2024



Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	+

# About This Report



SeAH Steel Sustainability Report 2024

## Report Overview

SeAH Steel publishes the Sustainability Report annually by outlining environmental, social, and governance (ESG) performance and strategies of SeAH Steel and our second-tier subsidiary, Dong-A Steel. This year’s report marks our fourth publication, demonstrating our ongoing efforts to embed sustainability across the operations and to ensure transparent and accountable engagement with all stakeholders.

## Reporting Standards

- GRI (Global Reporting Initiative)
- SASB (Sustainability Accounting Standards Board)
- TCFD (Task Force on Climate-related Financial Disclosures)
- ESRS (European Sustainability Reporting Standards)

## Reporting Period

- January 1, 2024 - December 31, 2024
- \* Some of the key performances include information from the first half of 2025.
  - \* To offer a comprehensive perspective on quantitative performance trends, we disclose data from the past three years (2022-2024).

## Reporting Scope

- Financial Reporting: Based on Korean International Financial Reporting Standards (K-IFRS) for consolidated financial statements
- Non-financial Reporting\*:
- (SeAH Steel) Includes headquarters and domestic plants
  - (Dong-A Steel) Includes headquarters and domestic plants
- \* In case of divergence from the scope of this report, footnotes or additional information are provided.
- \* Certain quantitative data have been revised from the previous year’s report due to updates in calculation methodology or correction of errors. Revised data are indicated with footnotes.

## Assurance

- Financial Information:
- (SeAH Steel) KPMG Samjong Accounting Corp.
  - (Dong-A Steel) Shinhan Accounting Corp.
- Non-financial Information: Korea Productivity Center Quality Assurance (See Third Party Assurance Statement on pp. 136-137)

## Contact Information

- Production: ESG Promotion Team, Sustainability Management Office of SeAH Steel
- Address: 26th FL, SeAH Tower, 45 Yanghwa-ro, Mapo-gu, Seoul, South Korea
- Email: seahsteel.esg@seah.co.kr
- Website: www.seahsteel.co.kr
- Phone: +82-2-6970-1141 to 1144



Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	+

Contents

Overview

CEO Message	05
Company Profile	06
Corporate History	07
Global Network	08
Business Portfolio	09
Powering the Future with Offshore Wind	12

Sustainability Framework

ESG Strategy	14
ESG Governance	15
Materiality Assessment	16
Stakeholder Engagement	19
Leadership Perspectives on Sustainability	20
Sustainability Snapshots 2024	23

Environmental

Climate Action	Material Issue	25
Environmental Management	Material Issue	38
Biodiversity		51

Social

Occupational Safety and Health	Material Issue	53
Talent Management	Material Issue	68
Human Rights		80
Responsible Supply Chain		82
Community Engagement		86

Governance

Corporate Governance		92
Ethics and Compliance	Material Issue	95
Risk Management		104
Information Security		107

Appendix

ESG Data	110
GRI Index	125
SASB Index	128
ESRS Index	129
TCFD Index	135
Independent Assurance Statement	136

Overview	
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	+



05	CEO Message
06	Company Profile
07	Corporate History
08	Global Network
09	Business Portfolio
12	Powering the Future with Offshore Wind



Overview

CEO Message	
Company Profile	
Corporate History	
Global Network	
Business Portfolio	
Powering the Future with Offshore Wind	
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	+

CEO Message



Despite numerous challenges and periods of change, SeAH Steel has consistently turned adversities into opportunities. We will continue to strengthen our foundation to overcome future adversities and advance as a sustainable and resilient company.



Dear Esteemed Stakeholders,

Over the past 60 years, SeAH Steel has grown into a leading company representing South Korea’s steel pipe industry. Despite numerous challenges and periods of change, we have turned adversity into opportunity and have successfully built a solid position in the market, backed by our technological expertise and the trust of our customers. These achievements have been made possible through the dedication of our employees and the unwavering support of our stakeholders. SeAH Steel currently stands at a pivotal turning point. The business environment is becoming increasingly challenging with a slowdown in domestic construction demand, heightened global supply chain risks, the rise of tariffs and protectionist policies, and growing calls for transition in carbon-intensive industries. Even amid these adversities, SeAH Steel remains focused not on short-term performance but on strengthening our fundamentals and transforming our business to secure a sustainable future. We will continue building a foundation to overcome change and challenges and to advance toward becoming an enduring enterprise.

Securing Technological Capabilities for the Future Energy Market Transition

SeAH Steel is proactively responding to the transition of the global energy market. We focus on high-value-added steel pipe products that are essential to future energy infrastructure such as offshore wind power, hydrogen transportation, and CCUS (carbon capture, utilization, and storage) supported by thorough market analysis and the strengthening of our technological capabilities. We have established an eco-friendly management strategy based on four key directions: process improvement, system development, resource circulation, and eco-friendly R&D. By implementing specific strategies tailored to each business site, we are enhancing our manufacturing competitiveness to meet the demands of the evolving energy landscape. In 2024, we successfully completed a trial production using low-carbon steel plates for offshore wind foundations, securing the capability to reduce carbon emissions by approximately 12% while maintaining the same product quality. Additionally, we obtained the K<sub>1</sub>H certification, a key hydrogen embrittlement test required for high-pressure hydrogen transportation steel pipes. Through close collaboration with industry partners, academia, and research institutes, we are advancing high-strength and low-temperature toughness technologies to ensure the safety and reliability of hydrogen transport. Looking ahead, SeAH Steel will continue to strengthen our capabilities to respond to the future energy transition through energy efficiency improvements, accurate carbon emissions assessments, and the development of eco-friendly products.

Building an Organizational Culture based on Communication and Cooperation and our unique “Winning Formula”

In January 2025, we held a proclamation ceremony for our new organizational Culture Deck, “SeAH, the Better Way.” Through this initiative, we presented a renewed direction for change, encouraging all employees to move forward with a new mindset for the future. To foster a workplace culture that reflects the spirit of “The SeAH Way, The Better Way,” we aim to establish a resilient organizational culture that drives sustainable growth by building on our unique strengths (The SeAH Way)

while adapting flexibly (The Better Way) to changing market conditions. To this end, we will strengthen a collaborative and integrated culture of communication by fostering mutual respect in daily work, improving work efficiency, and establishing flexible collaboration frameworks, thereby creating SeAH Steel’s unique “Winning Formula.” This organizational culture will become SeAH Steel’s strongest asset in overcoming future uncertainties.

Establishing a Systematic Foundation for Sustainability Management and its Internalization into Daily Operations

SeAH Steel is realigning the organizational structure to better embed sustainability management into our daily operations. We operate a full-time ESG Consultative Body to reinforce cross-functional collaboration and enhance company-wide response capabilities to address diverse sustainability issues. In 2024, SeAH Steel appointed a new executive responsible for Safety, Health, and Environment (SHE) Planning, formed a new Energy Environment Planning Team, and elevated the environmental function at certain business sites to Safety Environment Teams, thereby solidifying our dedication to internalize sustainable practices. Furthermore, we are expanding practical and participatory activities to ensure that sustainability management becomes ingrained in employee behavior and organizational culture. Through the publication of ESG Newsletters, the installation of in-house waste battery recycling bins, and various ESG campaigns and initiatives, employees at SeAH Steel are behaving with eco-consciousness at the workplace. SeAH Steel has always turned adversities into opportunities. As we continue to move forward toward a better future, we are committed to listening to the voices of our stakeholders. We kindly ask for your continued trust and support as we pursue our journey to become a trusted global leader for generations through sustainability management.

June 2025  
SeAH Steel CEO Howard Whi Young Lee

Overview

- CEO Message
- Company Profile
- Corporate History
- Global Network
- Business Portfolio
- Powering the Future with Offshore Wind

Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	+

Company Profile



Since our establishment, **SeAH Steel** has led the development of the steel pipe industry in Korea and abroad based on the principles of challenge and innovation. In 1967, we became the first Korean steel pipe manufacturer to export products to the United States, marking the beginning of our entry into global markets. SeAH Steel currently operates the largest domestic production system for carbon steel and special pipes, including stainless steel and titanium pipes, through four production sites located in Pohang, Gunsan, Suncheon, and Changwon. Based on this manufacturing infrastructure, we manufacture high value-added steel pipe products to a wide range of industries such as shipbuilding, construction, and energy. We are actively expanding into emerging energy infrastructure sectors, including offshore wind power, liquefied natural gas (LNG), and hydrogen transportation. We are enhancing the competitiveness in the LNG sector through the operation of Korea’s largest 24-inch stainless steel pipe roll-forming facility and steadily increasing our investment in offshore foundation structures for wind power generation.

Company Name	Established
SeAH Steel Corp.	September 3, 2018
CEO	Number of Employees
Howard Whi Young Lee, Mangi Hong	796 employees
Corporate Website	Headquarters
<a href="https://www.seahsteel.co.kr/">https://www.seahsteel.co.kr/</a>	25-27F, SeAH Tower, 45 Yanghwa-ro, Mapo-gu, Seoul, Republic of Korea

2024 Financial Performance	
Revenue	KRW1,786.2 billion
Operating Profit	KRW201.9 billion
Total Assets	KRW1,765.8 billion



**Dong-A Steel**, established in 1987, is a specialized steel pipe manufacturer recognized for our strong customer trust, built on excellent product quality and continuous technological development in the structural pipe sector. We operate an integrated production system that includes slitting, pipe forming, and coating at the Gwangyang Plant 1 and 2. We have an annual production capacity of 320,000 metric tons for pipe forming and 270,000 metric tons for slitting. Dong-A Steel is enhancing our competitiveness in the structural pipe market by expanding both domestic sales and export volumes. To support this strategy, we have obtained multiple KS and JIS certifications across various product categories, including steel pipes, C-channel, and color square pipes. We are continuing to pursue a management approach centered on quality and technological advancement. In 2024, Dong-A Steel became a second-tier subsidiary of SeAH Steel after SeAH Steel acquired SSIK, which held 100% ownership of Dong-A Steel.

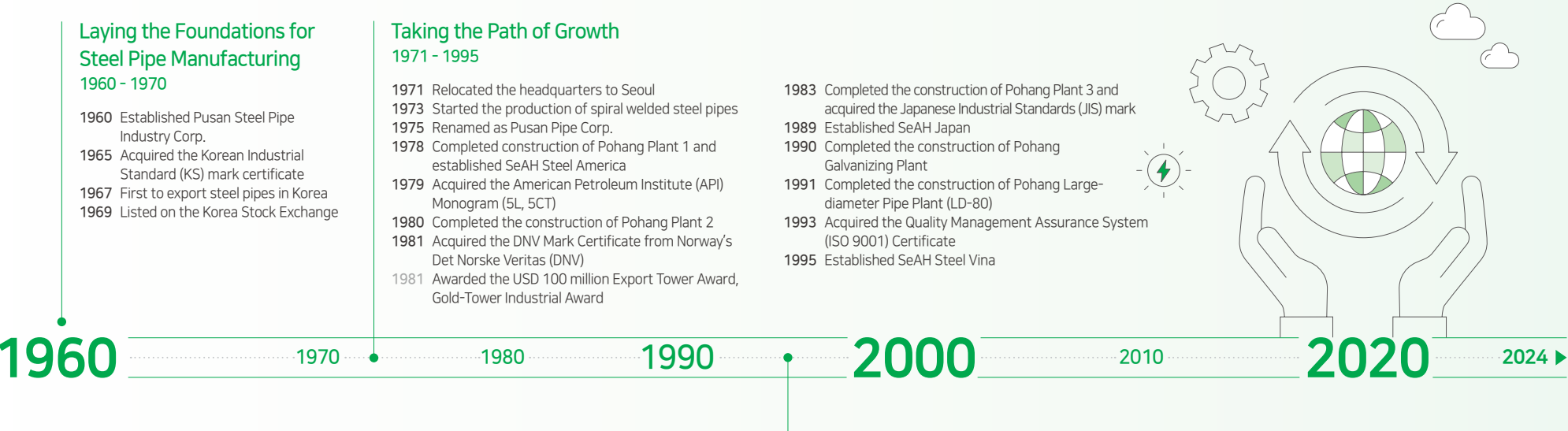
Company Name	Established
Dong-A Steel Corp.	April 20, 1991
CEO	Number of Employees
Young Jun Choi	31 employees
Corporate Website	Headquarters
<a href="http://www.dosco.com/">http://www.dosco.com/</a>	15 Taein 4-gil, Gwangyang-si, Jeollanam-do, Republic of Korea

2024 Financial Performance	
Revenue	KRW132.9 billion
Operating Profit	KRW0.1 billion
Total Assets	KRW127.3 billion



Overview	
CEO Message	
Company Profile	
Corporate History	
Global Network	
Business Portfolio	
Powering the Future with Offshore Wind	
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	+

Corporate History



Overview

CEO Message	
Company Profile	
Corporate History	
Global Network	
Business Portfolio	
Powering the Future with Offshore Wind	
<hr/>	
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	+

Global Network



America

SeAH Steel America, Inc.  
State Pipe & Supply, Inc.  
SeAH Steel USA LLC

Canada

SeAH Steel America Calgary Office

Europe

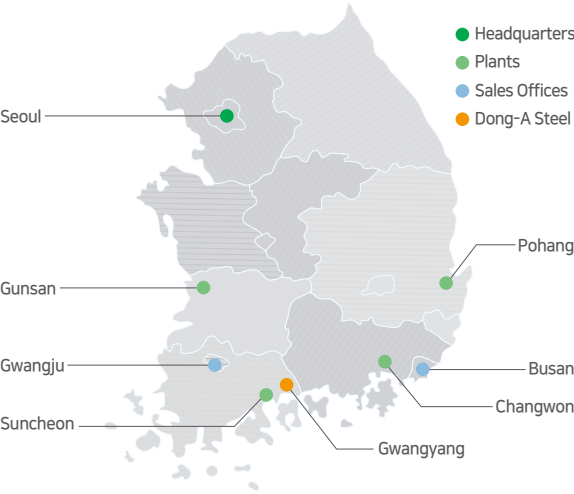
SeAH Steel Europe S.r.l.  
Inox Tech S.p.A.  
SeAH Wind Ltd.  
SeAH Coated Metal Europe

Asia

SeAH Steel Holdings Corp.  
SeAH Japan Co., Ltd.  
SeAH Steel Holdings Beijing Office  
SeAH Steel Vina Corp.  
Vietnam Steel Pipe Co., Ltd.  
SeAH Steel UAE, LLC  
SeAH Steel Holdings Middle East Office

SeAH Steel

Domestic Operations	Pohang Plant	Suncheon Plant
Location	Jangheung-dong, Nam-gu, Pohang	Haeryong-myeon, Suncheon
Main Products	API steel pipes	Steel pipes for LNG plants, steel pipes for offshore wind foundation
Production Capacity	1.05 million metric tons/year	Steel pipes 170,000 metric tons/year Special pipes 40,000 metric tons/year
Domestic Operations	Gunsan Plant	Changwon Plant
Location	Osikdo-dong, Gunsan	Ungnam-dong, Changwon
Main Products	General small - to medium sized diameter steel pipes	Stainless pipes for ordinary piping
Production Capacity	300,000 metric tons/year	40,000 metric tons/year



Dong-A Steel

Location	Main Products	Production Capacity
Taein dong, Gwangyang-si, Jeollanam-do	Structural pipes and square pipes	320,000 metric tons/year

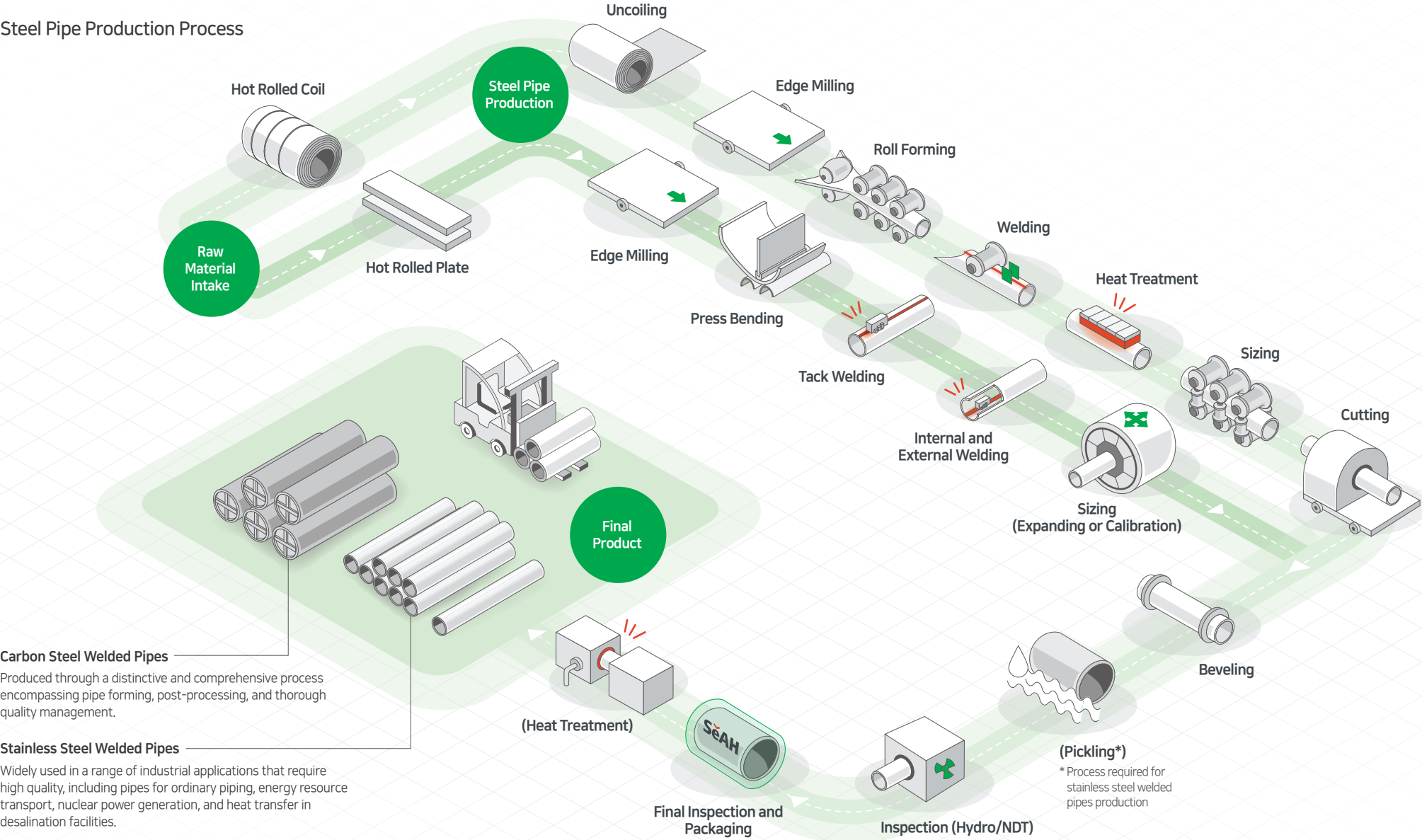


Overview

CEO Message	
Company Profile	
Corporate History	
Global Network	
<u>Business Portfolio</u>	
Powering the Future with Offshore Wind	
<hr/>	
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	+

Business Portfolio

Steel Pipe Production Process

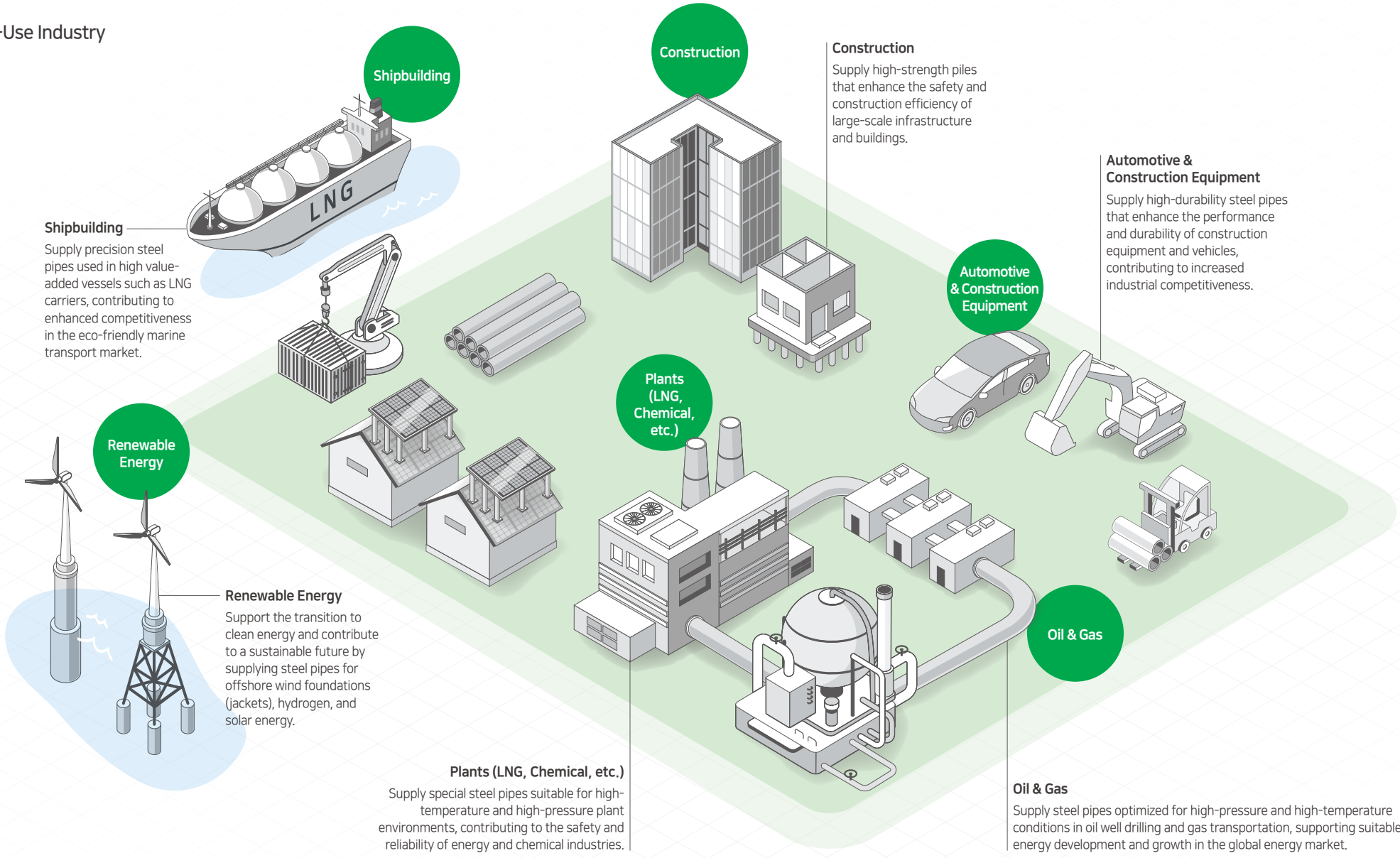


Overview

CEO Message	
Company Profile	
Corporate History	
Global Network	
<b>Business Portfolio</b>	
Powering the Future with Offshore Wind	
<hr/>	
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	+

Business Portfolio

End-Use Industry



Overview

CEO Message

Company Profile

Corporate History

Global Network

**Business Portfolio**

Powering the Future with Offshore Wind

Sustainability Framework +

Environmental +

Social +








Governance +

Appendix +

Business Portfolio

Eco-friendly Product R&D Strategy

In 2020, **SeAH Steel** became the first within the domestic steel pipe industry to establish an R&D center at our Pohang Plant. We are currently focused on three key areas to strengthen the development of eco-friendly and low-carbon products: energy transition, industry, and mobility. SeAH Steel is continuously developing high-efficiency, corrosion-resistant, and high-strength products, including steel pipes for offshore wind foundations, solar and geothermal power, H<sub>2</sub> and CO<sub>2</sub> transport, and specialized tubes for electric vehicles and hyperloop systems. We strive to address climate change and fulfill our responsibility to advance environmentally friendly technology.

Energy Transition	Industry	Mobility
Participation in eco-friendly renewable energy projects and the supply of products	Supply of pipelines for H <sub>2</sub> energy conversion as well as CO <sub>2</sub> storage and utilization	Supply of products related to electric vehicles and efficient transportation systems
<div>Steel Pipes for Offshore Wind Foundations<ul style="list-style-type: none"><li>Steel pipes for foundations of ultra-large-scale offshore wind farms</li><li>Foundation substructures supporting high-efficiency, large-scale offshore wind farms to reduce Levelized Cost of Energy (LCOE)</li></ul></div> <div>Steel Pipes for Solar Power Generation<ul style="list-style-type: none"><li>Highly corrosion-resistant galvanized steel pipes</li><li>Steel pipes with improved durability to minimize the demand for replacement</li></ul></div> <div>Steel Pipes for Geothermal Power Generation<ul style="list-style-type: none"><li>Casing and tubing for capturing geothermal energy</li><li>Steel pipes for use in water, sulfur, and high-temperature environments</li></ul></div>	<div>Steel Pipes for H<sub>2</sub> Transportation<ul style="list-style-type: none"><li>Welded steel pipes (ERW, SAW) for high-pressure hydrogen transport</li><li>Participation in core renewable energy technology development projects<ul style="list-style-type: none"><li>Implemented government projects with industry/academia/research institutes</li></ul></li><li>Hydrogen testbed cities<ul style="list-style-type: none"><li>Supplied welded pipes (securing hydrogen embrittlement resistance)</li></ul></li><li>Pohang Jangheung Hydrogen Charging Station<ul style="list-style-type: none"><li>Supplied steel pipes for H<sub>2</sub> transport at the largest Hydrogen Charging Station in Pohang Jangheung</li></ul></li></ul></div> <div>Steel Pipes for CO<sub>2</sub> Transportation<ul style="list-style-type: none"><li>Steel pipes for transporting captured CO<sub>2</sub> to sites for utilization</li><li>Characteristics of CO<sub>2</sub> transportation steel pipes<ul style="list-style-type: none"><li>Stability of supercritical single-phase flow during CO<sub>2</sub> transport (minimal fluctuation in temperature and pressure)</li><li>Prevention of pipeline corrosion caused by CO<sub>2</sub> properties (maintenance of dry conditions)</li><li>Compatibility with hydrogen industry infrastructure (application of CCUS in blue hydrogen production)</li></ul></li></ul></div>	<div>Steel Pipes for Electric Vehicles<ul style="list-style-type: none"><li>Steel pipes for rotor shafts</li><li>Parts for transmitting motor rotation to the reducer</li><li>Lightweight pipes for extended driving range and enhanced cost efficiency</li><li>Pipes for improved part performance, extended lifespan, and increased fuel efficiency</li></ul></div> <div>Tubes for Hyperloop<ul style="list-style-type: none"><li>Lightweight, high-strength tubes for ultra-high-speed transportation</li><li>Tubes enabling travel up to 1,200 km/h inside a near-vacuum (0.001 atm or less)</li><li>Large-diameter spiral tube-forming technology<ul style="list-style-type: none"><li>Technology for roundness (structural quality) and straightness</li></ul></li></ul></div>

Overview

CEO Message	
Company Profile	
Corporate History	
Global Network	
Business Portfolio	
<a href="#">Powering the Future with Offshore Wind</a>	
<hr/>	
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	+

Powering the Future with Offshore Wind

Leading Energy Transition through Offshore Wind

Leveraging our capabilities in high value-added steel pipe manufacturing, **SeAH Steel** is contributing to the global transition toward clean energy by supplying high-quality foundations to the offshore wind market, a key renewable energy source gaining worldwide attention. Offshore wind power offers higher efficiency than onshore wind power due to fewer site constraints and stronger wind conditions, leading to rapid growth particularly in Europe and Asia. To actively respond to this market growth, SeAH Steel is utilizing the geographical advantages of the Suncheon Plant to reduce logistics costs and enhance production efficiency. We have also strengthened supply stability by maximizing our capacity to produce large-diameter steel pipes for jacket-type foundations. As a result, SeAH Steel has secured contracts for major global offshore wind projects, including the NNG project in the UK, the St. Brieuc project in France, and the Changfang and Xidao Offshore Wind Farm Project (CFXD) in Taiwan, solidifying our position in the offshore wind sector. In July 2024, we expanded the production capacity by acquiring the 46.65 km<sup>2</sup> asset of CL Energy Steel.

Since 2023, SeAH Steel has been participating in Global Offshore Wind (GOW), the UK’s largest offshore wind exhibition, together with SeAH Wind, to raise brand recognition and expand project opportunities in the global offshore wind market. Held annually in mid-June, GOW attracts more than 260 global offshore wind companies and over 5,000 visitors. The event features conferences and networking programs covering topics such as supply chain development, sustainability, digitalization, and artificial intelligence. Key participants include developers such as Ørsted and Equinor, EPCI contractors such as DEME and Van Oord, and substructure manufacturers such as Smulders and Navantia. Through engagement with these global players, SeAH Steel is expanding strategic partnerships across the offshore wind supply chain and further strengthening our market presence.



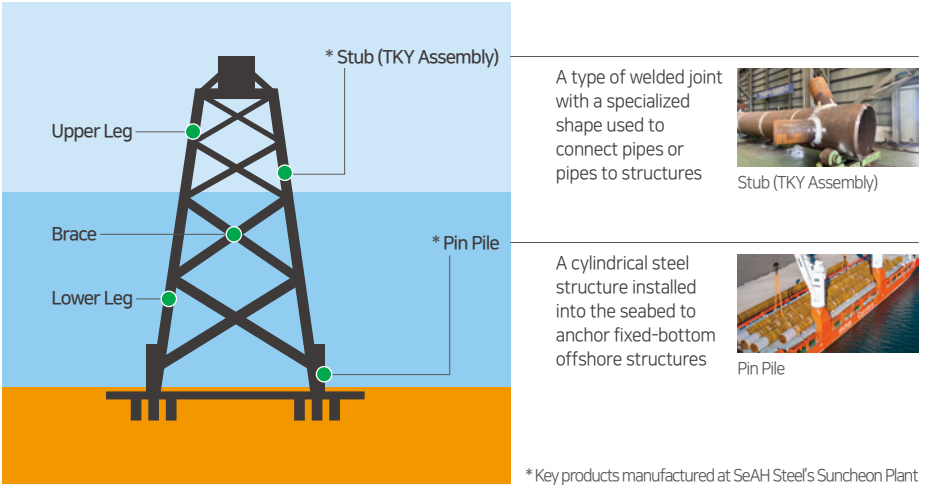
Global Offshore Wind (GOW) Exhibition



Offshore Foundation

Jacket

A type of fixed-bottom structure composed of three to four legs, installed below the sea surface to support offshore structures such as towers, transition pieces, and turbines.



Enhancing Product Competitiveness

<b>Introduction of LSO (Long Stick Out) Welding Process</b>	<ul style="list-style-type: none"><li>Resolve process constraints in welding for heavy-wall products</li><li>Improve productivity of heavy-wall products with a deposition rate 30% higher than conventional SAW</li></ul>	<b>Enhanced Product Competitiveness</b> <ul style="list-style-type: none"><li>Gain superior production efficiency over competitors in welding and cutting</li><li>Address diversified customer needs in the offshore wind market</li><li>Improve competitiveness in project biddings and secure supply chain stability</li></ul>
<b>Development of new WPS (Welding Procedure Specification)</b>	<ul style="list-style-type: none"><li>Predevelop WPS for products of various specifications</li><li>Reduce development time for new WPS creation time by approximately 30 days</li></ul>	
<b>Profile Cutting Machine</b>	<ul style="list-style-type: none"><li>Perform complex cuts such as stub saddle cuts and precise length cutting of circular pipes</li><li>Enhance cutting precision and adaptability for jacket components</li></ul>	



Overview	+
Sustainability Framework	
Environmental	+
Social	+
Governance	+
Appendix	+

# SUSTAINABILITY FRAMEWORK

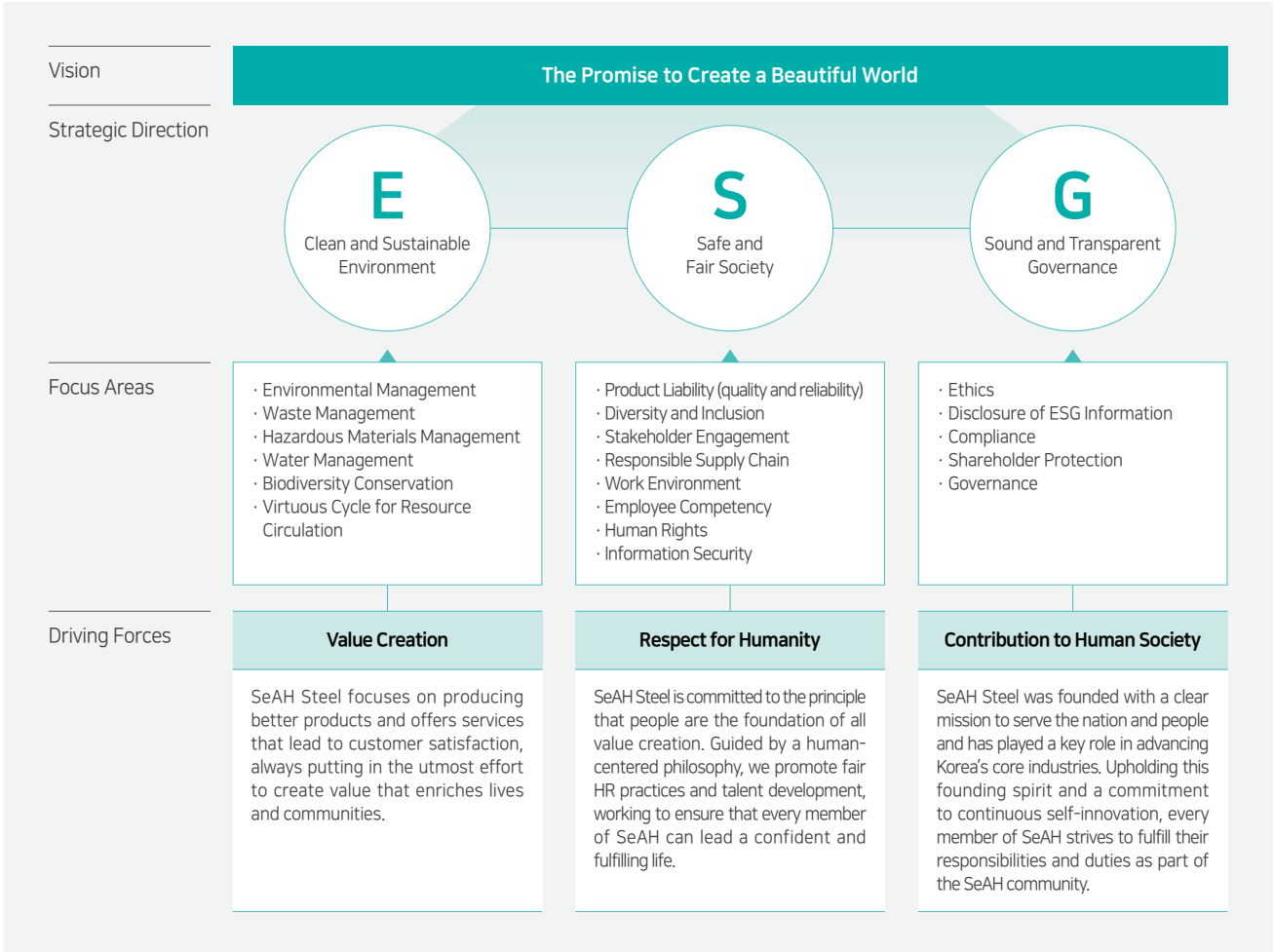
14	ESG Strategy
15	ESG Governance
16	Materiality Assessment
19	Stakeholder Engagement
20	Leadership Perspectives on Sustainability
23	Sustainability Snapshots 2024

Overview	+
Sustainability Framework	
ESG Strategy	
ESG Governance	
Materiality Assessment	
Stakeholder Engagement	
Leadership Perspectives on Sustainability	
Sustainability Snapshots 2024	
Environmental	+
Social	+
Governance	+
Appendix	+

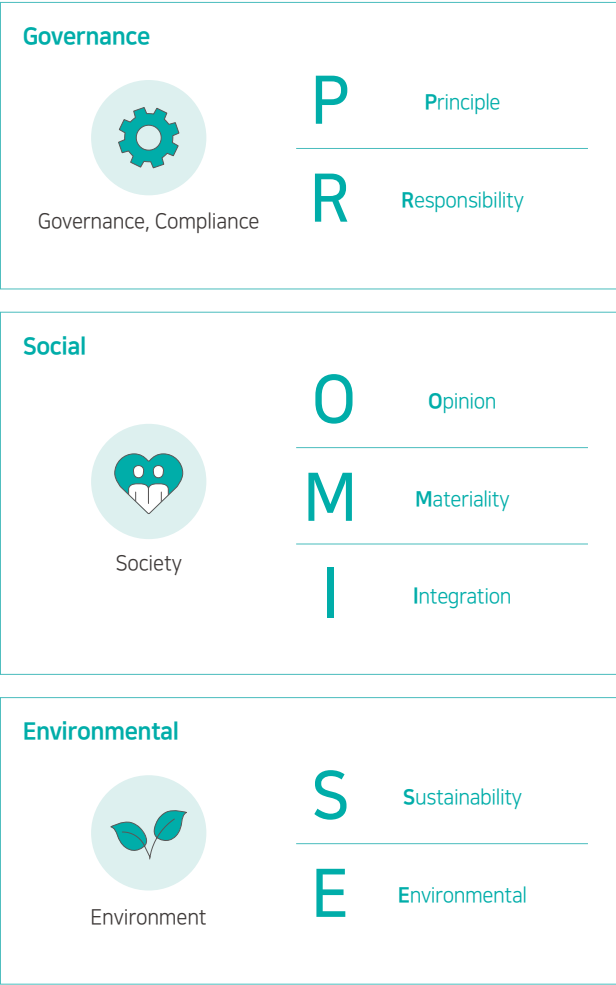
## ESG Strategy

Under the vision of “The Promise to Create a Beautiful World,” SeAH Steel has established and is actively implementing a sustainable management system encompassing Environmental, Social, and Governance (ESG) principles. Based on strategic directions and action plans for each core area, we aim to internalize ESG management by advancing our foundation for value creation, respect for humanity, and contribution to human society. To this end, we are strengthening our sustainability efforts through the “PROMISE” strategy, which is built around seven core ESG values.

### Sustainability Management System



### PROMISE Strategy

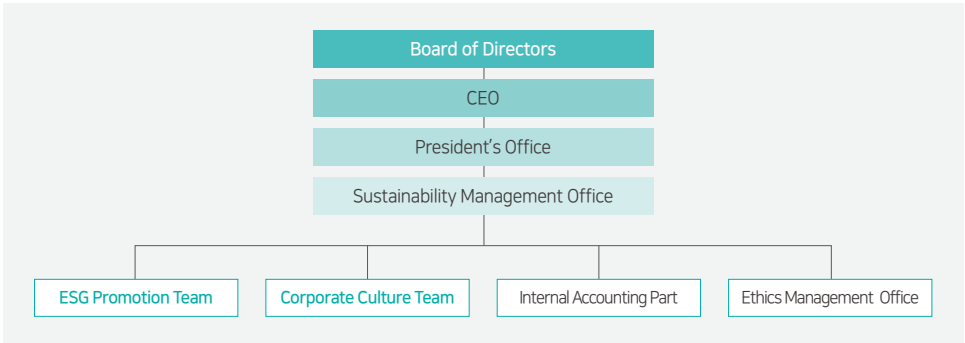
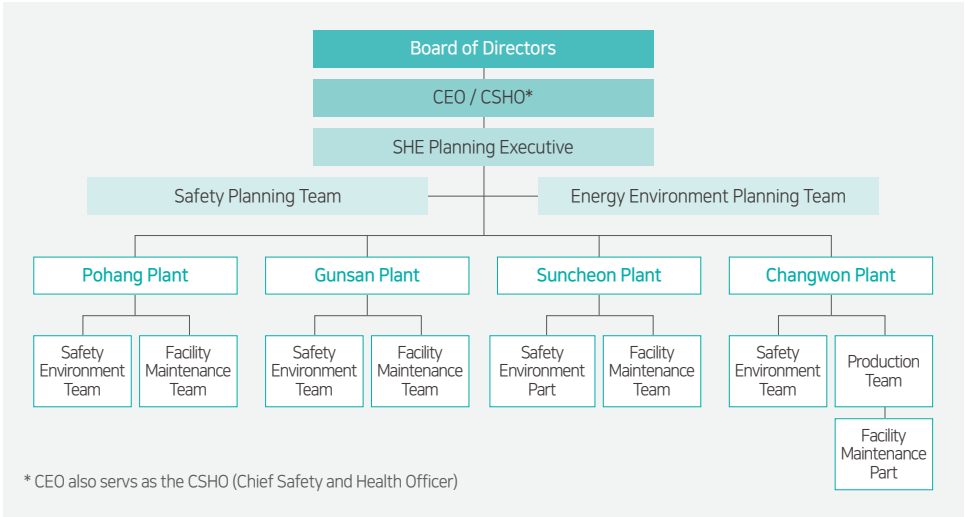


Overview	+
Sustainability Framework	
ESG Strategy	
ESG Governance	
Materiality Assessment	
Stakeholder Engagement	
Leadership Perspectives on Sustainability	
Sustainability Snapshots 2024	
Environmental	+
Social	+
Governance	+
Appendix	+

## ESG Governance

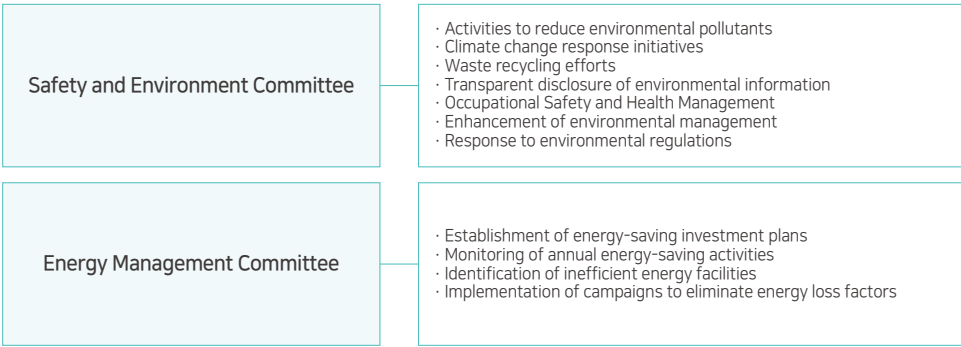
SeAH Steel has established a systematic ESG governance framework to strengthen our management foundation for a sustainable future and create a balance where the company and society can thrive together. We operate internal committees for each ESG pillar, including the Safety and Environment Committee, Energy Management Committee, Social Responsibility Committee, and Integrated Compliance Committee. Through this committee-based strategic decision-making structure, SeAH Steel has secured comprehensive and proactive response capabilities to ESG issues. The departments responsible for the practical operation and oversight of ESG governance include the Sustainability Management Office, Safety Planning Team, and Energy Environment Planning Team. These departments provide support for the operations of each committee. In addition, ESG performance along with our relevant targets and goals is compiled quarterly and reported across the company to ensure systematic performance monitoring and continuous improvement. Overall, SeAH Steel continues to strengthen sustainability management capabilities each year by integrating and aligning company-wide efforts around ESG governance.

### Organizational Chart



### Governance Roles

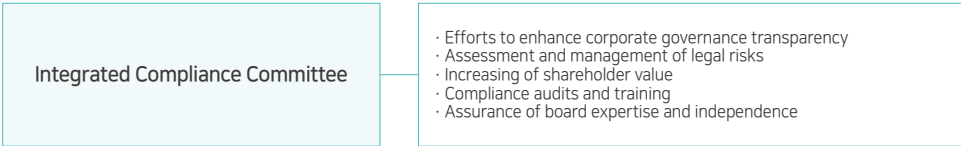
#### Environmental



#### Social



#### Governance



Overview	+
Sustainability Framework	
ESG Strategy	
ESG Governance	
Materiality Assessment	
Stakeholder Engagement	
Leadership Perspectives on Sustainability	
Sustainability Snapshots 2024	
Environmental	+
Social	+
Governance	+
Appendix	+

# Materiality Assessment

## Double Materiality Assessment: Process

SeAH Steel conducted a materiality assessment based on the double materiality assessment approach outlined in the EU Corporate Sustainability Reporting Directive (CSRD). The process involved analyzing industry standards as well as disclosure and evaluation frameworks, benchmarking companies and key customers, internal records, internal corporate risks, and both local and global media sources. In addition, interviews with executives were conducted to identify five key material issues. Surveys were then conducted by both internal and external stakeholders, and the results were aligned and integrated to determine the final prioritization of the five material issues. SeAH Steel transparently discloses the identified impacts and management strategies related to these material issues through the Sustainability Report.

### STEP 1

#### Diagnose and analyze internal and external environments

##### Industry Classification and Analysis of Domestic and International Trends

· **Enhanced Industry Classification Criteria:** An analysis of MSCI, DJSI, and SASB criteria, along with the company's activities under GICS and SICS and the impact of upstream and downstream activities

##### Industry Standards for SeAH Steel's Value Chain

- Upstream and SeAH Steel (Dong-A Steel): Steel
- Downstream: Construction

· **Ratings and Disclosure Standards Analysis:** An analysis of international initiatives and guidelines related to ESG (GRI Standards, KCGS, MSCI, SASB, ESRS, ISSB, DJSI, etc., a total of 9 standards)

· **Benchmarking:** An identification of key issues from companies with excellent sustainable management performance in the same and similar industries  
- Target: A total of 25 companies, including domestic and international steel and construction companies

· **Internal Material Analysis:** Mapping of materiality issue keywords from BOD agendas

· **Risk Analysis:** An analysis of risk impacts using internal strategic objectives and company-wide KPIs

##### Global and Local Press and Media Key Issues Analysis

**Survey Period** : January 1, 2024 – December 31, 2024

· **Media Analysis:** An analysis of a total of 276 ESG-related articles on SeAH Steel and Dong-A Steel, sourced from major global and local media via Google News

### STEP 2

#### Compile list of issues

Based on a comprehensive review of internal and external environment analyses, a Long List of 17 issues was identified. Subsequently, interviews were conducted with executives from SeAH Steel and Dong-A Steel to evaluate the materiality of each issue, and a Short List of 5 key issues was derived.

##### SeAH Steel Long List (17 Issues)

Rank	Issue	Rank	Issue
1	Occupational Safety and Health	10	Human Rights
2	Climate Action	11	Air Pollution
3	Talent Management	12	Employee Engagement and Awareness
4	Ethics and Compliance	13	Corporate Governance
5	Environmental Management	14	Water
6	Responsible Supply Chain	15	Information Security
7	Risk Management	16	Community Engagement
8	Waste	17	Biodiversity
9	Chemicals		

### STEP 3

#### Conduct stakeholder survey on materiality issue

A double materiality-based survey on ESG management and related issues was conducted with internal and external stakeholders to identify the most material issue among the five shortlisted topics.

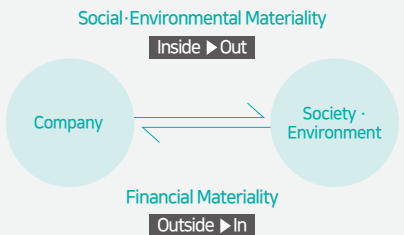
**Survey Period** : March 6, 2025 – March 14, 2025

**Survey Method** : Online Survey

**Total Participants** : 120 participants

##### Double Materiality Assessment Process on ESRS Guidelines

During executive interviews and as well as internal and external stakeholder surveys, we applied the double materiality assessment process based on the ESRS guidelines to determine social, environmental, and financial impacts.



### STEP 4

#### Prioritize issues and select key topics

Incorporating the outcomes of the previous steps and impact scores from a double materiality survey of internal and external stakeholders, the five most material issues were selected and prioritized, thus finalizing and identifying the company's key ESG issues.

##### SeAH Steel's Material Issues in 2024



Rank	Area	Material Issue
1	S	Occupational Safety and Health
2	E	Climate Action
3	S	Talent Management
4	E	Environmental Management
5	G	Ethics and Compliance

Overview	+
Sustainability Framework	
ESG Strategy	
ESG Governance	
Materiality Assessment	
Stakeholder Engagement	
Leadership Perspectives on Sustainability	
Sustainability Snapshots 2024	
Environmental	+
Social	+
Governance	+
Appendix	+

## Materiality Assessment

### Double Materiality Assessment: Result

Through the double materiality assessment, **SeAH Steel** identified and defined key issues and clarified our management responsibilities for each issue. Using the double materiality assessment framework outlined in the EU CSRD/ESRS disclosure Implementation Guidance 1 (IG1), SeAH Steel systematically analyzed both the social and environmental impact and the financial impact of each material issue. Based on this analysis, we are strengthening our strategic management system.

Rank	Area	Material Issue	Definition	Impact Materiality	Financial Materiality	Global Initiatives		Reference Page No.
						GRI	UN SDGs	
1	S	Occupational Safety and Health Actual	"Occupational Safety and Health" refers to establishing and continuously improving an internal safety and health management system to protect the safety and well-being of employees and stakeholders. When a serious accident occurs, companies may face not only the loss of talent and reputational damage but also legal sanctions. To strengthen safety and health management, companies must implement a comprehensive system that includes risk assessment, safety training, and emergency response protocols. Additionally, it is essential to identify potential physical and chemical hazards in advance and implement preventive measures to minimize the risk of accidents.	●●●●●	●●●●●	GRI 403	3 SAFETY AND HEALTH	pp. 53-67
2	E	Climate Action Potential	"Climate Action" refers to activities through which a company proactively identifies climate-related risks, develops strategies to mitigate them, and establishes and implements carbon neutrality targets. Companies must address these climate risks by adopting technologies and equipment that reduce carbon emissions during the production processes, transitioning to renewable energy, and improving energy efficiency. In addition, regular monitoring and reporting of greenhouse gas emissions are essential to ensure transparency and to maximize both economic and environmental impact through new business strategies.	●●●●○	●●●●●	GRI 305	7 AFFORDABLE AND CLEAN ENERGY 13 CLIMATE ACTION	pp. 25-37
3	S	Talent Management Potential	"Talent Management" refers to activities that systematically enhance the knowledge, skills, and competencies of employees within an organization, thereby boosting corporate competitiveness and productivity while promoting individual growth. As a key strategic element for a company's long-term success and sustainability, talent management has a positive impact on both the organization and the members. Companies can nurture employees' potentials through job-related skills training, organizational culture improvement, fair recruitment, leadership development, and performance-based rewards. In addition, organizations should establish communication channels for employees to foster a better organizational culture, protect maternity rights of female workers, and create flexible work environments to support work-life balance.	●●●●○	●●●●○	GRI 401, 404, 405	4 QUALITY EDUCATION 5 GENDER EQUALITY 8 DECENT WORK AND ECONOMIC GROWTH	pp. 68-79
4	E	Environmental Management Potential	"Environmental Management" refers to a systematic and strategic approach in which a company integrates environmental considerations into all aspects of business operations to minimize environmental impact and promote sustainable growth. Companies must establish an environmental management strategy that sets clear direction and goals and implement concrete plans and activities to achieve them. Additionally, companies should build a structured environmental management system to continuously monitor and improve environmental performance, while complying with relevant laws and regulations to prevent legal risks and environmental incidents, thereby enhancing credibility and transparency.	●●●●○	●●●●○	GRI 303, 305, 306	6 CLEAN WATER AND SANITATION 12 RESPONSIBLE CONSUMPTION AND PRODUCTION	pp. 38-50
5	G	Ethics and Compliance Potential	"Ethics and Compliance" refers to a company's commitment to fulfilling legal obligations, while upholding social responsibility, and fostering a transparent and fair business environment through ethically-grounded practices. This not only enhances brand image and drives sales of products and services but also positively influences overall business performance by strengthening employee loyalty and building trust with customers. To implement compliance management, companies must establish a robust compliance system, conduct training and monitoring to reinforce legal and ethical awareness among employees, and develop internal control systems to prevent corruption and ensure fair trade. Unethical behavior and legal violations must be proactively prevented, and prompt corrective actions must be taken when identified.	●●●●○	●●●●○	GRI 205, 206	16 PEACE, JUSTICE AND STRONG INSTITUTIONS	pp. 95-103



Overview	+
Sustainability Framework	
ESG Strategy	
ESG Governance	
Materiality Assessment	
Stakeholder Engagement	
Leadership Perspectives on Sustainability	
Sustainability Snapshots 2024	
Environmental	+
Social	+
Governance	+
Appendix	+

# Materiality Assessment

## Material Issues and Response Management

SeAH Steel has identified key opportunities and risks for each of the five material issues derived from the materiality assessment and has strengthened execution by establishing strategic response plans based on these insights. Going forward, we will transparently disclose the results of the double materiality assessment and related ESG activities to stakeholders and actively engage in communication to further advance and refine our ESG management practices.

Rank	Area	Material Issue	Opportunities and Risks		Strategies and Initiatives	Activities and Performances in 2024
1	S	Occupational Safety and Health	Opportunities	<ul style="list-style-type: none"><li>A safe and pleasant working environment can be provided by preventing accidents and illnesses through effective health and safety management</li><li>Compensation costs and production downtime resulting from industrial accidents can be reduced, and overall cost savings can be achieved by improving operational efficiency</li></ul>	<ul style="list-style-type: none"><li>Enhance the Integrated SHE system</li><li>Establish the SeAH Safety System (SSE), a smart safety management system</li><li>Provide safety consulting, training, and health &amp; safety evaluations for business partners</li><li>Conduct joint health and safety inspections</li><li>Conduct company-wide cross CP inspections</li><li>Implement employee health promotion programs</li></ul>	<ul style="list-style-type: none"><li>Added TBM and on-site patrol features to SeAH Keeper (integrated SHE mobile application) at SeAH Steel</li><li>Deployed the SSE system at 47 sites at SeAH Steel</li><li>Launched a mobile grievance counseling channel for business partners at Dong-A Steel</li><li>Completed and resolved all 730 identified risk factors through SeAH Steel's CP cross inspections</li><li>Carried out company-wide health promotion activities at SeAH Steel</li></ul>
			Risks	<ul style="list-style-type: none"><li>Serious disruptions to operations as well as declines in product quality and productivity can be caused due to industrial accidents</li><li>Financial burdens may be increased due to production delays, rising medical and compensation costs, and potential legal penalties</li></ul>		
2	E	Climate Action	Opportunities	<ul style="list-style-type: none"><li>Carbon neutrality goals can become more achievable by proactively establishing and implementing policies for GHG reduction and climate risk management</li><li>Reduction of energy costs, the discovery of new market opportunities, and profitability enhancement can be achieved due to process improvements, adoption of renewable energy, and development of eco-friendly products</li></ul>	<ul style="list-style-type: none"><li>Establish a roadmap to reduce greenhouse gas emissions by 15% by 2030 compared to 2018 levels, as part of the 2050 Net Zero goal</li><li>Establish the 2030 Renewable Energy Roadmap</li><li>Establish the first Energy and Environment Planning Team</li><li>Enhance energy consumption monitoring through the introduction of the Factory Energy Management System (FEMS)</li><li>Invest in process improvement equipment and eco-friendly product development</li><li>Expand green purchasing initiatives</li></ul>	<ul style="list-style-type: none"><li>Acquired ISO 50001 certification at the SeAH Steel Suncheon Plant</li><li>Acquired RINA certification for hydrogen embrittlement testing at SeAH Steel</li><li>Introduced and commenced operation of the FEMS at SeAH Steel</li><li>Reduced greenhouse gas emissions by 180.2 tCO<sub>2</sub>eq through LED lighting replacement at SeAH Steel</li><li>Achieved emissions reduction through investments in process improvement equipment</li></ul>
			Risks	<ul style="list-style-type: none"><li>Global warming and climate-related crises can be exacerbated due to insufficient commitment to setting robust GHG reduction targets and implementing climate initiatives</li><li>Cost burdens may increase, competitiveness in global markets may weaken, the ability to attract new investments may be hindered due to stricter carbon regulations</li></ul>		
3	S	Talent Management	Opportunities	<ul style="list-style-type: none"><li>Key talent can be secured through competency building programs and can contribute to social equity, creating quality jobs, and revitalizing the economy</li><li>Reduced re-hiring and health-related costs and greater work efficiency can be achieved by expanding diversity and strengthening welfare benefits, leading to increased employee satisfaction</li></ul>	<ul style="list-style-type: none"><li>Expand training and competency development programs for employees</li><li>Implement a performance-based compensation system</li><li>Operate employees workshop programs</li></ul>	<ul style="list-style-type: none"><li>Expanded application of AI-based competency assessments to production employees at SeAH Steel</li><li>Operated various competency development programs at SeAH Steel, including self-directed learning based on the Individual Development Plan (IDP)</li><li>Launched SeAH Steel's mentoring program, SeAH Energizer Day</li><li>Expanded the One Team Workshop to include 10 teams to strengthen execution at the team level</li></ul>
			Risks	<ul style="list-style-type: none"><li>Loss of talent may occur due to inadequate employee benefits, training support, or perceived inequity</li><li>Corporate competitiveness and productivity may be weakened while recruitment and training costs may be increased due to a loss of skilled employees and declining employee satisfaction</li></ul>		
4	E	Environmental Management	Opportunities	<ul style="list-style-type: none"><li>Helping protect local communities and ecosystems can be made possible by reducing air and water pollution and promoting a circular economy</li><li>Costs can be reduced while sales increase as a result of avoiding fines and litigation costs that follow regulatory violations, as well as acquiring environmental certifications which can help boost market competitiveness</li></ul>	<ul style="list-style-type: none"><li>Revise the company's Environmental and Energy Management Guidelines</li><li>Expand acquisition of eco-friendly certifications such as EPD and RoHS</li><li>Conduct awareness campaigns to improve employee understanding of environmental issues</li><li>Invest in facilities to reduce air and water pollutant emissions</li><li>Establish mid- to long-term targets to achieve zero landfill waste by 2050 and expand ZWTL certification</li></ul>	<ul style="list-style-type: none"><li>Acquired EPD certification at the SeAH Steel Suncheon Plant</li><li>Conducted the SeAH Leaders and Employees ESG Challenge campaigns</li><li>Identified and resolved 89 weakness improvement tasks through environmental Cross CP inspections at SeAH Steel</li><li>Installed IoT monitoring devices in coating facilities at Dong-A Steel</li><li>Introduced reverse osmosis (R/O) systems at the SeAH Steel Gunsan Plant</li><li>Acquired Gold-level ZWTL (Zero Waste to Landfill) certification at the SeAH Steel Gunsan Plant</li></ul>
			Risks	<ul style="list-style-type: none"><li>Public health issues and environmental degradation may arise due to the negative impact of environmental pollution on local communities and ecosystems</li><li>Financial losses may arise due to fines and remediation costs or a weakened market competitiveness as a result of a lack of environmental certifications</li></ul>		
5	G	Ethics and Compliance	Opportunities	<ul style="list-style-type: none"><li>A transparent and responsible corporate culture can be fostered by managing fair trade risks and conducting ethical practices, credibility between business partners and stakeholders can be strengthened</li><li>Long-term profitability can be obtained through enhanced credibility with suppliers and customers and unnecessary costs can be prevented by proactively mitigating legal and regulatory risks</li></ul>	<ul style="list-style-type: none"><li>Operate an Integrated Compliance Committee</li><li>Collect ethics and compliance pledges from employees and conduct related training programs</li><li>Conduct compliance evaluations and provide compliance guidelines</li><li>Publish a Compliance Newsletter</li></ul>	<ul style="list-style-type: none"><li>Passed the ISO 37301 surveillance audit at SeAH Steel</li><li>Expanded SeAH Steel's Integrated Compliance Committee to hold three meetings per year</li><li>Implemented ethics and compliance training programs</li></ul>
			Risks	<ul style="list-style-type: none"><li>Fair competition within the industry can be undermined due to an erosion of trust between the company, business partners, and customers leading to an increased likelihood of corruption and unfair practices</li><li>Disruptions in conducting business and financial losses may arise due to legal violations resulting in fines, litigation costs, and reputational damage</li></ul>		

Overview	+
Sustainability Framework	
ESG Strategy	
ESG Governance	
Materiality Assessment	
Stakeholder Engagement	
Leadership Perspectives on Sustainability	
Sustainability Snapshots 2024	
Environmental	+
Social	+
Governance	+
Appendix	+

# Stakeholder Engagement

SeAH Steel operates a variety of communication channels to strengthen engagement with diverse stakeholders, including customers, employees, business partners, local communities, government entities, and investors with the aim of building mutual trust. We collect feedback through tailored communication methods suited to each stakeholder group and use this input to drive meaningful management improvements and identify ESG-related initiatives. Even amid a rapidly changing business environment, SeAH Steel remains committed to closely understanding stakeholder expectations and needs and integrating them into our sustainability strategy and implementation plans. Through this approach, we continue to carry out responsible business practices that support sustainable growth.



Stakeholder	Definition	Communication Channels	Key Issues
Customers	Product users and contributors to social progress	Company website, customer service center, sustainability blog, LinkedIn	<ul style="list-style-type: none"><li>Responding to product and service inquiries</li><li>Enhancing customer satisfaction</li><li>Protecting customer information and data security</li></ul>
Employees	Core stakeholders driving organizational growth and sustainability	Intranet, labor union, meetings by job level, interviews, employee surveys, grievance resolution channels	<ul style="list-style-type: none"><li>Improving organizational culture</li><li>Providing employee training and strengthening capabilities</li><li>Promoting communication among employees</li></ul>
Business Partners	Key partners in building a trustworthy supply chain and creating mutual value through fair and mutually beneficial partnerships	Mutual growth programs, regional business owner meetings	<ul style="list-style-type: none"><li>Supporting mutual cooperation initiatives</li><li>Managing safety for business partners</li><li>Expanding ESG assessments across the supply chain</li></ul>
Local Communities and NGO	A collaborative community of communication and shared growth, working together to build a sustainable society	Company website, sustainability report, employee-participatory volunteer activities	<ul style="list-style-type: none"><li>Conducting relief and support activities</li><li>Supporting vulnerable groups</li><li>Cleaning and preserving the local communities</li></ul>
Government and Media	Advocates of transparency and social responsibility by monitoring and giving guidance on societal issues	Government policy hearings, stakeholder meetings, sustainability report, press releases, company website	<ul style="list-style-type: none"><li>Responding to government regulations and policies</li><li>Participating in government funded projects</li><li>Managing corporate reputation</li></ul>
Shareholders and Investors	Interest-driven value creators advocating responsible management and mutual growth	Shareholder meetings, investor relations disclosures, company website	<ul style="list-style-type: none"><li>Enhancing corporate value</li><li>Disclosing corporate activities transparently</li><li>Expanding shareholder engagement</li></ul>



Overview	+
Sustainability Framework	
ESG Strategy	
ESG Governance	
Materiality Assessment	
Stakeholder Engagement	
Leadership Perspectives on Sustainability	
Sustainability Snapshots 2024	
Environmental	+
Social	+
Governance	+
Appendix	+

# Leadership Perspectives on Sustainability

## Perspectives on ESG Fundamentals

Internalization of ESG Management	Principles and Implementation Framework for Internalizing ESG Management
-----------------------------------	--

**SeAH Steel** Head of Changwon Plant

The Changwon Plant of SeAH Steel has established a mid-to-long-term ESG strategy based on three core principles: circular economy, eco-friendly value creation, and responsible management. We aim to internalize sustainability management and achieve our ESG mid-to-long-term strategies by 2026 through proactive responses to external change and organizational restructuring.

In particular, the Changwon Plant is actively responding to increasingly strict environmental and safety regulations by continuing investments in facility upgrades, strengthening 3R (Reduce, Reuse, Recycle) activities for wastewater and waste, maintaining a zero-accident workplace, conducting risk assessments for suppliers, and providing hands-on safety training. These responsible management efforts are strategic measures aimed at establishing an eco-friendly production system that supports carbon neutrality while reducing regulatory risks and creating a circular economy.

Furthermore, the Changwon Plant is working to build a practical eco-friendly management system supported by an operational structure and to foster an ESG culture grounded in employee participation. We also actively engage in “ESG Friends,” a collaborative in-house consultative body, to raise employee awareness and promote the expansion of ESG management throughout the organization.

**Dong-A Steel** Production Executive | Chief Safety and Health Officer

In 2024, Dong-A Steel implemented key strategic initiatives aligned with our ESG goals, focusing on improving productivity, reducing energy usage, and reducing waste. We are actively working to optimize equipment efficiency by improving operational rates, yield, and production speed, thereby minimizing resource waste and contributing to a circular economy. Efforts are also being made to reduce the physical burden of high-intensity tasks and to establish a safer and more efficient working environment.

Dong-A Steel recognizes that embedding ESG management within the organization depends on employee engagement and voluntary participation. With this understanding, we are prioritizing efforts to raise awareness of corporate culture, safety, and environmental responsibility among employees. Centered around our vision of becoming “a company that grows together with the employees,” Dong-A Steel has restructured the training programs by job category and established a systematic training framework to strengthen ESG implementation capabilities.

Looking ahead, Dong-A Steel will continue to embed ESG principles into our operations, aiming for continuous on-site improvement and sustainable development. We will further advance ESG integration by cultivating a culture-based talent development system as a foundation for long-term responsible management.

Key Stakeholders and Engagement Activities	ESG Initiatives and Operations Aligned with Key Stakeholders
--	--

**SeAH Steel** CEO | Head of Pohang Plant · Chief Safety and Health Officer

SeAH Steel places customers and employees at the center of our ESG management and strives to make ethical and responsible decisions through continuous communication and feedback. By incorporating regular feedback and improvement activities, we aim to build a trust-based organizational culture and establish a sustainable management system that meets stakeholder expectations.

SeAH Steel works closely with our customers to develop products that meet their specifications, improve quality, and fulfill evolving customer needs. In particular, the Pohang Plant has been expanding our potential customer base by leading the development of eco-friendly infrastructure pipe technologies through the R&D Center, which was established in 2020 as the first kind in the domestic steel pipe industry.

To ensure a safe and healthy working environment for employees, we proactively identify and manage workplace hazards through programs such as the TOP Diagnostic and CP Cross-Check. In addition, we operate an on-site health center staffed by a professional nurse to support employee health management.

**SeAH Steel** SHE Planning Executive

Business partners are the most important stakeholders for ESG management. At major manufacturing sites such as Pohang, Gunsan, Suncheon, and Changwon, business partners play a key role in the production process.

Given that approximately 58% of industrial accidents over the past two years were attributed to insufficient safety and health systems among business partners, SeAH Steel introduced a “Safety and Health Consultant System” in November 2023. This system provides tailored training and support to business partners with five or more employees at each site. Through these efforts, SeAH Steel aims to promote sustainable and mutually beneficial growth with our business partners.



Overview	+
Sustainability Framework	
ESG Strategy	
ESG Governance	
Materiality Assessment	
Stakeholder Engagement	
Leadership Perspectives on Sustainability	
Sustainability Snapshots 2024	
Environmental	
Social	+
Governance	+
Appendix	+

# Leadership Perspectives on Sustainability

## Material Issue 1

Occupational Safety and Health	Occupational Safety and Health Internalization Strategy
--------------------------------	---

**SeAH Steel**  
CEO

- Head of Pohang Plant
- Chief Safety and Health Officer

SeAH Steel has adopted the “advancement of our safety reporting and management systems” as a core ESG principle. We are working toward achieving zero industrial and serious accidents by enhancing the integrated SHE (Safety, Health, and Environment) system. The company also promotes a strong safety culture through real-time detection of hazardous risk factors using the mobile app “SeAH Keeper” and by encouraging QR-based Toolbox Meetings (TBM) across worksites.

**SeAH Steel**  
SHE Planning

Setting our 2025 business goal as achieving “Zero Industrial and Serious Accidents” and “100% Improvement in High-Risk Areas,” we are internalizing workplace health and safety. In particular, we are conducting activities such as risk assessments, publishing safety and health newsletters, sharing safety, health, and environmental information through the integrated SHE system, and promoting safety awareness through safety events and campaigns.

**Dong-A Steel**  
CEO

Dong-A Steel has designated safety and environmental improvement as one of our core ESG management principles. To enhance on-site safety, we apply best practices shared within the group-wide Safety and Environment Committee to our own safety management system, strengthening safety across all operations.

## Material Issue 2

Climate Action	Climate Action and Greenhouse Gas Reduction Strategy
----------------	--

**SeAH Steel**  
CEO

- Head of Pohang Plant
- Chief Safety and Health Officer

SeAH Steel is pursuing a 15% reduction in greenhouse gas emissions by 2030 as part of our goal to transition to a low-carbon production system by 2050. To achieve this, we are developing energy-efficient and carbon-reduction technologies through eco-friendly R&D and have introduced the Factory Energy Management System (FEMS) at the Pohang Plant to systematically manage energy use. Additionally, SeAH Steel is continuously advancing the transition to renewable energy and reducing greenhouse gas emissions through the installation of on-site solar power systems and investment in high-efficiency equipment.

**SeAH Steel**  
Head of Gunsan Plant

SeAH Steel’s Gunsan Plant is improving energy efficiency by replacing outdated equipment and enhancing work processes. Through these efforts, we are reducing indirect greenhouse gas emissions on-site and actively contributing to climate change response.

**SeAH Steel**  
Head of Suncheon Plant

As part of our climate action efforts, SeAH Steel’s Suncheon Plant has acquired the Energy Management System (ISO 50001) certification and established an energy-efficient production system. In addition, we are expanding the offshore wind foundation production capacity to further grow our renewable energy business.

## Material Issue 3

Talent Management	Employee Communication and Talent Development Strategy
-------------------	--

**SeAH Steel**  
CEO

- Head of Pohang Plant
- Chief Safety and Health Officer

SeAH Steel recognizes talent development as a key driver of sustainable growth. We are dedicated to strengthening communication among employees and improving organizational culture. To this end, we are expanding a culture of collaboration and engagement through various programs, including the operation of a “Junior Board,” the internalization of our culture deck, and the enhancement of job-specific training.

**Dong-A Steel**  
Production Executive

- Chief Safety and Health Officer

Dong-A Steel believes that respect for humanity is not only at the core of ESG management but also that it embodies the essence of SeAH Group’s fundamental philosophy of principled management. Based on this belief, we are focusing on strengthening employee awareness of human rights and ethics through targeted training programs.

**Dong-A Steel**  
Sales Executive

Dong-A Steel is strengthening our talent management system to enhance employee’s sense of belonging, recognizing them as key stakeholders. As part of this effort, we are comprehensively restructuring our training programs to enable tailored talent development by job category.

Overview	+
Sustainability Framework	
ESG Strategy	
ESG Governance	
Materiality Assessment	
Stakeholder Engagement	
Leadership Perspectives on Sustainability	
Sustainability Snapshots 2024	
Environmental	+
Social	+
Governance	+
Appendix	+

# Leadership Perspectives on Sustainability

## Material Issue 4

Ethics and Compliance	Risk Management and Compliance Strategy
-----------------------	---

**SeAH Steel**  
CEO

- Head of Pohang Plant
- Chief Safety and Health Officer

SeAH Steel operates a compliance management system based on the ISO 37301 Compliance Management System to manage ethical and legal risks. We also conduct voluntary inspections in areas such as information security and fair trade, thereby strengthening internal controls and enhancing our ability to respond to risks. In addition, SeAH Steel promotes transparent and fair decision-making through active communication with customers and employees, further reinforcing organizational integrity.

**SeAH Steel**  
Head of Changwon Plant

The Changwon Plant is actively promoting ethical management with the goal of conducting fair and transparent business practices. To enhance employees' ethical awareness and establish a strong ethical culture within the organization, regular ethics training is conducted. We also provide clear internal guidelines and codes of conduct to be followed during business activities, enabling all employees to consistently maintain fair and transparent relationships with stakeholders.

**Dong-A Steel**  
Sales Executive

Dong-A Steel recognizes that adhering to fair trade practices is the starting point of sustainable business operations, and we have thus formally expressed a strong commitment to complying with the Fair Trade Act. As a result, we have designated fair trade-related risks as a key area of focus for 2025. We are also establishing practical risk management measures, including implementing credit evaluation procedures for business partners.

## Material Issue 5

Environmental Management	Environmental Strategy for Resource Circulation and Waste Reduction
--------------------------	---

**SeAH Steel**  
CEO

- Head of Pohang Plant
- Chief Safety and Health Officer

SeAH Steel is actively pursuing manufacturing process improvements with the goal of achieving zero landfill waste, in an effort to contribute to the development of a circular industrial ecosystem. We are working to increase recycling rates and transition to a circular economy based production system. Through these efforts, SeAH Steel is enhancing resource efficiency and establishing an eco-friendly operational foundation that minimizes environmental impact.

**SeAH Steel**  
Head of Gunsan Plant

SeAH Steel's Gunsan Plant is promoting a workplace that expands the recycling of by-products generated during the production process as part of our efforts to reduce waste. To avoid landfill or incineration of manufacturing waste, we also provide ongoing waste management training for employees. As a result of these efforts, in December 2024, the Gusan Plant became the first in the domestic steel pipe industry to receive UL's Zero Waste To Landfill (ZWTL) Gold Certification, being recognized for our excellence in waste management throughout the production process.

**SeAH Steel**  
Head of Changwon Plant

As part of our environmental improvement efforts to promote a circular economy, SeAH Steel's Changwon Plant is actively working to reduce pollutants and expand waste recycling. We are also advancing our environmental risk response system by actively promoting 3R activities (Reuse, Recycle, Reduce).

Overview +

Sustainability Framework

- ESG Strategy
- ESG Governance
- Materiality Assessment
- Stakeholder Engagement
- Leadership Perspectives on Sustainability
- Sustainability Snapshots 2024

Environmental +

Social +

Governance +

Appendix +

# Sustainability Snapshots 2024

February



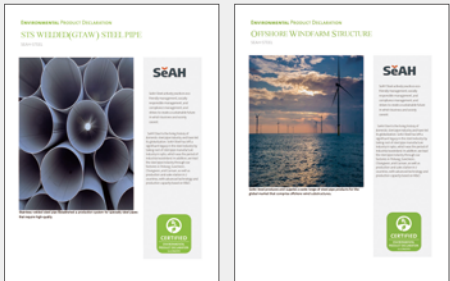
**Dong-A Steel**  
Signed a Resource Circulation Business Agreement for Waste Plastic Recycling

March



**SeAH Steel Holdings, SeAH Coated Metal, and Dong-A Steel**  
Signed a business agreement with E-Cycle Governance to establish a resource circulation system for waste electrical and electronic equipment

August



**SeAH Steel Suncheon Plant**  
Acquired the UL's Environmental Product Declaration (EPD) certification for STS (SAW, GTAW) and steel pipes for offshore structures (SAW)

August



**Dong-A Steel**  
Acquired the Environmental Product Declaration (EPD) certification for ERW steel pipes

October



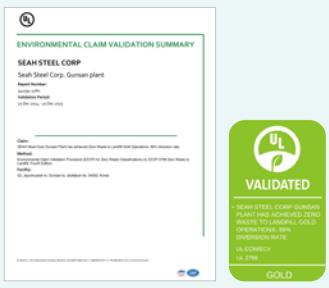
**SeAH Steel Suncheon Plant**  
Acquired the DNV ISO 50001 certification for three product categories: STS (SAW, GTAW) and Offshore Foundation Structure (SAW)

December



**SeAH Steel Changwon Plant**  
Received the Minister of Environment Award for two consecutive years in the BELFS PLUS Chemical Safety Campaign

December



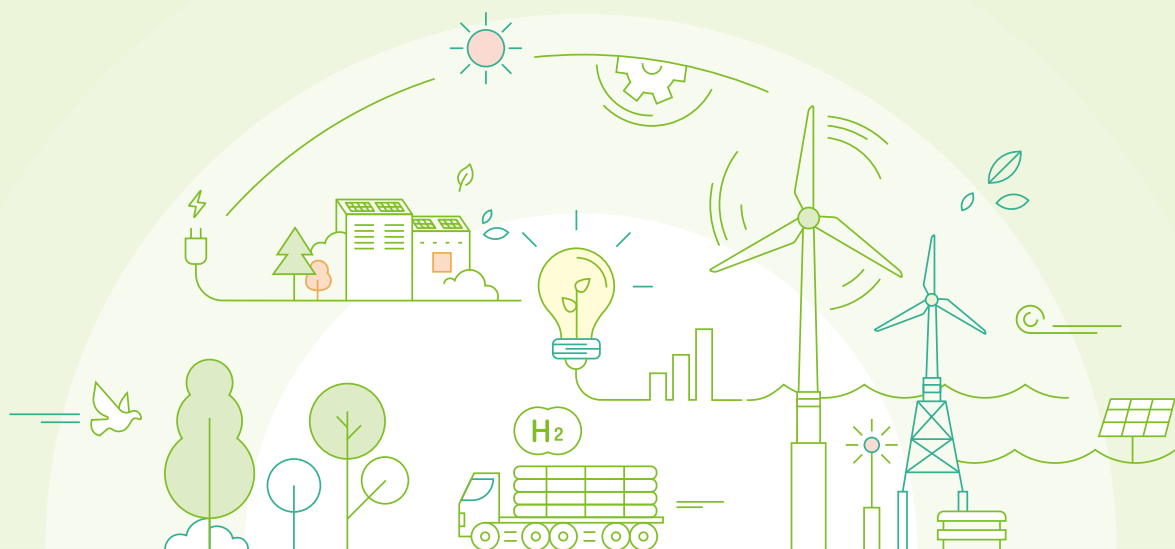
**SeAH Steel Gunsan Plant**  
Became the first in the domestic steel pipe industry to acquire the UL's Zero Waste to Landfill (ZWTL) Gold Certification

December



**SeAH Steel Changwon Plant**  
Participated in the Gyeongsangnam-do Voluntary Agreement for Fine Dust Reduction

Overview	+
Sustainability Framework	+
Environmental	
Social	+
Governance	+
Appendix	+



# ENVIRONMENTAL

25	Climate Action	Material Issue
38	Environmental Management	Material Issue
51	Biodiversity	

Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+

## Climate ActionMaterial Issue

### Governance

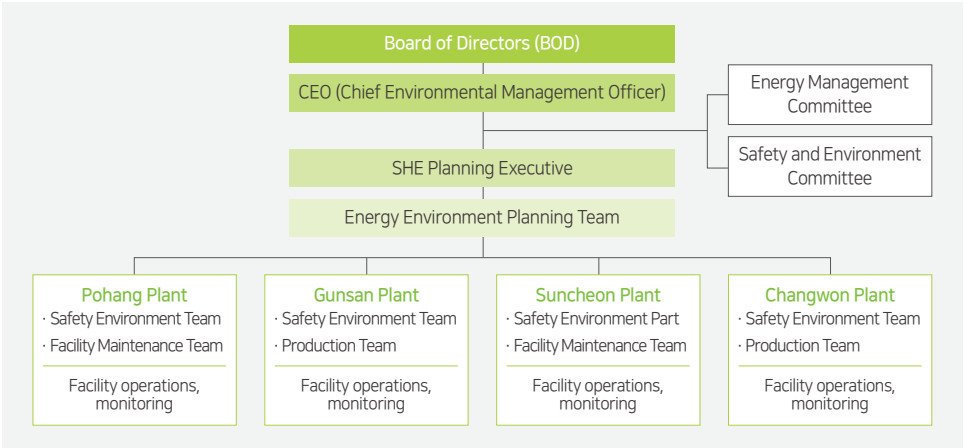
#### Climate Action Governance

**BOD, Executives, and Departments** | To systematically carry out activities in response to climate change, **SeAH Steel** established the Energy Environment Planning Team in 2024 to oversee and manage climate-related issues. At each business site, the Safety Environment Department collaborates with the Facility Maintenance Team and Production Team to set energy reduction targets and monitor implementation progress. In 2025, the Gunsan Plant elevated the Safety and Environment Part to a full-fledged Safety and Environment Team to further strengthen the overall organizational capabilities. We also established and implemented mid- to long-term roadmaps and detailed action plans linked to the KPIs of responsible executives (SHE Planning Executive and the Production Executive at the Pohang Plant). The Energy Environment Planning Team conducts quarterly reviews of implementation performance and reports the results to the CEO (Chief Environmental Management Officer). In addition, annual reports on energy consumption, reduction plans, and performance outcomes are regularly submitted to senior management and reflected in strategic decision-making. In February 2025, the “Environmental Management Plan,” which includes the performance results for 2024 and the plans for 2025, was reported to the BOD. Going forward, we will continue refining our management systems, with a focus on the structured management of climate-related issues.

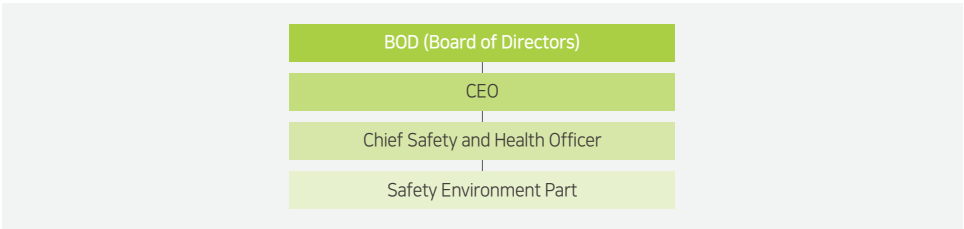
To promote systematic safety and environmental management, **Dong-A Steel** established a Safety and Environment Part under the Chief Safety and Health Officer in 2024, building a comprehensive safety and environment management system and developing our management capabilities. The Safety Environment Part is actively engaged in various initiatives to address climate change, including process improvements and energy-saving campaigns.

**Energy Management Committee** | In May 2024, **SeAH Steel** established the Energy Management Committee to systematically set carbon emission reduction targets for each business site and regularly review implementation performance. The Committee is led by energy-related departments and operates in collaboration with the Production Team, Facility Maintenance Team, and support organizations. Drawing on accumulated field experience and operational expertise, the Committee strengthens its professionalism and execution of energy-saving initiatives. Each business site actively promotes field-oriented energy efficiency initiatives by holding monthly working-level meetings to identify and implement improvement tasks for energy source-specific losses. The results of these activities are reported directly to the CEO on a quarterly basis, and we continue to advance our sustainable energy management system with the interest and support of the senior management. In 2024, we identified a total of 75 energy-saving ideas (51 in Pohang, 3 in Gunsan, 4 in Suncheon, and 17 in Changwon), and carried out improvements on 233 energy loss items (67 in Pohang, 104 in Gunsan, 11 in Suncheon, and 51 in Changwon). In 2025, we plan to actively utilize the newly allocated energy improvement budgets for each business site to continue these activities.

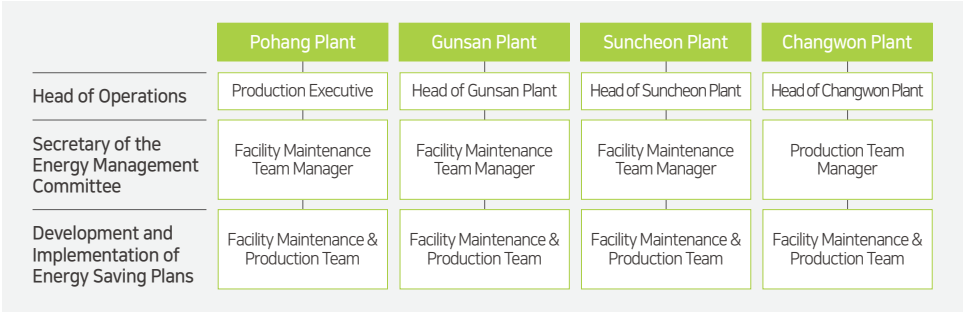
Climate Action Organizational Chart (SeAH Steel)



Climate Action Organizational Chart (Dong-A Steel)



Energy Management Committee Organizational Chart (SeAH Steel)



Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+

# Climate Action

Material Issue

## Strategy

### Climate Action Strategy

SeAH Steel has set “Building Sustainable Plants by Transitioning to Low Carbon Production by 2050” as our mid-to-long term goal, and we are continuously refining and developing this eco-friendly strategy that we established in 2024. To achieve this goal, we are developing phased implementation plans centered around four key strategic tasks focused on reducing carbon emissions: Process Improvement, System Development, Resource Circulation, and R&D for Eco-friendly Products. At the Pohang Plant, energy efficiency is improved by replacing outdated equipment and introducing a Factory Energy Management System (FEMS). The Gunsan Plant is transforming into a resource-circulating facility by minimizing landfill waste and maximizing recycling, as demonstrated by the acquisition of Zero Waste to Landfill (ZWTL) certification. The Suncheon Plant established an energy management system aligned with international standards through a certification acquired under ISO 50001. The Changwon Plant is steadily reducing energy loss by phasing out low-efficiency equipment. Through these site-specific strategies, SeAH Steel is strengthening the company-wide foundation for eco-friendly production and enhancing our sustainable competitiveness in manufacturing.

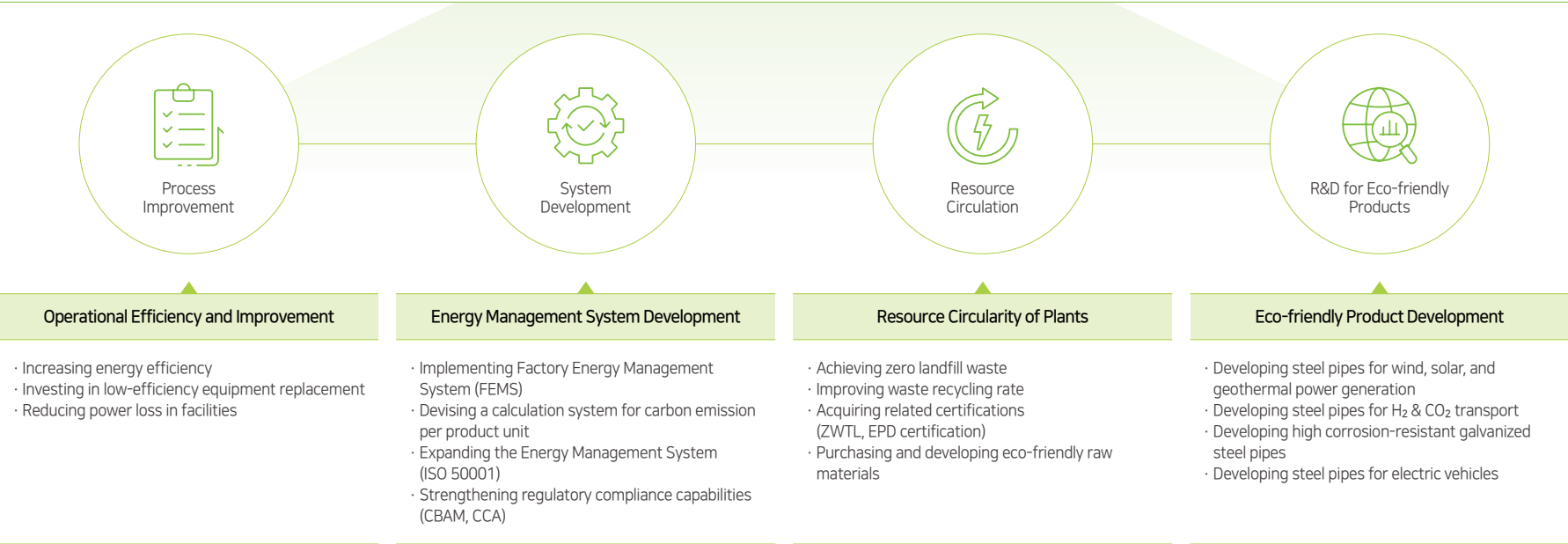
Vision

Building Sustainable Plants by Transitioning to Low Carbon Production

Mission

Achieve Carbon Neutrality by 2050 and Maximize Resource Circulation

Strategy



Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+

# Climate Action

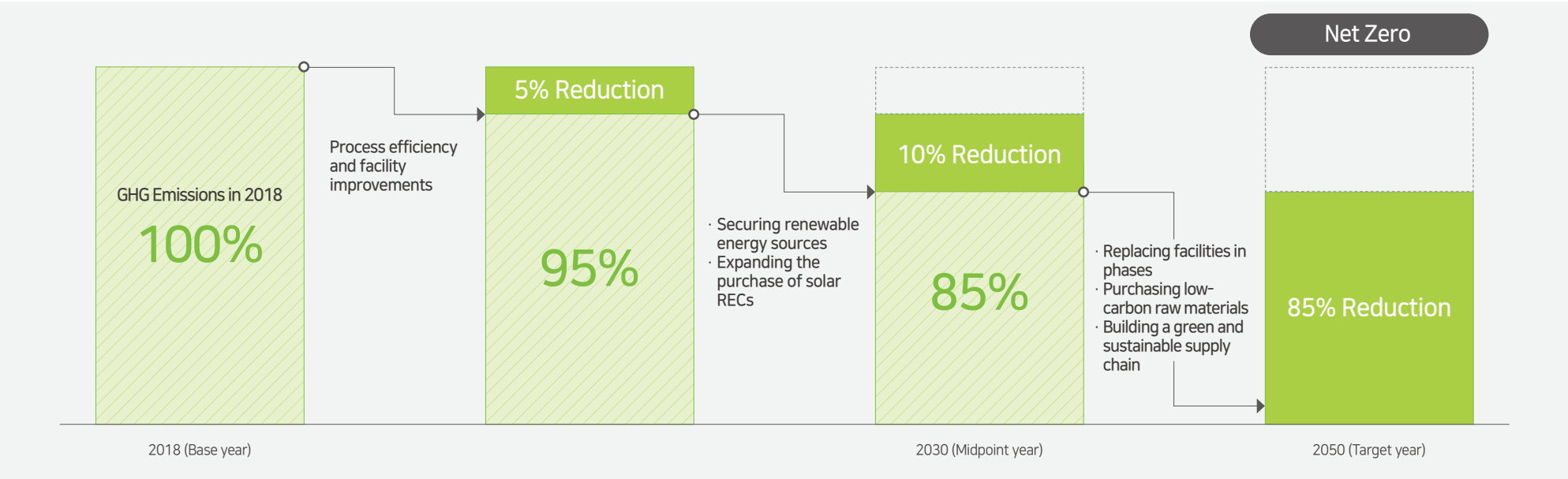
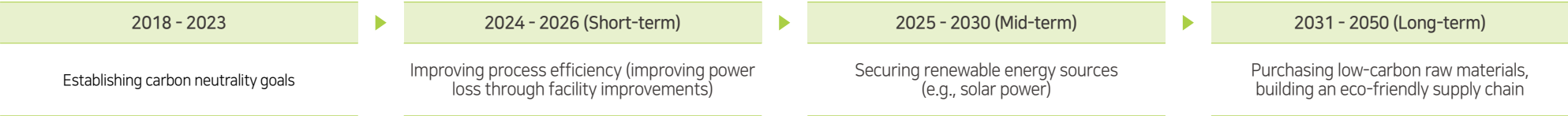
Material Issue

## Strategy

### Carbon Neutrality Roadmap

SeAH Steel has set a target to reduce greenhouse gas emissions by 15% from that of 2018 (based on the same production volume), or 5% in the case of production levels increasing by 125,000 metric tons, by 2030. Of the 15%, 5% reduction is to be achieved through energy savings from process improvements, while the remaining 10% will be reduced through securing renewable energy sources, including on-site generation and the purchase of Renewable Energy Certificates (RECs). To systematically manage greenhouse gas reduction performance, SeAH Steel regularly monitors Scope 1 and Scope 2 emissions as key indicators. We are also refining our calculation methodology by focusing on key categories among the 15 Scope 3 categories that align with the characteristics of our business. Through this, we will gradually expand the scope of indirect emissions management across the value chain. Through this, we intend to establish concrete greenhouse gas reduction strategies and action plans to drive emissions reductions across the entire value chain.

### Carbon Neutrality Roadmap (SeAH Steel)





Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+

Climate Action **Material Issue**

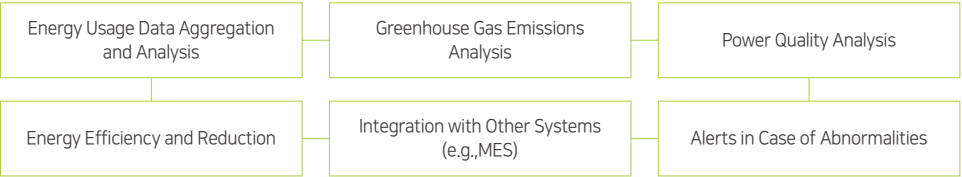
Strategy

Upgrading Energy-related Operations

**Establishment of Factory Energy Management System (FEMS)** | **SeAH Steel** began investing in the implementation of Factory Energy Management System (FEMS\*) at the Pohang Plant in July 2024 to strengthen systematic energy reduction and management. The system has been fully operational since April 2025; and to ensure its effective operation, the “Energy Center” was newly established within the Energy Environment Planning Team's office to identify energy loss factors and carry out relevant improvement measures by analyzing real-time based data. FEMS will be linked with the Manufacturing Execution System (MES), enabling more precise energy management and product-specific energy efficiency analysis. In addition, we plan to gradually expand the implementation of FEMS to all business sites to extend our aggregated energy usage patterns collected through the system, while incorporating preventative improvement plans to establish a company-wide energy efficiency framework.

\*FEMS (Factory Energy Management System): A system that measures, monitors, analyzes, plans, and controls the energy usage of facilities within our plants to optimize supply and consumption of energy.

FEMS Functions



FEMS Monitoring Screen (SeAH Steel)



**Energy Efficiency Improvement Activities** | **SeAH Steel** is replacing lighting systems with high-efficiency LED lights in both the office areas and factory buildings across all business sites to improve energy efficiency. In 2024 alone, over 1,000 lights were replaced which is expected to reduce annual greenhouse gas emissions by approximately 180.2 tCO<sub>2</sub>eq. In addition, areas with potentials for efficiency improvement were identified, and improvements are steadily implemented based on the results of energy diagnosis conducted at each plant. Specifically, insulation has been reinforced for facilities using LNG to reduce heat loss, and equipment with excessive rated capacity is being replaced with high-efficiency alternatives to further enhance energy efficiency.

**Dong-A Steel** enhances energy efficiency by reducing unnecessary lighting during daylight hours and using timer outlets when ambient illumination is sufficient. The effectiveness of these measures is further supported through employee-driven initiatives, such as energy-saving idea contests.

**Process Improvement Facility Investments** | **SeAH Steel** is continuously making facility improvements to reduce greenhouse gas emissions. From 2023 to 2024, the Pohang Plant invested KRW 1.45 billion in facility improvements, achieving an annual reduction of approximately 953 tCO<sub>2</sub>eq in greenhouse gas emissions and saving about KRW 415 million in electricity costs (based on KRW 200 per kWh). At the Changwon Plant, facility investments such as replacing low-efficiency steam boilers are expected to reduce LNG consumption by more than 10%.

**Dong-A Steel** is improving energy efficiency and reducing greenhouse gas emissions by investing in facilities for process improvement, such as installation of high-efficiency motors and optimization of pneumatic system loads.

Process Improvement Activities by Plant (SeAH Steel)

Plant	2024 Key Initiatives
Pohang Plant	Installation of VSD air compressor, adoption of hybrid air blower, etc.
Gunsan Plant	Implementation of power usage and air compressor monitoring system, etc.
Suncheon Plant	Adoption of high-efficiency turbo blowers and inverters, installation of insulation covers, replacement of VSD air compressors, etc.
Changwon Plant	Control of induction furnace pump speeds, replacement of low-efficiency boilers, energy optimization of heat treatment systems, etc.



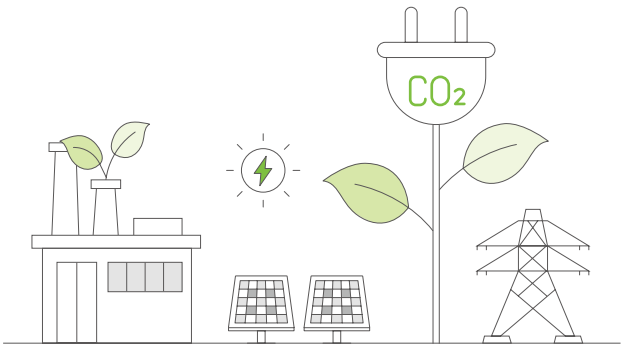
Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+

## Climate Action Material Issue

### Strategy

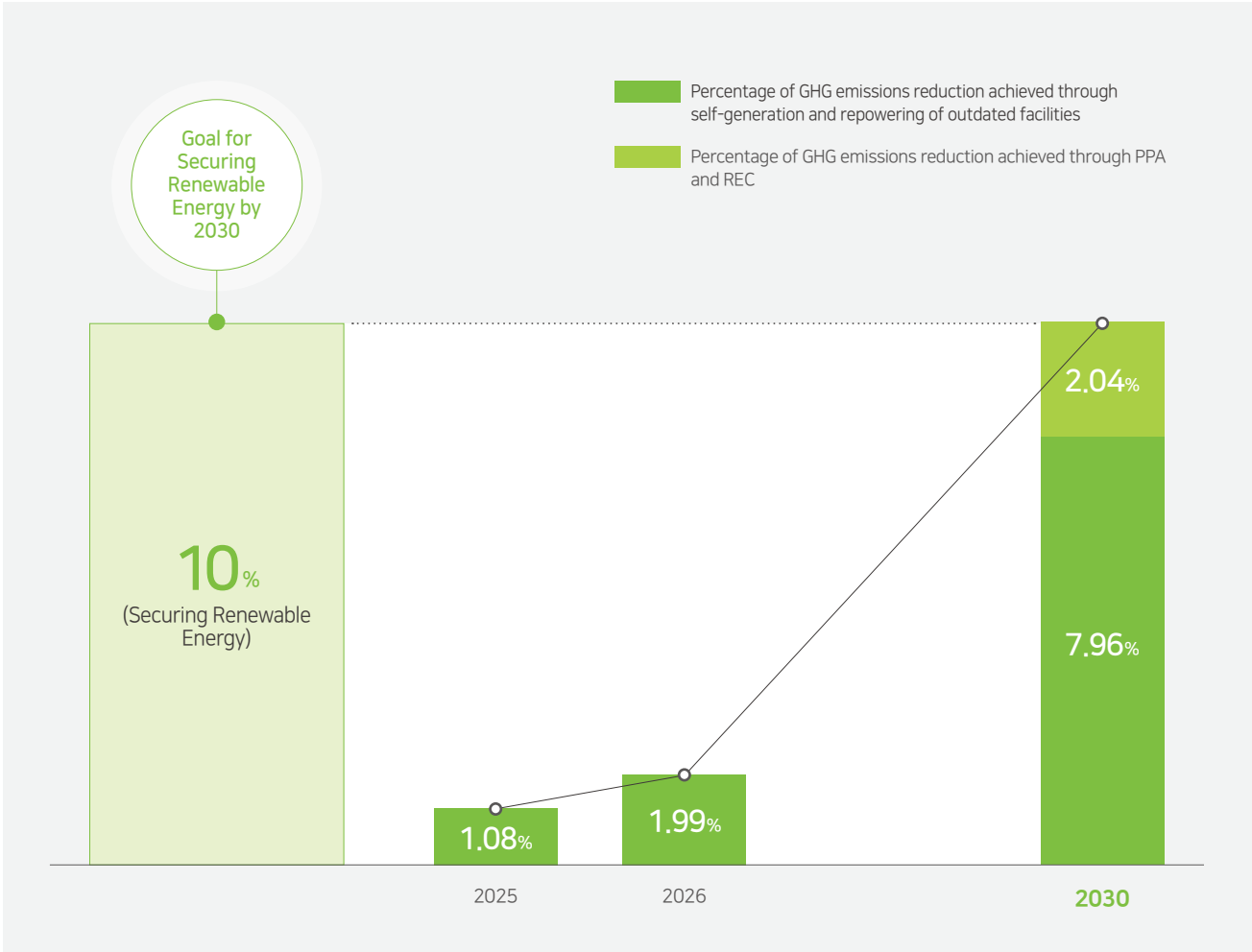
#### 2030 Renewable Energy Roadmap

SeAH Steel aims to achieve carbon neutrality by 2050 and proactively respond to global carbon-related regulations, including the EU Carbon Border Adjustment Mechanism (CBAM). Given that over 80% of our greenhouse gas (GHG) emissions arise from indirect emissions (Scope 2) such as electricity consumption, securing renewable energy has been selected as a core strategy. Accordingly, a new roadmap was established in 2025 to raise the target set to procure renewable energy by 2030 from 7.5% to 10% compared to that of 2018 GHG emissions levels. As a first step, self-consumption solar power plants will be installed on idle spaces at our Pohang, Gunsan, and Changwon plants. A phased-in transition will then be implemented, converting facilities with expiring leases to on-site generation and upgrading outdated infrastructure. Through these efforts, we aim to secure a total solar power generation capacity of 11.47 MW by 2030, resulting in an approximately 8% reduction in greenhouse gas emissions compared to 2018 levels. To achieve the remaining reduction target, we plan to actively explore a range of options such as Power Purchase Agreements (PPAs) and Renewable Energy Certificates (RECs), in line with domestic and international carbon regulatory trends.



Roadmap for Securing Renewable Energy (SeAH Steel)

(Compared to 2018 greenhouse gas emissions)



Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+

Climate Action Material Issue

Strategy

Development of Eco-friendly Products

**Investments in Low-Carbon Materials and Decarbonization Technologies** | SeAH Steel is expanding the use of low-carbon raw materials to reduce greenhouse gas (GHG) emissions and achieve carbon neutrality. To this end, we are actively pursuing collaboration opportunities with manufacturers developing raw materials made from electric furnace production. We also aim to minimize GHG emissions across the entire life cycle of steel pipe products by adopting the Life Cycle Assessment (LCA) methodologies. In line with this approach, we plan to strengthen Scope 3 emissions management by extending our reduction efforts to upstream and downstream activities, including those of outsourced and contracted partners.

As for technology developments, SeAH Steel is jointly carrying out an industry-academia-research project aimed at “developing welded steel pipe manufacturing technology for high-pressure hydrogen applications with a yield strength of 485 MPa,” targeting completion by 2028. The project focuses on securing high strength and low-temperature toughness suitable for hydrogen transportation. In addition, SeAH Steel has enhanced manufacturing efficiency and reduced energy consumption and carbon emissions by eliminating the previously required quenching and tempering (Q/T) heat treatment process in the production of high-strength OCTG\* products. This was achieved through improvements in raw material design and manufacturing technology, enabling the production of finished products equivalent to SeAH 80 and SeAH 110 grades using only the ERW (Electric Resistance Welding) process. Going forward, SeAH Steel plans to continue leading the eco-friendly steel pipe market through ongoing investments in low-carbon raw materials, technological innovation, and process optimization.

\* OCTG (Oil Country Tubular Goods): OCTG refers to steel pipes used in the extraction and transportation of crude oil and natural gas. These products are characterized by high strength, excellent corrosion resistance, and resistance to stress corrosion cracking. OCTG primarily refers to products within the API 5CT specification for casing and tubing.

Expanding the Application of Green Steel

In August 2024, SeAH Steel collaborated with Hyundai Steel to successfully carry out a joint trial production and pipe-forming evaluation of low-carbon HR plates for offshore wind foundations with a yield strength of 355 MPa. This initiative marked the first case in Korea in which ultra strength steel plates, produced through a hybrid electric arc furnace and blast furnace process, were processed into steel pipes. We confirmed that the newly developed product reduces carbon emissions by approximately 12% while maintaining existing quality standards. Through this achievement, SeAH Steel has demonstrated the expanded applicability of low-carbon materials in the offshore wind sector. SeAH Steel will continue to strengthen collaboration with a diverse range of partners to broaden the adoption of environmentally responsible materials and to position ourselves at the forefront of developing sustainable steel pipe solutions that contribute to a more sustainable future.

**Acquired Certification for RINA Hydrogen Embrittlement Test** | In 2024, SeAH Steel acquired certification for the hydrogen embrittlement test (K<sub>1</sub>H\*), a fundamental requirement for quality assessment of steel pipes for hydrogen transport, from RINA Consulting, an Italian institution specializing in hydrogen embrittlement evaluation. The test was conducted in accordance with ASME B31.12, Option B, an international standard used to verify hydrogen embrittlement resistance in high-pressure hydrogen transport environments. High-pressure hydrogen can penetrate steel, concentrate stress at micro-defects, weaken the metal’s structure, and cause fracture through a phenomenon known as “hydrogen embrittlement.” Consequently, steel pipes for hydrogen transport must exhibit high resistance to hydrogen embrittlement. To address this, we apply comprehensive quality control measures to prevent hydrogen embrittlement and enhance resistance. This includes alloy design of raw materials, microstructure control via rolling and cooling adjustments, optimizing forming conditions, and minimizing residual stress during pipe manufacturing.

As a result of the hydrogen embrittlement test, SeAH Steel’s pipes demonstrated resistance levels of Weld > 74.1 MPa·√m, HAZ > 79.6 MPa·√m, and Base Metal > 74.7 MPa·√m. These results exceed the minimum requirement of 55 MPa·√m specified by ASME B31.12, confirming that the pipes meet the high level of hydrogen embrittlement resistance required for hydrogen transport. Through this certification, SeAH Steel has further enhanced the technological credibility within the hydrogen ecosystem. We will continue to develop high-performance steel pipes and verify their quality to contribute to the transition toward a hydrogen society.

\* K<sub>1</sub>H: Minimum Threshold Stress Intensity Factor is a key indicator used to assess hydrogen embrittlement resistance and is required for the quality evaluation of steel pipes for hydrogen transportation.



RINA Hydrogen Embrittlement Test Certification (SeAH Steel)



Steel Pipe for Hydrogen Transportation

Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+

# Climate Action

Material Issue

## Strategy

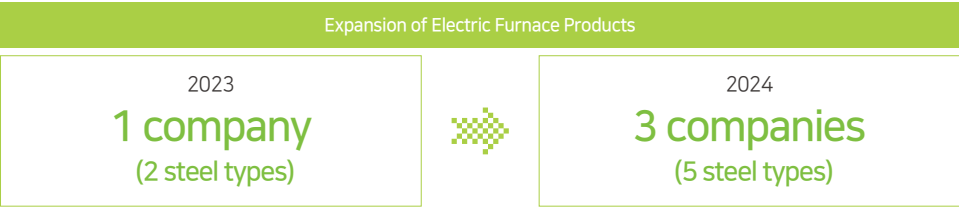
### Green Procurement

**Green Procurement Policy** | Under the ESG vision of “The Promise to Create a Beautiful World,” **SeAH Steel** established the Green Procurement Policy in 2024 to minimize resource waste and environmental pollution. This policy applies to all business sites, including headquarters, plants, and sales offices, and seeks to prioritize the purchase of products that reduce environmental impact. In this policy, “green procurement” refers to the eco-friendly purchasing that prioritizes the evaluation and purchase of products that minimize the input of energy and resources as well as the emissions of GHG and pollutants compared to other products or services with the same purpose. This includes eco-labelled products, low-carbon products, high-quality recycled products, and energy-saving products. SeAH Steel actively reflects these environmental considerations throughout the entire business process, including the supply, transportation, production, distribution, and disposal of raw and auxiliary materials. We will continue to expand green procurement and minimize environmental impact.

**Active Implementation of Green Procurement** | In line with the Green Procurement Policy, **SeAH Steel** is gradually expanding the purchase of eco-friendly products. In 2022, we conducted a pilot purchase of 19 metric tons of raw materials produced using the electric arc furnace method, which emits only about 25% of the carbon emissions compared to the traditional blast furnace method. In 2023, we significantly increased the purchase volume to 6,191 metric tons. Although the total volume decreased in 2024 compared to the previous year, we made efforts to secure competitive eco-friendly raw material sourcing suppliers. As a result, we increased the number of suppliers from one to three and the number of steel grades from two to five. We will continue expanding our pool of eco-friendly suppliers and diversifying steel grades, thereby establishing a robust green ecosystem that can respond to growing demand for sustainable materials.



### Expansion of Electric Furnace Products (SeAH Steel)



## Risk Management

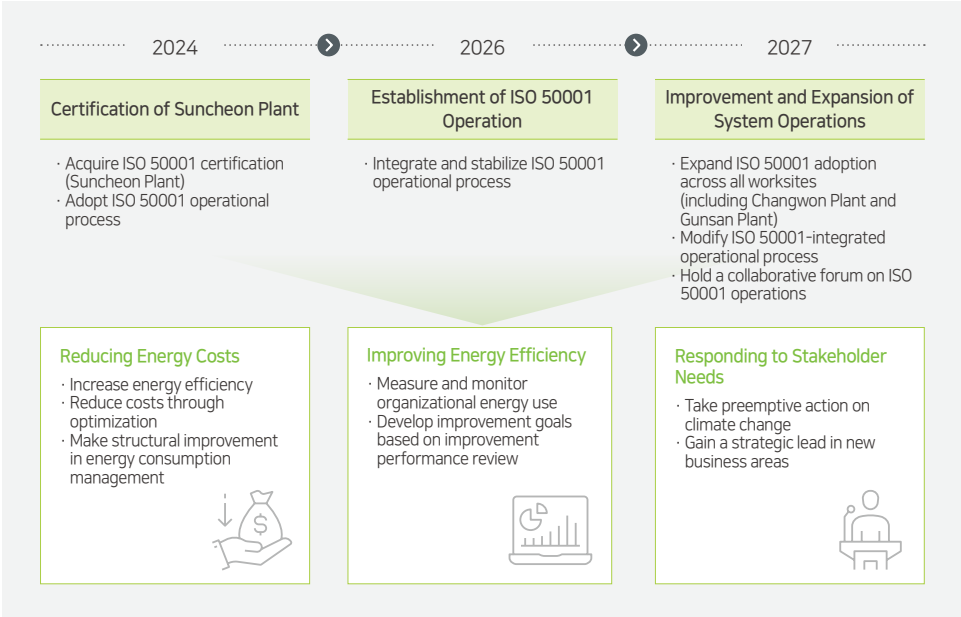
### Energy Management System (ISO 50001) Certification

At **SeAH Steel**, we are extending our Energy Management System (ISO 50001) certification across our operations to enhance our competitiveness by improving energy performance and reducing greenhouse gas and energy emissions. We have internalized energy management across the organization through a system that monitors usage, analyzes efficiency, sets targets, implements improvements, and provides ongoing feedback at each stage. After certifying our Pohang plant in 2022, we acquired certification for the Suncheon plant in 2024. We plan to extend certification to the Changwon and Gunsan plants to achieve full implementation across all sites.



ISO 50001 Certification  
(SeAH Steel Pohang, Suncheon Plant)

### Company-wide Implementation Strategy for ISO 50001 (SeAH Steel)



Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+



## Climate Action Material Issue

### Risk Management

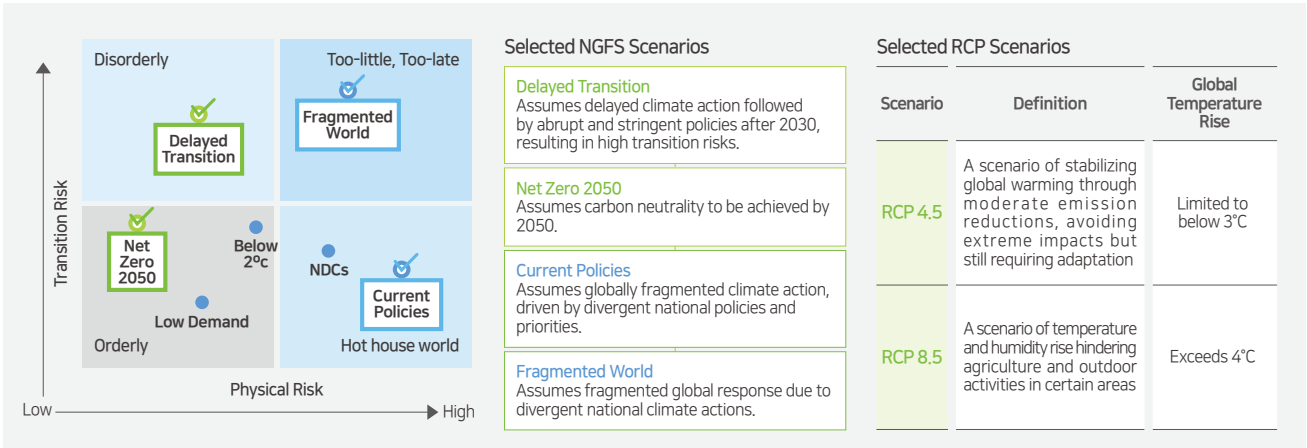
#### Climate Change Risk Identification and Scenario Selection

**Identifying Climate Change Risks** | As a first step in assessing climate change risks and their financial impacts, **SeAH Steel** reviewed a range of climate scenarios and drew out potential risks and opportunities. Based on the TCFD recommendations, we established an initial response framework to enhance our climate resilience. Using the Network for Greening the Financial System (NGFS) scenario portal and climate projection data provided by Korea’s local governments, we analyzed both transition and physical risks\* across our domestic operations. This analysis will serve as a foundation for developing our future climate action systems and low-carbon transition strategies. We will continue our efforts to strengthen our climate resilience and sustainable management.

**NGFS Scenario Selection** | **SeAH Steel** analyzed both transition and physical climate risks based on the NGFS Phase V scenarios, reflecting the characteristics of the steel industry as a carbon-intensive sector. For assessing Korea’s overall climate risk exposure and potential financial impacts, we applied the Net Zero 2050, Delayed Transition, Current Policies, and Fragmented World scenarios. For physical risk assessments at each domestic site, we used RCP 4.5 and RCP 8.5 scenarios in accordance with the IPCC standards.

\* Transition risk: Risks arising from changes in regulations and policies, eco-friendly technologies, and consumer behavior that may occur during the transition to carbon neutrality.  
\* Physical risks: Chronic and acute risks that may result from physical environmental changes (such as temperature rise, precipitation, and sea level rise) or natural disasters.

#### Climate Change Scenario Framework



**Climate Change Risk Analysis** | Before analyzing climate risks at each site, **SeAH Steel** assessed Korea’s overall exposure to mid- and long-term climate risks by utilizing the NGFS scenario. The analysis projected potential damages brought upon by typhoons, floods, and heatwaves; and typhoons were especially found to be the most significant risk factors. All scenarios indicated an increasing trend in risk, while the “Current Policies” scenario indicated the most gradual yet consistent increase in severity. Given our operations across multiple regions in Korea, SeAH Steel acknowledges the potential risks posed by climate change and will conduct more detailed site-specific assessments to identify appropriate countermeasures.

#### Climate-induced Losses Projection in Korea

	Typhoons			Floods			Heatwaves		
	2030	2040	2050	2030	2040	2050	2030	2040	2050
Current Policies									
Delayed Transition									
NZE 2050									
Fragmented World									
Annual Expected Damage from River Floods, Tropical Typhoons									
				< 0%	0~3%	~6%	~10%	~16%	30%~
Labor Productivity Due to Heat Stress (pp)									
					-1pp	-2pp	-3pp	-4pp	-5pp

· Annual expected flood damage: The estimated average annual damage expected to result from floods.  
· Annual expected tropical cyclone damage: The estimated average annual damage expected to result from tropical cyclones.  
· Heat stress-induced productivity loss rate: A percentage indicating the degree to which work efficiency declines during normal working hours due to decreased human physical labor capacity under hot and humid climate conditions.

Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+



## Climate Action Material Issue

### Risk Management

#### Climate Change Scenario Analysis

**Key Physical Risks at Domestic Operations** | We analyzed the long-term trends in sea level rise, increase in heatwave (or extreme heat) days, and changes in annual precipitation in regions where our domestic operations are located based on RCP 4.5 and RCP 8.5. The analysis result indicated that the severity of all physical risk factors is projected to increase. Although specific trends and magnitude of impacts vary by site, all sites are expected to face reduced work productivity due to flooding damage caused by sea level rise and heavy rainfall, as well as damage from an increased number of heatwave days. To prevent future infrastructure damage from natural disasters and to manage water resources more efficiently, SeAH Steel plans to analyze the climate conditions and vulnerabilities specific to the locations of our domestic business sites and utilize the findings in developing future response strategies.



\* Dong-A Steel is adjacent to Suncheon Plant and shares similar climate conditions. Dong-A Steel's RCP scenario analysis for annual precipitation, sea level rise, and number of heat wave days is adopted from that of SeAH Steel's Suncheon Plant.

Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+

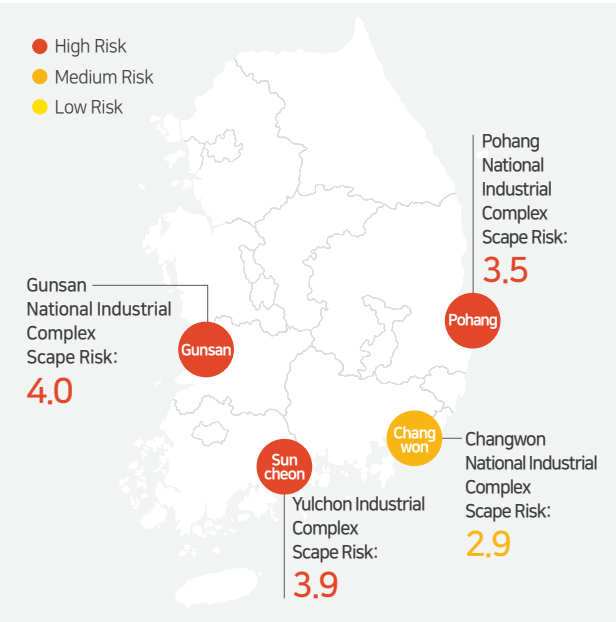
Climate ActionMaterial Issue

Risk Management

Climate Change Risk Analysis Results

**Water-related Climate Risk | SeAH Steel** identified major risks and opportunities associated with climate change across our domestic business sites and analyzed the associated potential business impacts. Using the World Wide Fund for Nature (WWF)’s Water Risk Filter, we assessed the status of water-related risks such as flood frequency, water quality, and water stress at each business site, and conducted a comprehensive scenario-based (SSP/RCP) analysis of flood, water scarcity, and water quality risks. The results indicate that we are generally exposed to high flood risk across our domestic business sites, while water scarcity and water quality risks are expected to gradually increase to moderate levels by 2050. In particular, the Changwon Plant showed relatively low water stress, making it the least vulnerable to water-related climate risks among the four plants. In contrast, the Gunsan Plant recorded a risk level of 4 for all indicators including flood frequency, water quality, and water stress, indicating the highest level of vulnerability. SeAH Steel recognizes that the steel industry is highly dependent on water-related natural capital and has significant environmental impacts and understands the importance of thorough site-specific examination of climate risks and vulnerabilities. Based on this understanding, SeAH Steel plans to systematically develop strategies to minimize infrastructure damage caused by natural disasters and to ensure stable access to water resources and effective water quality management.

Water-related Risk (Flood Frequency, Water Quality, Water Stress)  
Map for Domestic Business Sites



\* Scape Risk: Average score of water-related risks based on flood frequency, water quality, and water stress.

Short- to Mid-term Physical Risks by Scenario

		1.01.32.63.44.25.06.6						Very lowExtreme	
Location	Scenario	Flood			Water Scarcity				
		2020	2030	2050	2020	2030	2050		
Pohang	RCP 4.5	H	VH	VH	L	M	M		
	RCP 8.5	H	VH	VH	L	M	M		
Gunsan	RCP 4.5	H	VH	VH	L	M	M		
	RCP 8.5	H	VH	VH	L	M	M		
Suncheon	RCP 4.5	H	VH	VH	L	L	M		
	RCP 8.5	H	VH	VH	L	L	M		
Changwon	RCP 4.5	H	VH	VH	VL	L	L		
	RCP 8.5	H	VH	VH	VL	L	L		
		Acute Physical Risk			Chronic Physical Risk				

\* RCP scenarios and SSP (Shared Socioeconomic Pathways) scenarios were used interchangeably, as RCP 2.6, RCP 4.5, and RCP 8.5 assume the same temperature trajectories as SSP1-2.6, SSP2-4.5, and SSP5-8.5, respectively.

\* A uniform risk scoring scale of 1 to 6.6 is consistently applied across all risk categories and types, as calculated and provided by WWF.

Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+

## Climate Action

Material Issue

### Risk Management

#### Climate Change Risks and Opportunities

SeAH Steel has identified the key risks and opportunities related to climate change at domestic sites and has analyzed its potential business impacts. To minimize the medium- and long-term operational risks posed by climate change and to transition toward an environmentally friendly business structure, SeAH Steel will continue the efforts to develop eco-friendly steel pipes for transportation, expand offshore wind and other renewable energy initiatives, and increase the use of low-carbon products. In addition, we are reviewing our carbon neutrality roadmap and environmental management strategies to strengthen climate resilience. Through this process, we aim to define specific GHG reduction measures and establish phased implementation plans. In addition, we are reinforcing our existing emergency response systems to address risks such as short- and medium-term revenue losses and deteriorating working conditions from typhoons and heavy rainfall. We are also making specific investments in facility upgrades and R&D to improve the efficiency of energy and water use, which will serve as the foundation for a more systematic and robust monitoring framework.

#### Analysis of Climate-related Risks and Opportunities

Type		Potential Financial Impact	Response Measures	Term		
				Short-term	Mid-term	Long-term
Transition Risks	Regulation/Policy	Carbon cost from carbon regulations (ETS, EU CBAM, etc.)	- Establishing GHG inventory (Scope 1, 2, 3) and LCA system - Expanding renewable energy sourcing (e.g., on-site generation, REC, PPA)		●	●
	Technology	Increased investment costs for GHG reduction facility installation and conversion	- Implementing early adoption of low-carbon technologies and investing in high-efficiency production systems		●	●
	Market	Loss of new revenue opportunities and reduced market share in the steel pipe industry due to insufficient response to energy infrastructure pipe demand	- Increasing R&D investment and expanding facilities for LNG, hydrogen, and offshore wind pipe solutions	●	●	●
		Market share loss driven by increasing demand for low-carbon steel	- Securing low-carbon raw materials and diversifying the range of steel pipes using these materials	●	●	●
	Reputation	Decreased sales and limited investment attraction due to loss of credibility from inadequate climate-related disclosures	- Enhancing the reporting scope, level, and sophistication of TCFD/KSSB disclosure	●	●	
Physical Risks	Acute	Revenue loss, disaster recovery costs, and insurance premium increases due to typhoons and heavy rainfall	- Enhancing disaster resilience through infrastructure upgrades and emergency preparedness systems	●	●	
	Chronic	Productivity decline and facility replacement/investment needs due to rising temperatures and changing precipitation patterns	- Reducing water consumption and establishing reuse systems through process optimization and facility enhancements		●	●
		Trade disruption due to port flooding caused by sea level rise	- Diversifying and developing logistics routes		●	●
Opportunities	Technology	Cost reduction through the introduction of high-efficiency equipment and energy-saving technologies	- Enhancing high-efficiency equipment investment and energy management system	●	●	●
	Market	Revenue growth and long-term contract opportunities by transitioning to eco-friendly products to meet stricter procurement standards of major clients	- Reinforcing client trust by acquiring more certifications issued for eco-friendly corporate activities (e.g., eco-labels, ISO 50001)	●	●	●
		Market expansion through product portfolio diversification, including steel pipes for electric vehicles and H <sub>2</sub> /CO <sub>2</sub> transport	- Developing high-efficiency, high-corrosion-resistant, and high-strength products and acquiring relevant certification	●	●	●



Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+

Climate ActionMaterial Issue


Metrics and Targets

Climate Action Metrics and Targets

Greenhouse Gas (GHG) Reduction Goals

SeAH Steel

15% reduction compared to 2018 (by 2030)



Process Improvement

5%

+



Securing Renewable Energy

10%

SeAH Steel

2024 Energy-related Investments

KRW 1,257 billion

SeAH Steel

Sites Certified with ISO 50001

2 sites (Pohang, Suncheon Plant)

2022-2024 GHG Emissions

SeAH Steel

Category	Unit	2022	2023	2024
Total GHG emissions	tCO <sub>2</sub> eq	62,106	75,030	68,586
GHG emissions (Scope 1)	tCO <sub>2</sub> eq	7,565	8,500	7,854
GHG emissions (Scope 2)	tCO <sub>2</sub> eq	54,541	66,530	60,732
GHG emissions intensity	tCO <sub>2</sub> eq/ KRW million	0.03	0.03	0.04

Dong-A Steel

Category	Unit	2022	2023	2024
Total GHG emissions	tCO <sub>2</sub> eq	5,307	4,611	4,928
GHG emissions (Scope 1)	tCO <sub>2</sub> eq	335	284	278
GHG emissions (Scope 2)	tCO <sub>2</sub> eq	4,972	4,327	4,650
GHG emissions intensity	tCO <sub>2</sub> eq/ KRW million	0.03	0.04	0.04

36



Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+

Climate Action Material Issue

Participating in Environmental Initiatives and Promoting Green Finance

**Participation in the Green Steel Committee** | SeAH Steel has joined six other major domestic steel companies in announcing the “Steel Industry 2050 Carbon Neutrality Joint Declaration” to support the national vision of achieving carbon neutrality by 2050. This declaration marks the first official carbon neutrality pledge in the domestic industrial sector. SeAH Steel is taking a leading role in addressing the climate crisis by participating in the Green Steel Committee, a private-sector advisory body established to advance carbon neutrality initiatives within the steel industry. Through this committee, SeAH Steel is engaging in various activities such as joint technology development and policy proposals aimed at achieving 2050 carbon neutrality, expanding reduction efforts in collaboration with client and partner companies, and promoting the implementation of reduction measures across the steel industry. Through these efforts, we are spreading the commitment to carbon neutrality across the entire industrial ecosystem and diligently fulfilling our role as a responsible corporate citizen in creating a sustainable steel industry.



Steel Industry 2050 Carbon Neutrality Declaration



“ SeAH Steel demonstrates leadership in tackling the climate crisis. ”

**Issuance of Green Bonds** | SeAH Steel is reviewing the issuance of green bonds and ESG investment opportunities as part of our broader strategy to transition to green energy and address climate change. In 2021, we issued green bonds to finance the construction of a dedicated plant for offshore wind foundations, raising KRW 80 billion to secure production capacity and renewable energy infrastructure. The funds helped establish a critical foundation to capitalize on the growing offshore wind power market.

**Climate Tech Fund Investment** | In September 2021 and July 2023, SeAH Steel joined the Envisioning Impact Solutions Fund, a climate tech-focused impact fund managed by Envisioning Partners, participating as a strategic limited partner (LP). The fund was launched in January 2024 with total capital of KRW 44 billion and was established under the Social Investment Fund Program led by the Korea Growth Investment Corporation. SeAH Steel joined as an investor alongside leading domestic and international ESG institutions, including Pavilion Capital (Singapore), Daesang Holdings, Kakao Impact Foundation, and The Asan Nanum Foundation. The fund invests in high-growth-potential climate tech companies, and SeAH Steel is contributing to climate action and carbon neutrality through our indirect investments in innovative eco-friendly technologies.



Certification Assessment of Green Bonds as ESG Financial Products (SeAH Steel)

Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+

## Environmental Management

Material Issue

### Governance

#### Environmental Management System

**Roles and Responsibilities** | To implement systematic environmental management, **SeAH Steel** established the Energy and Environment Planning Team, a dedicated organization that oversees all business sites. Operating directly under the CEO, the team has built and is managing a company-wide environmental management system. As a corporate planning unit for environmental management, the team formulates SeAH Steel's mid- to long-term environmental strategy and sets annual environmental goals and detailed action plans, regularly monitoring progress across departments. In 2025, key environmental agenda items including strategic direction and performance outcomes were reported to and approved by the Board of Directors. SeAH Steel plans to continue reporting major items to the Board to reinforce top management-led environmental governance.

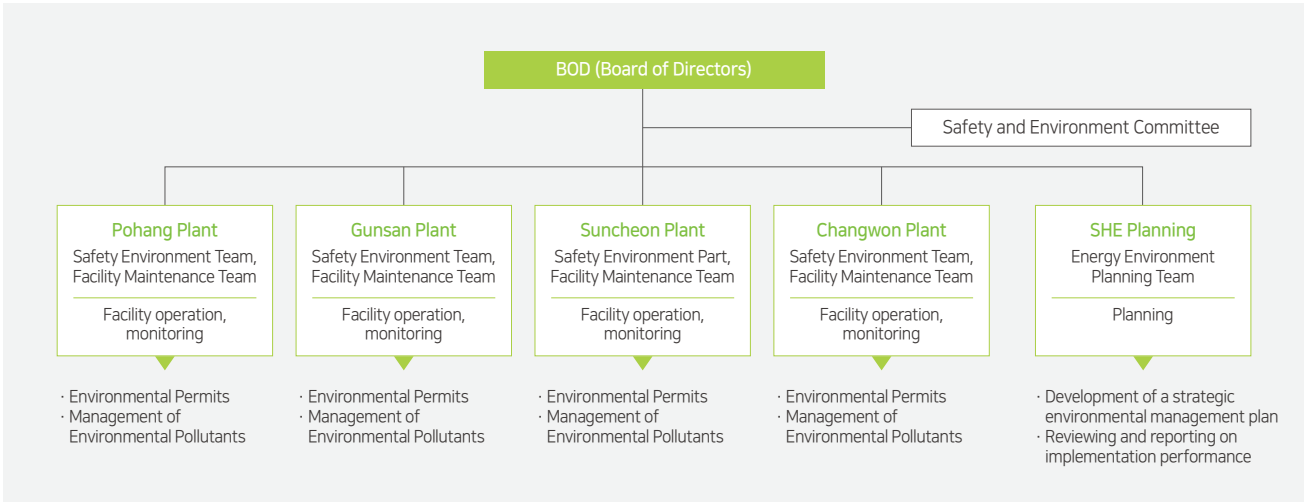
SeAH Steel Environmental Management Policy

In 2024, **Dong-A Steel** established the Safety Environment Part under the Chief Safety and Health Officer to implement systematic environmental management and build a company-wide environmental management system. The Safety and Environment Part will undertake a range of initiatives aimed at minimizing air pollutant emissions and generation, increasing waste reuse to promote resource circulation, and ensuring the safe handling and management of hazardous chemical substances as part of our environmental management efforts.

#### Environmental Management Organizational Chart (Dong-A Steel)



#### Environmental Management Organizational Chart (SeAH Steel)



**SeAH ESG Friends** | **SeAH Steel** has been operating our ESG consultative body, "SeAH ESG Friends," since 2023 to lead key initiatives such as publishing the sustainability report, facilitating corporate response to domestic and global ESG ratings, and supporting supply chain assessments. To enhance our employees' understanding of ESG management and strengthen their capabilities, we conduct regular group training sessions. These sessions provide a forum to share updates on our sustainability practices and future plans and feature expert-led seminars on reporting techniques and emerging ESG trends. We also encourage members of SeAH ESG Friends to incorporate their ESG contributions into their individual KPIs. Moving forward, we will continue to build internal ESG competencies and further embed ESG practices across our organization.

#### Environmental Reports to the BOD in 2025

Date	Reported Agenda Items
Feb. 5, 2025	2025 Environment and Energy Operation Plan



SeAH ESG Friends Training

Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+

# Environmental Management

Material Issue

## Governance

### Environmental Management System

**Environmental and Energy Management Guidelines** | **SeAH Steel** recognizes the evolving international expectations and trends related to environmental management and operates an environmental management system based on the Plan-Do-Check-Action (PDCA) cycle to minimize the negative environmental and social impacts of our business activities. In March 2024, we integrated the previously separately operating Environmental Management System (ISO 14001) and Energy Management System (ISO 50001) frameworks to revise our Environmental and Energy Guidelines.

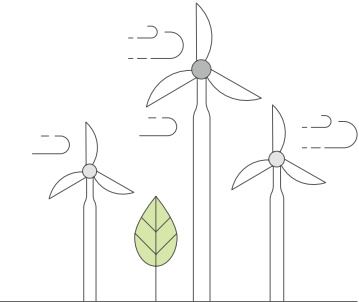
#### Environmental and Energy Guidelines (SeAH Steel)

- 01
- ▶▶ We comply with environmental and energy-related laws and regulations in accordance with ISO 14001 and ISO 50001 standards.
- 02
- ▶▶ We establish and carry out environmental and energy goals and action plans and pursue ongoing execution and improvement.
- 03
- ▶▶ We promote carbon neutrality by transitioning to renewable energy and designing eco-friendly facilities.
- 04
- ▶▶ We contribute to environmental preservation by actively minimizing waste generation and promoting resource circulation.
- 05
- ▶▶ We fulfill our social responsibility by reducing greenhouse gas emissions through the procurement of eco-friendly raw materials and the development of sustainable products.
- 06
- ▶▶ We establish and operate our environmental and energy management system with the participation of all employees and stakeholders.
- 07
- ▶▶ We proactively assess the environmental and energy risks of our business activities, establish appropriate preemptive measures, and continuously implement improvements.

**Environmental Management System (ISO 14001) Certification** | **SeAH Steel** is dedicated to responsible corporate management for environmental protection and sustainable development. We have established environmental management as a core principle of our business operations across all our sites and have thus built and operate a systematic environmental management system. In particular, the Pohang, Gunsan, Suncheon, and Changwon Plants have all acquired ISO 14001 (Environmental Management System) certification, which is an international standard established by the International Organization for Standardization (ISO) that officially recognizes our management system for minimizing environmental impacts and promoting efficient resources use. Additionally, all of SeAH Steel's business sites undergo regular audits and recertification audits by third-party certification bodies every year to objectively verify the effective implementation of the system. We address any shortcomings and areas for improvement identified in these audits. Through this process, each business site proactively identifies and manages environmental risks that may arise in specific processes and activities, ensuring compliance with environmental regulations, and fosters a sustainable production environment that meets the stakeholder expectations. SeAH Steel will continue to enhance our environmental management system based on ISO 14001 and consistently implement initiatives to improve our environmental performance with a sense of responsibility.

#### Environmental Management System (ISO 14001) Certification (SeAH Steel)

Business Site	Certification Validity Period
Pohang Plant	Aug. 22, 2024 – Aug. 21, 2027
Gunsan Plant	Sept. 5, 2023 – Sept. 25, 2026
Suncheon Plant	Apr. 11, 2023 – Apr. 10, 2026
Changwon Plant	Feb. 15, 2025 – Feb. 14, 2028



ISO 14001 Certification (SeAH Steel Pohang, Gunsan, Suncheon, Changwon Plant)

Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+

# Environmental Management

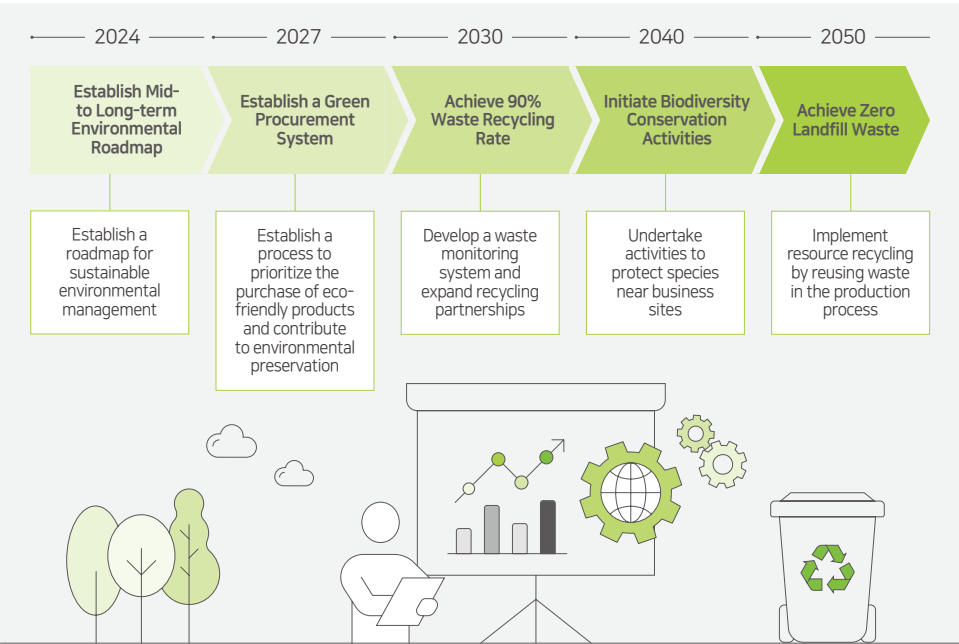
Material Issue

## Strategy

### Environmental Management Roadmap

SeAH Steel has set “Sustainable Environment” as our mid- to long-term vision, and we are pursuing strategies such as minimizing environmental risks, advancing the environmental management system, and internalizing ESG to pursue this goal. To this end, we are digitalizing operation logs, building real-time monitoring systems, and enhancing inspections through collaborating with external expert institutions. In addition, we are working to activate resource circulation, revise the integrated ISO manuals, and strengthen effectiveness by linking environmental goals to employee KPIs to further advance our environmental management systems. Furthermore, SeAH Steel plans to internalize ESG throughout the company by scaling up environment-related certifications, conducting environmental risk assessments, and offering environment-related programs across the supply chain, thereby progressively broadening our efforts to eventually include biodiversity initiatives as well.

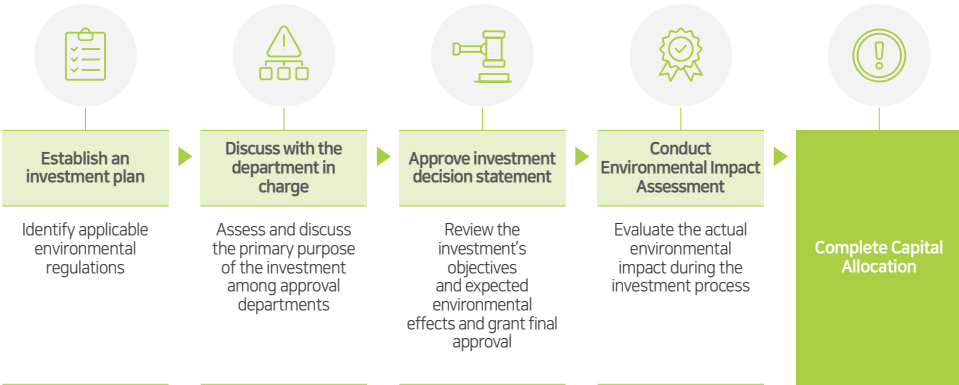
### Environmental Management Mid- to Long- Term Strategies and Goals (SeAH Steel)



### Investment Decisions and Procurement Policies on Environment

**Investment Review Process** | SeAH Steel has restructured our investment review framework to reflect environmental factors, moving beyond our earlier focus on simply compliance and cost. Accordingly, we now assess the purpose and expected outcomes of each investment from an environmental perspective and determine its appropriateness by considering the project’s potential to generate environmental value. Incorporating this approach, we aim to minimize environmental management risks during the project by proactively evaluating environment and energy-related risks and opportunities, such as potential reductions in greenhouse gas emissions and pollutant generation.

### Environmental Investment Review Process (SeAH Steel)



### 2022-2024 Environmental Investments (SeAH Steel)

(Unit: KRW billion)

Category	Description	Total Investments (2022-2024)
Air Quality Improvement Investment	- Investment in improving air pollution control facilities (scrubber) - Investment in mitigating air quality risks in the pickling process	17.3
Water Quality Improvement Investment	- Investment in replacing old filter presses - Investment in facilities to reduce nonpoint source pollution - Investment in advanced wastewater treatment system establishment	8.5

Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+

# Environmental Management

Material Issue

## Strategy

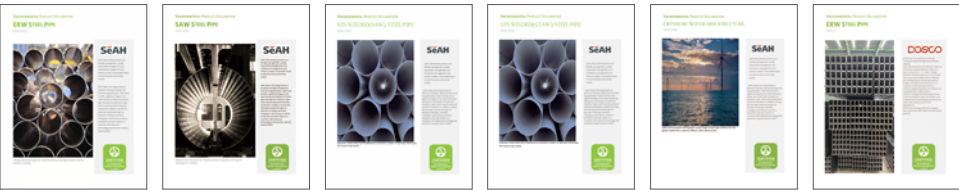
### Scaling up Environment-related Certifications

Based on the Environmental Product Declaration (EPD) certification, **SeAH Steel** provides transparent information on the environmental impacts of our products to stakeholders including our customers and business partners. The EPD certification is based on an international system that quantitatively analyzes environmental impacts such as resource inputs and greenhouse gas emissions throughout the entire product life cycle from raw material extraction to manufacturing, distribution, and disposal. Using this certification, we respond to increasingly stringent carbon emissions regulations and environmental requirements across various countries. This also helps us strengthen our competitiveness in global markets that require high environmental standards such as the construction and energy sectors. In particular, SeAH Steel's Pohang Plant became the first in Korea to acquire EPD certification for Electric Resistance Welded (ERW) and Submerged Arc Welded (SAW) carbon steel pipes in 2022. In 2024, the Suncheon Plant also followed suit by acquiring the EPD certification. We plan to continue expanding EPD certifications across various product lines to create eco-friendly value and practice ESG management.

In August 2024, **Dong-A Steel** acquired EPD certification for ERW carbon steel pipes. This certification was acquired to quantify resource inputs and environmental emissions throughout the entire production process and to systematically assess their potential environmental impacts in order to provide transparent information at our plant. We also acquired Restriction of Hazardous Substances (RoHS) certification. By restricting the use of hazardous substances in chemical components, this certification demonstrates the environmental friendliness and safety of our products. It also enhances our readiness to comply with environmental regulations, a key requirement for competing in global markets.



RoHS Certification  
(Dong-A Steel)



EPD Certification  
(SeAH Steel Pohang Plant)

EPD Certification  
(SeAH Steel Suncheon Plant)

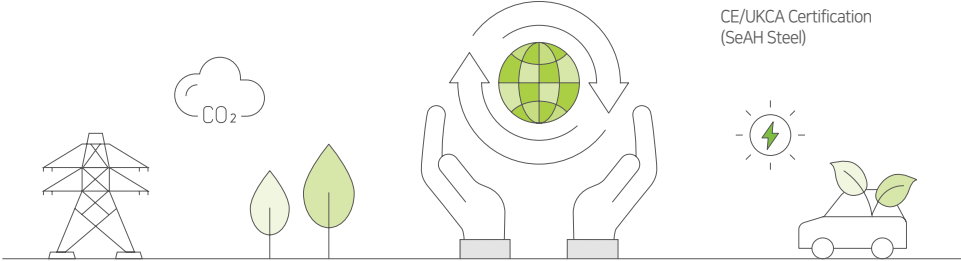
EPD Certification  
(Dong-A Steel)

### Securing Trust in the European Market (CE/UKCA Mark Certification)

In 2024, **SeAH Steel's** Pohang Plant acquired the Conformité Européenne (CE) and UK Conformity Assessed (UKCA) mark certifications for the cold-formed welded steel pipes manufactured from non-alloy steel, in accordance with the EN 10219-1 standard. These certifications were granted by Lloyd's Register (LRQA), an internationally recognized conformity assessment body. The certified products, widely applied in construction and structural sectors, are now officially recognized as compliant with both European and UK regulatory requirements. The CE mark is a mandatory conformity certification for products distributed within the European Economic Area (EEA) and the European Free Trade Association (EFTA), verifying compliance with rigorous EU standards related to consumer safety, environmental protection, and product performance. High-risk categories, including construction materials, are subject to this certification, and products must bear the CE mark on both the product and its packaging to be legally marketed in Europe. The UKCA mark is a separate product certification introduced by the UK government. UKCA certification is separately required for products to be distributed in the United Kingdom, regardless of CE certification. By complying with both certification systems, SeAH Steel aims to enhance the quality and reliability of our products and further strengthen the foundation for export expansion to the EU, EEA, and UK markets.



CE/UKCA Certification  
(SeAH Steel)





Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+

# Environmental Management

Material Issue

## Strategy

### Employee Engagement and Awareness Activities

**SeAH Leaders and Employee ESG Challenge |** In 2024, SeAH Steel launched the “SeAH Leaders ESG Challenge” to provide team leaders with an opportunity to practice ESG in their daily lives and set an example for their team members. A total of 22 team leaders participated in the challenge, each selecting one of the following to participate for a week: the Veggie Challenge, which promotes vegetarianism by reducing the consumption of carbon-intensive ingredients such as meat and embracing a plant-based diet; the Bring your Own Container Challenge, which involves using reusable containers to reduce disposable product usage; the Plogging Challenge, which combines jogging with picking up litter; and the Waste Sorting and Disposal Challenge, which encourages proper waste separation in everyday life. Through this initiative, we enhanced employees’ understanding of and engagement with ESG and fostered a stronger sense of responsibility for achieving ESG goals. In 2025, we are implementing new challenges for all employees alongside the existing challenges, such as the Fit for Wellness Challenge to promote health through weight loss, the Peer Recognition Challenge to encourage respect for diversity among colleagues, and the Paperless Challenge to reduce paper usage within the office. Through these programs, we aim to help employees naturally engage in activities related to the environment and society in their daily lives. At the same time, we are fostering an enjoyable and engaging culture shared among colleagues.

### ESG Challenges for SeAH Leaders and Employees

Category	Description	Duration	Participants
Veggie 	Shifting from carbon-intensive meat consumption to a plant-based vegetarian diet	5 times	Team of two
Plogging 	Plogging near the workplace	3 times	Team/Part
Bring your Own Container 	Using reusable containers for food/drink to reduce disposable product use	5 times	Team of two
Waste Sorting and Disposal 	Properly separating and disposing daily waste	5 times	Individual
Fit for Wellness 	Losing 5kg or increasing the InBody score by three points	6 months	Individual
Peer Recognition 	Engaging in activities that respect diversity among colleagues (e.g., using thoughtful language and expressions of appreciation)	1 week	Team
Paperless 	Sharing and practicing various ways to reduce paper usage in the office	1 week	Individual

**ESG Newsletter |** SeAH Steel distributes card news cotents and newsletters to effectively communicate the importance of ESG management and latest trends to employees. Since 2024, we have also been publishing English newsletters to share global ESG trends for our overseas affiliates' employees, providing information on a variety of topics through intranet postings and email distribution. These efforts help employees better understand unfamiliar ESG-related terms and engage their interest and participation in ESG management.

**Paperless Campaign |** SeAH Steel launched a campaign to reduce the use of printed paper to conserve resources by minimizing unnecessary print paper consumption. Through the campaign, we highlighted the environmental impact of chemicals and water used in the production and disposal of print paper and introduced specific measures to reduce usage. In addition, we encouraged employees to adopt alternative paper-saving practices such as using scratch paper utilizing chat functions, and changing work habits, and shared tips for reducing ink and electricity consumption by enabling eco-modes on multifunction printers and using eco-fonts, thereby promoting active participation among employees.

### Paperless Campaign (SeAH Steel)



Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+

# Environmental Management

Material Issue

## Risk Management

### Reinforcing Environmental Compliance

**Compliance to Environmental Laws and Regulations** | SeAH Steel is responding to changes in domestic and international laws and regulations related to environmental pollutant emissions by thoroughly analyzing the relevant legal standards and systematically strengthening environmental compliance activities at all business sites. In pursuit of a more advanced level of environmental stewardship that goes beyond basic legal and regulatory compliance, we have established internal standards that are over 30% stricter than those mandated by law. Based on these elevated standards, we regularly monitor the environmental impact of each business site and have implemented a proactive response system to promptly address any signs of abnormality. Furthermore, we develop and apply site-specific response strategies that reflect the characteristics of each product and process, thereby preventing environmental risks and enhancing field-based management and oversight capabilities.

### Legal and Regulatory Compliance (SeAH Steel)

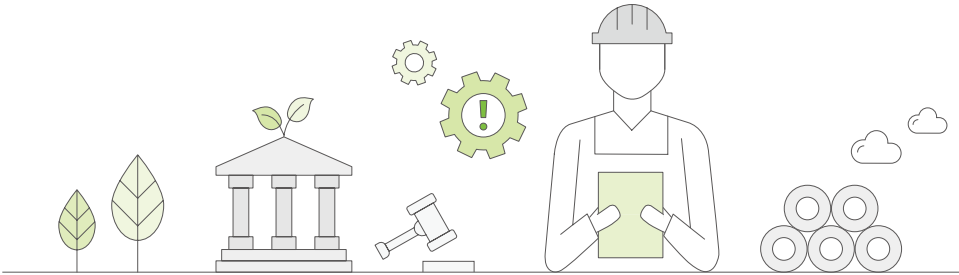
Environmental Laws and Regulations	Strategies
Act on the Allocation and Trading of Greenhouse Gas Emission Permits	As a designated entity of Emission Trading System (ETS), SeAH Steel calculates our annual greenhouse gas (GHG) emissions and undergoes verification by an external institution to comply with related laws. We also engage in GHG reduction activities to achieve Nationally Determined Contribution (NDC) targets.
Clean Air Conservation Act	In order to comply with legally permitted thresholds for air pollutant emissions, SeAH Steel applies internal management standards that are up to 30% stricter than legal standards. Additionally, we proactively respond by investing in high-temperature oxidation facilities such as RTO and TO to keep the concentration of total hydrocarbons (THC) from coating processes below the regulatory limits.
Water Environment Conservation Act	In order to comply with legally permitted thresholds for water pollutant emissions, SeAH Steel applies internal management standards that are up to 30% stricter than legal standards. We also manage nonpoint source pollution risks caused by rain and other factors by investing in filter presses for suspended solids (SS) removal and in nonpoint source pollutant reduction facilities.
Chemical Substances Control Act	To meet the management standards for hazardous chemical handling facilities used in acid processing, we submit the Preparation and Submission of Risk Management Plans in advance and conduct regular inspections as scheduled. In addition, we operate a 24-hour chemical spill prevention and containment system to prevent accidents caused by chemical substances.

**Environmental Compliance Activities** | SeAH Steel engaged in a variety of environmental management activities at each business site through our environmental departments. These efforts include environmental investments and employee training aimed at preventing environmental accidents and minimizing pollutant emissions. To address evolving environmental regulations, we operate a company-wide Compliance Program (CP) and a Safety and Environment Committee. For improvement tasks identified through environmental risk analysis, each business site establishes detailed action plans and implements the necessary measures.

Led by top management, the Safety and Environment Committee regularly reviews the environmental performance of each business unit and makes strategic decisions accordingly. In addition, we conduct environmental CP Cross inspection among business sites and engage in collaborative efforts to eliminate environmental risks through discussions on key environmental issues. In 2024, a total of 89 improvement tasks were identified through the environmental CP cross inspection, and 100% of required measures have been completed. Through this inspection, we closely reviewed the management condition of emission and prevention facilities, the system for providing hazardous information, and the operations of waste storage.

### Environmental Compliance Program (CP): A Cross Inspection (SeAH Steel)

Category	2022	2023	2024
Number of Identified Cases	115	58	89
Percentage of Improvement Rate	100	100	100



Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+

# Environmental Management

Material Issue

## Risk Management

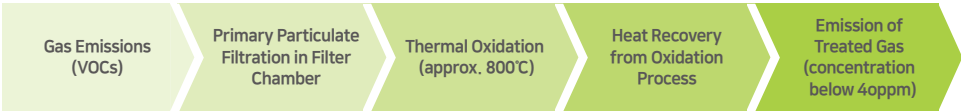
### Air Pollutant Management

**Monitoring Air Pollutant Emissions** | To improve air quality, **SeAH Steel** monitors and systematically manages air pollutants generated throughout the entire steel pipe manufacturing process. Through these efforts, we strive to effectively reduce emissions and create a more pleasant working environment. We focus on reducing emissions of major air pollutants such as dust, nitrogen oxides (NOx), and sulfur oxides (SOx) which can be generated during high-temperature welding processes. We also operate a stricter internal management system by applying in-house standards that are at least 30% more stringent than the emission limits specified in the Clean Air Conservation Act.

**Air Pollutant Emission Reduction Efforts** | **SeAH Steel** is enhancing air quality by implementing customized air pollution control systems tailored to the process characteristics and environmental conditions of each plant. At the **Pohang Plant**, SeAH Steel introduced a Regenerative Thermal Oxidizer (RTO)<sup>1</sup> to effectively treat Volatile Organic Compounds (VOCs) generated during the coating process. The system stores incineration heat in the heat storage material within the facility to maintain the optimal temperature and improve fuel use efficiency. At the **Gunsan Plant**, where coated product output is relatively low, SeAH Steel installed a Direct-fired Thermal Oxidizer (TO)<sup>2</sup> that provides high efficiency with easy maintenance. The **Changwon Plant** uses the Tele Monitoring System (TMS)<sup>3</sup> to measure and manage the concentration of pollutants emitted in real time. By conducting regular maintenance on local exhaust systems, we improve the working environment and enhance dust collection efficiency. Furthermore, by linking TMS monitoring data to mobile devices, we enabled real-time monitoring and management of air pollutant concentrations from pollution control facilities, even when off-site. Through the mobile application, users can check parameters such as flow rate, internal temperature, concentration levels, and room access status at intervals of 5 to 30 minutes, and can also review historical data to monitor trends in air pollutant emissions. With the implementation of this monitoring system, prompt responses to any abnormalities have become possible even on holidays and weekends when managers are absent, and the efficiency of monitoring analysis and data tracking management has been improved.

1) RTO: Regenerative Thermal Oxidizer  
2) TO: Thermal Oxidizer  
3) TMS: Tele-Monitoring System

### RTO Operation Process



To improve working conditions and capture fumes generated during the pipe forming process, **Dong-A Steel** conducts regular maintenance of local exhaust systems. In 2024, IoT sensors were installed on the first coating line at Gwangyang Plant 1, the second coating line at Gwangyang Plant 2, and the C-channel coating facility. Data collected from process-specific filtration and adsorption systems, as well as emission and control equipment with current meters, is transferred to GreenLink\*. Through this system, we practice real-time monitoring and effective management.

\* GreenLink: A platform operated by the Ministry of Environment to manage small-scale air emission sources.



RTO Facility (SeAH Steel Pohang Plant)



TO Facility (SeAH Steel Gunsan Plant)



IoT Device for Air Quality Monitoring on Coating Equipment (Dong-A Steel)

DEMS >자료조회		
조회설정		검색
시간	항목	측정값
05-08 00:00	NOx	29.89
05-08 00:30	NOx	29.55
05-08 01:00	NOx	30.63
05-08 01:30	NOx	30.33
05-08 02:00	NOx	28.73
05-08 02:30	NOx	29.67
05-08 03:00	NOx	29.50
05-08 03:30	NOx	31.93
05-08 04:00	NOx	33.54
05-08 04:30	NOx	36.16
05-08 05:00	NOx	35.04

TMS Management Screen (SeAH Steel Changwon Plant)



Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+

# Environmental Management

Material Issue

## Risk Management

### Water Resource Management

**Monitoring Water Withdrawal and Discharge** | SeAH Steel and Dong-A Steel deeply recognize the importance of protecting water resources and strictly manage water pollutants to remain at or below 30% of the legal discharge limits. In addition, to prevent legal compliance risks and ensure the sustainable use of water, we endeavor to reduce industrial water consumption and strictly control the quality of discharged water to prevent overuse and contamination. We classify water consumption into industrial water and municipal water, calculate usage based on meter readings collected from each facility, and have established a systematic water usage management system accordingly. Water used for product manufacturing is supplied as industrial water through intake facilities located within industrial complexes. This water is mainly utilized in processes such as cooling, rust prevention, replenishment of water-soluble cutting fluids, and the operation of various facilities at our sites.

**Water Pollutant Reduction Efforts** | SeAH Steel carries out site-specific initiatives each year to reduce water pollutants. At the Pohang Plant, inverters were installed on cooling water and pipe forming oil pumps to minimize unnecessary industrial water usage during idle operation. At the Gunsan Plant, a Reverse Osmosis (R/O\*) system was introduced in 2024 to remove organic carbon and ionic substances from wastewater using high pressure. This allows treated wastewater from the plant to be reused as industrial water, thereby reducing both wastewater discharge and new industrial water consumption. The Changwon plant has installed dedicated reduction facilities to effectively manage nonpoint source water pollutants during rainfall. In addition, the Gunsan and Changwon Plants replaced outdated filter presses to improve the efficiency of the wastewater treatment and pollutant reduction.

The Suncheon Plant introduced a smart wastewater treatment system that significantly shortens the response time for detecting abnormal pH levels. Furthermore, we automated and digitized the previously manual daily operation log, thereby enhancing the plant's overall water quality management system.

Dong-A Steel is increasing the recycling rate of industrial water used in the production process. This allows for 100% reuse of all industrial water for productions thereby minimizing the discharge of water pollutants. Pipe forming oil, which may be contaminated during production or by the working environment, is separated from contaminants through an oil skimmer installed in the oil tank and a sludge scrubber introduced in 2024. These measures are continuously improved and managed to ensure that waste (waste oil) is properly separated and discharged.

\* R/O(Reverse Osmosis): A purification system that removes salts, heavy metals, and other impurities by forcing water through a semi-permeable membrane.



R/O Facility (SeAH Steel Gunsan Plant)

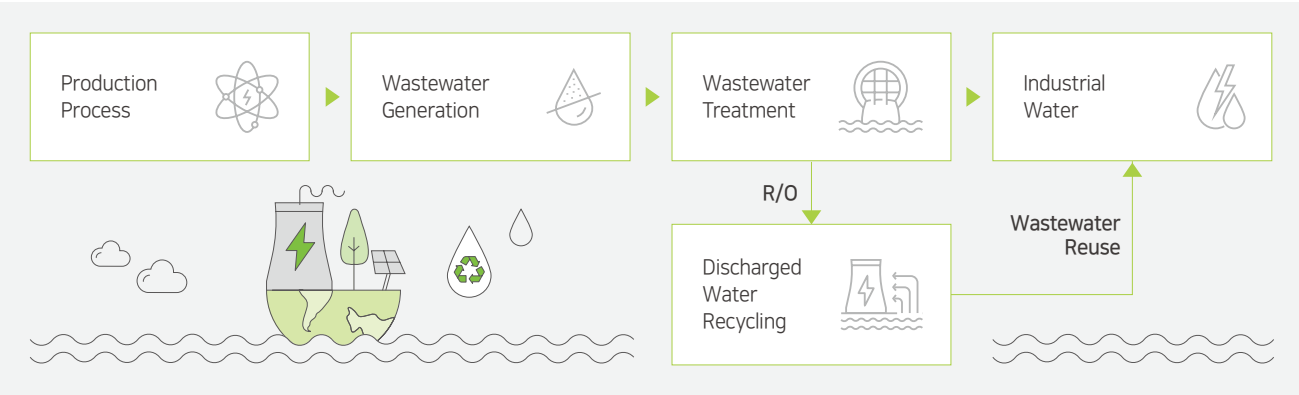


Sludge Scrubber (Dong-A Steel)



Oil Skimmer (Dong-A Steel)

### Wastewater Reuse Process (SeAH Steel Gunsan Plant)



Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+

# Environmental Management

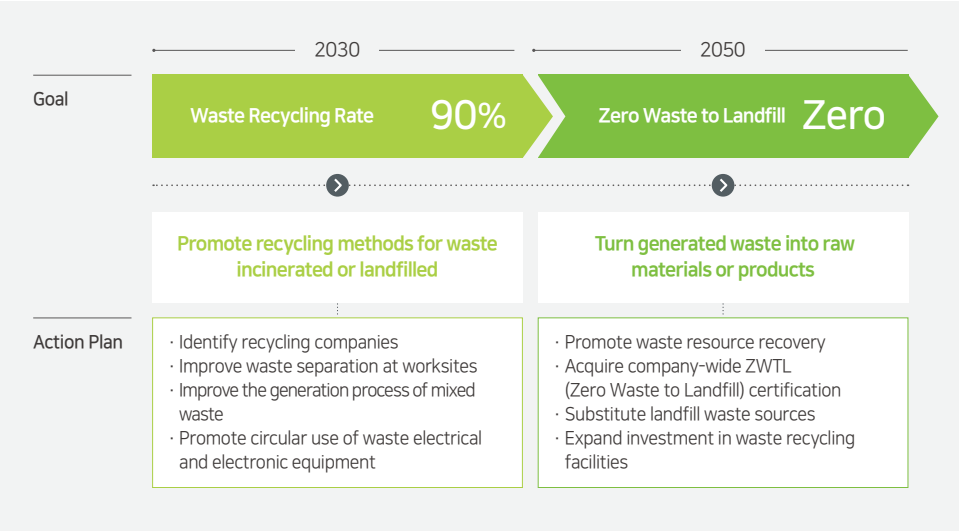
Material Issue

## Risk Management

### Waste Management

**Waste Management Strategy |** SeAH Steel is minimizing environmental pollution generated during waste landfill and incineration processes by reducing waste and promoting recycling. We have established a mid-to-long-term resource circulation roadmap, setting out how we will achieve a 90% waste recycling rate across the entire company by 2030 and zero landfill waste by 2050. To achieve these targets, we have set KPIs to improve waste recycling rates and operate a management system that evaluates our performance on a quarterly basis. We also conduct annual evaluations of our recycling companies and systematically provide hazardous substance information in accordance with the Wastes Control Act, to help our stakeholders handle waste safely. Furthermore, to reduce the amount of waste that has to be landfilled or incinerated, we are promoting various investment and improvement activities, including identifying recycling companies, setting up real-time monitoring systems, and improving production processes. Through these efforts, we are accelerating the transition to a resource-circulating production system.

### Resource Circulation Strategies and Goals (SeAH Steel)



**Dong-A Steel** also strives to minimize environmental pollution caused by the landfilling and incineration of production-related waste by reducing overall waste generation and actively promoting recycling. All general waste is fully recycled, and we are continuously working to increase the recycling rate of designated waste. Through these efforts, we are advancing systematic waste management with the goal of maintaining a recycling rate of over 50%.

**Waste Management Monitoring and Other Activities |** SeAH Steel's main sources of landfill waste are slag and wastewater treatment sludge, which are generated during the manufacturing process. To address this, we are pursuing a "Zero Waste to Landfill" goal, which involves reviewing our mid- to long-term plans with a view to converting these materials into reusable resources. We recycle all by-products generated during production, such as iron scrap, and regularly monitor key waste indicators, including waste and recycling volumes, through our integrated SHE system. In addition, in accordance with the Waste Management Act, waste generated at our sites is lawfully entrusted to verified transportation and disposal companies through contractual agreements. We are also actively seeking new recycling treatment partners. Furthermore, by transparently managing and disclosing waste disposal details through the Ministry of Environment's electronic waste information system, Allbaro, we practice responsible resource circulation management.

**Dong-A Steel** manages waste in accordance with the Wastes Control Act, following the fundamental principle of lawful waste disposal. Waste generated at our business sites is consigned to certified waste management companies, and all waste treatment records are managed and disclosed through Allbaro, the Ministry of Environment's electronic system.

### Improvements in Waste Treatments (SeAH Steel)

Category		Earlier Method	Improved Method
General Waste	Slag	Landfilling	Recycling
	Wastewater Treatment Sludge		
	Waste Refractory	Incineration	Recycling
Designated Waste	Oil Waste	Incineration	Recycling

Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+

## Environmental Management

Material Issue

### Risk Management

#### Waste Management

##### Waste Battery Recycling and Resource Circulation Campaign

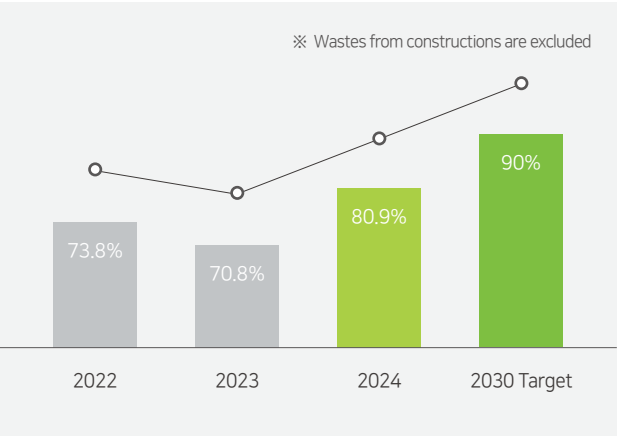
On April 22, 2025, **SeAH Steel** signed a MOU with the Korea Battery Recycling Association to establish a resource recycling system for waste batteries. Through this MOU, waste batteries generated both in and outside of worksites will be collected and properly disposed of, ultimately contributing to the recovery of valuable metals such as nickel, cobalt, and lithium. In 2024, a total of 885 kg of waste electrical and electronic equipment was collected, resulting in the production of 861 kg of recyclable resources and a reduction of 2,174 kgCO<sub>2</sub>eq in greenhouse gas emissions (classified as Scope 3).

**Waste Recycling** | In line with our mid- to long-term resource circulation strategy, **SeAH Steel** has set a target of achieving a 90% waste recycling rate by 2030. As a result of our continued efforts, the recycling rate excluding construction waste exceeded 80% for the first time in 2024. Going forward, SeAH Steel plans to further strengthen our waste reduction initiatives.

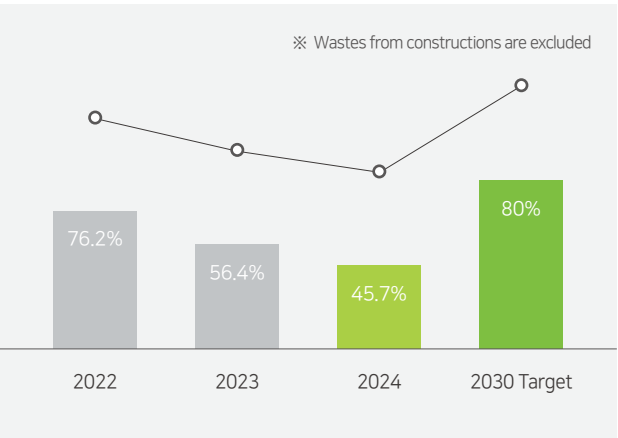


MOU with E-Cycle Governance (SeAH Steel)

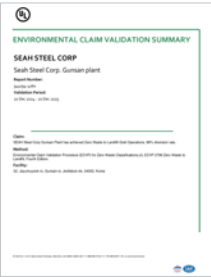
##### 2022-2024 Waste Recycling Rate (SeAH Steel)



##### 2022-2024 Waste Recycling Rate (Dong-A Steel)



**Zero Waste To Landfill** | **SeAH Steel** has set the goal of acquiring Zero Waste to Landfill (ZWTL) certification as part of our company-wide mid- to long-term strategy to minimize the environmental impact from waste and pursue transition into a resource circulation plant. The Gunsan Plant achieved a 99% waste recycling rate (excluding heat recovery incineration) and became the first plant in the domestic steel pipe industry to acquire ZWTL Gold designation. This outcome was achieved through SeAH Steel's proactive efforts to identify certified waste management companies that can manage and recycle production-related waste such as spent sulfuric acid, wastewater treatment sludge, process sludge, and dust. In addition, we provide waste discharge training to employees on a regular basis. SeAH Steel will continue to promote the development of environmentally friendly business sites and gradually increase the number of locations certified for Zero Waste to Landfill.



ZWTL Gold Designation  
(SeAH Steel Gunsan Plant)

Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+

# Environmental Management

Material Issue

## Risk Management

### Chemical Substances Management

**Chemical Monitoring** | SeAH Steel consistently monitors not only domestic regulations, such as Chemical Substances Control Act, but also the latest trends in international chemical regulations such as EU REACH, in order to rigorously manage risks associated with chemicals at our business sites and in surrounding communities. Based on these efforts, company-wide internal CP inspections are conducted regularly to thoroughly assess whether current practices fully meet applicable legal requirements. In addition, to strengthen chemical accident prevention and response capabilities within our business sites, we prepare and submit a Prevention and Management of Chemical Accidents Plan, which includes an assessment of potential impacts on surrounding areas in the event of an accident. We also continue to enhance our emergency response readiness by establishing and conducting regular training programs.

**Chemical Life Cycle Management Process** | To ensure the safe handling of chemical substances, SeAH Steel systematically manages their entire lifecycle, from procurement to final disposal. When introducing a new chemical substance, we require submission of a Chemical Substance Review Request Form to the Safety and Environment department at least 10 days before the planned use. Use is permitted only after safety review and approval. All procured chemical substances are tracked and managed at each stage, including receipt, use, storage, transport, and disposal, through an integrated digital system. The Safety Environment Team oversees the entire process to maintain strict internal control. Before disposal, we re-evaluate the substance’s composition and potential hazards. Verified waste treatment providers are then entrusted with final disposal to ensure safe and responsible handling.

**Dong-A Steel** practices safe management of all chemical substances used in our processes throughout their entire life cycle, from procurement to disposal. To ensure the safety of workers handling hazardous chemical substances and prevent chemical accidents, all chemical substance purchases undergo screening by the Safety Environment Team. After receipt, chemical substances are continuously tracked and managed, and the dedicated department reviews and safely consigns them to certified treatment contractors for proper disposal at the final disposal stage.

Chemical Substance Life Cycle Management Process (SeAH Steel/Dong-A Steel)



Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+

# Environmental Management

Material Issue

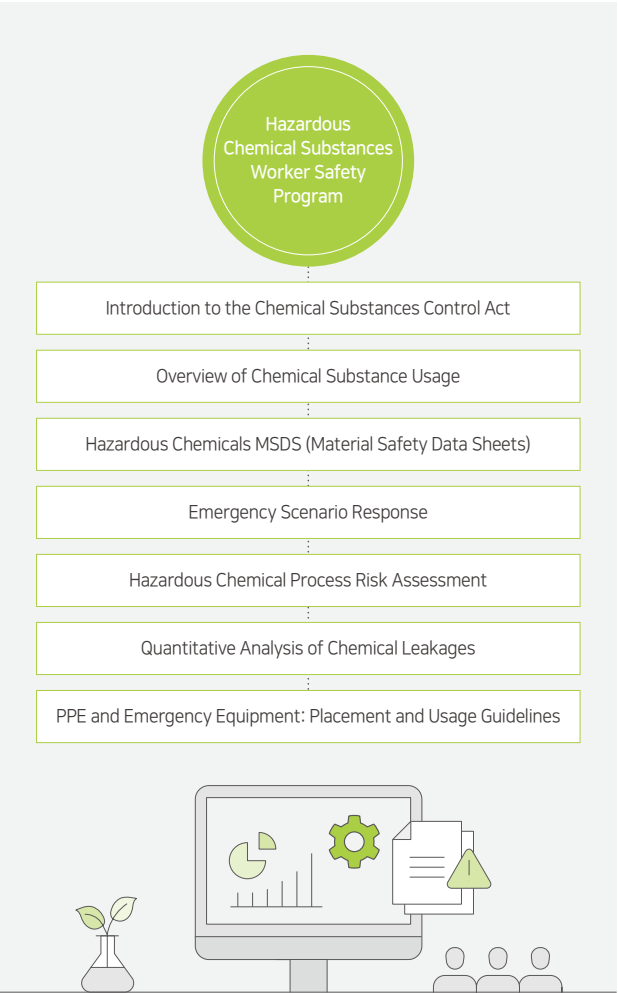
## Risk Management

### Chemical Substances Management

**Hazardous Chemical Management** | At **SeAH Steel**, we operate systematic education and training programs to protect our workers from hazardous chemical substances and to prevent chemical-related accidents across our business sites. For facilities that handle hazardous substances during production processes, we provide Material Safety Data Sheets (MSDS) and conduct targeted safety training to ensure that our employees fully understand the risks and hazards associated with each substance. We also conduct regular emergency response drills simulating chemical leakage scenarios for all employees working in chemical-handling areas. These drills are designed to strengthen their abilities to respond quickly and effectively, from the initial containment phase to the recovery stage in the event of an incident. Through these proactive efforts, we aim not only to safeguard the health and safety of our employees but also to minimize the risk of environmental pollution and chemical accidents.

**Dong-A Steel** conducts regular safety training for process workers at facilities that handle hazardous chemical substances. At least once a year, we provide training on chemical handling and safety management, emergency response protocols, and Material Safety Data Sheets (MSDS). In addition, whenever the chemical substances in use are updated, added, or modified, ad hoc training is also provided. Furthermore, we continuously update information on hazardous chemical substances used at the facilities and provide it to workers. Chemical substances are stored and managed in designated areas such as material warehouses and hazardous substances storage facilities. To prevent damage caused by chemical substances, we enhance safety awareness through worker training, MSDS postings, and the installation of safety signs.

### Hazardous Chemical Substances Safety Program (SeAH Steel)



**Chemical Accident Response System** | **SeAH Steel** continuously expands investments in key chemical handling facilities to ensure thorough management of hazardous chemical substances and the prevention of leaks. We have installed gas and leak detectors at critical sites to proactively block any hazardous chemical leaks. In addition, we operate leak prevention systems designed for swift response in the event of an accident. To maintain stringent oversight, CCTV cameras are deployed at major locations for real-time monitoring of chemical handling operations.

In particular, the **Changwon Plant** operates a 24-hour hazardous chemical leak alert system and has established a hands-on training center where employees can directly experience chemical safety and disaster prevention equipment. Recognizing the achievements of these systematic safety management and prevention activities, we were selected as an “outstanding business site” for the 2024 BELFS PLUS Chemical Safety Campaign organized by the Nakdong River Drainage Basin Area Environment Center and thus received the Minister of Environment Award for the second consecutive year following 2023.



Minister of Environment Award for the BELFS PLUS Chemical Safety Campaign (SeAH Steel Changwon Plant)



Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+



Environmental ManagementMaterial Issue

Metrics and Targets





Overview	+
Sustainability Framework	+
Environmental	
Climate Action	Material Issue
Environmental Management	Material Issue
Biodiversity	
Social	+
Governance	+
Appendix	+

## Biodiversity

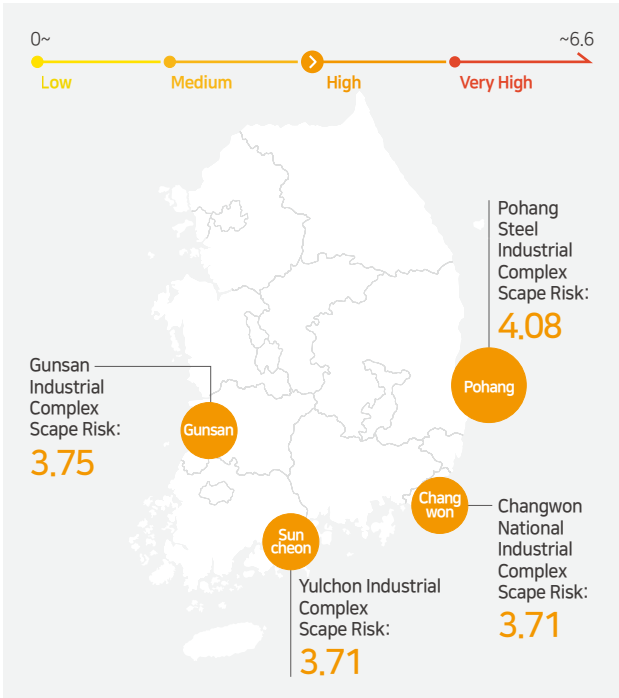
### Biodiversity Conservation

#### Biodiversity Risk Assessment

To implement appropriate biodiversity conservation programs, **SeAH Steel** identified the species and population levels in areas surrounding our business sites to analyze biodiversity risks. Using the WWF Biodiversity Risk Filter, we assessed the potential negative impacts of our domestic business sites on local biodiversity. All sites were found to have a “high” level of biodiversity risk; therefore, we are planning to actively expand site-specific mitigation activities.

Biodiversity Risk Assessment Map for Domestic Business Sites (SeAH Steel)

Unit: Point(s)



In addition, we identified Class I and II endangered species in Pohang, Gunsan, Suncheon, and Changwon and analyzed the biodiversity profile of each area in order to understand the status of endangered species near our domestic business site locations. Commonly identified endangered species across most sites included otters, white-tailed eagles, red-crowned cranes, and black-headed gulls. Based on this, we identified conservation priorities for aquatic ecosystems and wild birds.

Endangered Species near Domestic Business Sites (SeAH Steel)



Business Site	Endangered Species (Class I and Class II)
Pohang Plant	Mammals 3 species    Birds 21 species
Gunsan Plant	Mammals 2 species    Birds 35 species Amphibians·Reptiles 3 species    Invertebrates 2 species Terrestrial Plants 3 species
Suncheon Plant	Mammals 4 species    Birds 27 species
Changwon Plant	Mammals 4 species    Birds 15 species Fish 2 species

#### Natural Capital Dependency and Impact Analysis

Using the ENCORE Tool, **SeAH Steel** analyzed the biodiversity-related dependencies and impact based on the characteristics of our steel pipe manufacturing process. Although none of the ecosystem service dependency factors were categorized as “high,” the analysis revealed a degree of dependency on natural capital such as water resources, water quality, and soil. As for impact factors, the areas identified as having the most significant effect on ecosystems were water and soil pollution, noise, and light pollution.

#### Material Potential Dependencies (Casting of Metals\*)

Dependency	Level
Flood mitigation services	Medium
Air filtration services	Medium
Water flow regulation services	Medium
Water purification services	Medium
Water supply services	Medium
Soil and sediment retention services	Medium

#### Material Potential Impacts (Casting of Metals\*)

Impact	Level
Emissions of toxic pollutants to water and soil	High ▲
Disturbances (e.g., noise, light)	High ▲
Emissions of GHG	Medium
Emissions of non-GHG air pollutants	Medium
Emissions of nutrient pollutants to water and soil	Medium
Volume of water use	Low

\* According to the International Standard Industrial Classification (ISIC) used by the ENCORE tool, the steel pipe manufacturing industry is categorized under “Casting of Metals.”



Overview	+
Sustainability Framework	+
Environmental	+
Social	
Governance	+
Appendix	+



# SOCIAL

53	Occupational Safety and Health	Material Issue
68	Talent Management	Material Issue
80	Human Rights	
82	Responsible Supply Chain	
86	Community Engagement	

Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Occupational Safety and Health Material Issue

## Governance

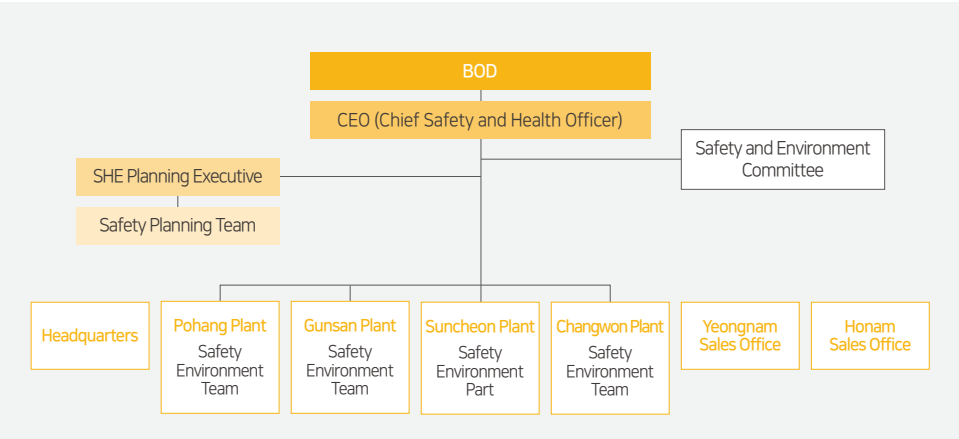
### Occupational Safety and Health Governance

**BOD, Executives, and Departments** | SeAH Steel prioritizes safety as a core value of corporate management and implements management policies that prioritize the safety and health of all employees and stakeholders. We have established a safety and health management system directly under the CEO; and at the beginning of each year, the CEO (who is also the Chief Safety and Health Officer) delivers a message on safety and health on the company bulletin board, thereby clearly communicating SeAH Steel's commitment to safety and health.

The Safety Planning Team is a dedicated department responsible for overseeing company-wide safety and health operations. The team drives a range of proactive initiatives to identify and mitigate risks across our facilities. Key activities include managing internal inspection systems—such as CP inspections and SHE TOP diagnoses—and enhancing risk assessment processes. Additionally, we closely monitor and respond to changes in safety and health regulations, including the Serious Accidents Punishment Act, to continuously elevate our standards. In compliance with the Occupational Safety and Health Act, we establish an annual safety and health plan, which is submitted to the Board of Directors for approval and then rigorously implemented.

SeAH Steel Occupational Safety and Health Policy

### Safety and Health Organizational Chart (SeAH Steel)

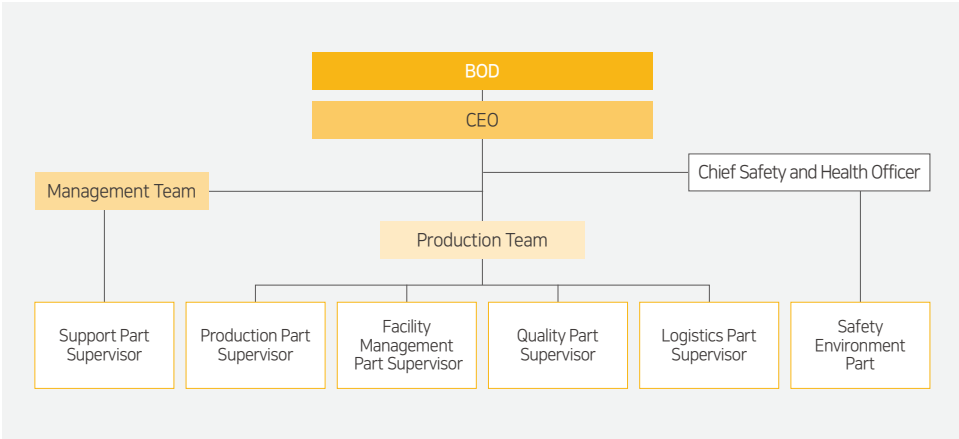


### Key Occupational Safety and Health Plans (SeAH Steel)

2023	2024	2025
<ul style="list-style-type: none"><li>Enhance the SHE System</li><li>Expand the implementation of SeAH Safety Eye</li></ul>	<ul style="list-style-type: none"><li>Introduce the Safety and Health Performance Incentive System</li><li>Internalize TBM (Tool Box Meeting)</li><li>Support establishment of safety and health management systems for our business partners</li></ul>	<ul style="list-style-type: none"><li>Foster a shared understanding of safety</li><li>Reinforce safety rules compliance on-site</li><li>Develop a safety accident prevention model</li></ul>

**Dong-A Steel** has appointed a Chief Safety and Health Officer and established a dedicated safety team with assigned personnel to enhance our safety and health management system. By regularly benchmarking safety practices across our affiliates and participating in consulting activities, we proactively address the updated regulatory requirements, including those under the Serious Accidents Punishment Act. We continue to focus on improving safety management and fostering expertise. In 2024, we expanded our safety and health management system by establishing a Safety Environment Team and appointing additional members.

### Safety and Health Organizational Chart (Dong-A Steel)



Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Occupational Safety and Health

Material Issue

## Governance

### Occupational Safety and Health Governance

**Safety and Environment Committee** | SeAH Steel continues to elevate our company-wide safety and health management system, with the Safety Planning Team at our core. With this system in place, we are committed to building a resilient and sustainable safety culture, improving safety and health management levels through regular safety information exchange and decision-making. To achieve this, the Safety and Environment Committee, chaired by the CEO (Chief Safety and Health Officer), convenes regularly with plant managers, SHE Planning Executive, and the Safety Planning Team Leader to drive strategic alignment across all levels of the organization. Additionally, the Committee conducts operational meetings focused on on-site managers and staff to review actual safety and health operations and discuss implementation strategies. Complementing these governance efforts, SeAH Steel conducts monthly safety data reviews to rigorously assess the impact of our safety and health programs, identify opportunities for continuous improvement, measure the effectiveness of risk mitigation initiatives, and deploy actionable, site-specific countermeasures.

In 2024, the SeAH Steel Safety and Environment Committee addressed issues such as supporting the establishment of safety and health systems for partner companies and operating a performance evaluation system for safety and health activities. For 2025, the Committee plans to implement activities such as a certification program for the establishment of occupational safety and health management systems for business partners and “Safety Discussions.” Furthermore, all facilities operate a quarterly Occupational Safety and Health Committee and a monthly Safety and Health Consultative Body. In 2024, we received 55 occupational safety and health-related grievances, including improvements to on-site hazards, and addressed 48 of them.

### Key Activities of Safety and Environment Committee (SeAH Steel)



### Safety and Environment Committee Meetings Held in 2023-2025 (SeAH Steel)

Date	Agenda Item (selective)	Decision Result (Outcome)	Attendance Rate (%)
Mar. 20, 2023	Results of SeAH Steel Holdings’ Industrial Safety Management Inspection	Resolved	100
June 26, 2023	Progress on Investment for Newly Integrated SHE System Implementation	Reported	100
Sept. 14, 2023	Report on SeAH Steel’s Mid- to -Long-term Safety and Health Strategy (2023 - 2025)	Reported	100
Nov. 21, 2023	Operation of Safety and Health Related Personnel KPI System	Resolved	100
Mar. 28, 2024	Establishment of Safety and Health Systems for Business Partners (with five or more employees)	Reported	100
June 20, 2024	Results of Company-wide Safety and Health Document Audit	Reported	100
Sept. 30, 2024	Report on Occupational Safety Culture Consulting Results	Reported	100
Nov. 28, 2024	2025 Occupational Safety and Health Goals	Resolved	100
Mar. 21, 2025	Implementation of Safety Discussion	Reported	100

### Grievances on Occupational Safety and Health in 2022-2024 (SeAH Steel)

Category		Unit	2022	2023	2024
Grievances	Reported	Case(s)	56	64	55
	Resolved	Case(s)	56	60	48
	Resolution Rate	%	100	94	87

### Occupational Safety and Health Performance Evaluation System

Starting in 2024, SeAH Steel introduced a performance evaluation system for safety and health management to establish an autonomous safety system on-site. This system incorporates the performance of department team leaders into their employee evaluations, using quantitative indicators such as accident occurrence rates, risk assessment results, and evaluations of safety and health personnel to conduct objective and fair evaluations. This performance evaluation system supports the development of a strong safety culture within the organization and contributes to building a sustainable safety and health management system.

Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health <span>Material Issue</span>	
Talent Management <span>Material Issue</span>	
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+



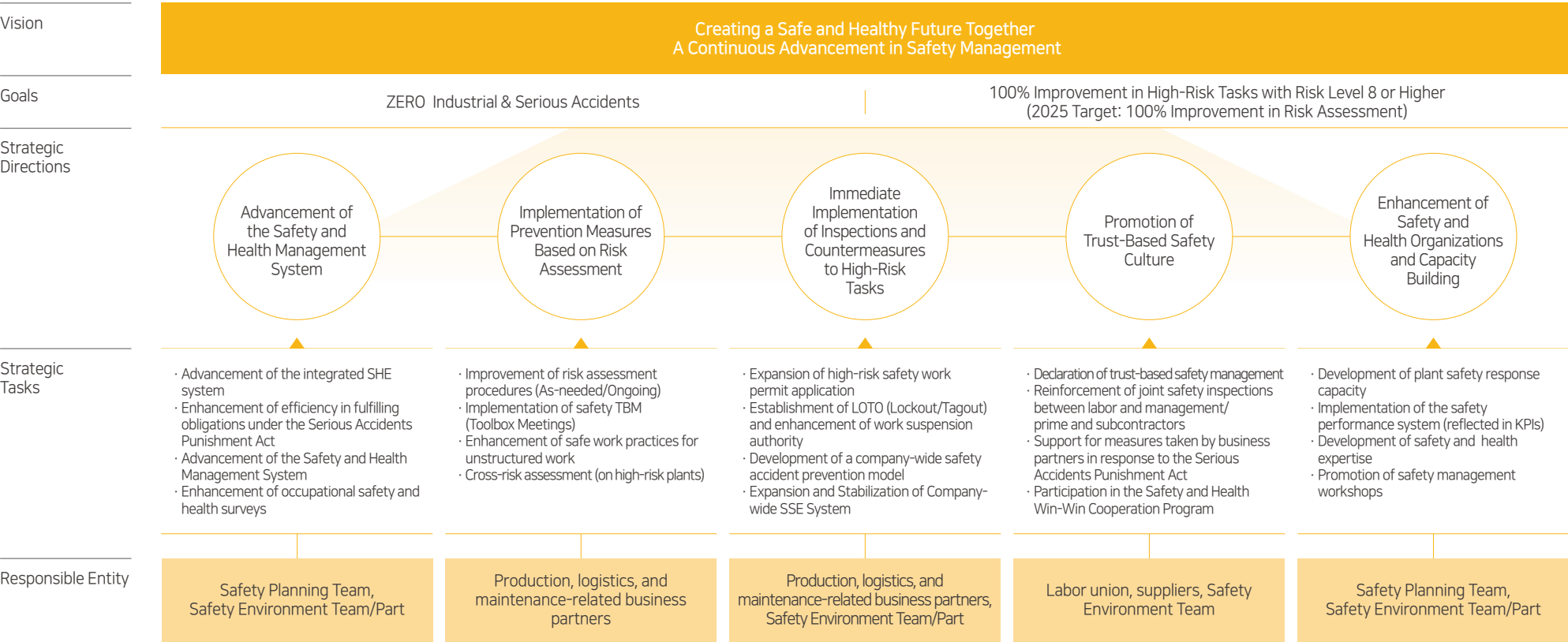
# Occupational Safety and Health Material Issue

## Strategy

### Occupational Safety and Health Roadmap

SeAH Steel has established “ZERO Industrial and Serious Accidents while Achieving 100% Improvement in High-Risk Tasks” as our 2025 occupational safety and health goal, and we are implementing systematic strategies to achieve this goal. Specifically, we have set five strategies: advancement of the safety and health management system, prevention measures based on risk assessments, immediate inspection and countermeasures for high-risk tasks, promotion of a trust-based safety culture, and enhancement of safety and health organizations and their capacity building. In addition, in order to further scale up our company-wide safety and health prevention capacity, we are also developing the “company-wide safety accident prevention model” project in 2025 and expanding effective safety and health activities that all employees can participate in.

### Occupational Safety and Health Roadmap (SeAH Steel)



Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Occupational Safety and Health

Material Issue

## Strategy

### Serious Accident Prevention Activities

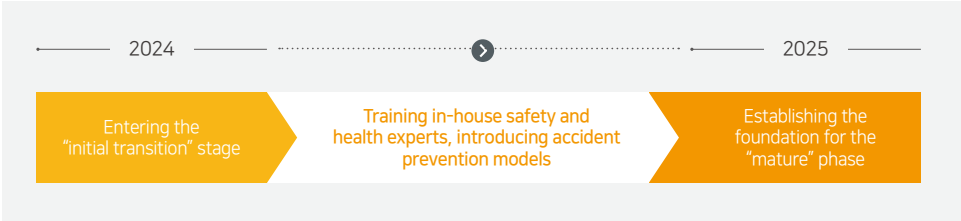
Since the enforcement of the Serious Accidents Punishment Act in 2022, **SeAH Steel** has completely reorganized our safety and health system and has launched proactive and systematic management activities to prevent serious accidents. We have established a company-wide safety and health organization and are conducting multifaceted prevention activities centered on safety planning. We plan to continuously expand investment in the prevention of serious accidents, considering the lives and health of our employees and stakeholders as our top priority.

**Advancing the Safety and Health Management System** | **SeAH Steel** is advancing the level of company-wide safety and health management by establishing a data-based integrated SHE system with additional functions and enhanced accessibility to improve on-site utilization. Furthermore, we are pursuing the operation of digital-based smart safety management by managing high-risk factors in real time and enabling immediate action through a site-specific smart safety system.

**Spreading Safety Culture and Strengthening Competency** | **SeAH Steel** is practicing various activities to strengthen our capacities and foster safety culture. We regularly conduct safety and health awareness consulting sessions to assess and improve our employees' awareness levels on safety. Based on 2024 assessments of all supervisors, we confirmed that our current safety awareness level corresponds to the "initial transition" stage. Therefore in 2025, we plan to establish a foundation for advancing to a "mature" stage by training in-house safety and health experts and introducing a safety accident prevention model. Furthermore, we have established a work stoppage process to facilitate immediate action in the event of a potential hazard and ensure its effective implementation by providing annual training for all employees. We also assign specialized safety and health consultants to strengthen the safety capabilities of our business partners and collaborate with the Legal Team to prevent legal risks through due diligence on safety and health documents. In addition, we focus on spreading the safety awareness culture and preventing disaster recurrence by conducting company-wide campaigns like LOTO (Lockout/Tagout), TBM (Toolbox Meeting), and safety slogan contests. Furthermore, we installed accident history signs in locations where past accidents have occurred to raise on-site employees' vigilance.

**Dong-A Steel** conducts safety culture promotion campaigns, including an annual safety slogan contest, to foster a strong safety culture among employees. We focus on raising employee awareness and strengthening safety culture through various initiatives such as actively managing communication channels on social media platforms (KakaoTalk, Naver Band), operating a suggestion program for reporting near-misses and potential hazards, recognizing outstanding safety achievements with special awards, and providing incentives for achieving zero-accident records.

### Diagnosis Process of Supervisors' Safety and Health Awareness



Safety and Health Awareness Diagnosis Consulting (SeAH Steel)



Safety Culture Promotion Campaign (Dong-A Steel)



Safety Slogan (Dong-A Steel)



Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Occupational Safety and Health Material Issue

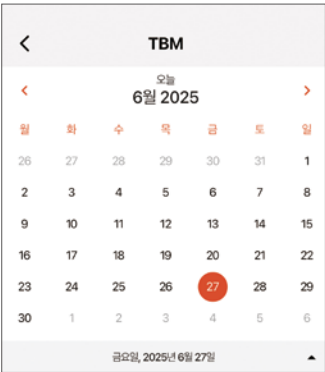
## Strategy

### Advancing the Safety and Health Management System

**Integrated SHE System** | In April 2022, **SeAH Steel** implemented a company-wide Integrated SHE System to reinforce our accountability for workplace safety and health, prevent incidents more effectively, and conduct systematic root cause analyses. Through the system, we manage safety data in real time, collect employee feedback in a structured manner, ensure full compliance with regulatory requirements, and maintain a prevention-focused occupational health and safety (OHS) management framework. Using the Safety Feedback Platform in our Integrated SHE System, employees can submit safety and health reports, suggestions, requests, and inquiries. We promptly review each submission and take immediate action to implement relevant safety improvements. All collected data is analyzed in real time and incorporated into our safety and health management plans. In 2023, we enhanced the system by adding compliance tracking for the Serious Accidents Punishment Act and Process Safety Management (PSM) requirements. In 2024, we introduced safety and health personnel evaluation functions and a work plan management module to further strengthen our OHS governance. To improve accessibility in the field, we launched the SeAH Keeper mobile application, which supports real-time safety management in mobile environments and fosters proactive, employee-led safety and health initiatives. In 2024, we added a QR code-enabled Tool Box Meeting (TBM) function and an on-site safety patrol tool. In 2025, we will continue advancing the system by upgrading the user interface for greater usability and organizing engagement activities to increase employee participation.



Mobile App, "SeAH Keeper" (SeAH Steel)



Mobile TBM (SeAH Steel)



Mobile QR Code for Site Patrol (SeAH Steel)

**Smart Safety System** | **SeAH Steel** has established the SSE (SeAH Safety Eye) system, a site-specific smart safety management system, to prevent safety accidents and preemptively mitigate high-risk factors in the workplace. The SSE system consists of a crane safety system, a roll conveyor safety control system, an intelligent fire prevention system, and smart cameras, and detects and monitors hazards in the workplace environment in real time. In particular, an automatic control function that immediately shuts down the equipment when a worker enters or leaves a hazardous area fundamentally eliminates the possibility of accidents, thereby enabling a more precise and effective safety management. By utilizing the SSE system, we are continuously promoting the advancement of smart safety management to secure technology-based safety and create a safe workplace environment.

To prevent and reduce high-risk safety incidents, **Dong-A Steel** has implemented a smart forklift safety system and smart IoT cameras at two steel pipe manufacturing sites. Additionally, we continue to proactively prevent accidents by installing protective barriers that restrict access to high-risk areas.

### SSE System Implementation and Investments (SeAH Steel)

Category	2022- 2023	2024	2025
Number of sites	38 sites	47 sites	
Amount of investments	KRW 786 million	KRW 454 million	Under review



SSE (SeAH Safety Eye) System (SeAH Steel)



Smart Camera Monitoring (SeAH Steel)



Smart Forklift System (Dong-A Steel)



IoT Camera (Dong-A Steel)

Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Occupational Safety and Health

Material Issue

## Strategy

### Strengthening Safety and Health Capacities

**Operation of Safety Culture Center** | To promote an accident-free workplace through hands-on safety training, **SeAH Steel** has established safety culture centers at the Pohang, Suncheon, and Changwon plants. All employees receive mandatory safety and health training at these centers at least once a year, while subcontractors and business partners also complete safety training before starting work. We are currently reviewing the establishment of a safety culture center at the Gunsan plant in 2025, with the goal of having such centers at all business sites. Through experience-based training, we aim to develop a pool of in-house safety and health experts, enhance the quality of training, and contribute to fostering a strong safety culture across the company.

**Safety Consulting and Training** | **SeAH Steel** operates a specialized safety consultant program to provide practical support for our business partners in establishing and managing independent safety and health systems. The safety consultants offer guidance on legal compliance and enhance overall safety management capabilities through individualized consulting that reflects the specific conditions at business partners' sites. In particular, they provide guidance on the Serious Accidents Punishment Act and the Occupational Safety and Health Act, and reinforce organizational safety awareness through safety leadership training for executives. In addition, we systematically improve the safety and health standards of our business partners through a range of initiatives, including recommending improvement plans based on risk assessments, inspecting safety facilities, supporting training for practitioners, and monitoring compliance with safety rules at subcontracting sites.

**Dong-A Steel** actively promotes safety and health education, risk assessment support, activation of employee suggestion activities, and improvement of communication channels to support our business partners in establishing a systematic safety and health management system. In addition, to strengthen their capacity related to safety and health, we will continue to implement activities to strengthen the safety management system by providing consulting services for the establishment of safety and health systems in cooperation with other related organizations.

**Joint Labor-Management Safety and Health Inspections** | In order to establish effective safety culture, **SeAH Steel** periodically conducts joint labor-management safety and health inspections. Led by each site's plant manager, employees' representatives, team leaders, safety and health managers, and CEOs of business partners participate in safety and health inspections to discover risk factors from various perspectives and establish improvement plans. We improve 100% of the identified risk factors and encourage autonomous participation within a collaborative and open environment.

**Practicing Safety Management** | At **SeAH Steel**, the CEO (Chief Safety and Health Officer) visits all business sites quarterly to identify hazards and understand safety and health challenges in order to develop effective solutions. We also operate the Safety and Health Win-Win Cooperation Partnership Program to enhance the safety and health capabilities of our business partners, providing structured support for training, risk assessments, and on-site safety inspections. Through these initiatives, we are strengthening our partners' safety management skills and advancing the establishment of a sustainable safety culture.

**Dong-A Steel** actively engages with our business partners through monthly business partner CEO councils, weekly contractor meetings, and regular consultations with representatives of business partners. In 2024, we enhanced the grievance handling process and introduced a mobile participation channel. We are also strengthening the safety and health competence of our partners by leveraging social media channels (KakaoTalk, Naver Band) to share safety and health information and encourage employees to proactively submit suggestions.



Representatives' Meetings of the Safety and Health Council  
(SeAH Steel Gunsan Plant)



Safety and Health Council Meeting  
(SeAH Steel Gunsan Plant)



Joint Safety Inspection (SeAH Steel Pohang Plant)



Joint Safety Inspection (SeAH Steel Suncheon Plant)



Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Occupational Safety and Health

Material Issue

## Strategy

### Strengthening Safety and Health Capacities

**Safety and Health Evaluations of Business Partners** | SeAH Steel conducts annual safety and health evaluations for our business partners to assess their performance and provide support, fostering mutual growth in the field of safety and health. We structure the evaluation around five key areas: safety and health management system, implementation level, operational management, response system for the Serious Accidents Punishment Act, and accident frequency and level. To enhance the safety and health capabilities of our business partners, we reflect a non-renewal clause in the operating guidelines for selecting qualified business partners, which applies when a company's score falls below a designated threshold. In addition, we provide incentives to outstanding business partners based on the results of the first and second half of the evaluation.



### Building a Safe Workplace Environment

With the health and safety of our employees as our highest priority, SeAH Steel implements a wide range of initiatives, including workplace environment management, prevention of occupational stress, and support for overall health care. To prevent accidents, we proactively identify and address hazards and risk factors, while operating programs and facilities that promote both psychological well-being and physical health. We also continue to strengthen our safety systems to minimize at-risk behaviors in the workplace. Through this integrated health and safety management framework, we will further advance the welfare of our employees and provide a safer, more comfortable workplace environment.

Management of Workplace Environment

In order to create a healthy workplace environment for employees, we are establishing measures to reduce workplace hazards and improving outdated facilities. In addition, we have registered safety data sheets (SDS) for chemicals used in each process in the integrated SHE system so that employees can check them at any time and thus work in a safe environment.

Implementation of Employee Assistance Program (EAP)

SeAH Steel has implemented the Employee Assistance Program (EAP) to promote healthy and stable organizational operations by proactively eliminating factors that negatively affect job satisfaction and productivity, such as job stress and other psychological anxiety factors.

Prevention of At-Risk Workplace Behavior

SeAH Steel places the highest priority on the safety of our workforce and has implemented the Smart Safety Equipment (SSE) system to proactively identify and mitigate risks. The system employs smart cameras to monitor and designate hazardous zones, automatically shutting down equipment upon entry or exit. Furthermore, we have introduced a wire rope damage diagnostic system, installed Safe Gates, and adopted automatic crane hook release devices to enhance both workplace safety and operational efficiency. We will continue to advance our smart safety infrastructure to further pursue an accident-free workplace.

Operation of Health Care Center

SeAH Steel's Pohang Plant operates a dedicated health center to manage and promote the well-being of our employees. Stationed nurses provide regular health monitoring, including health consultations, blood pressure measurements, and blood glucose testing. In addition, an occupational health physician visits the center once a month to provide expert medical services. The health center is equipped with blood pressure monitors, blood glucose meters, and cholesterol testing devices to help prevent cerebrovascular diseases, as well as hand massagers, low-frequency massagers, full-body massage chairs, and infrared therapy equipment to prevent musculoskeletal disorders. Through these facilities and services, the Pohang Plant actively supports the maintenance and improvement of employees' overall health.

Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Occupational Safety and Health

Material Issue

## Strategy

### Enhancing Safety Management through Internal and Group Collaboration

**SeAH Steel Safety Environment Exchange** | **SeAH Steel** promotes advanced safety culture and management across business units by convening an annual “Safety Environment Exchange Meeting.” The event provides a platform for business leadership to share best practices, review the latest regulatory trends, and proactively address emerging safety and environment issues. In April 2025, the 8th annual meeting was held at the Pohang Plant, with participation from 33 representatives, including regulatory officials and technical professionals. Participants discussed strategies to mitigate serious industrial accidents and reviewed enhanced preventive protocols in alignment with SeAH’s Safety, Security, and Environment (SSE) System advancement efforts.

**SeAH Safety Environment Exchange** | **SeAH Group** strengthens safety management and fosters a culture of accident prevention by enhancing collaboration across our affiliates. To support this initiative, we hold a quarterly “SeAH Safety Management Exchange,” during which we share leading safety and health practices and jointly explore strategies for advancing safety management. Key participating affiliates include SeAH Steel, SeAH Besteel, SeAH Changwon Special Steel, SeAH Special Steel, and SeAH Aerospace & Defense, reinforcing our group-wide safety network and establishing a sustainable cooperative framework. These exchanges serve as an essential platform for consolidating experiences and expertise across the group. Through ongoing engagement, we aim to expand safety synergies and work collectively toward an accident-free workplace.



The 8th Safety Environment Exchange Meeting (SeAH Steel)



The 9th Safety Environment Exchange Meeting (SeAH Group)

### The 8th Safety Environment Exchange Meeting (SeAH Steel)

Responsible Department	Main Agenda
Compliance Team	Briefing session on CP Lounge (Compliance IT System)
Safety Environment Team (Gunsan Plant)	Management of ZWTL certification acquisition
Safety Environment Team (Changwon Plant)	Case-sharing session on BELFS PLUS chemical safety campaign
Safety Environment Team (Pohang Plant)	Advancement of SSE System (analysis of employee entry records into hazardous areas, etc.)
Business Planning Team	Discussion on ESG strategic direction and deliverables of Vision 2030 Mid- to Long-Term Strategy
Energy Environment Planning Team	Response plan for ISO revision
Safety Environment Part (Suncheon Plant)	SeAH Steel & SeAH Wind’s SHE Technology Exchange Meeting
Safety Planning Team	Revision of the serious accident response procedures and safety incident investigation procedures

### Company-Wide CP Cross-Inspections

Since 2021, **SeAH Steel** has conducted the company-wide “Compliance Program (CP) Cross-Inspections,” in which Safety Environment teams from each business site visit other locations to review safety management practices. Through this process, potential hazards that are often overlooked in internal inspections are identified, and feedback is exchanged to strengthen our proactive safety management framework. Beginning in 2024, the program has been conducted on a semiannual basis to further reinforce the inspection and mitigation of hazardous and high-risk areas. During 2024, we identified a total of 730 risk factors and completed corrective measures for all of them, achieving a 100% improvement rate.



CP Cross-Inspection (SeAH Steel)

### CP Cross-Inspections in 2022-2024 (SeAH Steel)

(Unit: Case(s))

Category		2022	2023	2024
CP Cross-Inspection	Identified	457	207	730
	Improved	448	203	730
	Improvement Rate	98%	98%	100%

Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Occupational Safety and Health

Material Issue

## Strategy

### Employee Health Promotion Initiatives



**SeAH Steel's Pohang Plant** operates a smoking cessation clinic that conducts annual assessments of employee smoking status, monitors smoking rates, and supports successful smoking cessation. The number of employees participating has steadily increased from 11 in 2022 to 13 in 2023 and 18 in 2024. Program activities include posting smoking cessation posters, distributing educational and promotional materials, and installing signage promoting a smoke-free workplace. In partnership with the Pohang City Health Center, the clinic also offers access to smoking cessation specialists and personalized counseling to improve quit success rates.



Smoking Cessation Clinic (SeAH Steel Pohang Plant)



**SeAH Steel's Pohang Plant** conducts an annual alcohol harm-reduction campaign in collaboration with the Pohang Addiction Management Integrated Support Center. The program uses specialized alcohol goggles that replicate the physical and cognitive impairment caused by intoxication, providing participants with a clear understanding of alcohol's effects. This approach reinforces awareness of drinking-related risks and encourages more responsible habits. In addition, company-wide alcohol metabolism tests are carried out anonymously, and departmental averages are reviewed to identify areas requiring further support. Furthermore, training sessions led by external experts and individual counseling are offered to those identified as needing assistance.



Alcohol Harm-Reduction Campaign (SeAH Steel Pohang Plant)



**SeAH Steel's Pohang Plant** implements health initiatives aimed at preventing cardiovascular and cerebrovascular diseases such as stroke, hypertension, hyperlipidemia, and diabetes through programs including a smoking cessation clinic, weight loss program, and alcohol harm-reduction campaigns. On-site occupational health specialists deliver health education and conduct safety seminars for all employees. Annual risk assessments for cardiovascular and cerebrovascular diseases are performed to identify individuals who are exposed to high health-related risks and require additional management. Regular measurements of blood pressure, glucose levels, and body fat percentage are also conducted and customized health solutions for each employee are suggested. **Dong-A Steel** provides our employees with targeted health education and professional counseling programs to help prevent cardiovascular and cerebrovascular diseases, including hypertension, diabetes, and hyperlipidemia. Employees identified as requiring enhanced medical oversight receive personalized care plans and specialized follow-up treatment.



CPR Training (SeAH Steel Pohang Plant)

Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health <span>Material Issue</span>	
Talent Management <span>Material Issue</span>	
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Occupational Safety and Health Material Issue

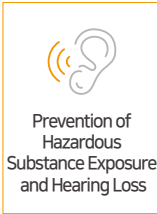
## Strategy

### Employee Health Promotion Initiatives



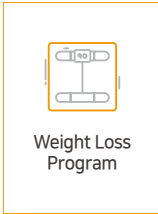
At **SeAH Steel's Pohang Plant**, proactive measures are implemented to prevent musculoskeletal disorders (MSDs) arising from repetitive tasks or improper work postures. Stress-relief exercises are conducted before shifts begin, and each team is given regular guidance on appropriate stretching routines. Employees are encouraged to utilize massage chairs during breaks, and on-site clinics have made self-massaging tools and professional therapy services readily accessible.

At **SeAH Steel's** Changwon Plant, a stretching program was introduced to improve physical flexibility and promote blood circulation, helping to reduce the risk of musculoskeletal disorders. Instructional posters and video materials were also distributed to encourage participation and support employees in following the program.



At **SeAH Steel's Gunsan Plant**, a pilot initiative was launched in October 2024 to protect the hearing of employees working in high-noise environments and prevent hearing loss. Personal hearing protection devices, custom-fitted based on audiometric screening and ear shape assessment, were provided on a trial basis. The initiative incorporates actual user feedback to improve the fit and effectiveness of protective equipment, and we plan to make further improvements.

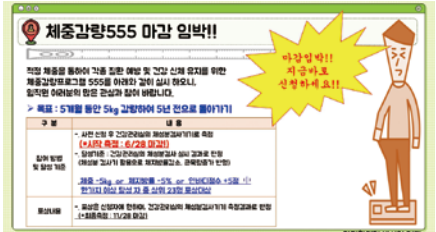
**Dong-A Steel** also conducts periodic worksite assessments and provides site-appropriate hearing protection to prevent employees' exposure to hazardous noise.



At **SeAH Steel's Pohang Plant**, we operate a weight loss program to promote healthy lifestyle habits and manage metabolic syndrome among our employees. Since 2024, we have updated our previous weight loss program, "Weight Loss 333" to "Weight Loss 555." Weight Loss 555 stands for "5 kilograms in 5 months to your 5-years-ago weight." This initiative aims to raise awareness of weight and health management within the workplace and foster employees to practice and maintain healthy lifestyles.

#### Weight Loss Program Participants and Results in 2022-2024 (SeAH Steel Pohang Plant)

Category	2022	2023	2024
Participated	46 people	116 people	103 people
Succeeded	11 people	25 people	6 people
Success Rate	24%	22%	6%



"Weight Loss 555" Program (SeAH Steel Pohang Plant)



Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Occupational Safety and Health

Material Issue

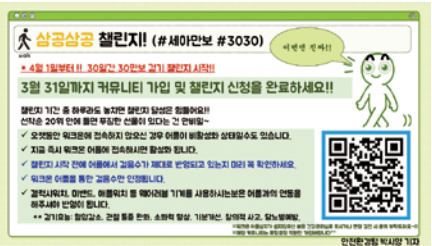
## Strategy

### Employee Health Promotion Initiatives




Counting Steps Campaign

SeAH Steel's Pohang Plant implemented a participatory fitness program to encourage voluntary health management called the "SeAH Manbo 3030 Challenge," which sets a target of walking 300,000 steps over 30 days. Employees track and share their steps using mobile pedometer applications and exchange information on recommended walking routes and trails. In 2024, a total of 126 employees participated, with 46 participants achieving the 300,000-step target and the first 20 achievers being awarded prizes. From 2025, the challenge will shift from an individual-based format to a team-based format to further promote engagement and collective participation.



SeAH Manbo-3030 Challenge (SeAH Steel Pohang Plant)



Health Examination Program

SeAH Steel and Dong-A Steel provide comprehensive health examination programs to safeguard employee well-being and promote preventive healthcare. These programs provide regular monitoring of health conditions and support preventive measures as well as follow-up care.

#### Health Examination Program in 2022-2024

(Unit: Person(s))

Category	2022	2023	2024
General health check-up	466	479	593
Special health examination	228	237	436
Pre-placement health assessment	55	89	237

※ Based on Pohang, Gunsan, Suncheon, and Changwon Plants

#### Health Examination Program in 2022-2024

(Unit: Person(s))

Category	2022	2023	2024
General health check-up	24	20	26
Special health examination	13	14	14
Pre-placement health assessment	8	12	4

General Health Check-up

SeAH Steel provides general health check-ups for early detection of cardiovascular and cerebrovascular conditions, such as hypertension, coronary artery disease, stroke, and hyperlipidemia. After check-ups, employees receive follow-up health management guidance based on their individual results and risk profiles. Additional workplace wellness initiatives such as smoking cessation, alcohol harm-reduction, and physical activity campaigns are implemented to promote self-directed health improvement among employees and foster a culture of health and well-being.

Pre- and Post-Placement Health Assessment

SeAH Steel conducts pre-placement and post-placement medical evaluations for employees assigned to roles involving potential exposure to hazardous substances. These targeted health assessments aim to proactively identify and mitigate work-related health risks, preventing the onset of occupational illnesses attributable to chemical or physical agents.

Special Health Examination

SeAH Steel provides specialized health examinations at regular intervals in accordance with Occupational Safety and Health Act's regulatory requirements for employees exposed to specific occupational hazards, including chemical substances, noise, and other risk factors. Following these examinations, we offer individualized medical counseling, referrals, and workplace adjustments as needed to prevent occupational illnesses and promote long-term employee health.

Comprehensive Health Examination

SeAH Steel provides financial support for employees and their spouses to undergo comprehensive health screenings every two years, aimed at the early detection of adult diseases and cancers that may not be identified through standard or specialized examinations. In collaboration with leading medical institutions, the program offers a wide range of screening options and allows employees to select both the healthcare facility and specific examination items, ensuring access to services that meet their individual health needs.

Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+



# Occupational Safety and Health

Material Issue

## Risk Management

### Risk Assessment and Risk Monitoring

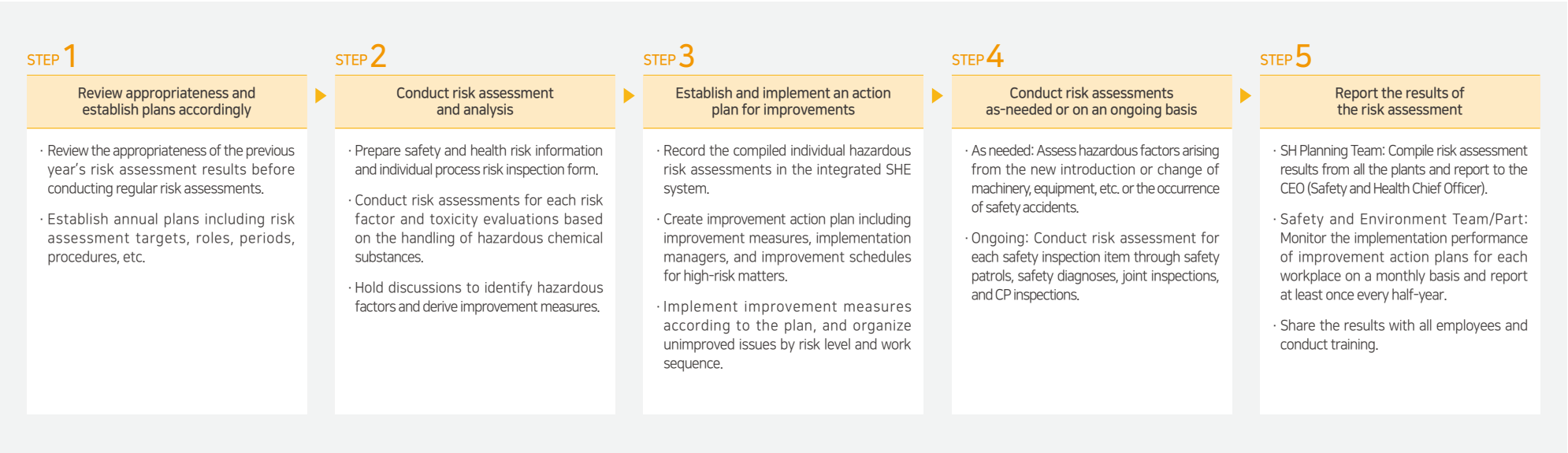
**KRAS Risk Assessment** | SeAH Steel continuously conducts systematic risk assessments and improvement activities based on the KOSHA Risk Assessment System (KRAS) methodology to proactively identify and effectively manage hazardous and risk factors in industrial settings. In 2024, we identified 639 hazardous risk factors, of which 607 were addressed, achieving a 95% improvement rate. In addition, SeAH Steel actively supports our business partners in enhancing their risk assessment capabilities by assisting them in acquiring KOSHA-MS certification and excellent risk assessment workplaces certifications. Currently, 60% of business partners with five or more employees have achieved this certification, and we plan to further increase the proportion through continued support.

### KOSHA-MS and Excellent Risk Assessment Workplace Certifications of Business Partners (SeAH Steel)

(Based on March 2025)

Category	Pohang Plant	Gunsan Plant	Suncheon Plant	Changwon Plant
Excellent Risk Assessment Workplace	3	4	6	5
KOSHA-MS	2	-	-	-

### Risk Assessment Process





Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Occupational Safety and Health

Material Issue

## Risk Management

### Risk Assessment and Risk Monitoring

**Hazard Identification Process** | **SeAH Steel** systematically identifies potential hazards and risk factors in our industrial worksites through a structured risk assessment process, and we continuously implement improvement activities to manage these risks effectively. Currently, we apply the KRAS (Korea Risk Assessment System) methodology to estimate the frequency and severity of risk across six categories: mechanical (equipment-related) factors, electrical factors, chemical factors, biological factors, task-specific factors, and workplace environment factors, thereby determining the overall level of risk. In 2024, we identified a total of 639 risk factors, of which 607 were fully mitigated, achieving a 95% improvement rate. We also actively support our business partners in strengthening their risk assessment capabilities, including assistance in acquiring both KOSHA-MS (Korean Occupational Safety and Health Management System) certification and excellent workplace for risk assessment. As of now, 60% of our business partners with five or more employees have acquired excellent workplace certification, and we plan to continue providing support to further increase the certification rate.

### Risk Assessment Activities (SeAH Steel)

(Unit: Cases, %)

Category	Risk Assessment (regular)	Risk Assessment (ad-hoc)	Safety Patrol	Safety Diagnosis	CP Cross-Inspection	Joint Inspection
Identified	300	94	1,758	696	730	336
Improved	300	94	1,758	692	730	330
Improvement Rate	100	100	100	99	100	98

We leverage a multi-stakeholder inspection system to identify workplace hazards at an early stage. Based on these findings, we implement practical and effective corrective measures, continuously enhancing our company-wide occupational health and safety (OHS) performance.

In 2024, **Dong-A Steel** addressed 80 of the 83 hazards and risks identified through risk assessments and meetings with business partners representatives. Both the Dong-A Steel 1st and 2nd Plants received certification as excellent workplaces for risk assessment. We aim to continuously improve the risk assessment practices of our business partners and support them in achieving excellent risk assessment workplace certification through ongoing improvement and training initiatives. In addition, joint fire drills with local fire departments and the development of emergency response plans strengthen our ability to respond promptly and systematically in emergency situations. Training also includes employee evacuation, the use of AEDs, handling protective equipment, and preventive measures, ensuring comprehensive preparedness across all sites.

### ISO 45001 Certification

**SeAH Steel** has acquired and maintains Occupational Health and Safety Management System (ISO 45001) certification across all operations. All employees actively engage in initiatives such as compliance with occupational health and safety regulations, promotion of accident prevention, and participation in safety-focused Compliance Program (CP) activities. In addition, internal ISO auditors are appointed annually to conduct audits and ensure the continued maintenance of certification.



ISO 45001 Certification (SeAH Steel Pohang, Gunsan, Suncheon, Changwon Plant)

Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Occupational Safety and Health

Material Issue

## Risk Management

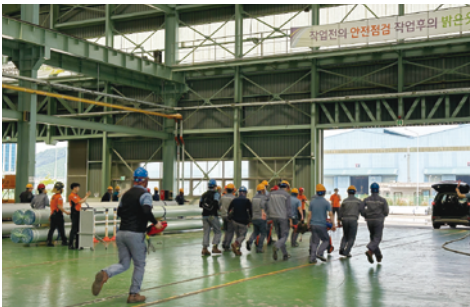
### Emergency Response Training and Equipment Safety Inspections

At **SeAH Steel**, each site conducts scenario-based emergency response drills modeled after actual events to improve employees' readiness and reinforce a strong safety culture. Regular inspections, including non-destructive testing, are carried out on critical equipment such as conveyors and cranes to identify potential hazards and maintain safe working conditions. Safety measures are developed to reflect specific conditions of each site. The feedback collected during drills and inspections is incorporated into operational practices. Through these efforts, we will continue to improve our safety management system.

**Fire Drills** | **SeAH Steel** strengthens on-site safety through both internal fire drills and joint exercises with local authorities that simulate real fire emergencies. Employees participate in all stages of emergency response, including detection, initial suppression, evacuation, and communication, ensuring they understand their roles and can act quickly and effectively. In addition to protecting people and property, our training emphasizes rapid and coordinated response during emergencies. Programs cover correct use of firefighting equipment, cooperation between departments, and coordination with external agencies, preparing employees to respond efficiently under pressure. After each drill, we review all activities, identify improvements, and apply lessons learned to enhance our safety systems and cultivate a resilient organizational culture.



Fire Drill (SeAH Steel Pohang Plant)



Joint Fire Drill (SeAH Steel Suncheon Plant)

**Chemical Spill Response Training** | **SeAH Steel** conducts scenario-based training to strengthen employees' ability to respond quickly and effectively in the event of chemical substance spills. In November 2024, the Gunsan Plant held a drill for employees at the plating facility, simulating an emergency in which sulfuric acid leaks from a pipeline. The training focused on step-by-step procedures, including recognizing the situation and initiating an immediate response, stopping work and issuing alarms, evacuating to safety assembly points, shutting off valves, and preventing the spread of chemical substances. Participants were assigned with roles within each scenario and carried out the procedures accordingly. Employees gained hands-on experience in emergency actions, reinforcing accident prevention measures and improving the speed and effectiveness of recovery processes. After the drill, a review and feedback session was conducted to deepen understanding of each response stage and discuss improvements to enhance the effectiveness of the training.



Emergency Drill for Chemical Spill at Plating Plant (SeAH Steel Gunsan Plant)



Non-Destructive Testing (NDT) of Crane Attachment Equipment (SeAH Steel Changwon Plant)

**Equipment Safety** | Inspections **SeAH Steel** conducts regular inspections to ensure the safety of equipment in the workplace. In December 2024, the **Gunsan Plant** carried out routine inspections on eight conveyors, confirming the safety of all equipment. In November 2024, the **Changwon Plant** inspected nine conveyors, thoroughly checking key components, including claw conveyor safety devices, and achieved a passing result for all items. In addition, non-destructive testing was conducted on crane attachments such as C-hooks and handling beams. Fifteen pieces of equipment were evaluated on-site, and all were confirmed to be safe for operation. We will continue to strengthen overall workplace safety, including tasks involving heavy equipment, by performing regular inspections of hazardous machinery and equipment.



Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+



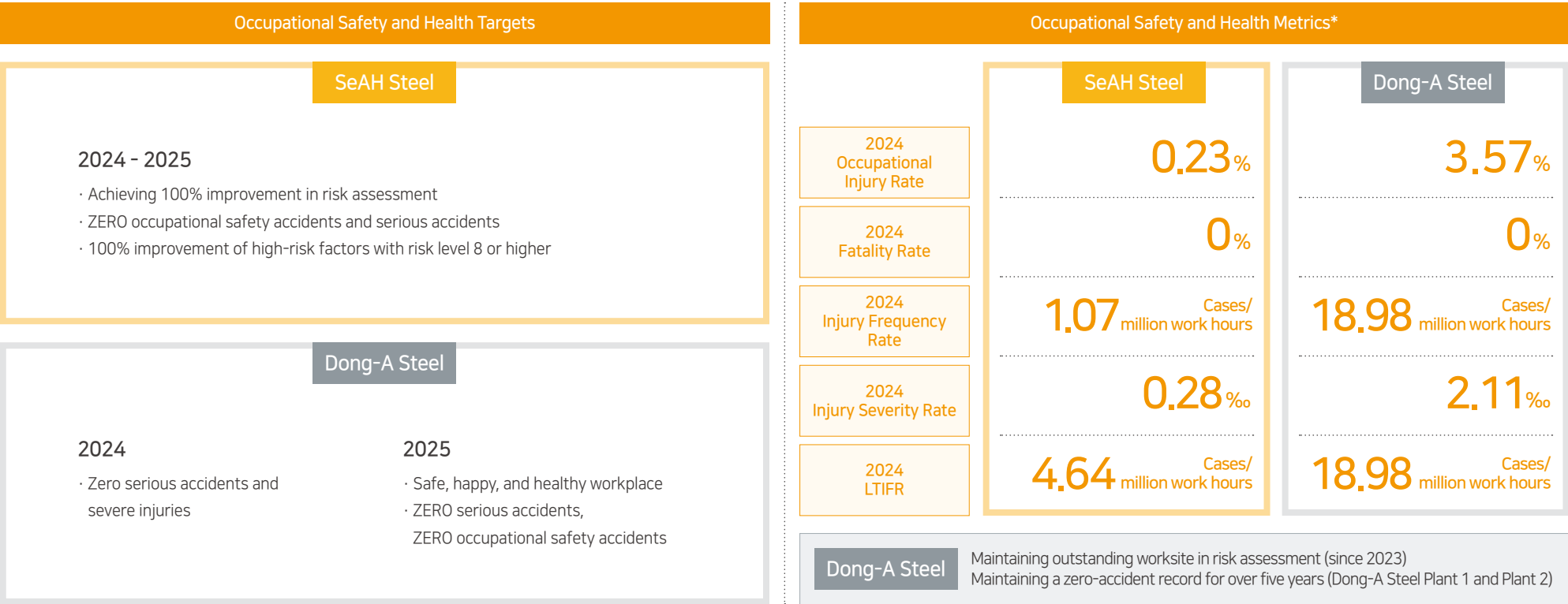
# Occupational Safety and Health

Material Issue

## Metrics and Targets

### Occupational Safety and Health Metrics and Targets

To achieve these objectives, **SeAH Steel** is implementing a proactive, prevention-focused safety management system. We closely track performance using quantitative OHS indicators, including injury frequency rate, fatality rate, accident rate, severity rate, and lost-time injury rate (LTIFR). These metrics serve as objective benchmarks for assessing safety management levels across all operations and as a foundation for designing effective corrective and preventive measures. We will continue to foster a strong safety culture company-wide through a data-driven, systematic OHS management, with the aim of achieving a sustainable and accident-free workplace.



\* Figures include both employees of each affiliate and those of its business partners

Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Talent Management

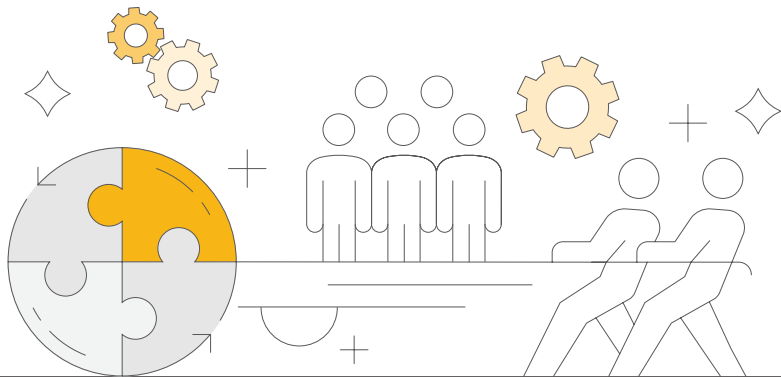
Material Issue

## Governance

### Talent Management Governance

**SeAH Steel** systematically manages our core talent management system through close collaboration between our HR team, corporate culture team, and relevant departments. Each team operates a range of initiatives designed to attract and develop talent, strengthen organizational capabilities, and reinforce our company culture. These include value-based recruitment, customized training and development programs, fair performance evaluations, and transparent compensation systems. We are refining our talent management programs to effectively respond to the evolving business landscape. At the same time, we strive to promote a healthy workplace culture that prioritizes psychological well-being and open communication. We will continue to advance our talent management framework to establish ourselves as an employer of choice where exceptional talent is empowered to grow and succeed together.

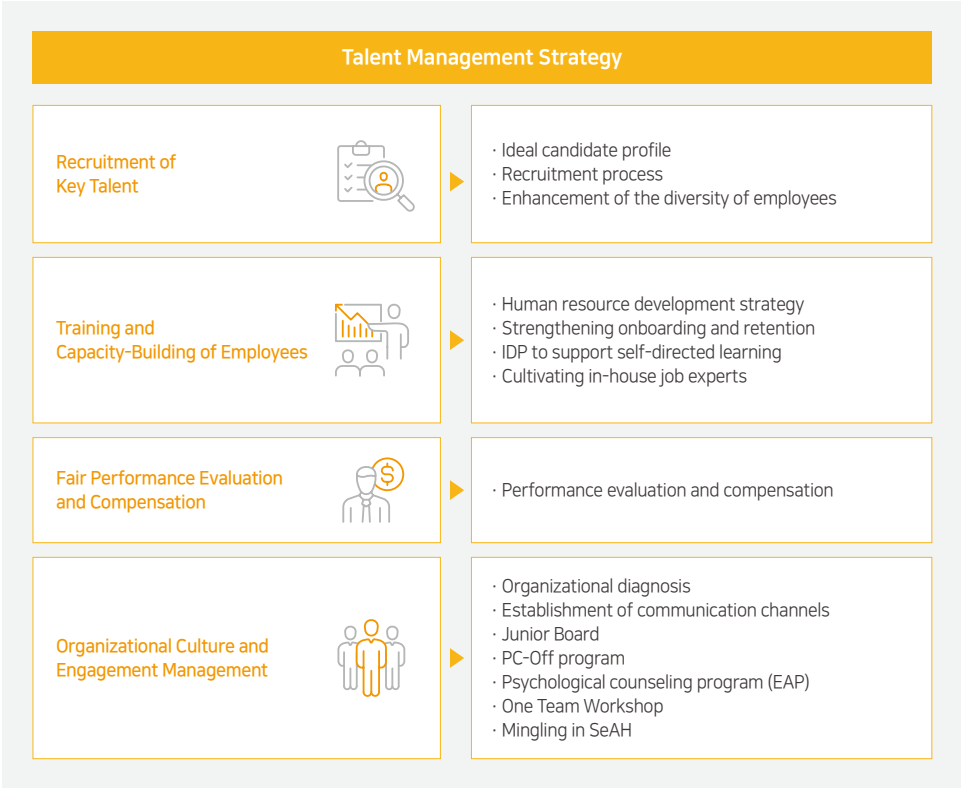
**Dong-A Steel** undertakes diverse initiatives to attract and develop key talent. The dedicated HR organization emphasizes collaboration and communication among employees while systematically implementing talent management strategies. To promote mutual growth with the local community, we are expanding regional recruitment and operate a fair, KPI-based performance evaluation and reward system. In addition, by assessing organizational culture, we enhance employee engagement and provide inclusive benefits accessible to all employees, regardless of gender or employment type, thereby supporting both individual growth and the sustainable development of the organization.



## Strategy

### Talent Management Strategy

**SeAH Steel** and **Dong-A Steel** uphold the core values of “Integrity, Passion, and Competence” and operate a structured process to attract, develop, and retain talent capable of effective collaboration across the organization. In particular, our talent development framework is structured around four key stages: recruitment of key talent, employee training and capability development, fair performance evaluation and reward, and organizational culture and employee engagement management. This framework ensures a systematic approach from recruitment through organizational integration and sustained engagement.



Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Talent Management

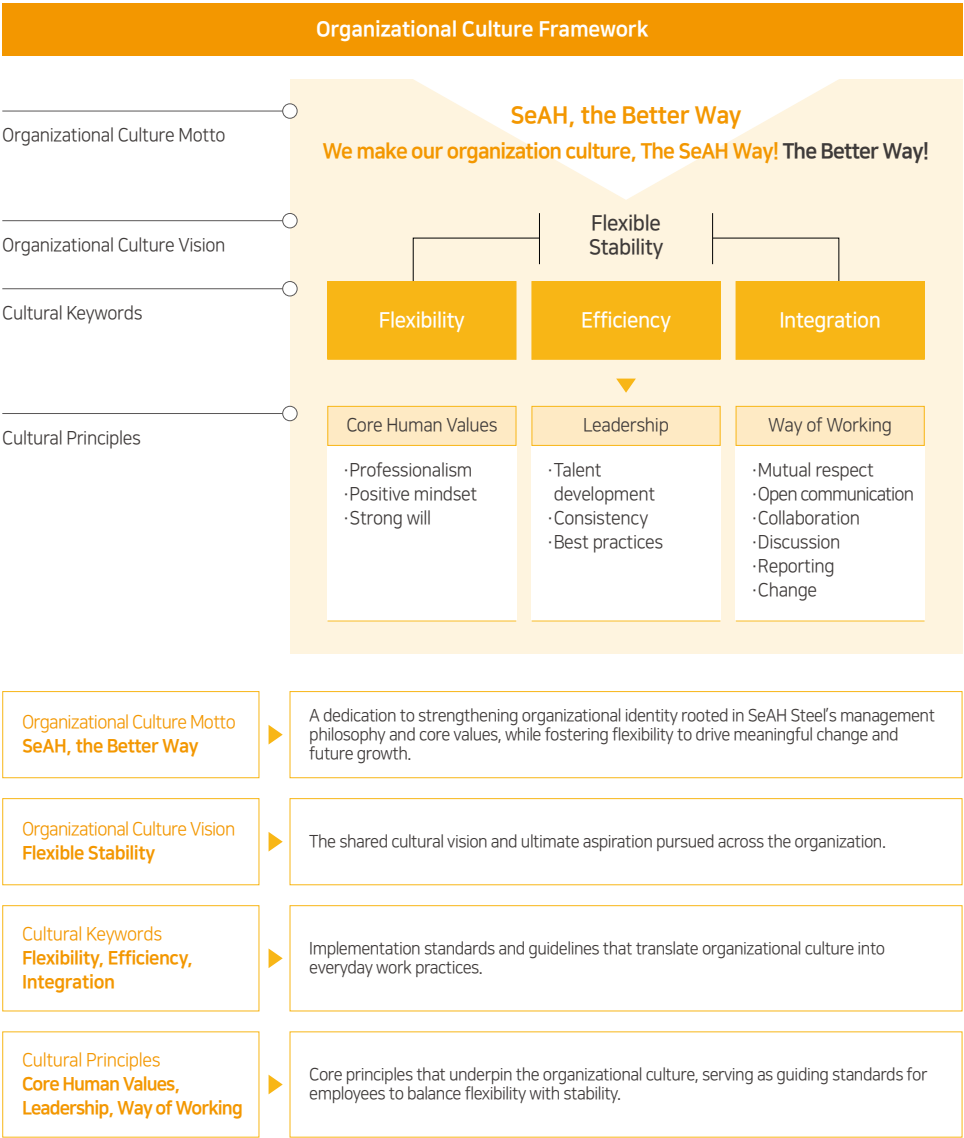
Material Issue

## Strategy

### Recruitment of Key Talent

**Core Values of People at SeAH** | SeAH Steel is dedicated to generating shared value through diversity and creativity, contributing to a more sustainable and prosperous future. Our people, driven by passion and a spirit of challenge, serve as the cornerstone of the company’s growth and are poised to play a pivotal role in shaping the future of Korea’s steel industry.

### Core Values of People at SeAH (SeAH Steel)



Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Talent Management

Material Issue

## Strategy

### Recruitment of Key Talent

**Recruitment Branding** | **SeAH Steel** prioritizes attracting top talent to strengthen organizational competitiveness and support sustainable growth. We have implemented a structured recruitment branding strategy, including job interviews with current employees and a redesigned career website. The job interviews provide applicants with first-hand insights into roles and working environments, enhancing their understanding of the positions. The updated career website offers an intuitive user interface and effectively communicates the company's values and vision, reinforcing transparency and credibility throughout the recruitment process. These branding efforts go beyond traditional recruitment promotion by improving the overall candidate experience and enhancing the company's reputation. By aligning with the expectations of younger generations who value organizational missions and ways of working, we will foster a steady inflow of motivated individuals and enhance our reputation and competitiveness.

**Structuring Recruitment Process** | At **SeAH Steel**, our recruitment process is designed to be both structured and fair. Candidates are evaluated throughout three stages: document screening, AI-based competency assessments, and interviews. The AI tool objectively measures job-related skills and attributes, the first interview assesses professional expertise, and the second evaluates personality and organizational fit. Since 2024, we have extended the AI assessment to not only include administrative positions but also production roles, creating a more consistent process across all functions. We uphold principles of fairness and inclusion in every stage of recruitment. Our practices are free from discrimination based on gender, age, race, nationality, background, or religion, and we provide regular training for interviewers to maintain objectivity.

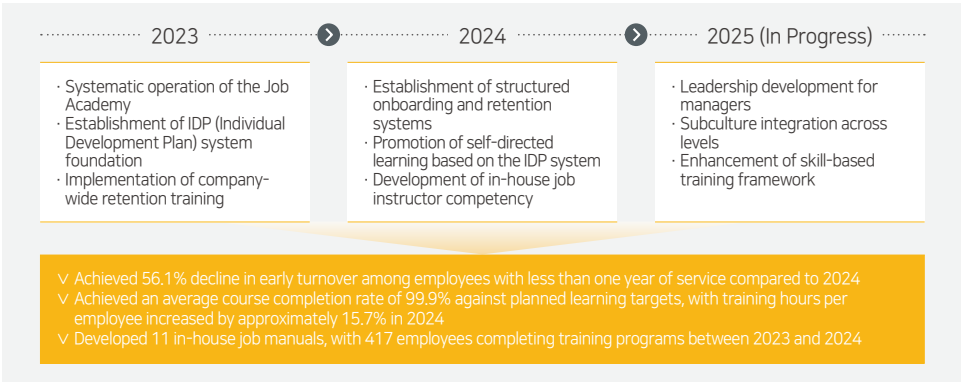
**Community-Based Recruitment** | **Dong-A Steel** seeks to grow together with individuals who share our values and vision. To strengthen our recruitment base, we collaborate with local universities such as Suncheon National University and Suncheon Cheongam University, as well as with regional partners including the Gwangyang Bay Area HR Center and Good Job Gwangyang. These partnerships broaden access to qualified candidates while contributing to shared growth with the community.

**Employment of Socially Vulnerable Groups** | **SeAH Steel** strives to promote employee diversity by granting additional points to children of national veterans and applicants with disabilities in the recruitment process. We offer flexible work arrangements and support for employees with disabilities, including provision of large monitors and communication allowances. In addition, we invest in certified workplaces for people with disabilities, thereby supporting indirect employment for individuals with severe disabilities and regularly procuring products manufactured at these facilities. Through these measures, we continue to advance initiatives that foster a diverse workforce and maintain fair and equitable opportunities for all employees.

### Employee Training and Competency Development

**Annual Training Plan** | Aiming for long-term growth of both individuals and the organization, **SeAH Steel** operates programs that not only enhance employees' professional expertise but also align the company's vision with individual growth. Each year, we establish a company-wide training plan that reflects our strategic priorities. In 2024, our initiatives included strengthening onboarding and retention, fostering self-directed learning through Individual Development Plans (IDPs), and cultivating in-house experts. These initiatives delivered measurable results, including a 56.1% reduction in early turnover, a near-complete training completion rate, and the development of new job-related media contents. By continuously investing in people, we are shaping a resilient workforce that supports both individual and organizational success.

#### Key Training Initiatives and Outcomes in 2023-2025 (SeAH Steel)





Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Talent Management

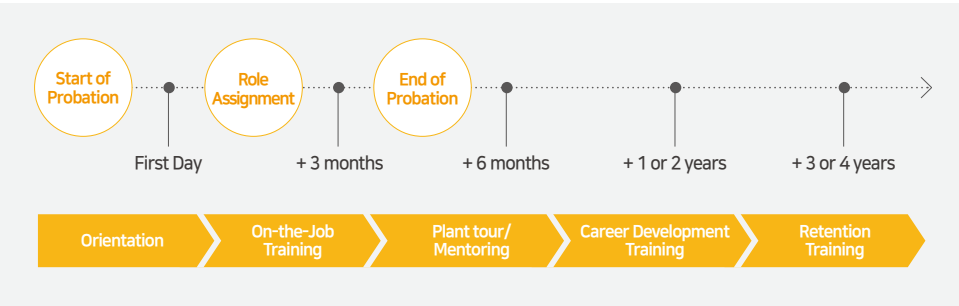
Material Issue

## Strategy

### Employee Training and Competency Development

**Onboarding and Retention Training Framework** | SeAH Steel operates a phased training program designed to help new employees adapt to the organization and support their long-term growth. Spanning from the initial stage of employment through the third to fourth year, the program reflects employees’ key concerns at each stage and guides them through a progression of adaptation, engagement, growth, and full integration within the company.

#### New Employee Onboarding and Retention Training System (SeAH Steel)



**SeAH Energizer Day Mentoring Program** | SeAH Steel operates the “SeAH Energizer Day” mentoring program to help new employees quickly adapt to the organization and successfully execute their roles. In April 2024, we established the annual activity plan through a mentoring ceremony, engaging 45 mentors and mentees in activities that included six themed missions and three group sessions. To encourage active participation, we are presenting awards to outstanding mentors and mentees. This program enhances new employees’ organizational engagement while also contributing to the leadership development of junior employees taking the role of mentors.



SeAH Energizer Day

#### New Employee Onboarding and Retention Training Program in 2024 (SeAH Steel)

Category	Program	Target	Participants	Contents	Duration	Average Satisfaction Score (Feedback Score)
Level	New Employee Orientation	New Hires from Mar. 2024	18	Organizational Understanding (10H), Organizational Engagement (4H) (Includes Team Building and Workplace Etiquette Training)	Mar. 28, 2024 - Mar. 29, 2024	4.8/5
	Experienced Employee Orientation	Experienced Hires from July 2024	5	Organizational Understanding (7H), Hands-on System Training (1H) (All participants attend the on-site training at the headquarters)	July 23, 2024	-
	New Employee OJT / Project Presentation	New Hires from Mar. 2024	17	12-week OJT/ Departmental Improvement Project Presentations	Mar. 28, 2024 ~ Jun. 28, 2024	-
	New Employee Steel MOOC / Corporate Reading Program	New Hires from Mar. 2024	17	Study of Basic Steel Knowledge and 12 Selected Books	Apr. 8, 2024 ~ Jun. 28, 2024	-
	New Employee Plant Tour	New Hires from 2023-2024	23	Understanding of Workplace Environment, Plant Tour, Networking Evening, Peer Night	Apr. 15, 2024 - Apr. 18	4.6/5
	SeAH Energizer Day Mentoring Program	New Hires & Junior Employees from 2023-2024	47	Partnership Ceremony, 7 Program Sessions, Midterm Assessment Worksheet, Completion Ceremony (New)	Apr. 19, 2024 - July 25, 2024	4.3/5
	2nd Year CDP Career Design Workshop	New Hires from 2023	24	Career Development Process based on Job Descriptions, Career Merchandise Production (New)	Dec. 15, 2024 - Dec. 16, 2024	4.4/5
	3rd Year Retention Program, “Re:SeAH”	New Hires from 2022	28	Elements of Self-Motivation, Peer Night	Dec. 18, 2024 - Dec. 19, 2024	4.6/5

Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+



## Talent Management

Material Issue

### Strategy

#### Employee Training and Competency Development

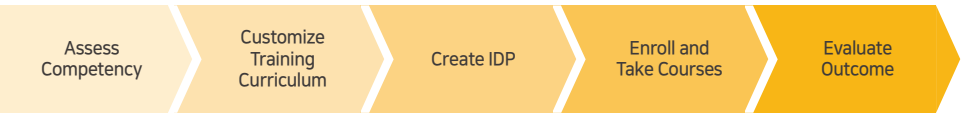
**Group Training Platform (SeAH-ON)** | **SeAH Steel** delivers all training programs through the Group Learning Platform, SeAH-ON. SeAH-ON is a comprehensive digital learning system that manages the entire learning process, including access to online courses, offline course registrations and individual training histories. In addition, it provides employees with a self-directed environment to explore, register for, and complete various training programs. As of March 2025, SeAH-ON offers a total of 4,063 courses, including 1,414 common job-related E-learning courses, 127 specialized job courses, 1,150 foreign language courses, and 700 certification programs, to promote our employees' career development and skill enhancement. The platform is fully integrated with our ERP system, automatically recording one's training history and performance in real time. This data supports individualized learning analytics and development programs, enhancing training management efficiency while aligning employee growth with organizational strategy.

#### SeAH-ON Data Utilization Process (SeAH Steel)



**SeAH-IDP System** | **SeAH Steel** operates the SeAH-IDP system, which recommends individualized training courses based on competency assessment results and supports employees in creating Individual Development Plans (IDPs) to ensure the completion of required learning. Through this system, employees progress along a structured learning path aligned with their current skills and development needs, fostering systematic and effective competency development.

#### SeAH-IDP Operation Process (SeAH Steel)



SeAH-IDP is integrated with the company's learning platform, SeAH-ON, through which employees select recommended courses based on both their own and their supervisor's competency assessment results. Employees also create annual learning plans and monitor their progress and completion directly via the platform. This self-directed learning framework provides clear guidance and autonomy, while real-time tracking of course completion reinforces engagement and accountability. The system was recognized as a best practice during the 2024 Quality Management System (ISO 9001) surveillance audit. In 2024, the completion rate against individual learning plans reached 99.9%, with increases observed in total participants, total training hours, and per-employee training hours compared to the previous year, demonstrating strong engagement and tangible learning outcomes.

#### SeAH-IDP System Operation Outcomes in 2023-2024 (SeAH Steel)

Category	2023	2024	YoY Change
Number of participants	802	831	3.62%
Total training hours	44,507	52,859	18.77%
Total training hours per employee	55	64	15.65%

**OJT for New Hires and Customized E-Learning** | **Dong-A Steel** seeks to enhance organizational competitiveness by developing the capabilities of our workforce. To facilitate the rapid integration and skill acquisition of new employees, we provide structured on-the-job training (OJT) led by experienced personnel within each department. In addition to in-person and external training, we utilize the group-wide digital learning platform to create individualized training plans, offering role-specific E-learning modules tailored to each employee's development needs and competency profile.

Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Talent Management

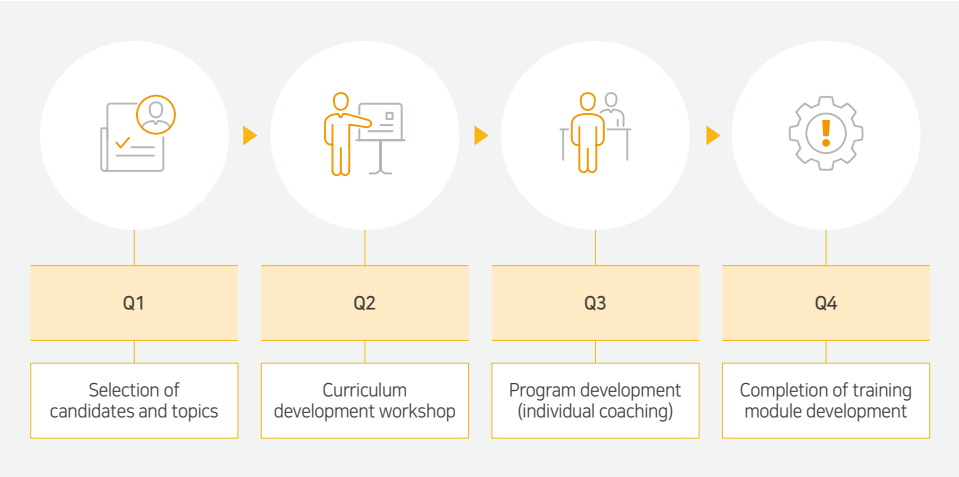
Material Issue

## Strategy

### In-House Talent Development

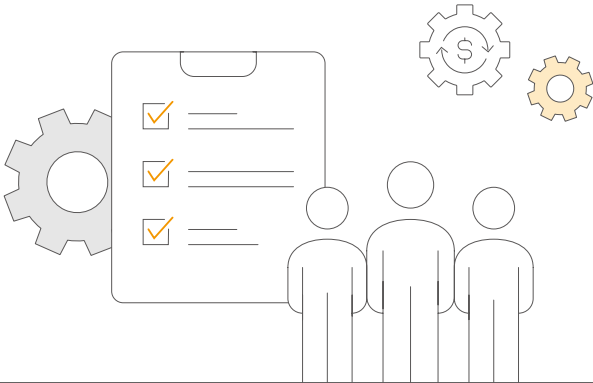
**In-House Job Expert Program** | SeAH Steel operates an in-house job expert program to systematize the know-how of employees in operational roles and transform it into educational media contents to be shared within the organization. Job experts are selected at the departmental or site level with support provided for content design and development. This initiative facilitates knowledge transfer among employees and reinforces role-specific competencies. By 2024, a total of 11 job-related content pieces have been produced, serving as practical training assets within the company.

### In-House Job Expert Development Process (SeAH Steel)



**Professional Qualification Acquisition Support** | SeAH Steel offers a Professional Qualification Acquisition Support System, helping our employees gain job-related certifications by covering registration and examination fees. We currently support over 67 types of certifications across management, sales, production, and R&D. In 2024, we provided support to 23 (about 6%) of our 369 office employees for professional qualification acquisition, covering both examination fees and training costs. Those who acquired the qualifications were subsequently connected as in-house experts or job content developers, which has had a positive effect not only on strengthening expertise within the organization but also boosting employee motivation. The number of certified individuals is increasing in various fields such as accounting, facilities, quality, and more; and their active involvement has strengthened SeAH Steel's capacity to foster in-house expertise and build a culture of continuous learning.

### Professional Certification Assistance Program (SeAH Steel)



Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Talent Management

Material Issue

## Strategy

### Fair Performance Evaluation and Compensation

**Performance-Linked Compensation System** | SeAH Steel fosters employee performance and motivation through a performance-based human resources and evaluation system. We aim to achieve mutual growth for both the company and our employees by strategically assigning roles according to individual capabilities and performance. Through a rotational assignment system, employees gain exposure to diverse roles and opportunities to identify areas that best align with their strengths. Evaluation outcomes are directly linked to subsequent compensation and HR management decisions, reinforcing employee engagement and commitment.

#### SeAH Steel Performance Evaluation System

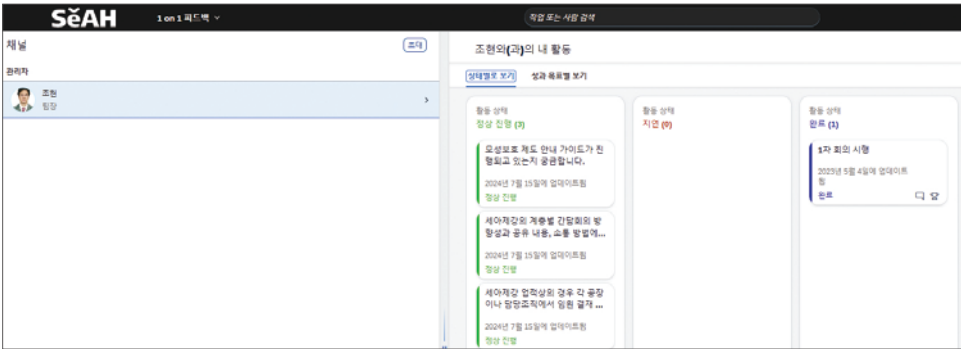
- Operates a performance management framework based on qualitative and quantitative indicators linked to company-wide strategy
- Uses a Balanced Scorecard (BSC) approach to derive standardized evaluation scores from company-wide and departmental KPIs, followed by individual assessments  
※ Evaluation ratings are assigned on a five-tier scale: S, A, B, C, and D
- After the performance feedback and adjustment processes have been completed, any annual salary increases and incentive payments for the following year are applied in accordance with the employee's evaluation rating



**Performance Evaluation Mediation and Arbitration System** | SeAH Steel operates a structured, multi-stage process to ensure the reliability and fairness of performance evaluations, comprising requests for review, mediation, and arbitration. When an employee raises a substantiated request for review of their evaluation, an executive reviews the employee's performance log and proposes a mediated resolution to the evaluator. This process is designed to strengthen transparency and acceptance of evaluation outcomes among employees. If agreement is not reached during mediation, the HR Committee acts as the final arbiter, reviewing all relevant materials and perspectives before issuing a binding decision. This ensures that the evaluation result be conclusive. The system serves as a key mechanism to minimize conflicts, uphold objectivity, and reinforce a transparent, performance-driven organizational culture.

**BSC-Based Performance Management System** | SeAH Steel applies a Balanced Scorecard (BSC)-based performance management system that systematically aligns organizational objectives with individual goals. Through goal-setting agreements between management and employees, we maintain consistency and integrity in evaluations. A continuous feedback mechanism, supported by IT systems, provides real-time insight into performance and areas for improvement. This approach helps employees assess their contributions objectively and take proactive steps to enhance their performance.

#### 1-on-1 Feedback within the Performance Evaluation System (SeAH Steel)



**360-Degree Performance Evaluation** | SeAH Steel conducts a 360-degree performance evaluation for all employees. This system assesses the extent to which individuals demonstrate the organization's core competencies, including adherence to corporate values, ways of working, and leadership capabilities, from multiple perspectives. The evaluation outcomes and feedback provide an objective view of competency gaps, serving as a foundation for personal development. For employees in leadership roles, the process provides a comprehensive assessment of leadership competencies, supporting both the development of individual leaders and the overall strengthening of leadership within the organization.

**KPI-Based Performance Management System** | Dong-A Steel fosters a high-performance culture and supports sustainable, shared growth through a fair and transparent performance evaluation and compensation system. To this end, we conduct KPI-based evaluations aligned with organizational objectives and manage performance according to clear and objective criteria, ensuring the systematic operation of human resource and performance management processes.

Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Talent Management

Material Issue

## Strategy

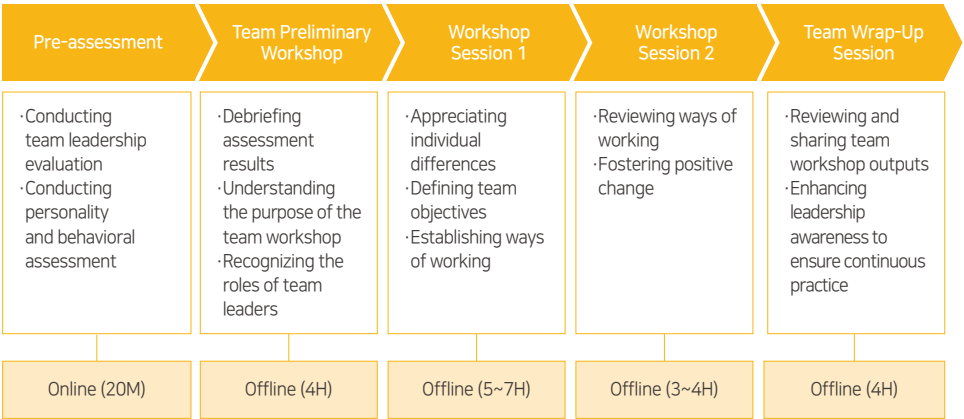
### Improving Organizational Culture

**One Team Workshop** | SeAH Steel launched the “One Team Workshop” program in 2023 to foster open communication, collaboration, and effective team performance across the organization. The workshop is designed to align team objectives, facilitate the exchange of diverse perspectives, and cultivate a sense of unity and belonging, ultimately enhancing employee engagement. In 2023, the program was conducted with four teams; and in 2024, it expanded to ten teams. Starting in 2025, the program will be standardized across nine business sites, evolving from the previous three-step format (pre-assessment, single team workshop, summary session) to a five-step model (pre-assessment, team preliminary workshop, workshop session 1, workshop session 2, and team wrap-up session). The 2025 workshops will be tailored to the specific needs of each team, including one-on-one coaching for team leaders to strengthen leadership skills. Program effectiveness is systematically measured using pre- and post-workshop assessments, and detailed records of workshop content and outcomes are maintained. Beyond conventional training, the program serves as a strategic initiative to enhance organizational culture and improve team performance through practical, hands-on application.



One Team Workshop (SeAH Steel)

### One Team Workshop Operation Process (SeAH Steel)



**Junior Board** | In 2024, SeAH Steel launched the “Junior Board” to foster innovation at the operational level and generate ideas for advancing our corporate culture. In 2025, members were nominated among employees from the Associate- to Manager-level through a combination of voluntary application and management review. Selected members will serve as Change Agents, driving the internalization of our corporate culture framework, “SeAH, the Better Way,” and proposing solutions to key workplace challenges. Through regular meetings and direct engagement with the CEO and designated executives, the Junior Board will support the ongoing enhancement of a healthy and dynamic corporate culture.

**SeAH, the Better Way** | As part of our efforts to strengthen organizational culture, SeAH Steel introduced a new corporate culture framework, “SeAH, the Better Way,” in 2024. On January 20, 2025, we held a company-wide launch event to communicate the framework’s significance and outline the direction for future organizational transformation. We will conduct workshops for all employees to embed the framework and cultivate a work culture guided by the principles of “SeAH, the Better Way,” fostering a dynamic and forward-looking organization.



Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Talent Management

Material Issue

## Strategy

### Improving Organizational Culture

**Mental Counseling Program (EAP)** | Since 2023, **SeAH Steel** has operated a confidential psychological counseling program in partnership with accredited external institutions to support the mental well-being and emotional stability of our employees. The program addresses a wide range of personal and professional concerns, including interpersonal relationships, work-related stress, and family conflicts. All counseling sessions are strictly confidential, and client information is safeguarded in full compliance with privacy regulations. Each employee is eligible for up to eight counseling sessions per year at no cost. In cases where a licensed counselor determines that an employee may be in a high-risk category, and with the employee's prior consent, relevant information may be shared with the appropriate internal department to facilitate additional support, follow-up counseling, or other necessary interventions. If the employee does not consent, all personal information remains strictly confidential.



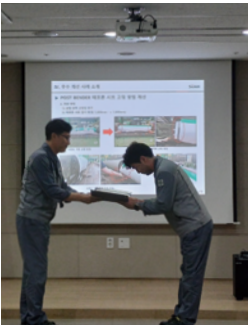
Employee Assistance Program

**PC-Off Policy** | Since August 2021, **SeAH Steel** has implemented a PC-Off Policy to systematically manage overtime work and ensure compliance with statutory working hour requirements. This initiative helps prevent unnecessary extended working hours, allowing employees to focus more effectively during their scheduled work time, thereby enhancing office productivity and operational efficiency. We also actively promote a culture of leaving work on time, improving workplace practices to enable employees to achieve a healthy work-life balance. Through these efforts, we aim to foster a sustainable workplace environment that supports both employee well-being and organizational performance.

**Solution Day** | **SeAH Steel's Suncheon Plant** hosts a monthly "Solution Day" to foster rapport, mutual encouragement, and a sense of unity among employees. The program includes company-wide and plant-specific business updates, the sharing of best practices in resolving long-standing operational challenges, and the recognition and rewarding of outstanding employees. "Solution Day" plays a vital role in strengthening internal communication, promoting organizational cohesion, and aligning team efforts toward shared objectives. The initiative will continue throughout 2025 and is expected to remain an integral activity supporting the Suncheon Plant's healthy operations and sustainable growth.



Solution Day (SeAH Steel Suncheon Plant)



**Organizational Culture Assessment** | To foster a healthy and sustainable organizational culture, **SeAH Steel** conducts an annual company-wide organizational culture assessment for all employees. Beginning in 2024, **Dong-A Steel** has also implemented our own assessment program. The assessment covers three key dimensions: organizational satisfaction, job satisfaction, and organizational culture. Through this process, we evaluate overall employee engagement, satisfaction with job roles, and the defining characteristics of the workplace culture. Findings are shared across the organization, and the feedback gathered is reviewed in consultation with relevant departments. The resulting action items are translated into targeted improvement initiatives aimed at strengthening organizational cohesion, enhancing employee experience, and supporting long-term cultural development.



Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Talent Management

Material Issue

## Strategy

### Employee Welfare

**Welfare Benefits** | **SeAH Steel** provides equal welfare benefits to all employees regardless of age, gender, or contract type. We operate the “refreshment vacation” and “summer vacation” systems to improve rest conditions and provide vacation expenses and vacation condominiums to promote practical rest. To show our appreciation for long-term employees, we award plaques and awards every five years to employees with 10 years of service or more and provide travel expenses for employees with 25 years of service along with a consolation vacation. In addition, we provide housing deposit and rent support through the “Housing Support System for Transferees” when employees transfer between business sites to help them establish a stable housing base. We also operate a transfer support program consisting of one-on-one consulting and online training for senior employees who are preparing for retirement or honorary retirement and systematically help them plan for life after retirement.

**Dong-A Steel** operates a system to ensure that all employees can enjoy welfare benefits equally regardless of gender or employment type, and through this, we strive to improve the quality of our employees’ lives. In particular, we ensure sufficient rest and provide opportunities to recharge through the summer vacation system and vacation expenses support.

### Welfare Benefits Policies (SeAH Steel)

Name	Content
Refreshment Vacation	Special vacation to ensure restful conditions (including vacation expenses)
Summer Vacation	Regular vacation days during the summer (with vacation reimbursement)
Vacation Condominium Access	Assistance with a condo that you can share with your family
Long Service Rewards	For employees with 10+ years of service, 5-yearly plaque and 25-year recognition vacation and travel reimbursement
Relocation Housing Support	Housing deposit and rent assistance when transferring between locations
Relocation Support Program	Support for senior retirees, including one-on-one consulting and online education

**Family-friendly Management and Maternity Protection** | **SeAH Steel** is committed to supporting work-life balance for our employees by offering a wide range of family-friendly policies and leading the way in creating a happy workplace environment for all. We actively encourage remote work for pregnant employees and provide various maternity protection measures, including reduced working hours during pregnancy, time off for prenatal checkups, flexible working hours, and prohibitions on overtime, night shifts, and work on holidays. Additionally, we provide various support related to childbirth, including paid maternity leave, leave for miscarriage or stillbirth, spousal maternity leave, and childbirth congratulatory payments. We also demonstrate thoughtful consideration for female employees preparing for pregnancy through programs such as infertility treatment leave. During the child-rearing period, we provide a maximum of one year of child-rearing leave, reduced working hours during the child-rearing period, child-care time systems, family care leave and vacation, and a child education allowance system to enable employees to focus on raising their children. We also actively support employees by ensuring that there are no disadvantages such as wage cuts upon return to work. Additionally, we promote leisure-friendly management to help employees secure leisure time and enjoy cultural activities, striving to create a self-directed and healthy workplace environment. These systems are transparently communicated through department-level meetings and internal systems, and we provide active support to ensure employees can utilize these systems smoothly. As a result of these efforts, SeAH Steel has been recognized as a model company practicing family-friendly management and leisure-friendly management, having received the “Family-Friendly Certification” from the Ministry of Gender Equality and Family and the “Leisure-Friendly Enterprise Certification” from the Ministry of Culture, Sports and Tourism.

**Dong-A Steel** grants maternity leave and paternity leave (which may be taken in one installment), along with a childbirth congratulatory allowance. The parental leave system can be used for up to one year after the birth of a child, and there are no restrictions regarding reinstatement once the leave ends. In addition, Dong-A Steel operates a family care leave system that can be used when a family member needs care.



Family-Friendly Certification (SeAH Steel)



Leisure-Friendly Business Certification (SeAH Steel)

Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Talent Management

Material Issue

## Strategy

### Welfare Benefits

**Retirement Pension System** | SeAH Steel offers retirement pension programs with an external funding ratio of 100% to support the stable retirement of our employees. We primarily operate under a defined benefit (DB) system; however, employees also have the option to select a defined contribution (DC) plan, with guidance on financial products from insurance companies and securities firm.

### Building a Culture of Labor-Management Cooperation

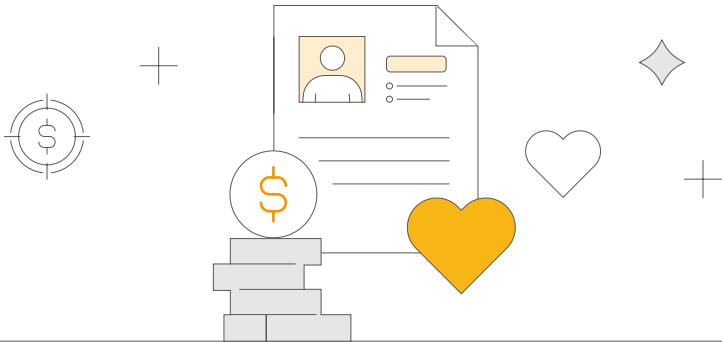
**Labor-Management Council** | Since our founding in 1960, SeAH Steel has embraced the management philosophy of valuing people, guided by the vision of "One Vision, Endless Possibilities." This vision reflects our dedication to fostering a collaborative and horizontal labor-management relationship based on continuous communication and mutual respect. Every year, we engage in joint consultations between labor and management to determine the annual salary increase rate. In making this decision, we consider various factors such as the company's revenue and operating profit to ensure wage adjustments are applied fairly and without gender bias. We also reflect individual performance evaluations proportionally in salary increases. We share our collective business results with all employees and recognize outstanding contributions by awarding exemplary employees with bonuses and special leave benefits. To proactively address employee concerns, we have introduced a Preemptive Grievance Handling System that empowers dedicated on-site managers to resolve issues promptly, helping us maintain an effective site-based labor management framework.

**SeAH Steel's Pohang Plant** actively collaborates with the labor union, conducting wage negotiation every year and renewing collective bargaining agreement every two years. When wage negotiations and collective bargaining agreements coincide in the same year, we update not only the wage increase rates but also key provisions of the agreement. Each month, we carry out joint labor-management welfare inspections to quickly identify and resolve concerns raised by our technical professionals. Quarterly labor-management councils focus on improving welfare facilities and systems, with the outcomes reflected in actual operations.

At **SeAH Steel's Pohang Plant**, we hold monthly meetings with professional team leaders and semi-annual meetings with professional supervisors to share management updates and provide an open forum for discussing challenges faced in the field. Feedback gathered through these meetings is reviewed through the labor-management council and translated into concrete improvements. We continue to make efforts to enhance our workplace environment.

Although **Dong-A Steel** does not operate a formal labor-management council, we organize regular informal gatherings and casual meetings to facilitate open communication between employees and management. Through these activities, we share business performance, collect employee suggestions, and provide a platform to address concerns. These efforts contribute to building mutual trust and fostering a positive organizational culture.

**Labor Union Activities** | **SeAH Steel's Pohang Plant** maintains a cooperative and fair labor-management relationship and fosters a positive organizational culture by regularly communicating with employees. The labor union has 19 executive committee members, including the chairman, vice chairman, secretary general, and directors of welfare and policy, as well as 16 delegates representing each plant division. The union takes an active role in enhancing the employees' working conditions and welfare. In particular, the union holds monthly executive committee meetings to gather feedback and presents recommendations on areas requiring improvement.



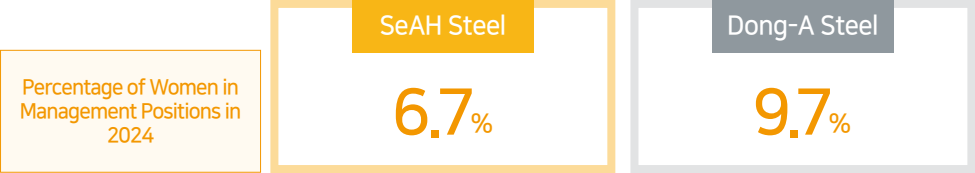
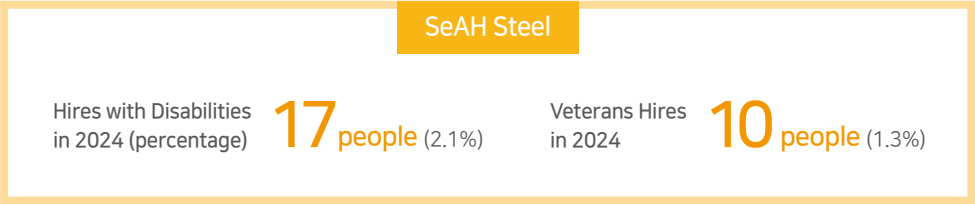
Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+



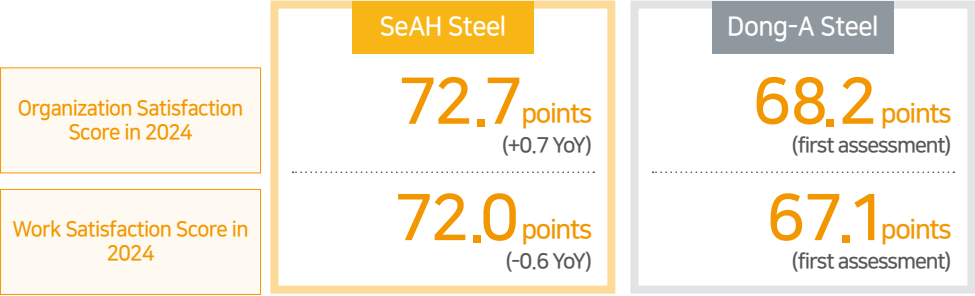
Talent ManagementMaterial Issue

Metrics and Targets

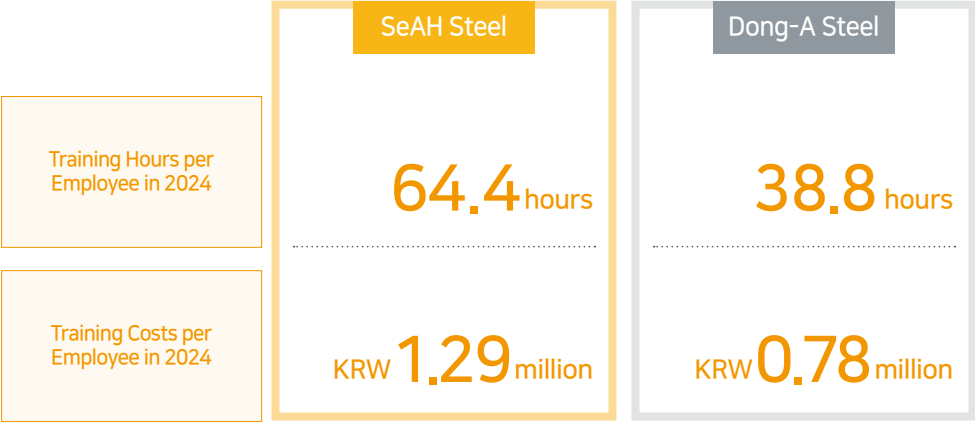
Employee Diversity



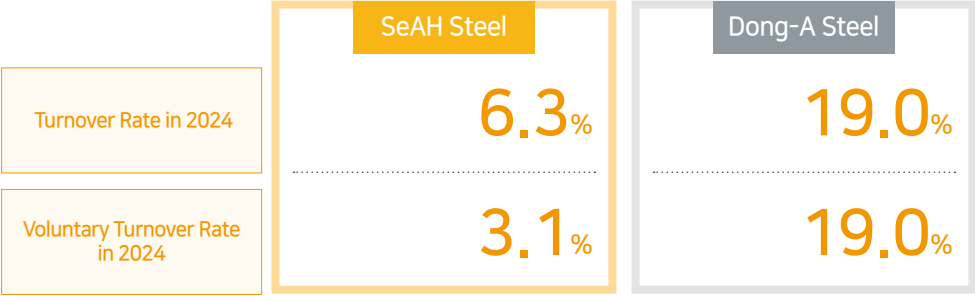
Organizational Culture Assessment



Employee Training



Employee Turnover



Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+



# Human Rights

## Governance

### Human Rights Management Charter

SeAH Steel and Dong-A Steel place the highest priority on protecting the human rights of all stakeholders and respect and practice human rights based on the SeAH Group Human Rights Management Charter, which reflects major international human rights standards and principles, including the Universal Declaration of Human Rights (UDHR), the UN Guiding Principles on Business and Human Rights (UNGPs), the OECD Guidelines for Multinational Enterprises, the UN Convention on the Rights of the Child, and the core conventions of the International Labor Organization (ILO). In this way, we are proactively preventing human rights risks.

Human Rights Management Charter

#### Human Rights Management Charter

- Article 1 ▶▶ Establishment of Human Rights Management System**  
SeAH Group shall respect all officers, employees, and stakeholders as human beings, provide them with regular human rights training to prevent mental or physical infringement of human rights and conduct monitoring and complaint handling procedures for human rights infringement through its Ethics Management Office.
- Article 2 ▶▶ Prohibition of Discrimination in Employment**  
SeAH Group shall not unfairly discriminate against any person based on his/her gender, nationality, religion, social status, race, age, academic background, disability, gender identity, among others, in its human resources management, including its recruitment, promotion, compensation, and provision of educational opportunities.
- Article 3 ▶▶ Guarantee of Freedom of Association and Collective Bargaining**  
SeAH Group shall encourage the Company and its officers and employees to freely communicate with each other to foster a sound organizational culture and guarantee their right to join the union and collective bargaining. In addition, SeAH Group shall not unfairly disadvantage any person based on his/her union activities.
- Article 4 ▶▶ Prohibition of Forced Labor**  
SeAH Group shall not force any person to work against his/her free will by unreasonably restricting his/her mental or physical freedom, such as by using violence, intimidation, or confinement, nor shall it require any officer or employee to transfer his/her identification card or other important personal information as a condition of employment.
- Article 5 ▶▶ Prohibition of Child Labor**  
SeAH Group shall comply with the minimum employment age standards provided by national and local laws and regulations and shall not expose minors to a working environment that is harmful or dangerous to the human body.

- Article 6 ▶▶ Guarantee of Occupational Safety**  
SeAH Group shall regularly inspect the facilities, equipment, and tools to ensure that all officers and employees can work in a safe working environment and shall strictly comply with safety and health standards under national and local laws and regulations. In addition, SeAH Group shall provide regular training which covers legal requirements for industrial safety and raise awareness among the officers and employees.
- Article 7 ▶▶ Responsible Management of Supply Chain**  
SeAH Group shall endeavor to share the values and principles of this Human Rights Management Charter with its affiliates and suppliers. If any affiliate or supplier violates this Human Rights Management Charter, SeAH Group may take necessary measures, such as suspending transactions with the violator.
- Article 8 ▶▶ Protection of Local Residents' Human Rights**  
SeAH Group shall manage any potential changes in the community's society and environment affected by its place of business and protect human rights. SeAH Group shall raise concerns regarding the potential impact of its place of business on the neighborhood and the residents and listen to and reflect the community's opinions in its business activities to address problems.
- Article 9 ▶▶ Protection of Environmental Rights**  
SeAH Group shall implement and carry out activities to protect the environment and encourage its domestic and overseas places of business, suppliers, and local communities to participate in their environment protection activities.
- Article 10 ▶▶ Protection of Human Rights of Customers**  
All officers and employees of SeAH Group shall prioritize the protection of life, health, and the properties of customers when providing products and services and shall take the best measures to protect personal information collected during their business activities.

- Article 11 ▶▶ Prevention of Workplace Harassment and Gapjil<sup>1)</sup>**  
The officers and employees of SeAH Group shall neither engage in any harassment or aggressive acts that may interfere with other employees from performing their duties, nor shall it give any inappropriate instruction to other employees to perform tasks that violate applicable laws and regulations and the Company's regulations and processes or is unrelated to the duties assigned.
- Article 12 ▶▶ Protection of Personal Information**  
SeAH Group shall protect the personal information of stakeholders, including customers, under national and local laws and regulations and shall not use any personal information for any other purpose without prior consent of the data subject. In addition, SeAH Group shall provide correct information and shall not provide any false information.
- Article 13 ▶▶ Compliance with Legal Working Hours and Conditions**  
SeAH Group shall fully comply with the working hours under national and local laws and regulations and other requirements under the labor law such as minimum wage, social insurance, breaks, and leaves.



1) "Gapjil" is a Korean expression that refers to an arrogant or authoritarian attitude or actions of people who have positions of power over others.

Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Human Rights

## Strategy & Risk Management

### Prevention and Management of Unethical Conduct

**Zero-Tolerance Principles** | SeAH Steel and Dong-A Steel address workplace bullying, sexual harassment, and violence based on the “Three Zero Tolerance Principles,” and have established internal guidelines and standards to prevent them. In addition, to strengthen our response to ethical risks, we have revised our employment rules and systematically manage unethical behavior of employees throughout the company.

SeAH Steel Anti-Workplace Bullying, Anti-Sexual Harassment, and Anti-Violence Policy

### Three Zero-Tolerance Principles

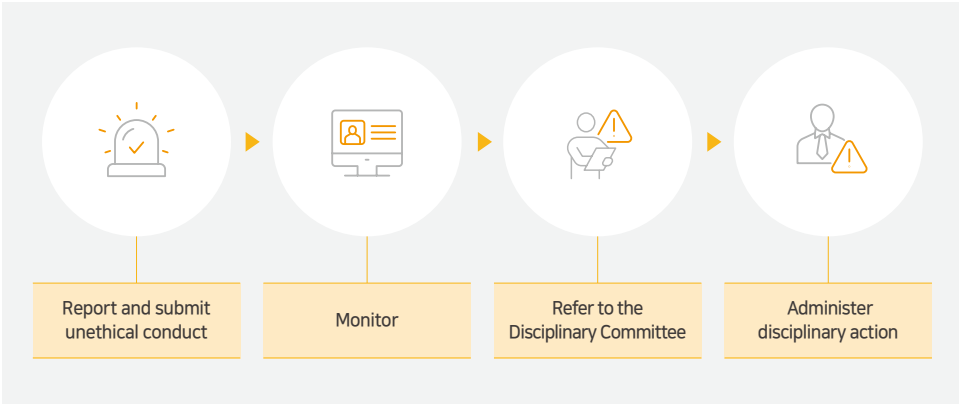


1 Bullying in the Workplace	Act of using one’s position or superiority in a relationship to inflict physical or mental pain on another employee or to deteriorate the working environment, beyond the appropriate scope of work
2 Sexual Harassment in the Workplace	Acts of using an employer’s, a supervisor’s, or an employee’s position in the workplace, making other employees sexually humiliated or disgusted due to sexual behavior, or giving any disadvantages in working conditions and employment because of non-compliance with sexual behavior or other demands
3 Violence	Violent acts between employees causing injury, physical assault, threats, confinement, property damage, or acts involving physical and tangible violence with an intent to cause harm, even if actual injury does not occur

### Reporting and Managing Human Rights

**Grievance Handling Center** | SeAH Steel and Dong-A Steel run a grievance handling center that receives and monitors reports of unethical conduct including bullying, sexual harassment, and abuse of authority. Reported cases undergo on-site investigations and are referred to the Disciplinary Committee in accordance with internal regulations. Disciplinary actions are taken based on the committee’s findings and the severity of the violation.

### Grievance Handling Center Operation Process



### Grievance Handling Center Reporting in 2022-2023 (SeAH Steel)

Category	2022	2023	2024
Reported Cases	2	3	0
Resolved Cases	2	3	0
Resolution Rate (%)	100	100	-

Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

## Responsible Supply Chain

### Governance

#### Supply Chain Management Governance

To build a sustainable supply chain, relevant departments at each **SeAH Steel** plant systematically carry out activities to evaluate, purchase from, communicate with, and support business partners. We proactively identify potential risks by evaluating a wide range of factors, including quality, delivery, safety, and environmental performance, and provide recommendations for improvement based on the results. Business partners are selected according to ethical and fair purchasing standards, with procurement practices designed to reflect the principles of sustainability and responsible supply chain management. In the first half of 2025, we enacted the “Responsible Minerals Policy” to prevent the distribution of conflict minerals throughout the supply chain and to detect and manage risks related to human rights violations and unethical procurement. Furthermore, each business site maintains regular communication channels to build partnerships with business partners, while offering various financial and non-financial support programs to enhance their capabilities and foster mutual growth.

SeAH Steel Responsible Minerals Policy

**Dong-A Steel’s** supply chain management department maintains ongoing communication with business partners to address concerns, enhance safety through regular consultative meetings and joint inspections, and provide support in areas such as labor, taxation, and other business operations. The department also supports the stable cash flow and development of business partners by paying contract fees in cash, offering deposit substitutes, and providing working capital assistance. In addition, we also strive to improve the welfare of our in-house business partners.



### Strategy

#### Supply Chain Management Strategy

With the goal of building a sustainable supply chain, **SeAH Steel** has established three core strategies: supply chain ESG evaluation, green procurement practices, and mutual growth. Based on these strategies, we are strengthening our responsible supply chain framework. In 2024, we completed a company-wide review of the Code of Conduct for Business Partners and will distribute the Code to our business partners, encouraging them to sign a pledge of compliance. Furthermore, we conducted an ESG evaluation survey of our long-term business partners, comprising 10 principal raw material suppliers and 10 secondary material suppliers. Based on the survey results, we plan to assess the current ESG status of our supply chain and incorporate these findings into our internal business partner evaluation criteria to drive continuous improvement.

SeAH Steel Code of Conduct for Business Partners



To build a sustainable supply chain, **Dong-A Steel** is enhancing our supply chain framework with shared growth as a core strategy. We maintain regular communication with business partners through periodic meetings and grievance-handling channels, actively identifying and addressing challenges and concerns raised by both internal and external partners. In addition, we are expanding non-financial support initiatives, such as providing consulting services, alongside financial assistance to help ensure the stable operation of our business partners.



Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Responsible Supply Chain

## Strategy

### Strengthening Communication with Business Partners

SeAH Steel seeks to strengthen win-win cooperative relationships with our business partners through ongoing communication and the prompt resolution of on-site challenges and grievances. To this end, we hold regular monthly meetings with CEOs of our business partners and weekly meetings with contractors, while maintaining and engaging close and continuous communication with individual business partners.

#### Strengthening Communication with Business Partners

Pohang Plant	Gunsan Plant	Suncheon Plant	Changwon Plant
<p>Through regular communication with representatives of business partners, <b>Pohang Plant</b> takes active enforcement measures only when grievances arise and improvement measures are required by the main contractor, and strives to develop a relationship that can grow together based on mutual trust and sustainable partnership.</p>	<p>In 2024, the <b>Gunsan Plant</b> actively addressed 95 grievances raised by business partners through consultations provided by the Business Support Team and relevant departments. Additionally, we improved the working environment for our business partners' employees by remodeling the cafeteria, changing rooms, and showers. We will continue to foster a culture of win-win cooperation by attentively listening to the voices of our business partners.</p>	<p>The <b>Suncheon Plant</b> holds regular monthly meetings with CEOs of our business partners and maintains active communication with 13 individual business partners regarding safety, health, workplace environment improvements, and grievance handling. In 2024, we received and successfully addressed 27 cases. Additionally, we have established an integrated SHE system to promptly share information and discuss countermeasures when concerns are raised.</p>	<p>In pursuit of mutual growth with our business partners, the <b>Changwon Plant</b> holds monthly meetings to gather feedback on safety management, workplace environment improvements, and issues related to leased offices. Additionally, we enhance business partners' satisfaction through interviews with their representatives and frequent communication with on-site managers. These efforts help us cultivate a collaborative and trust-based communication culture. Furthermore, we proactively take measures to prevent issues by conducting regular monitoring and risk assessments to ensure ongoing, effective communication and cooperation.</p>

Council of Business Owners (SeAH Steel Pohang Plant)

Council of Business Owners (SeAH Steel Gunsan Plant)

Council of Business Owners (SeAH Steel Suncheon Plant)

Regular Meeting Sessions (SeAH Steel Changwon Plant)

Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+



# Responsible Supply Chain

## Strategy

### Strengthening Communication with Business Partners

In 2024, **Dong-A Steel** operated regular communication channels, including monthly Business Owners’ Council meetings with business partner representatives and weekly contractor meetings, to collect requests and grievances from our business partners and develop improvement plans. Through 12 Business Owners' Council sessions and 12 joint inspections, a total of 71 safety-related grievances were identified, with 69 resolved. We also provide various non-financial support, such as consulting, to address business operation-related grievances like labor and taxation raised by our business partners during regular meetings. Additionally, the Safety Environment Part operates SNS channels, including KakaoTalk group chats and Naver Band, where workers can directly report grievances. This system encourages active communication and promotes safety-related suggestions.

### Mutual Growth (Non-Financial Support)

**Recruitment Partnership** | The **Changwon Plant** actively facilitates coordinated recruitment programs in partnership with Korea Polytechnic University and local universities to help our business partners secure skilled talent. Through ongoing collaboration and consultation between university representatives and business owners, we facilitate recruitment of skilled field workers tailored to the specific needs of the site.

**Training and Consulting Program** | **SeAH Steel's Suncheon Plant** aims to prevent a decline in supply chain performance caused by labor issues of internal business partners as part of our mutual growth efforts. Accordingly, starting from the fourth quarter of 2024, the plant has been conducting quarterly consulting sessions on labor laws and labor management standards for participating business partners. In 2024, a total of three business partners participated in the training, assisting with evaluation of compliance regarding key labor laws like specification of working conditions, annual paid leave, and standards for calculating working hours, helping to proactively mitigate commonly overlooked legal risks. In 2025, to address issues related to regular wages arising from a recent Supreme Court plenary ruling, the plant plans to provide information on wage-related risks that reflect the latest labor trends.

**Dong-A Steel** conducts safety training programs for business partners by inviting external experts and organizing site tours. We also share relevant information and offer support measures to prevent administrative and legal risks, including labor and taxation issues.

**Improving Welfare** | In collaboration with the Suncheon City Government and the Yulchon Industrial Complex Council, **SeAH Steel's Suncheon Plant** provides various welfare benefits to companies within the Yulchon Industrial Complex, including commuter bus services, dormitory support, and affiliate discounts. We offer commuter bus services for employees of our business partners and share dormitory information for workers coming from other regions. Additionally, in partnership with the Suncheon City Government and the Suncheon Chamber of Commerce and Industry, we coordinate with business partners and local authorities to offer partial housing rental subsidies to employees. Furthermore, we offer a range of welfare benefits through partnerships with local dentists, auto repair shops, and wedding halls in the Suncheon area.

**Dong-A Steel** operates an in-house cafeteria to enhance the quality of life and working conditions for employees of our business partners. We strive to provide high-quality meals by conducting annual satisfaction surveys and implementing appropriate adjustments to meal pricing. Additionally, commuter bus services are provided to facilitate employees’ commuting convenience.

**Legal Compliance** | The **Suncheon** and **Changwon Plants** have established and implemented an evaluation system for suppliers' compliance with production, quality, safety, CP, etc. and support supply stability and legal compliance for contracted work. In addition, we share information on flexible work systems and special overtime allowance systems to prevent legal risks related to working hours.

### Mutual Growth (Financial Support)

**SeAH Steel** and **Dong-A Steel** are supporting the smooth cash flow of our business partners by paying 100% of the contract payments incurred in the current month in cash or promissory notes by the 10th and 7th of the following month, respectively. Additionally, when entering into contract agreements, they are replacing the contract performance guarantees required at the time of contract signing such as cash, securities, payment guarantees, and credit guarantee funds, with performance guarantee insurance certificates to reduce the burden on partner companies. Furthermore, **Dong-A Steel** implements an operational funding support policy for our internal business partners to facilitate their stable business operations and growth. In 2024, one company was selected and provided with a total of KRW 49 million.

Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Responsible Supply Chain

## Risk Management

### Supply Chain ESG Assessment

**Safety Level Evaluation** | SeAH Steel conducts company-wide safety assessments through an integrated safety evaluation system and incorporates the results into new contract agreements. We also enforce an internal policy requiring subcontractors to submit all safety-related documents, including safety regulations, work plans, pledges for safe work practices, and plans for the utilization of safety management fees, prior to undertaking any hazardous tasks. Furthermore, we systematically manage safety-related data by recording the total occupational safety management expenses for each construction project and attributing them to the performance records of each business partner.

**Evaluation of Qualified Subcontractors** | SeAH Steel systematically manage the safety and health capabilities of our business partners through annual evaluations of qualified subcontractors engaged in safety-related work. In 2024, we conducted 67 regular evaluations of suppliers with a construction track record within the past two years. The evaluations confirmed that no suppliers were subject to bidding restrictions. Where improvements were necessary, we implemented supplementary measures, including providing training visits for risk assessment, inspecting the operational status of safety management systems, and requesting the completion of item-specific self-assessment sheets. For suppliers not subject to regular evaluations, we conducted ad hoc assessments prior to the signing of purchase contracts. From 2025, we will introduce in-depth assessments, further refining the evaluation criteria and expanding the number of assessment categories. All evaluation results are shared company-wide through our integrated safety evaluation system, and we plan to fully digitalize the evaluation and management process by linking it with the e-bidding platform.

**Third Party Management (Compliance)** | We carry out control activities and risk management in accordance with the Compliance Management System (ISO 37301) management process. Based on evaluation results, we select external suppliers and implement systematic third-party management by communicating our compliance management policies, requesting the submission of ethical management pledges, and requiring compliance practice statements. We also conduct control activity evaluations for internal stakeholders to ensure that compliance improvement measures are continuously incorporated into our supply chain management processes. Dong-A Steel is implementing compliance management initiatives, including establishing processes and appointing Compliance Helpers in each department, with the goal of acquiring certification for the Compliance Management System (ISO 37301) to strengthen supply chain risk management. Through these efforts, we establish compliance objectives, identify and control risks, and continuously enhance our management practices. In addition, we assess and address risks related to unfair trade and unfair competition by conducting internal transaction reviews, preparing contact reports, and carrying out biannual self-inspections to ensure adherence to compliance processes.

## Metrics and Targets

### Responsible Supply Chain Metrics and Targets

#### SeAH Steel

Supply Chain ESG Evaluation

Raw Materials 10 business partners

Auxiliary Materials 10 business partners

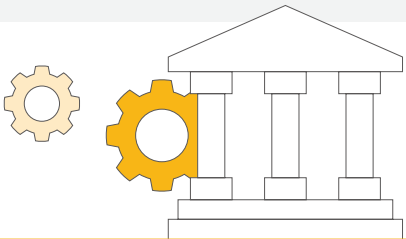
Suncheon Plant In-House Business Partners on Labor-related Consulting

3 business partners

#### Dong-A Steel

Funds Provided to In-House Business Partners

KRW 4.9 billion



Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Community Engagement

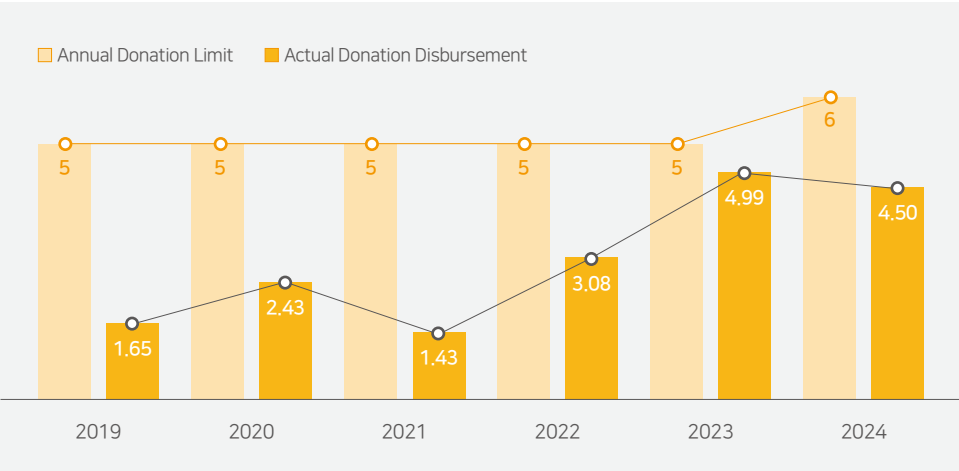
## Community Engagement Strategies

With the goal of “fulfilling corporate values to create a more beautiful world,” **SeAH Steel** continuously promotes social contribution activities focused on mutual growth with local communities and practical support for socially disadvantaged groups. In particular, we expand our engagement with local communities through various employee-driven campaigns and volunteer activities, embedding the value of sharing into our organizational culture. To this end, the Board of Directors reviews major donation agendas, purposes, recipients, and timeline for community engagement activities at the end of each year, and we have set an annual donation budget of KRW 600 million for both 2024 and 2025. Beyond supporting local communities and vulnerable groups, we are actively expanding our global social contribution efforts, including a KRW 30 million donation for overseas medical aid. Furthermore, we plan to establish a more systematic and sustainable approach by integrating our mid- to long-term social contribution strategies into overall management strategy. Our goal is to extend our positive impact globally while fostering a culture of sharing and compassion within local communities.

SeAH Steel Community, Donation, and Sponsorship Policy

Donation Budget and Performance (SeAH Steel)

(Unit: KRW 100 million)



## Community Engagement Activities

### Expanding Access to Culture and Education

**Supporting the Culturally Marginalized** | **SeAH Steel** actively engages in various sponsorship activities to promote Korean art and culture and support culturally marginalized groups. In 2024, we entered into a five-year sponsorship agreement with the National Museum of Modern and Contemporary Art Foundation, pledging KRW 50 million annually to support the preservation and restoration of 85 permanent exhibition works located in the Outdoor Sculpture Park at the Gwacheon Pavilion. Through this effort, we are actively contributing to the protection and conservation of these valuable cultural assets. Additionally, we sponsored the National Museum of Modern and Contemporary Art’s “Sign Language Interpretation Video Development Project” aimed at improving cultural accessibility for persons with hearing loss. From March 2022 to December 2023, we supported the production and operation of sign language interpretation videos within the Deoksugung Palace Exhibition Hall, thereby promoting the cultural rights of people with disabilities.

**Braille Tactile Teaching Aids** | **SeAH Steel** recognizes the issue of educational inequality faced by children with visual impairments and strives to improve awareness of their needs. As part of this effort, we produce tactile teaching aids. At the “SeAH Steel 7th Safety Environment Exchange Meeting” held in May 2024, company-wide safety and environmental representatives collaborated with first- and second-grade students with visual impairments from a local school to create tactile traffic safety teaching aids linked to the safety education curriculum. These aids were subsequently donated to a braille library and the school’s children with visual impairments. SeAH Steel plans to continue producing tactile teaching aids to support the improvement of braille literacy.



**Secondhand Book Donation Campaign** | To promote resource circulation and support people with limited access to books, SeAH Steel conducted a secondhand book donation campaign by collecting books from within the office and from employees’ households. The collected books were donated to the Mapo Welfare Foundation in Mapo-gu, where our headquarters is located, to be used as funding for elderly welfare projects. Additionally, some books were distributed to welfare organizations and community centers within Mapo-gu, contributing to the revitalization of the local community.



Secondhand Book Donation Certificate of Sponsorship (SeAH Steel)



Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Community Engagement

## Community Engagement Activities

### Relief and Support Activities

**Overseas Children Surgery Support** | SeAH Steel became the first Korean company to provide free surgeries for children with congenital facial deformities in Vietnam and Laos by sponsoring GlobalCare, a leading international healthcare NGO. From March 22, 2025, this eight-day initiative successfully provided safe surgical treatment to 42 children, restoring their health and physical well-being. SeAH Steel will continue to provide care and support to vulnerable and underserved communities both within Korea and abroad.

**Emergency Relief** | SeAH Steel actively supports the recovery of communities affected by disasters and provides assistance to victims. We have consistently donated funds for damage restoration in response to both domestic and international disasters, including the Pohang earthquake in 2017, the wildfires Gangwon Province in 2019, and the Turkiye earthquake in 2023. In 2025, SeAH Steel, together with major SeAH Group affiliates such as SeAH Changwon Special Steel, SeAH Special Steel, and SeAH Aerospace & Defense Materials, jointly donated a total of KRW 300 million to the Community Chest of Korea to aid the restoration of the Yeongnam region following forest fires and to support disaster victims. SeAH Steel will continue to fulfill our responsibility in community engagement by providing prompt and meaningful support during unforeseen disasters, sustaining our dedication to social contribution activities.



Global Care Overseas Children Surgery Support (SeAH Steel)



### Environmentally Friendly Activities

**Good Steps Challenge and Planting Trees Campaign** | To commemorate our 64th anniversary, SeAH Steel is continuing our dedication to sustainable social contribution by running the “Good Steps Challenge Season 2” for the second consecutive year, with full participation from all employees. In this challenge, we successfully reached our target of 100 million steps and donated a total of KRW 30 million through matching contributions to create the “Forest of Peace,” contributing to environmental restoration and a healthier urban ecosystem. The donation funded the planting of 800 seabuckthorn and 40 mountain ash trees during an Arbor Day event in late March 2025 to expand greenery at the Siheung City Industrial Park. We actively participated in the tree-planting event, deepening the meaning of the initiative. This program not only strengthened our employees’ sense of belonging and pride in the company through their voluntary participation but also contributed to urban carbon reduction and biodiversity enhancement, thereby returning vital environmental value to society.



Good Steps Challenge and Planting Trees Campaign (SeAH Steel)

**Local Clean-up Activities** | SeAH Steel and Dong-A Steel conduct regular cleanup activities to create a clean environment in local communities.

SeAH Steel	<b>Pohang Plant</b>	Plant and nearby area cleanup (semiannually, 31 participants)
	<b>Gunsan Plant</b>	Plant and nearby area cleanup (semiannually, 31 participants)
	<b>Suncheon Plant</b>	Public facility and park cleanup (bimonthly, 46 participants)
SeAH Steel		Industrial complex cleanup and plogging activities (quarterly)



Local Cleanup Activities (SeAH Steel Gunsan Plant)



Local Cleanup Activities (SeAH Steel Suncheon Plant)

Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Community Engagement

## Community Engagement Activities

### Strengthening Community Solidarity

SeAH Steel and Dong-A Steel carry out various community engagement activities, such as donations and support programs, tailored to the characteristics of the communities where our plants are located. Through these efforts, we actively promote mutual growth with the local communities.

#### SeAH Steel Pohang Plant

In order to foster mutual growth with the local community and fulfill the responsibilities as a corporate citizen, **Pohang Plant** held a total of 13 employee-driven volunteer activities in 2024. A total of 140 employees voluntarily participated in these activities, providing help to the local community through various forms such as cleaning up the area around Pohang Airport, serving regular meals, and repairing houses for a better living environment. In addition, we actively fulfill our social responsibilities by donating to social enterprises, and we hold a sponsorship ceremony and transparently disclose the purpose and results of our community engagement activities through both printed and online media to raise public awareness. In addition, since 2023, we have created broader social value by diversifying donation items and expanding the beneficiary groups by utilizing the “Bravo Beaver Point” program offered through standard workplaces for the disabled. In 2024, we donated KRW 10 million in medical expenses to a treatment camp for abused children and another KRW 20 million worth of donations for vulnerable energy users such as the elderly living alone. In addition, through the employee donation campaign, we raised a total of KRW 13.65 million, which contributed to creating a warm community by delivering 15,000 briquettes to underprivileged families in the area.



Medical Expense Support for Abused Children (SeAH Steel Pohang Plant)



Charcoal Briquette Delivery Volunteer Activity (SeAH Steel Pohang Plant)

#### SeAH Steel Gunsan Plant

SeAH Steel's **Gunsan Plant** carries out a variety of community engagement initiatives to promote mutual growth with the local community and to uphold our social responsibilities. At the end of 2024, we donated KRW 30 million to Gunsan City to support low-income and vulnerable groups, thereby contributing to community welfare. We also enhanced local engagement by volunteering at the Gunsan Senior Welfare Center, where our employees served meals and assisted with dining hall maintenance, building warm connections with seniors. In addition, we organized a briquette donation campaign in which about 50 employees and their family members visited 10 energy-vulnerable households in Guam-dong, Gunsan, to deliver briquettes. Through these efforts, we provided practical support to neighbors in need and reinforced the value of sharing with the participation of employees and their families.



Donation to Neighbors in Need in Gunsan (SeAH Steel Gunsan Plant)



Meal Service Volunteer Activity at Gunsan Senior Welfare Center (SeAH Steel Gunsan Plant)



Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Community Engagement

## Community Engagement Activities

### Strengthening Community Solidarity

#### SeAH Steel Suncheon Plant

In 2024, the **Suncheon Plant** established a community support system by leveraging the public network of Suncheon City. Building on this foundation, we donated a total of 350 cookie sets (worth approximately KRW 21 million) to economically vulnerable groups including low-income children, youth supported for self-sufficiency, and case-managed beneficiaries, bringing warmth to the community. We also conducted biannual volunteer activities at nursing homes, supported by the voluntary participation of all employees. Through these efforts, we continue to foster close and warm relationships with local seniors. In addition, we carried out CSR activities such as blood donation campaigns throughout 2024 in collaboration with our business partners, thereby strengthening the foundation of trust and cooperation within our network. In 2025, we will further enhance our social, economic, and environmental impact to the local community by donating books to local elementary schools and sharing charcoal briquettes with those in need of winter heating.



Donation to Suncheon Child Center (SeAH Steel Suncheon Plant)



Donation to Yegwang Village (SeAH Steel Suncheon Plant)

#### SeAH Steel Changwon Plant

To promote mutual growth with the local community and contribute to the welfare of the elderly, the **Changwon Plant** donated KRW 3 million to the Masan Hapcho Senior Welfare Center in 2024. Additionally, the plant participated in the annual Kimchi-Making Volunteer Activity held every winter and continues to carry out various community engagement programs, including charcoal briquette delivery and local environmental cleanup efforts, in partnership with local volunteer organizations. Beyond one-time donations, we strive to foster real, lasting change in the community through continuous exchange opportunities and strong emotional ties with local residents.



Donation to Masan Hapcho Senior Welfare Center (SeAH Steel Changwon Plant)



Kimchi-Making Volunteer Activity (SeAH Steel Changwon Plant)

Overview	+
Sustainability Framework	+
Environmental	+
Social	
Occupational Safety and Health	Material Issue
Talent Management	Material Issue
Human Rights	
Responsible Supply Chain	
Community Engagement	
Governance	+
Appendix	+

# Community Engagement

## Community Engagement Activities

### Strengthening Community Solidarity

#### SeAH Steel Headquarters

In February 2025, as part of our contribution to the local community in Mapo-gu, where our headquarters is located, **SeAH Steel** employees participated in the “Senior Meal Volunteer Program” organized by the Mapo Welfare Foundation. The Senior Meal Volunteer Program is designed to provide meals to the elderly aged 75 and over and promote social inclusion through employee-led care services. Employees served meals to the elderly and distributed weekend meal packages purchased with a portion of the KRW 10 million donated to the Mapo Welfare Foundation.

※ Senior Meal Volunteer Program: A program operated by Mapo-gu that provides free, well-balanced meals every day except Sunday to seniors aged 75 or older who live alone and are physically mobile.



Senior Meal Volunteer Program (SeAH Steel)



Donation to Senior Meal Program (SeAH Steel)

#### Dong-A Steel

In cooperation with the Gwangyang National Industrial Complex Win-Win Cooperation Council, **Dong-A Steel** conducts various community engagement activities to improve the welfare of the local community. We have helped stabilize the lives of local children and vulnerable people by donating daily necessities and funds through children's centers and related organizations, and we continue to provide regular donations to the Clean Tainan Community Council to support community-based initiatives such as local festivals and cultural events, operating local bus services, and environmental clean-ups. Dong-A Steel will continue to make efforts to practice mutual growth with the local community and create a sustainable community.



Donation to Taein-dong Citizen Center (Dong-A Steel)



Jungma Regional Children's Care Center Donation (Dong-A Steel)

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	
Appendix	+



# GOVERNANCE

92	Corporate Governance
95	Ethics and Compliance <span>Material Issue</span>
104	Risk Management
107	Information Security

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	
Corporate Governance	
Ethics and Compliance	Material Issue
Risk Management	
Information Security	
Appendix	+



## Corporate Governance

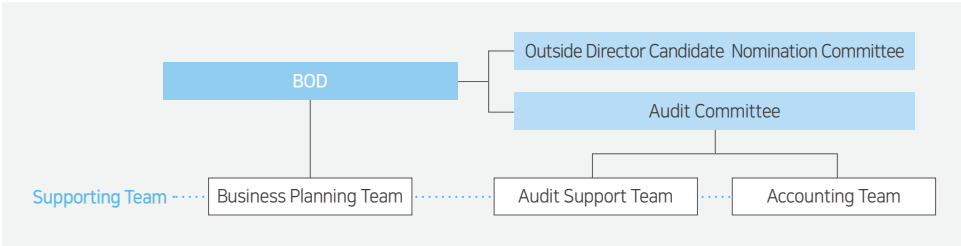
### Composition of the Board

To enhance the expertise and independence of the Board of Directors (BOD), **SeAH Steel** appointed two new outside directors at the 6th Annual General Meeting (AGM) held in March 2024. With this change, the proportion of outside directors increased from 40% to 57%. The Board currently comprises seven members (three inside directors and four outside directors) and deliberates and resolves matters stipulated by laws and regulations, matters delegated by the AGM, and key issues related to the company's management policies and business operations. Resolutions of the BOD are adopted by a majority of the directors present and by a majority of the votes cast by the directors present, subject to any higher thresholds required by applicable laws and regulations. To promote transparency in governance, the BOD established an Audit Committee and an Outside Director Candidate Nomination Committee pursuant to Article 12 of the BOD's Operating Regulations.

#### Board of Directors (SeAH Steel)

Category	Name (Date of Birth)	Gender	Position	Area of Expertise	Professional Background	Term of Office
Inside Director	Howard Whi Young Lee (Apr. 1962)	Male	· CEO · Chairperson of the BOD	Overall Management and Supervision	· Graduated from UCLA, Genetic Engineering · Joined SeAH in 1994	March 2025 - March 2028
Inside Director	Mangi Hong (Feb. 1962)	Male	· CEO	Safety and Health	· Graduated from Inha University, Industrial Engineering · Joined SeAH in 1988 · Current Plant Manager of the Pohang Plant and Chief Safety Health Officer of SeAH Steel	March 2024 - March 2027
Inside Director	Joosung Lee (Oct. 1978)	Male	· Member of the Outside Director Candidate Nomination Committee	Business Planning Division, Special Pipe Division	· Graduated from the University Chicago, Department of Economics · Graduated from the Columbia Business School (MBA) · Current President of SeAH Steel · Current CEO of SeAH Steel Holdings · Current CEO of APAC Investors · Current CEO of SSIK	March 2024 - March 2027
Outside Director	Saungsup Lee (Aug. 1962)	Male	· Chairperson of the Audit Committee · Member of the Outside Director Candidate Nomination Committee	Business Strategy	· Graduated from Seoul National University, College of Law · Current Attorney at Bae, Kim & Lee LLC	March 2025 - March 2028
Outside Director	Sin-Young Park (Feb. 1958)	Female	· Chairperson of the Outside Director Candidate Nomination Committee · Member of the Audit Committee	Business Strategy	· Graduated from Yonsei University, Public Policy and Management (Ph.D.) · Current Senior Research Fellow, Korea Social Policy Institute · Current member of the Happy Housing Site Selection Committee	March 2025 - March 2028
Outside Director	Chun Won Yi (Dec. 1965)	Male	· Member of the Audit Committee · Chairperson of the Outside Director Candidate Nomination Committee	Business Strategy	· Graduated from the University Chicago, Department of Economics · Graduated from the Columbia University, Business Administration (Ph.D.) · Current Professor of the Graduate School of Business Administration, Sungkyunkwan University · Former Associate Professor/Assistant Professor of the Graduate School of Business Administration, Sungkyunkwan University	March 2024 - March 2027
Outside Director	Hyung Il Oh (Sept. 1980)	Male	· Member of the Audit Committee · Member of the Outside Director Candidate Nomination Committee	Business Strategy	· Graduated from Columbia University, Accounting (Ph.D.) · Current Assistant Professor of the Korea Advanced Institute of Science and Technology (KAIST) · Current Outside Director and Chairperson of the Audit Committee, PI Advanced Materials	March 2024 - March 2027

#### BOD Organizational Chart (SeAH Steel)



### Operation of the Board

**SeAH Steel's** BOD holds regular meetings on a quarterly basis and convenes Extraordinary General Meetings (EGM) as needed for urgent matters. The BOD deliberates and resolves key issues related to management, finance, compliance, safety and health, and eco-friendly operations. In 2024, nine regular and EGMs were held, with an average attendance rate of 97%. BOD meetings are convened by the Chairperson in accordance with Article 41 of the Articles of Incorporation. Notice is given to each director at least one day prior to the meeting, delivered in writing, orally, by fax, email, or other available means of communication. The convening procedure may be waived with the unanimous consent of all directors. Resolutions of the BOD are adopted by a majority of directors present and voting, pursuant to Article 42 of the Articles of Incorporation. For matters falling under Korea's Commercial Act concerning the misuse of corporate opportunities or assets, or self-dealing, resolutions require the approval of two-thirds of the directors.

#### BOD Operations in 2022-2024 (SeAH Steel)

Category	Unit	2022	2023	2024
Number of BOD Meetings	Meeting(s)	10	7	9
	Regular	4	4	4
	Extraordinary	6	3	5
Number of Agenda Items	Item(s)	22	16	23
	Number of Agenda Items Rejected or Amended	0	0	0
	Item(s)			
Average Attendance Rate	%	96	100	97
	Inside Directors	100	100	100
	Outside Directors	90	100	95

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	
Corporate Governance	
Ethics and Compliance	Material Issue
Risk Management	
Information Security	
Appendix	+



## Corporate Governance

### Board Independence

SeAH Steel's BOD is dedicated to ensuring independence by appointing directors through a transparent and fair process. The Outside Director Candidate Nomination Committee recommends candidates for outside directorships and evaluates their qualifications. Outside directors are appointed through the Outside Director Candidate Nomination Committee, and the final decision is made at the shareholder's meeting. In the appointment process, candidates' transactional relationships with the company and their relationships with the largest shareholder are reviewed. Independence is ensured to enable the BOD to effectively carry out its role as the company's highest decision-making body.

#### Outside Director Appointment Process (SeAH Steel)



### Board Diversity and Expertise

To ensure that the BOD can make rational decisions without bias toward any particular field, SeAH Steel's BOD is composed of directors with extensive experience across a wide range of sectors, including industry, finance, academia, law, accounting, and the public sector. In addition to the appointment of a female outside director with a background in public administration and housing policy, SeAH Steel appointed two new outside directors in 2024 with professional backgrounds in finance and accounting, as required by Korea's Commercial Act, to further strengthen the BOD's capabilities and promote sound decision-making.

SeAH Steel Board Independence and Diversity Policy

#### Skill Matrix of Outside Directors (SeAH Steel)

Competency Indicator	Skill Indicator	Seungsup Lee	Sin-Young Park	Chun Won Yi	Hyung Il Oh
Core Competencies	Business Strategy	○	○	○	○
	ESG and Sustainability	○	○	○	○
	Leadership	○	○	○	○
	Risk Management	○	○	○	○
Professional Expertise	Industry and Public Policy		○		
	Legal Affairs and Advisory	○			
	Finance and Capital Markets			○	
	Accounting and Valuation				○

### Board Committee Composition

To enhance the effectiveness and independence of the BOD, SeAH Steel has established an Outside Director Candidate Nomination Committee and an Audit Committee, both of which are chaired by independent directors and are operated autonomously. The Outside Director Candidate Nomination Committee convenes as needed to ensure a fair and transparent selection process for outside directors and and supports the BOD in securing diversity and expertise in its composition. Although SeAH Steel is not required to have an audit committee based on our total assets (less than KRW 2 trillion as of 2024), we have voluntarily established one to reinforce the transparency, fairness, and professionalism of its audit function. The Committee is composed entirely of outside directors and holds regular quarterly meetings, as well as EGMs, when necessary, to deliberate on and oversee key audit matters.

#### Outside Director Candidate Nomination Committee (SeAH Steel)

Composition	Name of Director	Purpose and Authorities	Activities
Four Outside Directors, One Inside Director	Seungsup Lee (Chairperson) Sin-Young Park Chun Won Yi Hyung Il Oh Joosung Lee	<b>Purpose:</b> - To fairly select outside director candidates <b>Authority:</b> - Right to examine qualifications of outside directors and recommend candidates, etc.	(Held twice in 2024 and once in 2025) - Recommendation of outside director candidates - Resolution to appoint the chairperson of the Outside Director Nomination Committee, etc.

#### Audit Committee (SeAH Steel)

Composition	Name of Director	Purpose and Authorities	Activities
Four Outside Directors	Seungsup Lee (Chairperson) Sin-Young Park Chun Won Yi Hyung Il Oh	<b>Purpose:</b> - To audit the company's accounting and business affairs <b>Authority:</b> - Right to review the soundness and validity of financial activities and the appropriateness of financial reporting - Right to evaluate the operation status of the internal accounting control system - Right to consent to the appointment and dismissal of the head of internal audit department - Other responsibilities delegated by the BOD	(Held five times in 2024) - Report on the results of the quarterly audit review - Report on audit plan - Report on internal accounting management system operation plan and performance - Resolution on the appointment of the Head of the Audit Support Organization, etc.



Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	
Corporate Governance	
Ethics and Compliance	Material Issue
Risk Management	
Information Security	
Appendix	+

## Corporate Governance

### Outside Director Training

In order to strengthen the expertise and competence of outside directors, **SeAH Steel** offers a range of internal and external training programs for all outside directors. Additionally, in accordance with the Board of Directors’ Operating Regulations, we provide systematic education programs through external institutions upon request. The newly appointed outside directors in 2024 received an introductory training of the company and SeAH Group to enhance their understanding of management strategies and policies, as well as to reinforce their awareness of fiduciary duties. In addition, incumbent outside directors received training on the internal accounting management system, organized by the Korea Listed Companies Association, and on the company’s compliance management system, to support their ongoing professional development. These training and capacity-building activities for outside directors are disclosed in the annual report on a quarterly and semi-annual basis.

#### Outside Director Training Results (SeAH Steel)

Date of Training	Organizer	Attendants	Contents
March 14, 2024	SeAH Steel	Chun Won Yi, Hyung Il Oh, Sin-Young Park	Introduction to SeAH Steel and SeAH Group
July 17, 2024	SeAH Steel	Chun Won Yi, Seungsup Lee, Hyung Il Oh, Sin-Young Park	2024 Internal Accounting Management System Employee Training

### BOD Remuneration

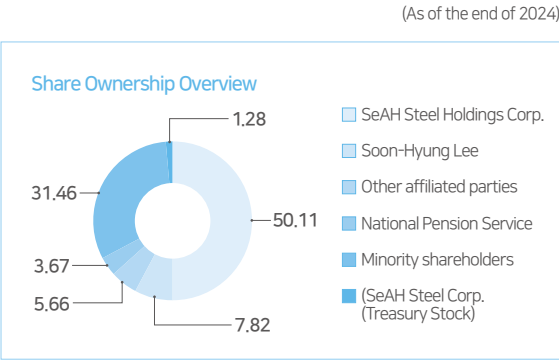
The remuneration of **SeAH Steel’s** BOD is determined within the limits approved by the general shareholders’ meeting, in accordance with Article 388 of Korea’s Commercial Act and our Articles of Incorporation. The remuneration limit for directors in 2024 was KRW 3.5 billion, and the limit approved by the General Meeting of Shareholders for 2025 is KRW 4.5 billion. The CEO’s remuneration consists of a base salary determined in accordance with the standards set by the BOD and a performance bonus based on the fiscal year management performance evaluation, including metrics such as sales and operating profit. Remuneration is paid in a transparent and objective manner.

#### Remuneration of the BOD (SeAH Steel)

Category	Unit	2022	2023	2024
CEO Remuneration	KRW million	863	975	1,022
Median Employee Compensation	KRW million	101	99	87
CEO-to-Median Employee Pay Ratio	times	8.5	10	11.7

### Shareholder Composition

As of the end of 2024, the total number of shares outstanding was 2,836,300 common shares, of which 1,803,562 shares were held by the largest shareholder and related parties, representing 63.59% of the total. Minority shareholders accounted for 31.46% of the common shares.



### Dividend Policy

**SeAH Steel** has introduced an improved dividend procedure aligned with global standards, designating the dividend record date for the 7th fiscal year dividend to come after the dividend amount has been finalized. The dividend amount is determined through resolutions of the BOD and the general shareholders’ meeting, within the range of distributable profits. This decision takes into account our financial structure, future strategic investments, and business environment, with the core principle of enhancing shareholder value. We are continuing our efforts to increase corporate and shareholder value, even amid an uncertain business environment, by enhancing the competitiveness of the manufacturing industry and improving business performance, rather than relying on short-term or one-time measures.

### Shareholder-Friendly Management

In order to strengthen trust-based communication with our shareholders, **SeAH Steel** increases transparency and fairness in all aspects of AGM operations. We carefully review the AGM agenda in advance, ensure shareholders can exercise their voting rights, pay careful attention to the convocation notice procedure, and schedule the AGM on a date that avoids periods of high shareholder meeting concentration to help ensure a quorum. Since 2022, we have voluntarily complied with the Korea Corporate Governance Principles by publishing the convening notice four weeks prior to the meeting date rather than the mandatory deadline of two weeks. To encourage minority shareholder participation and protect their rights, we operate an electronic voting system that allows shareholders to vote even if they do not attend the meeting in person. We also make it easier for shareholders to exercise their voting rights by disclosing meeting details to all shareholders, encourage proxy voting, and provide proxy forms. Furthermore, to prevent the appointment of executives involved in activities that could undermine corporate value or infringe upon shareholder rights, SeAH Steel has established internal regulations outlining clear criteria and procedures for executive appointments and strictly adheres to them.



Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	
Corporate Governance	
Ethics and Compliance	Material Issue
Risk Management	
Information Security	
Appendix	+

## Ethics and Compliance

Material Issue

### Governance

#### Ethical Management Office

SeAH Steel and Dong-A Steel recognize ethical management as a core value of corporate management and regard compliance with ethical standards as a key responsibility in all business activities. To this end, we operate an organization dedicated to establishing and implementing an ethical management system and foster a corporate culture that earns the trust of employees and stakeholders. The Ethics Management Office is responsible for ensuring compliance with internal laws and regulations, strengthening the internal control system, and promoting a culture of ethics and compliance. The Ethics Management Office supports the implementation of ethical management and contributes to enhancing organizational integrity through the management of ethical issues and system operations.

#### Code of Ethics

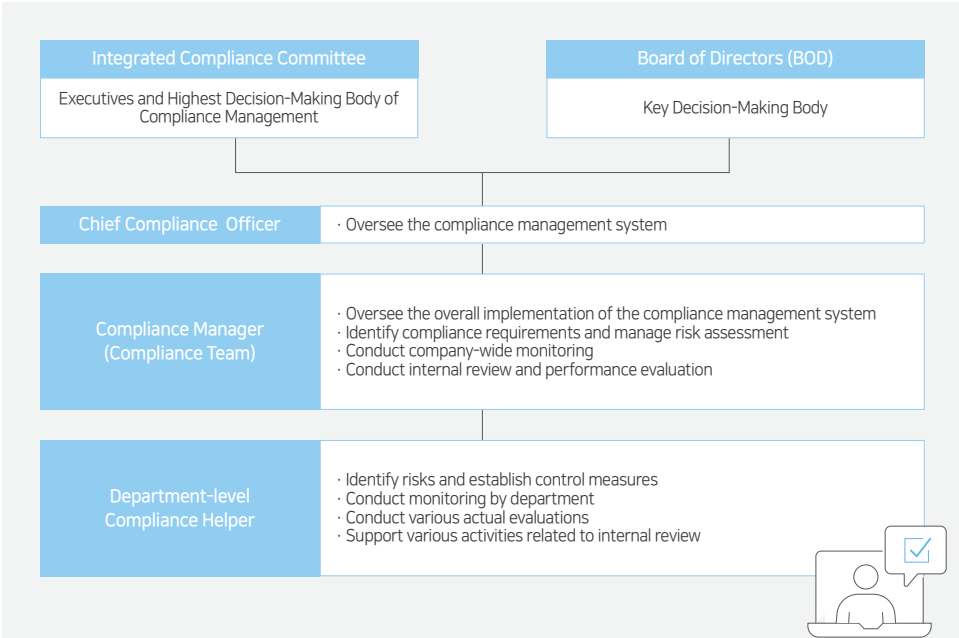
SeAH Steel and Dong-A Steel endeavor practicing ethical management to ensure that all employees contribute to a corporate culture grounded in ethical values and standards of behavior. Thus, we have established a Code of Ethics and Guidelines, which outlines a specific set of behavioral principles that employees are expected to follow. In particular, we are fostering a sound and trustworthy corporate culture by applying a strict zero-tolerance policy to all forms of unethical conduct in the workplace, including sexual harassment, bullying, and acts of violence.

Code of Ethics	<b>Social Responsibility</b> We strive to be a trusted corporate citizen by practicing transparent management and conducting business rationally.	<b>Responsibility to Employees</b> We consider our employees as our most valuable assets and do our best to make the company a place of self-fulfillment for our employees.
	<b>Responsibility to Stakeholders</b> We prioritize the value of our customers and shareholders and pursue mutual prosperity with our business partners.	<b>Basic Ethics of Employees</b> Employees pursue virtuous values and do not engage in unethical or illegal behavior against the ethical norms of society in their daily lives and work.
Guidelines for Practicing the Code of Ethics	<b>Job</b> The term "job" refers to duties, whether direct or indirect, that an employee continues to perform in the course of their position.	<b>Whistleblower</b> The term "whistleblower" refers to all employees who are obligated to report the receipt of bribes, gifts or entertainment, as well as the recognition of such occurrences.
	<b>Stakeholder</b> The term "stakeholder" refers to any person or organization that has business dealings with the company and refers to all internal or external person or organization whose rights or interests may be affected by the actions or decisions of employees. The provision or receipt of undue advantages through family, relatives, or acquaintances will be regarded as acts of the individual concerned.	<b>Reasonable Basis</b> The term "reasonable basis" refers to a level that can be understood by other employees or non-beneficiaries with sound common sense. It is a basis recognized as legitimate by the general public and within a range where the employee can handle work fairly without feeling burdened.
	<b>Unavoidable Circumstances</b> The term "unavoidable circumstances" refers to instances where a favor was delivered in absence, making it impossible to decline, or one where a firm refusal would be considered discourteous.	

#### Compliance Management Office

SeAH Steel operates a structured compliance management system under the supervision of the Compliance Officer. Designated Compliance Helpers identify and assess risks within their respective departments and carry out management activities aimed at risk prevention. In addition, the Compliance Team monitors departmental activities and provides guidance on areas requiring improvement. An internal audit of the compliance management system is conducted annually to evaluate its effectiveness, with the final results reported to the Compliance Officer. The Compliance Officer then reports the outcomes to the Integrated Compliance Committee and the Board, which serve as the highest-level bodies overseeing the program. This framework supports the establishment and operation of a concrete and practical "compliance integration system" that connects on-the-ground practices with executive decision-making.

#### Compliance Management Organizational Chart (SeAH Steel)



Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	
Corporate Governance	
Ethics and Compliance	Material Issue
Risk Management	
Information Security	
Appendix	+

# Ethics and Compliance

Material Issue

## Governance

### Compliance Guidelines

The core principle of compliance management at **SeAH Steel** and **Dong-A Steel** is the faithful adherence by all employees to both domestic and international standards, laws, and regulations. Grounded in the practice of autonomous and responsible compliance, we have established a system to prevent and respond to illegal conduct, while promoting a transparent and fair corporate culture by protecting whistleblowers and reinforcing independent compliance management.

### Compliance Guidelines

- 01
- The Company and its employees shall comply with all applicable domestic and international compliance obligations.
- 02
- If an employee violates compliance obligations or fails to take reasonable measures to prevent a violation after coming to know about it, the Company shall not be held liable on behalf of the employee and may take disciplinary action in accordance with the Company's regulations.
- 03
- All employees are responsible for managing and reporting compliance issues to the Compliance Officer.
- 04
- The Company shall establish a system for employees to report non-compliance with the norms of compliance obligations, keep the contents of the report and the personal information of the informant confidential, and protect them from unfavorable treatment based on the report.
- 05
- The Company shall establish a compliance management system that can achieve the purpose of compliance management and manage and improve the system continuously.
- 06
- The Compliance Officer shall have direct and regular reporting obligations to the governing body with appropriate authority and independence.

### Introduction and Operation of ISO 37301

**SeAH Steel** strives to achieve sustainable growth through strict compliance with laws and regulations. In response to an increasingly stringent regulatory environment, we became the first in the steel industry to obtain certification for our Compliance Management System (ISO 37301) in March 2023. Following this achievement, we successfully passed all subsequent audits conducted in 2024 and 2025, earning and maintaining external recognition for the systematic and effective implementation of our compliance management system.



ISO 37301 Certification  
(SeAH Steel)



### Integrated Compliance Committee

As the highest decision-making body for compliance management, **SeAH Steel** operates an Integrated Compliance Committee composed of executives from the domestic affiliates of SeAH Steel Holdings. The Committee convenes regularly each year. Beginning in 2024, the number of meetings has increased from twice to three times annually to further strengthen compliance oversight. The Committee reviews the operational status of the compliance management system and overall compliance activities, and addresses internal and external issues to promote practical, top-down risk management.

### Integrated Compliance Committee in 2024 (SeAH Steel)

Date	Session No.	Agenda (Reported Activities and Plans)
Apr. 2024	9th	Reported compliance activities and plans: ① Compliance operation plan and measures to improve sustainability evaluation indicators in 2024 ② ISO 37301 surveillance audit result (certification retained) ③ Final report on compliance standard procedures (subcontracting process response)
July 2024	10th	Reported compliance activities: ① 2024 Sustainability Assessment Operational Progress ② Operation of new process guidance and Executive Self-Checklist
Oct. 2024	11th	Reported compliance activities and plans: ① 2024 Sustainability Indicator Assessment ② 2025 Compliance activity objectives and plans ③ Compliance process improvement results

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	
Corporate Governance	
Ethics and Compliance	Material Issue
Risk Management	
Information Security	
Appendix	+

Ethics and ComplianceMaterial Issue

Governance

Compliance Officer

SeAH Steel has appointed a Compliance Officer in accordance with Article 542(13) of Korea’s Commercial Act and has established a dedicated support organization to systematically manage compliance. The Compliance Management Office, composed of legal experts, plays a key role in preventing and effectively managing the company’s legal risks. It also conducts ongoing compliance and ethics training to raise awareness and strengthen employees’ capabilities in their respective roles.

Compliance Team (5 members)	Compliance Management Support Organization
Team Manager (1 person)	· In-House Lawyer/Compliance Management System (ISO 37301) Certification Auditor (assistant)
Team Members (4 people)	· Two certified auditors (assistant) on ISO 37301/two internal auditors · Composed of experts and legal professionals in core business areas such as planning, sales, accounting, human resources, law majors, and etc.

Compliance Counsel Activities (SeAH Steel)


Date	Activities	Description
Jan. 2024	Collection of Ethics and Compliance Pledge	Obtained signed pledges on ethics and compliance management from all employees
Jan. 2024 - Feb. 2024	BOD Reporting and Approval on ISO 37301	Reported results of management review (Feb. 2024)
Feb. 2024 - Mar. 2024	ISO 37301 Surveillance Audit	- Passed the first surveillance audit for the ISO 37301 - Conducted an effectiveness audit of ISO 37301 operations for 2024 - Completed monitoring, internal audits, and management review reporting - Ongoing development of an integrated ISO 37301 platform
Mar. 2024 - Oct. 2024	Establishment, Operation, and Evaluation of Executive Performance Indicators	Enhanced compliance indicators in the 2024 CEO and executive evaluation metrics
Apr. 2024 - Oct. 2024	Strengthening of In-house Compliance Management	Revised the Fair Trade Compliance Manual to reflect amendments in relevant laws and regulations
Apr. 2024 - Dec. 2024	Integrated Compliance Committee Meetings (9th, 10th, 11th)	Reported progress and results of compliance activities
Apr. 2024 - Dec. 2024	Operation of ISO 37301	Established and operated ISO 37301 future initiatives on risk assessment, goal-setting, monitoring, performance evaluation, and internal audits
Jan. 2024 - Dec. 2024	Development of Compliance Platform	Established the compliance IT platform (SeAH CP Lounge)
Jan. 2024 - Dec. 2024	Sales Management System Monitoring	Monitored sales management system to prevent potential unfair collusive practices
Jan. 2024 - Dec. 2024	Preliminary Assessment of Inter-affiliate Transactions	Carried out a review of transactions occurred in 2024
Mar. 2024 - Dec. 2024	Implementation of Compliance-related Training	- Conducted training and workshops for compliance officers in each department (including ISO 37301) - Developed and delivered fair trade-related training (covering unfair collusive acts, unfair trade practices, undue support, subcontracting law, etc.) - Conducted compliance awareness surveys (including employee questionnaires and VOC) - Held the SeAH Group Compliance Quiz Contest - Published compliance newsletters on various topics (e.g., Serious Accidents Punishment Act, copyright, unfair competition prevention law, etc.)

Strategy

Ethics and Compliance Management Goals

In line with one of SeAH Group’s core values, “Honesty,” SeAH Steel conducts business in a legal and ethical manner and fulfills the social responsibilities to foster a culture of integrity within the organization. To that end, we have established mid- to long-term compliance management initiatives, including the operation of an efficient and effective Compliance Management System (ISO 37301), the development of an internal preventive process to ensure compliance with laws and regulations, the enhancement of the compliance evaluation system, and the promotion of a compliance-oriented organizational culture through regular training.

Mid- to Long-term Compliance Management Initiative

<p>Operating Compliance Management System</p> <p>Enhance operational efficiency via CP Lounge (IT platform)</p> 	<p>Establishing the Preventive Process for Legal Violations</p> <p>Improve processes to minimize legal risk</p> 
<p>Strengthening Compliance Evaluation System</p> <p>Implement practical and consistent evaluation framework</p> 	<p>Fostering Compliance Culture</p> <p>Provide issue-specific compliance training</p> 

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
<b>Governance</b>	
Corporate Governance	
<b>Ethics and Compliance</b>	<b>Material Issue</b>
Risk Management	
Information Security	
Appendix	+

# Ethics and Compliance

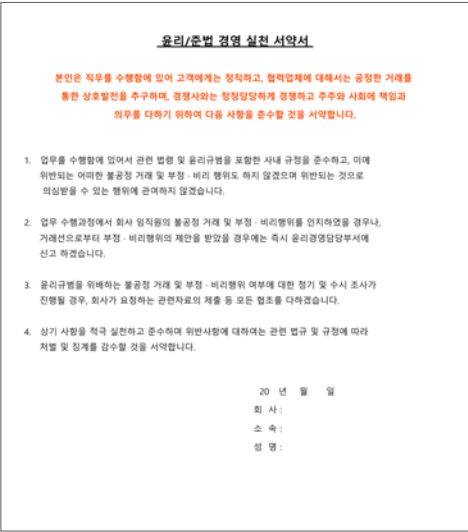
Material Issue

## Strategy

### Ethics and Compliance Activities

**Ethics and Compliance Pledge** | All employees at **SeAH Steel** and **Dong-A Steel** are required to sign the ethics and compliance pledge annually to uphold ethical compliance management, affirming commitment to honesty towards customers, fairness toward business partners, fair competition, and responsibility and accountability to shareholders and society. This pledge serves as a reminder of the company's ethical management philosophy.

**Employee Training** | **SeAH Steel** and **Dong-A Steel** are internalizing ethical management by providing regular online and offline ethics training for employees. The ethics training program, which consists of four mandatory courses, is delivered online for white-collar employees and through in-person sessions for technical professionals. Since 2022, SeAH Steel has incorporated real-life examples into the curriculum, enhancing the effectiveness of our ethics training by including targeted and focused content. To address workplace bullying and sexual harassment, we are operating additional face-to-face training sessions. Furthermore, we are operating "Compliance Day," a role-specific training program designed to raise ethical awareness across all levels of the organization.



Ethics and Compliance Pledge (SeAH Steel, Dong-A Steel)

**Strengthening Business Partner Ethics** | To practice ethical management across the company, SeAH Steel is advancing ethical awareness initiatives not only for internal employees but also for all stakeholders. In particular, we send an annual letter to our business partners and suppliers encouraging them to adopt ethical management practices and strive to build a responsible supply chain based on mutual benefit. To further expand the reach of ethical management, we plan to develop and implement tailored ethical management programs for our business partners and partners in the future.

**Providing Compliance Guidelines** | **SeAH Steel** and **Dong-A Steel** periodically review new and amended laws relevant to the company, such as the Fair Trade Act and the Subcontracting Act, to provide appropriate compliance guidelines. We strive to minimize legal risks by monitoring and identifying changes in both the internal and external regulatory environment.

Contents	SeAH Steel			Dong-A Steel		
	2022	2023	2024	2022	2023	2024
Workplace Harassment	1,166	904	403	29	29	31
Sexual Harassment Prevention	1,170	905	402	29	29	31
Disability Awareness	673	338	402	29	27	31
Ethics Training (by position level)	-	-	152	-	-	14

(Unit: Person(s))



Ethics and Compliance Workshop (SeAH Steel)



SeAH Compliance Day

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	
Corporate Governance	
Ethics and Compliance	Material Issue
Risk Management	
Information Security	
Appendix	+

# Ethics and Compliance

Material Issue

## Strategy

### Ethics and Compliance Management Activities

**Raising Employees' Compliance Awareness** | SeAH Steel and Dong-A Steel plan and implement various compliance education programs to raise employees' awareness of compliance obligations. In collaboration with the legal organization within the SeAH Group, we provide in-house online and offline training and seminars tailored to each employee level, focusing on the laws and regulations relevant to their roles. In addition, we publish a monthly compliance newsletter covering a range of topics, including legal issues and recent amendments to laws and regulations. To further enhance compliance knowledge, we hold an annual compliance quiz contest. In December 2024, we held the second SeAH Group Compliance Quiz Contest and recognized outstanding participants.

### Compliance Education Programs and Participants in 2024

(Unit: Person(s))

Contents	Target	SeAH Steel		Dong-A Steel	
		2023	2024	2023	2024
Legal Update Training: Subcontracting and Win-Win Cooperation Act*	Relevant Departments	69	-	15	-
Delivery Price Indexation System	Relevant Departments	72	-	15	-
Understanding the Compliance Management System	All Officers and Employees	319	354	28	30
Online Training on the Fair Trade Act	All Officers and Employees	-	342	-	26
Compliance Workshop	Departmental Compliance Helper	-	53	-	2

\* Act on the Promotion of Mutually Beneficial Cooperation between Large Enterprises and Small and Medium Enterprises  
\*\* Number of participants not indicated (-): not applicable, program was not offered

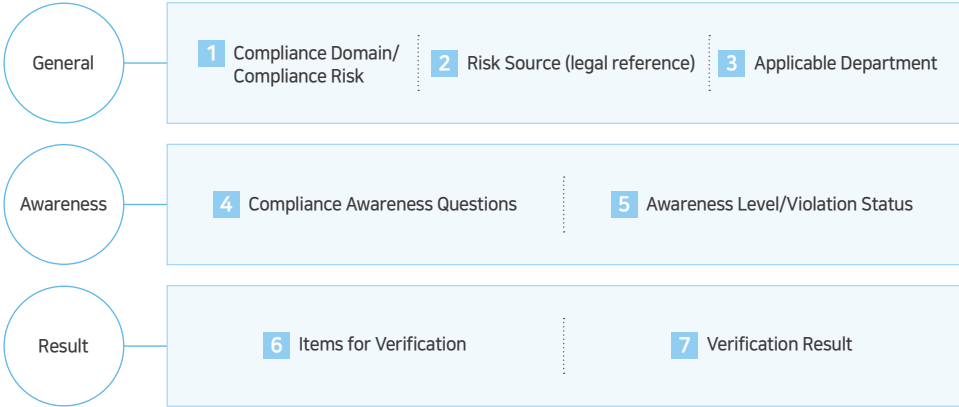


The Second SeAH Group Compliance Quiz Contest

**Strengthening Compliance Management System** | SeAH Steel conducts regular internal audits in accordance with ISO 37301 to proactively assess major compliance risks, such as unfair trade and unfair competition, and to identify areas for improvement to promote effective risk management. Compliance with internal business procedures and applicable laws and regulations is reviewed, and appropriate follow-up measures are taken to address identified issues, thereby strengthening transparency and accountability in corporate operations. In addition, we operate an evaluation-based practice system by establishing processes to support the practical implementation of ethics and compliance management, with the results incorporated into management evaluations, including those of executives. In particular, once legal risks are identified, employees assess their compliance through a "Self-Assessment Checklist," with the results reflected in performance evaluations. Going forward, SeAH Steel will continue to develop various policies aimed at enhancing the effectiveness of our compliance management efforts and continuously improving our evaluation systems.

**Dong-A Steel** is similarly undertaking compliance management initiatives in accordance with ISO 37301, including legal risk management, the establishment of internal (legal risk) prevention processes, and the development of a compliance-oriented organizational culture through periodic training.

### Compliance Self-Assessment Checklist (SeAH Steel)





Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	
Corporate Governance	
Ethics and Compliance	Material Issue
Risk Management	
Information Security	
Appendix	+



# Ethics and Compliance

Material Issue

## Risk Management

### Improving Employee Awareness

**Ethics Awareness Survey** | SeAH Steel conducts periodic surveys to assess employees’ awareness of ethics, and the results are used to develop the content of ethics training programs. In addition, we identify ethics-related risks that may arise in the workplace by department through internal procedures and establish control measures to proactively prevent violations and manage potential risks.

Each year, Dong-A Steel conducts a compliance survey, the results of which are reflected in the year-end organizational survey, to assess the level of awareness regarding compliance and ethics management.

**Ethical Management Practice Inspection** | SeAH Steel conducts a quarterly ethical management practice inspection for all employees. This assessment is used to communicate specific behavioral standards to employees, encourage self-evaluation, and promote voluntary improvement of ethical conduct, thereby supporting the continuous development of ethical awareness.

### Reporting Ethical Violations

SeAH Steel and Dong-A Steel operate a reporting system to manage employee violations of the law. Reports and inquiries are received through our website, and informants are fully protected under the Whistleblower Protection System.

### Whistleblower Protection Program

Confidentiality	Non-Retaliation	Leniency
The identity of the whistleblower will not be disclosed or implied without the whistleblower’s consent.	Whistleblowers are protected from any disadvantage or discrimination, including disciplinary action by their department or business partners, as a result of making a report, providing a statement, or submitting materials.	If a whistleblower’s fault or error is identified in connection with the report, disciplinary action may be reduced or waived.

### Ethical Management Suggestion Center

Through the Ethical Management Suggestion Center, SeAH Steel monitors and manages conduct that violates corporate ethics, such as unfair business practices, workplace bullying, sexual harassment, and violence. The center also collects suggestions aimed at enhancing transparency and efficiency, as well as improving unreasonable practices. In 2024, we strengthened accessibility and usability by launching a KakaoTalk (mobile messaging application) Open Chat feature, allowing users to submit suggestions either anonymously or under their real names. All submissions are investigated and handled by the Ethics Management Office or the Audit Office of SeAH Steel Holdings under strict confidentiality. Some suggestions submitted in 2024 are still under review or investigation, and the final resolution rate may change accordingly. In 2025, we plan to expand initiatives to promote the use of the Ethical Management Suggestion Center both internally and externally and to continue systematic operations based on our established internal procedures to enhance transparency and consistency in handling reports.

Dong-A Steel receives reports on unfair business conduct and other violations of a sound organizational culture, as well as suggestions for enhancing corporate value, improving transparency and efficiency, and addressing unreasonable or inefficient practices through the Ethics Management Office and the Ethical Management Suggestion Center. Submissions are accessible only to Dong-A Steel’s Ethics Management Office and are handled with strict confidentiality.

### Reported Cases at the Ethical Management Suggestion Center

(Unit: Case(s), %)

Category		SeAH Steel			Dong-A Steel		
		2022	2023	2024*	2022	2023	2024
Reported Cases	Misconduct	1	0	3	0	0	0
	Grievances	0	2	0	0	0	0
	Others	0	0	1	0	0	0
Resolution Rate		100	100	50	-	-	-

\* Certain cases reported in 2024 are still being reviewed and investigated.



Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	
Corporate Governance	
Ethics and Compliance	Material Issue
Risk Management	
Information Security	
Appendix	+

# Ethics and Compliance

Material Issue

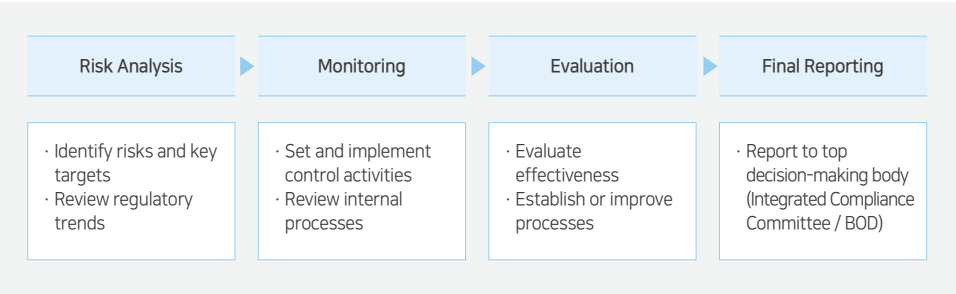
## Risk Management

### Compliance Risk Management

To proactively manage compliance risks related to fair trade, **SeAH Steel** conducts assessments of risks such as collusion, unfair trade practices, and internal transactions based on the requirements of the Compliance Management System (ISO 37301) as well as established business procedures. In addition, a preventative monitoring system is in place to identify issues and carry out improvement activities through ongoing monitoring efforts across various areas, including the preventative management and operational status of related departments. These activities are reported to senior management and the Compliance Officer through the Integrated Compliance Committee, and compliance management activities and plans are regularly reported to the BOD.

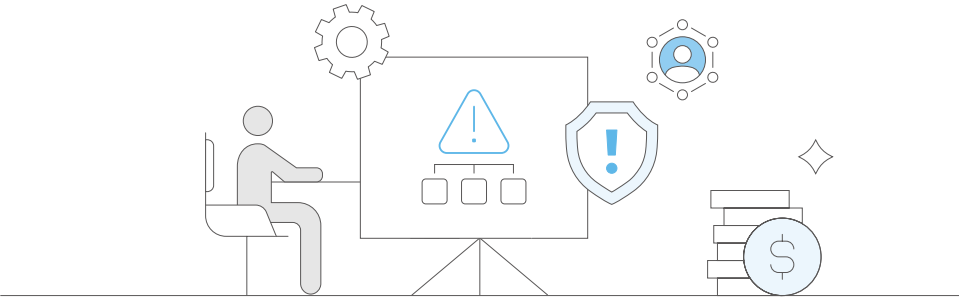
**Dong-A Steel** has designated a person responsible for compliance with the goal of acquiring the Compliance Management System (ISO 37301) certification. The designated individual has completed the “Compliance Management System Internal Auditors Training Course,” passed the qualification examination, and plans to manage compliance risk in accordance with ISO 37301.

### Compliance Risk Management Process (SeAH Steel)



### Compliance Risk Prevention (SeAH Steel)

- Preventative Monitoring System
  - Appoint a compliance manager or implement prior work consultation to prevent risks related to tasks with potential fair-trade issues
  - Operate pre- and post-reporting processes to prevent risks arising from employees’ interaction with parties in the same industry
- Build a dedicated IT platform for compliance to enhance compliance activities management and accessibility of employees
- Formalize pre-screening process for inter-affiliate transactions
- Enact a corporate governance charter to establish and maintain a balanced governance structure
- Establish preventive action process under Serious Accidents Punishment Act



Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	
Corporate Governance	
Ethics and Compliance	Material Issue
Risk Management	
Information Security	
Appendix	+

# Ethics and Compliance

Material Issue

## Risk Management

### Implementation of Compliance Program (CP)

SeAH Steel and Dong-A Steel ensure that all employees comply with laws and regulations related to fair trade and subcontracting through the implementation of the Compliance Program (CP). This program supports our efforts to contribute to the establishment of a free and fair market competition order. As such, a self-compliance manual reflecting recent amendments to the Fair Trade Act and the Fair Transactions in Subcontracting Act has been distributed, and principles have been established for compliance with the eight key elements of fair trade, as well as for engaging with stakeholders, to promote and embed a culture of fair trade. Furthermore, we assess risks associated with unfair trade practices and unfair competition, establish mitigation measures based on the assessment results, and implement them accordingly. The effectiveness of these measures is evaluated and managed through a scoring system, and regular monitoring and internal audits are conducted to ensure the continued effectiveness of the program.

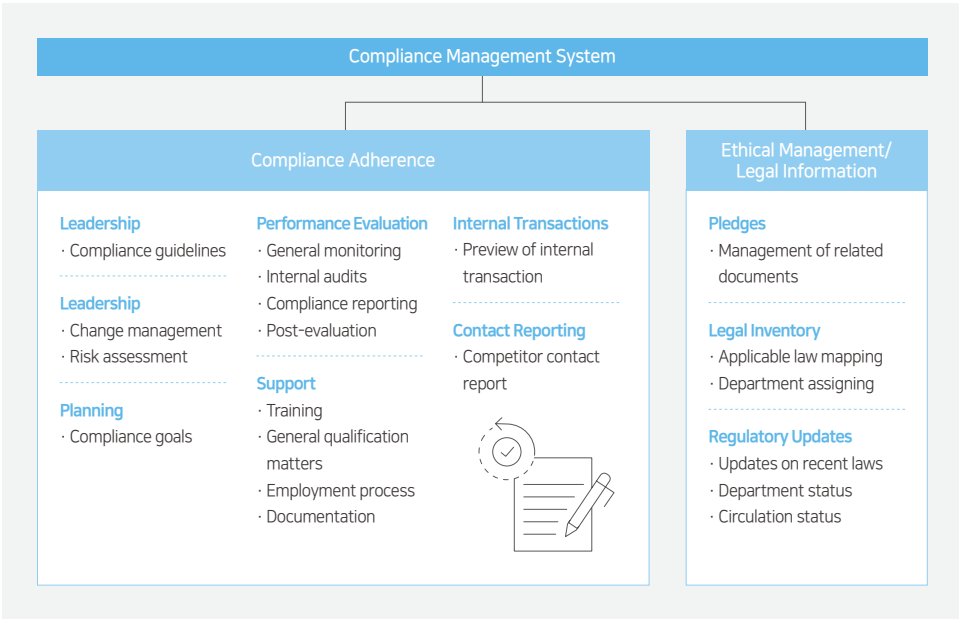
### The Eight Principles of Fair Trade

01 Establishment and Implementation of CP Standards and Procedures	02 Top Management's Commitment and Support for Compliance
Establish standards and procedures to ensure compliance with fair trade laws and regulations.	The top management publicly announces the determination and guidelines for fair trade compliance and actively supports CP operation.
03 Production and Utilization of Compliance Handbook	04 Establishment of an Internal Monitoring System
Compile, create, and distribute handbooks on fair trade-related laws and regulations, CP standards, and procedures.	Establish an oversight system to prevent violations and report results to the BOD.
05 Appointment of a Compliance Manager	06 Effectiveness Evaluation and Improvement Measures
The highest decision-making body (BOD) appoints a compliance manager within the organization, assigning responsibility for effective CP operation.	Implement inspections, evaluations, and other measures related to CP standards, procedures, and operations, followed by improvement measures.
07 Continuous and Systematic Compliance Training	08 Disciplinary Actions for Fair Trade Violations by Employees
Conduct regular training on CP standards, procedures, and matters related to regulatory compliance on fair trade.	Establish and enforce internal policies that outline disciplinary measures commensurate with the severity of violations and implement safeguards to prevent similar misconduct.

### Establishment of Integrated Computerized System (CP Lounge)

As the need for a system that systematically and efficiently manages various compliance and ethics activities continues to grow, SeAH Steel has established the CP Lounge, a computerized system designed to centrally manage key elements such as the compliance system, compliance process operations, and the ethics and compliance management pledge. The CP Lounge consolidates various compliance activities to enhance management efficiency and improve employee access to relevant policies. Notably, it provides department-specific, customized legal and regulatory information, enabling employees to remain informed about the laws and regulations relevant to their work and to prevent risks that may arise from the enactment or amendment of applicable laws. This system contributes to the implementation of practical compliance management and further strengthens our overall compliance framework.

### CP Lounge Operation Structure



Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	
Corporate Governance	
Ethics and Compliance	Material Issue
Risk Management	
Information Security	
Appendix	+



Ethics and ComplianceMaterial Issue

Metrics and Targets



Ethics Training Programs and Participants in 2024

(Unit: Person(s))

Category	Program	SeAH Steel	Dong-A Steel
Mandatory	Workplace Harassment	403	31
Mandatory	Sexual Harassment Prevention	402	31
Mandatory	Disability Awareness	402	14
Voluntary (Company-initiated)	Ethics Education (by position level)	152	14



Compliance Training Programs and Participants in 2024

(Unit: Person(s))

Program	Target	SeAH Steel	Dong-A Steel
Understanding the Compliance Management System	All employees	354	30
Online Training on the Fair Trade Act	All employees	342	26
Compliance Workshop	Department-level Compliance Helper	53	2

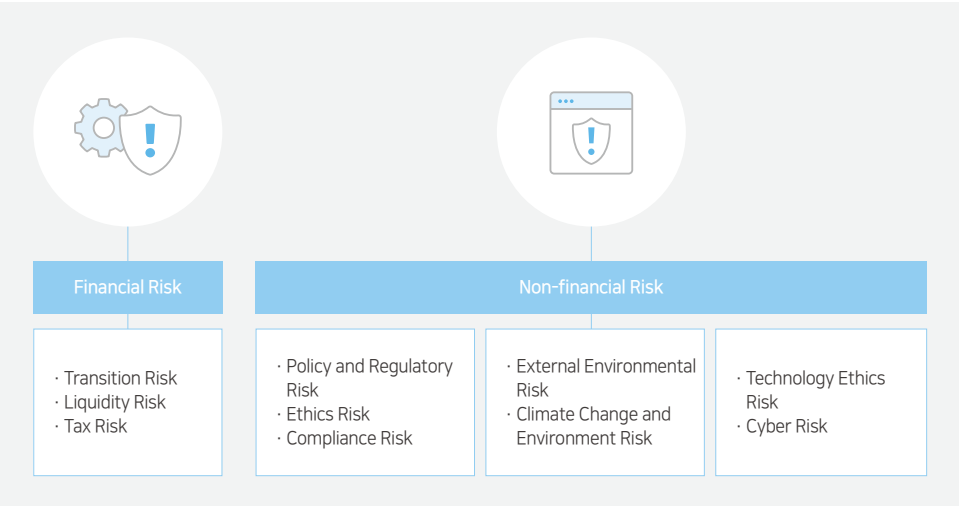
Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	
Corporate Governance	
Ethics and Compliance	Material Issue
Risk Management	
Information Security	
Appendix	+

# Risk Management

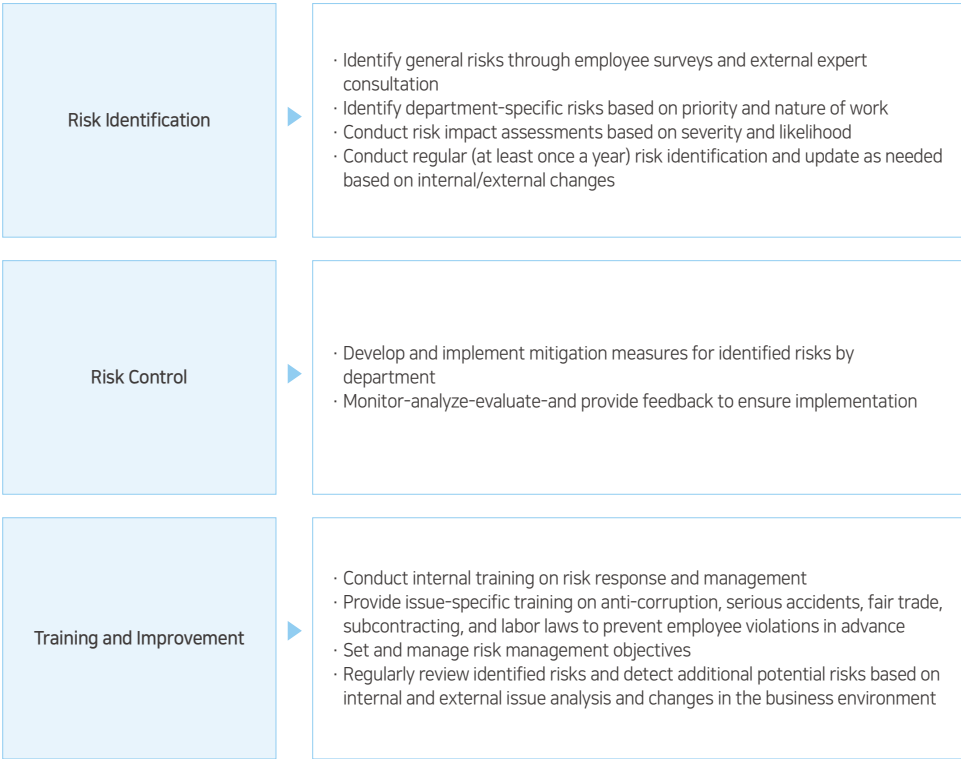
## Risk Management Process

SeAH Steel operates a risk management process to proactively identify and respond to financial and non-financial risks. In addition, designated personnel are assigned by department to prevent and manage compliance risks, enabling more efficient risk management activities. In particular, identified compliance risks are monitored both regularly and as needed by the Compliance Management Department and department-level compliance helper, with control measures established and implemented to manage such risks effectively.

### Key Risk Factors (SeAH Steel)



### Risk Management Process



Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	
Corporate Governance	
Ethics and Compliance	Material Issue
Risk Management	
Information Security	
Appendix	+



# Risk Management

## Internal Accounting Management

**SeAH Steel** operates an internal accounting management system to prevent distortion of financial statements and to provide transparent management information. As a publicly listed company, and in accordance with the Act on External Audit of Stock Companies, the internal accounting department undergoes audit certification by external auditors with respect to the internal accounting management system and its operational status. The results of the audit are reported by the CEO to the general shareholders’ meeting, the BOD, and the Audit Committee. In 2024, the Audit Committee was established to strengthen the reporting system, and it provides practical oversight and support for the operation of the internal accounting management system. In addition, company-wide training is conducted on a regular basis to enhance employees’ expertise and maintain their qualifications related to internal accounting controls.

### Internal Accounting Management System

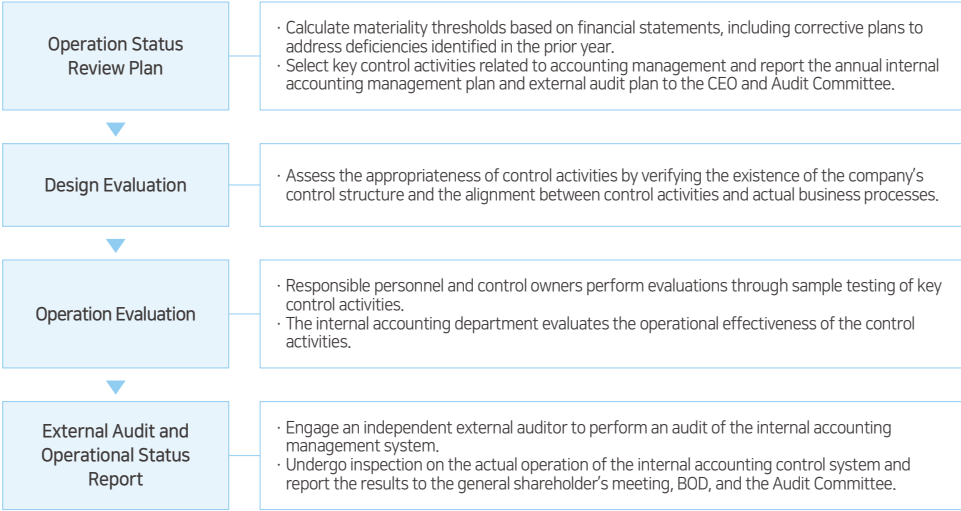
To evaluate the design and operation of controls within the internal accounting control system, **SeAH Steel** categorizes Entity-Level Controls (ELC) and Transaction-Level Controls (TLC) based on the Risk Control Matrix (RCM). ELC consists of five control elements (control environment, risk assessment, control activities, information and communication, and monitoring) and is used to assess the overall operational foundation of the internal control system. TLC identifies key control activities across 11 process areas, including order management, production and inventory management, cash management, taxation, and financial reporting. It conducts design and operational assessments to address inherent risks within its business processes.

Through this systematic RCM management system, we enhance the effectiveness of the internal accounting control system. In addition, we receive semi-annual change management reports from each department to ensure continued effectiveness. These reports include changes in organizational structure, systems, processes, and personnel. Based on this information, the Internal Accounting Management Department updates the RCM, workflow charts, and other related documentation to ensure that control designs remain current and appropriate. Through this change management process, we maintain the reliability of financial reporting and operate an effective internal control system by minimizing any discrepancies between the documented control framework and actual operational conditions.

### Internal Accounting Control System- Team Leader Performance Evaluation (KPI)

To ensure the operational effectiveness of the internal accounting management system and enhance employees’ awareness of internal controls, **SeAH Steel** incorporates relevant performance indicators (KPIs) into the performance evaluations of team leaders. This approach is intended to promote the practical implementation of the system, with evaluations based on quantitative criteria. Through this KPI integration, we are establishing a tangible connection between internal control activities and performance assessments, thereby strengthening both the system’s effectiveness and employee accountability. We will continue to systematically assess the operational status of the internal accounting management system and reinforce the foundation for sustainable management through its ongoing development and enhancement.

### Internal Accounting Control System (SeAH Steel)



### Report on Internal Accounting Operations Results

To ensure the reliability and effectiveness of the internal accounting management system, **SeAH Steel** regularly conducts evaluations of control design and operation, divided into entity-level controls and transaction-level controls. Significant deficiencies identified through these evaluations are reported to the CEO, auditors, and the BOD, and are systematically managed through collaboration with the relevant departments.

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	
Corporate Governance	
Ethics and Compliance	Material Issue
Risk Management	
Information Security	
Appendix	+



## Risk Management

### Internal Accounting Management

#### Audit Committee

The Audit Committee meets regularly to review the adequacy of the internal control system, the validity of accounting treatments, management’s performance audit, and the activities of the internal audit department. In 2024, the Audit Committee held a total of five meetings, with full attendance by all members, to review agenda items including major internal control issues, consultations with external auditors, the operation of the internal reporting system, and key risk management systems. The Committee conducts preliminary reviews and exchanges opinions through various means, such as in writing, by phone, and via email, as necessary, and invites external experts to provide input on agenda items to ensure thorough discussion, objectivity, and independence. All resolutions of the Audit Committee are adopted by a majority vote of its members present, in accordance with Korea’s Commercial Act and the Articles of Incorporation.

#### Audit Committee Activities in 2024 (SeAH Steel)

Session No.	Category	Activities			Voting Results by Committee Member			
		Date	Agenda Item	Decision Result (Outcome)	Seungsup Lee	Sin-Young Park	Chun Won Yi	Hyung Il Oh
1	Extraordinary	Mar. 14, 2024	[Item 1 Resolution] Appointment of Audit Committee Chair	Approved	-	Approved	Approved	Approved
2	Extraordinary	Apr. 24, 2024	[Item 1 Resolution] Approval of the Appointment of the Head of the Audit Support Organization (Internal Audit Support Team)	Approved	Approved	Approved	Approved	Approved
			[Item 2 Resolution] Revision of Audit Committee Operation Regulations	Approved	Approved	Approved	Approved	Approved
			[Item 1 Report] Annual Plan for Internal Accounting Management and External Audit	Reported	-	-	-	-
			[Item 2 Report] Internal Accounting Management System Performance Report for Q1 2024	Reported	-	-	-	-
3	Regular	May 9, 2024	[Item 1 Report] External Auditor Communication for Q1 Review Results	Reported	-	-	-	-
			[Item 2 Report] 2024 Internal Accounting Management System Operation Plan	Reported	-	-	-	-
			[Item 3 Report] 2024 Audit Plan	Reported	-	-	-	-
4	Regular	Aug. 12, 2024	[Item 1 Report] External Auditor Communication for Semi-Annual Review Report and Audit Plan	Reported	-	-	-	-
			[Item 2 Report] Internal Accounting Performance for Q2 2024	Reported	-	-	-	-
			[Item 3 Report] Audit Results for Q2 2024 and Audit Plan for Q3 2024	Reported	-	-	-	-
			Item 4 Report] Revision of Internal Control Regulations	Reported	-	-	-	-
5	Regular	Oct. 30, 2024	[Item 1 Report] External Auditor Communication for Q3 Review Results	Reported	-	-	-	-
			[Item 2 Report] Internal Accounting Performance Report for Q3 2024	Reported	-	-	-	-
			[Item 3 Report] Audit Results for Q3 2024 and Audit Plan for Q4 2024	Reported	-	-	-	-

### Tax Management

SeAH Steel and Dong-A Steel strictly comply with applicable laws and regulations across our business operations, adhere to filing deadlines for all tax obligations, and diligently fulfill tax responsibilities. We document and manage appropriate transaction evidence and proactively address tax risks by reviewing tax issues related to the sale of goods and services, corporate divisions, mergers and acquisitions, and cross-border transactions that may arise during business activities. As of our first corporate tax return for fiscal year 2024, SeAH Steel reported a marginal tax rate of 24%, an average tax rate of 20.9%, and an effective tax rate of 20.1% on taxable income. These rates reflect our engagement in activities aligned with national policy goals, such as productive investment, job creation, contributions to the venture ecosystem, and improvements in tax convenience, as well as tax credits applied under relevant tax laws.

#### Tax Policy

Faithful Tax Filing and Payment
We comply with tax filing deadlines and faithfully fulfill our tax payment obligations.
Minimization of Tax Risks
We engage tax professionals with relevant expertise and experience and actively retain external advisors when addressing tax matters that require specialized knowledge.
Compliance with International Transaction Standards
In transactions with overseas affiliated parties, we adhere to the arm’s length principle in accordance with the OECD Transfer Pricing Guidelines and the applicable regulations of each country.



Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	
Corporate Governance	
Ethics and Compliance	Material Issue
Risk Management	
Information Security	
Appendix	+



## Information Security

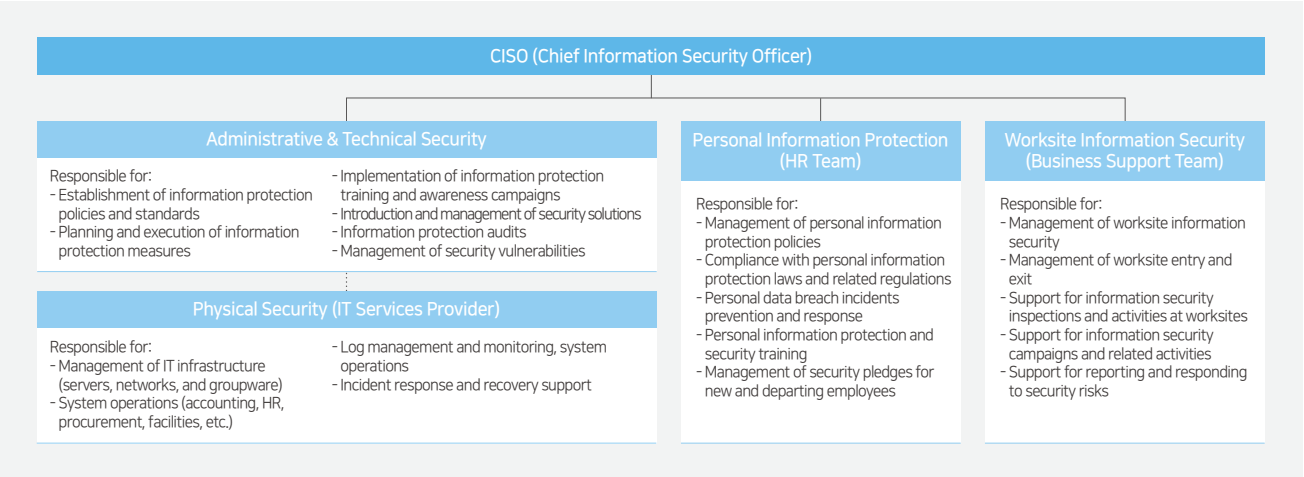
### Governance

#### Information Security Organization and Roles

Recognizing the importance of information security, SeAH Steel has appointed a Chief Information Security Officer (CISO) to ensure robust internal information security and to transparently disclose the company's information security practices. Under the CISO's leadership, we have established and are operating systems covering administrative and technical protection, personal information protection, workplace information security, and IT infrastructure security. Employee access rights are managed through regular reviews of information security policies and SAP (Systems, Applications, and Products in Data Processing) access authorizations, and a range of security solutions are employed to systematically mitigate information security risks. In 2025, we plan to implement detailed information protection guidelines and management regulations to further enhance our information security risk management framework.

#### Information Security Department Roles and Activities (SeAH Steel)

Administrative & Technical Security (DX Team)	Description
Establishing data security policies and standards	Draft internal information security policies and guidelines Update policies and guidelines (at least once a year)
Establishing data security initiatives and monitoring implementation progress	Establish annual security protection plans (e.g. strategies, agenda, budget, etc.) Monitor on a quarterly basis
Developing data security training program and campaigns	Plan and conduct biannual information security campaigns related to phishing email response drills and security incident case-sharing
Adopting and managing security solutions	Plan projects for introducing new solutions such as NAC, DLP, and malicious website blocking, select solutions and manage vendors Manage and optimize existing security solutions (e.g., database access control, VPN, and antivirus software)
Coordinating information security audit processes	Ensure compliance with ITGC internal controls by managing access rights, user accounts and passwords, and onboarding/offboarding processes
Mitigating security vulnerabilities	Conduct regular vulnerability assessments and remediate security weaknesses in IT systems and applications Conduct annual internal penetration testing or ethical hacking and address identified issues



Personal Information Protection (HR Team)	Description
Managing personal information protection	Manage personal information protection and designate responsible personnel
Managing information protection policy	Manage internal personal information protection guidelines across all processing stages (collection, usage, sharing, disposal, etc.) Develop and implement internal procedures for personal information protection
Complying with related laws	Conduct regular reviews and ensure compliance with updated personal information protection regulations Perform internal reviews for personal information protection compliance
Preventing and responding to data breaches	Conduct security checks on personal information processing activities Respond to personal data breaches
Conducting information protection training	Plan and implement mandatory annual information security training for all employees (e-learning, classroom training, etc.)
Managing security agreements for onboarding and offboarding employees	Prepare and administer security pledges during employee onboarding Establish a process for immediate revocation of personal information access rights upon employee offboarding

Worksite Information Security (Business Support Team)	Description
Managing information security	Manage security status of each worksite and designate responsible personnel Monitor and respond to on-site information security issues
Controlling and managing workplace access	Operate access control systems and manage access authorizations Manage visitors and maintain the security of critical worksite facilities
Conducting inspections and supporting security activities	Conduct regular on-site security inspections (twice a year is recommended) Manage workplace security equipment such as CCTV, security facilities, etc.
Supporting security activities and campaigns	Support worksite security campaigns and employee training
Supporting security risks reporting and response actions	Report and respond to security issues identified on site

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	
Corporate Governance	
Ethics and Compliance	Material Issue
Risk Management	
Information Security	
Appendix	+



# Information Security

## Strategy & Risk Management

### Security Solution Operation

To protect key information assets from cyber threats, **SeAH Steel** has implemented and operates a range of security solutions. Access rights for all employees are managed through SAP permission reviews, and multiple security solutions are utilized to address information security risks. In addition, we are enhancing our information protection capabilities through ongoing upgrades and improvements to our security systems in response to evolving threats.

### Key Security Solutions

- 01

DBSAFER: Strengthens DB security through access control, command control, and user authentication and ensures compliance traceability
- 02

Manages V3 Clients by implementing an integrated platform for V3 antivirus and vaccine management solutions
- 03

Ensures that only authorized users have external access to internal networks through user authentication
- 04

Data Loss Prevention (DLP): Conducts real-time monitoring and control to prevent external leakage of sensitive information
- 05

Malicious content blocking solution: Enhances network visibility and proactively blocks security threats
- 06

IP Management Solution (TCO): Collects and manages information from all devices connected to the network

### Information Security Training

To raise employees’ security awareness, **SeAH Steel** conducts malware simulation drills twice a year and provides threat information and privacy guidelines to recipients of phishing emails. In addition, we regularly perform internal checks for uninstalled antivirus software and violations of security policies and operate a disaster recovery system to ensure the effectiveness of the information protection framework and enable a systematic response in the event of an incident.

In addition to the annual information protection training for all employees, **Dong-A Steel** conducts supplemental group training once a year on topics related to security threats (e.g., confidentiality training) to further enhance employees’ security awareness.

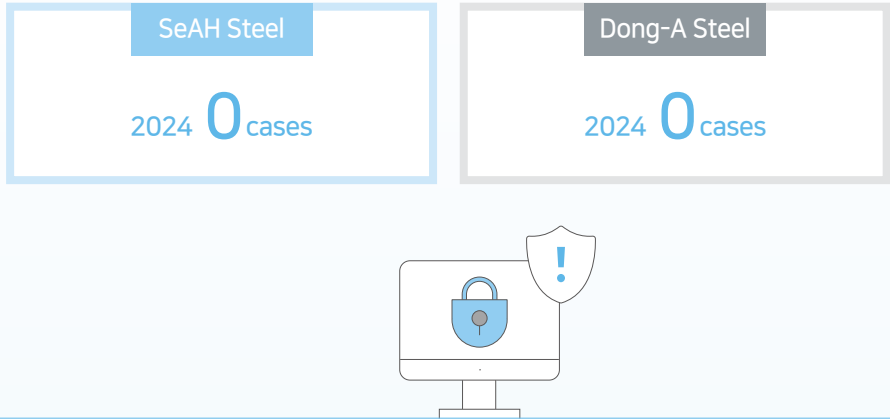
## Metrics and Targets

### Information Security Training in 2024

(Unit: Person(s))

Program	Target	Training Cycle	Type	Contents	SeAH Steel	Dong-A Steel
Information Security Training	All employees	Once/year	Online	Basic security awareness: policies, account, and password management	390	31
Personal Information Protection Training	All employees	Once/year	Online	Guidelines for personal information processing, data leak prevention measures, and response procedures for personal data breaches	390	31
Information Security Guide	All employees	Twice/year	Online	Phishing and smishing countermeasure, security threat case-sharing, and employee conduct guidelines	214	N/A

### Information Security-related Violations in 2024





Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	



# APPENDIX

110	ESG Data
125	GRI Index
128	SASB Index
129	ESRS Index
135	TCFD Index
136	Independent Assurance Statement

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	
ESG Data	
GRI Index	
SASB Index	
ESRS Index	
TCFD Index	
Independent Assurance Statement	



ESG Data | Environmental\*

\* SeAH Steel figures are based on data from the Pohang, Gunsan, Suncheon, and Changwon plants.

Energy Consumption

Category		Unit	2022		2023		2024	
			SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Energy consumption targets		GJ	963,548	-	1,337,633	-	1,390,018	-
Total energy consumption		GJ	1,186,392	93,431	1,433,009	97,342	1,309,658	99,892
Energy consumption (Direct)		GJ	147,451	6,574	157,519	6,382	144,162	6,515
	LPG	GJ	360	251	552	106	333	238
	LNG	GJ	143,465	5,680	153,229	5,636	139,337	5,579
	Diesel	GJ	1,308	641	962	641	1,953	698
	Gasoline	GJ	345	2	699	0	841	0
	Kerosene	GJ	1,973	0	2,077	0	1,698	0
Energy consumption (Indirect)		GJ	1,038,940	86,857	1,275,490	90,959	1,165,496	93,377
	Electricity	GJ	969,437	86,857	1,198,646	90,959	1,095,534	93,377
	Steam	GJ	69,503	0	76,844	0	69,962	0
Percentage of fossil fuels in energy consumption		%	100	100	100	100	100	100
Percentage of LNG in energy consumption		%	12.1	6.1	10.7	5.8	10.6	5.6
Energy intensity (per sales)		GJ/KRW million	0.66	0.54	0.77	0.66	0.73	0.75

Greenhouse Gas (GHG) Emissions

Category		Unit	2022		2023		2024	
			SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
GHG emissions targets		tCO <sub>2</sub> eq	55,694	-	70,568	-	73,031	-
Total GHG emissions		tCO <sub>2</sub> eq	62,106	5,307	75,030	4,611	68,586	4,928
Direct GHG emissions (Scope1)		tCO <sub>2</sub> eq	7,565	335	8,500	284	7,854	278
Indirect GHG emissions (Scope2) - location-based		tCO <sub>2</sub> eq	54,541	4,972	66,530	4,327	60,732	4,650
Total GHG emissions intensity (per sales)		tCO <sub>2</sub> eq/KRW million	0.03	0.03	0.04	0.03	0.04	0.04
	Scope 1 emissions intensity (per sales)	tCO <sub>2</sub> eq/KRW million	0.004	0.002	0.005	0.002	0.004	0.002
	Scope 2 emissions intensity (per sales)	tCO <sub>2</sub> eq/KRW million	0.030	0.029	0.036	0.029	0.034	0.035

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	
ESG Data	
GRI Index	
SASB Index	
ESRS Index	
TCFD Index	
Independent Assurance Statement	



ESG Data | Environmental\*

\* SeAH Steel figures are based on data from the Pohang, Gunsan, Suncheon, and Changwon plants.

Environmental Management

Category		Unit	2022		2023		2024	
			SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Environmental investments		KRW million	1,745	59	1,270	72	5,282	164
Environmental Management System (ISO 14001) certification	Number of eligible sites	Site(s)	4	2	4	2	4	2
	Number of certified sites	Site(s)	4	0	4	0	4	0
	Certification rate	%	100	0	100	0	100	0
Energy Management System (ISO 50001) certification	Number of eligible sites	Site(s)	4	2	4	2	4	2
	Number of certified sites	Site(s)	1	0	1	0	2	0
	Certification rate	%	25	0	25	0	50	0

Eco-friendly Vehicle Ownership

Category		Unit	2022		2023		2024	
			SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Total number of vehicles		Number	31	13	34	11	36	12
Number of eco-friendly vehicles		Number	1	0	3	0	3	4
	Electric vehicles	Number	1	0	2	0	2	0
	Hydrogen vehicles	Number	0	0	1	0	1	0
	Hybrid electric vehicles	Number	0	0	0	0	0	4
	Solar-powered vehicles	Number	0	0	0	0	0	0
Percentage of eco-friendly vehicle		%	3.2	0.0	8.8	0.0	8.3	33.3

Purchase of Raw Materials

Category		Unit	2022		2023		2024	
			SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Total raw materials purchased		Metric ton	919,207	136,402	1,054,615	146,800	1,008,998	136,909
Raw material consumption intensity (per sales)		Metric ton/KRW million	0.51	0.79	0.57	0.99	0.56	1.02
Sustainable raw materials purchased		Metric ton	19	0	6,191	0	163	0
Percentage of sustainable raw materials purchased		%	0.00	0.00	0.59	0.00	0.02	0.00

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	

ESG Data
GRI Index
SASB Index
ESRS Index
TCFD Index
Independent Assurance Statement



ESG Data | Environmental\*

\* SeAH Steel figures are based on data from the Pohang, Gunsan, Suncheon, and Changwon plants.

Sales of Eco-friendly Products

Category	Unit	2022		2023		2024	
		SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Eco-friendly sales	KRW million	144,400	0	1,009,381	0	991,149	33,037
Percentage of eco-friendly sales	%	8.0	0.0	54.2	0.0	55.5	24.7

Water\* and Effluents

Category	Unit	2022		2023		2024	
		SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Water consumption targets	1000 m <sup>3</sup>	504.0	-	375.5	-	455.3	-
Water consumption**	1000 m <sup>3</sup>	411.1	10.5	469.4	13.2	478.1	12.6
Industrial water	1000 m <sup>3</sup>	253.6	5.0	314.3	5.7	325.6	5.7
Potable water	1000 m <sup>3</sup>	157.5	5.5	155.1	7.5	152.5	6.9
Water consumption intensity (per sales)	1000 m <sup>3</sup> /KRW billion	0.23	0.06	0.25	0.09	0.27	0.09
Water reused	1000 m <sup>3</sup>	0.0	0.0	0.0	0.0	0.6	0.0
Wastewater discharged ***	1000 m <sup>3</sup>	211.8	0.0	229.3	0.0	216.6	0.0
Wastewater reused	1000 m <sup>3</sup>	0.0	0.0	0.0	0.0	0.0	0.0
Wastewater reuse rate	%	0.0	0.0	0.0	0.0	0.0	0.0

\* Water withdrawal and consumption volumes are equivalent.  
\*\* Water consumption has been corrected due to the exclusion of SeAH Steel's non-manufacturing site (Pohang Mundeok Plant).  
\*\*\* Wastewater discharged has been corrected due to a unit error in the aggregation of SeAH Steel Changwon Plant's data.



Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	
ESG Data	
GRI Index	
SASB Index	
ESRS Index	
TCFD Index	
Independent Assurance Statement	



ESG Data | Environmental\*

\* SeAH Steel figures are based on data from the Pohang, Gunsan, Suncheon, and Changwon plants.

Water Pollutants

Category		Unit	2022		2023		2024	
			SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Water pollutant emissions		Ton	5.41	-	28.16	-	19.65	-
	COD (Chemical Oxygen Demand)	Ton	1.31	-	7.53	-	1.47	-
	BOD (Biological Oxygen Demand)	Ton	0.61	-	2.41	-	3.21	-
	TOC (Total Organic Carbon)	Ton	1.40	-	3.12	-	0.89	-
	SS (Suspended Solids)	Ton	0.69	-	6.80	-	8.28	-
	T-N (Total Nitrogen)	Ton	1.30	-	8.19	-	5.72	-
	T-P (Total Phosphorus)	Ton	0.10	-	0.11	-	0.08	-

Air Pollutants

Category		Unit	2022		2023		2024	
			SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Air pollutant emissions		Ton	20.34	-	20.48	-	23.16	-
	PM (Particulates)	Ton	6.36	-	1.99	-	5.31	-
	NOx (Nitrogen oxides)	Ton	13.97	-	17.95	-	17.84	-
	SOx (Sulfur oxides)	Ton	0.01	-	0.54	-	0.01	-
Air pollutant emissions intensity (per sales)		Ton/KRW billion	0.011	-	0.011	-	0.013	-
	PM (Particulates)	Ton/KRW billion	0.004	-	0.001	-	0.003	-
	NOx (Nitrogen oxides)	Ton/KRW billion	0.008	-	0.010	-	0.010	-
	SOx (Sulfur oxides)	Ton/KRW billion	0.000	-	0.000	-	0.000	-

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	
ESG Data	
GRI Index	
SASB Index	
ESRS Index	
TCFD Index	
Independent Assurance Statement	



ESG Data | Environmental\*

\* SeAH Steel figures are based on data from the Pohang, Gunsan, Suncheon, and Changwon plants.

Waste

Category		Unit	2022		2023		2024	
			SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Waste generation targets		Ton	9,998	-	10,355	-	10,054	-
Total waste generated		Ton	11,965	146	13,891	169	10,365	265
General waste generated		Ton	5,963	95	5,944	85	5,055	93
	Incineration	Ton	84	0	81	0	27	0
	Landfill	Ton	2,525	0	2,560	0	1,612	0
	Miscellaneous	Ton	0	0	0	0	6	0
	Recycling	Ton	3,353	95	3,303	85	3,411	94
	Recycling rate	%	56.2	100	55.6	100	67.5	100
Construction waste generated		Ton	601	0	3,068	0	208	0
	Incineration	Ton	0	0	0	0	0	0
	Landfill	Ton	0	0	0	0	0.5	0
	Miscellaneous	Ton	601	0	3,068	0	207	0
	Recycling	Ton	0	0	0	0	0	0
	Recycling rate	%	0.0	0.0	0.0	0.0	0.0	0.0
Designated waste generated		Ton	5,378	52	4,898	85	5,102	172
	Incineration	Ton	329	35	516	74	298	144
	Landfill	Ton	0	0	0	0	0	0
	Miscellaneous	Ton	0	0	0	0	0	0
	Recycling	Ton	5,049	17	4,382	11	4,804	28
	Recycling rate	%	93.9	32.5	89.5	12.7	94.2	16.1
Percentage of designated waste		%	44.95	35.26	35.26	49.98	49.22	64.77
Total waste recycled (by-product recycled)		Ton	8,403	111	7,685	96	8,215	121
Total waste recycling rate (by-product recycling rate)		%	70.3	76.2	55.3	56.4	79.3	45.7

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	

- ESG Data
- GRI Index
- SASB Index
- ESRS Index
- TCFD Index
- Independent Assurance Statement



ESG Data | Environmental\*

\* SeAH Steel figures are based on data from the Pohang, Gunsan, Suncheon, and Changwon plants.

Chemical Substances

Category	Unit	2022		2023		2024	
		SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Chemical emissions	Ton	1.5	0.0	1.7	0.0	1.7	0.0
Number of hazardous chemical substances	Type(s)	6	0	6	0	6	0
Amount of hazardous chemical substances used	Ton	2,064	0	2,295	0	2,347	0
Amount of hazardous chemical spills	Ton	0	0	0	0	0	0

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	
ESG Data	
GRI Index	
SASB Index	
ESRS Index	
TCFD Index	
Independent Assurance Statement	



## ESG Data | Social

### Employees

Category			Unit	2022		2023		2024	
				SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Total number of employees			Person(s)	673	35	762	32	796	31
Executive			Person(s)	13	4	13	2	14	3
By gender	Male	Person(s)	13	4	13	2	14	3	
		Person(s)	0	0	0	0	0	0	
	By age	Under 30	Person(s)	0	0	0	0	0	0
		30 to 49	Person(s)	0	0	0	0	0	0
		50 and over	Person(s)	13	4	13	2	14	3
	General manager			Person(s)	46	5	42	4	39
By gender	Male	Person(s)	45	5	42	4	39	5	
		Person(s)	1	0	0	0	0	0	
	By age	Under 30	Person(s)	0	0	0	0	0	0
		30 to 49	Person(s)	5	0	6	0	4	2
		50 and over	Person(s)	41	5	36	4	35	3
	Deputy general manager			Person(s)	37	3	45	5	49
By gender	Male	Person(s)	36	3	44	5	48	3	
		Person(s)	1	0	1	0	1	0	
	By age	Under 30	Person(s)	0	0	0	0	0	0
		30 to 49	Person(s)	26	3	36	5	42	3
		50 and over	Person(s)	11	0	9	0	7	0
	Manager			Person(s)	94	5	85	5	85
By gender	Male	Person(s)	94	5	85	5	85	5	
		Person(s)	0	0	0	0	0	1	
	By age	Under 30	Person(s)	0	0	0	0	0	0
		30 to 49	Person(s)	93	5	84	5	84	6
		50 and over	Person(s)	1	0	1	0	1	0

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	
ESG Data	
GRI Index	
SASB Index	
ESRS Index	
TCFD Index	
Independent Assurance Statement	



ESG Data | Social

Employees

Category			Unit	2022		2023		2024	
				SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Assistant manager			Person(s)	40	6	52	4	65	3
	By gender	Male	Person(s)	36	4	49	2	62	2
		Female	Person(s)	4	2	3	2	3	1
	By age	Under 30	Person(s)	0	0	2	0	1	0
		30 to 49	Person(s)	39	6	49	4	63	3
		50 and over	Person(s)	1	0	1	0	1	0
		Associate			Person(s)	443	12	525	12
	By gender	Male	Person(s)	413	9	487	10	495	10
		Female	Person(s)	30	3	38	2	49	1
	By age	Under 30	Person(s)	80	5	113	7	125	5
		30 to 49	Person(s)	129	5	169	3	185	4
		50 and over	Person(s)	234	2	243	2	234	2
		Special appointment			Person(s)	0	0	0	0
	By gender	Male	Person(s)	0	0	0	0	0	0
		Female	Person(s)	0	0	0	0	0	0
	By age	Under 30	Person(s)	0	0	0	0	0	0
		30 to 49	Person(s)	0	0	0	0	0	0
		50 and over	Person(s)	0	0	0	0	0	0
		Employment type	Full-time employees		Person(s)	636	34	630	32
	Male		Person(s)	609	29	603	28	645	28
	Female		Person(s)	27	5	27	4	29	3
Temporary employees			Person(s)	37	1	132	0	122	0
	Male		Person(s)	28	0	118	0	98	0
	Female		Person(s)	9	1	14	0	24	0
Functions	Office work		Person(s)	340	30	344	28	369	27
	Technical work		Person(s)	333	5	418	4	427	4
Non-employee worker			Person(s)	518	79	567	83	506	85

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	
ESG Data	
GRI Index	
SASB Index	
ESRS Index	
TCFD Index	
Independent Assurance Statement	



ESG Data | Social

Employee Diversity

Category	Unit	2022		2023		2024	
		SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Number of foreigners	Person(s)	1	0	1	0	1	0
Number of hires with disabilities	Person(s)	12	0	19	0	17	0
Percentage of hires with disabilities	%	1.8	0.0	2.5	0.0	2.1	0.0
Number of veterans (and/or eligible individuals) hires	Person(s)	8	0	10	0	10	0
Percentage of veterans (and/or eligible individuals) hires	%	1.2	0.0	1.3	0.0	1.3	0.0
Number of women in management positions	Person(s)	2	0	1	0	1	1
Percentage of women management positions*	%	1.1	0.0	0.5	0.0	0.5	5.9

\* The percentage of women in management positions for 2023 has been corrected as a result of some employees being double-counted due to their dual positions at SeAH Steel.

New Hires and Turnover

Category			Unit	2022		2023		2024	
				SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Number of new hires			Person(s)	80	9	175	12	115	4
	By gender	Male	Person(s)	56	5	147	5	91	3
		Female	Person(s)	24	4	28	7	24	1
	By age	Under 30	Person(s)	68	3	80	8	61	2
		30 to 49	Person(s)	9	6	78	4	47	2
		50 and over	Person(s)	3	0	17	0	7	0
Turnover			Person(s)	47	4	69	13	41	6
	Turnover rate	%	7.4	12.5	10.9	39.4	6.3	19.0	
	Voluntary turnover	Person(s)	17	4	16	13	20	6	
	Voluntary turnover rate*	%	2.7	12.5	2.5	39.4	3.1	19.0	
Average years of service			Year(s)	18.8	4.7	18.8	4.9	17.0	6.0
	Male	Year(s)	19.2	4.9	19.2	5.0	17.4	5.9	
	Female	Year(s)	10.2	3.5	9.7	4.5	7.1	6.9	

\* The voluntary turnover rate has been corrected due to a change in calculation method from the previous Sustainability Report 2023.



Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	
ESG Data	
GRI Index	
SASB Index	
ESRS Index	
TCFD Index	
Independent Assurance Statement	



ESG Data | Social

Employee Training

Category		Unit	2022		2023		2024	
			SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Training hours	Total training hours	Hour(s)	37,632	1,681	44,507	1,310	52,859	1,202
	Training hours per employee	Hour(s)	55.9	48.0	58.4	40.9	66.4	38.8
Training costs	Total training costs	KRW million	662	10	814	20	1,026	24
	Training costs per employee	KRW million/person	0.98	0.27	1.07	0.63	1.29	0.78
Number of employees trained	Environment	Person(s)	398	1	363	1	199	2
	Fair trade	Person(s)	56	38	141	36	325	30
	Safety and health	Person(s)	10,078	39	19,318	39	17,494	35
	Ethics and anti-corruption	Person(s)	306	38	-	36	152	27
	Human rights	Person(s)	1,170	38	1,096	36	1,207	27
	Information security	Person(s)	385	34	348	31	403	31

Labor-Management Relations

Category		Unit	2022		2023		2024	
			SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Number of strikes		Case(s)	0	0	0	0	0	0
Labor union and labor management council	Employees eligible for unionization	Person(s)	373	-	363	-	313	-
	Number of unionized employees	Person(s)	240	-	221	-	245	-
	Unionization rate	%	64.3	-	60.9	-	78.3	-

Retirement Pension

Category		Unit	2022		2023		2024	
			SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Amount of retirement pension assets under management		KRW 100 million	559	5	566	5	578	5
Number of employees covered by retirement benefit plan		Person(s)	531	21	699	17	603	19

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	
ESG Data	
GRI Index	
SASB Index	
ESRS Index	
TCFD Index	
Independent Assurance Statement	



ESG Data | Social

Parental Leave

Category	Unit	2022		2023		2024	
		SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Employees on parental leave	Person(s)	3	0	4	0	3	0
Male	Person(s)	1	0	3	0	1	0
Female	Person(s)	2	0	1	0	2	0
Returnees from parental leave	Person(s)	0	0	3	0	1	0
Male	Person(s)	0	0	2	0	0	0
Female	Person(s)	0	0	1	0	1	0
Parental leave return rate	%	0	0	75	0	33	0
Male	%	0	0	67	0	0	0
Female	%	0	0	100	0	50	0

Performance Evaluation

Category	Unit	2022		2023		2024	
		SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Number of employees who received regular performance evaluations	Person(s)	252	18	261	19	291	20
Percentage of employees who received regular performance evaluations	%	100	100	100	100	100	100

Employee Satisfaction

Category	Unit	2022		2023		2024	
		SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Organizational assessment	Point(s)	71.9	-	72.0	-	72.7	68.2

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	

ESG Data
GRI Index
SASB Index
ESRS Index
TCFD Index
Independent Assurance Statement



ESG Data | Social

Social Contribution

Category		Unit	2022		2023		2024	
			SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Number of volunteers		Person(s)	365	83	149	89	81	87
Volunteer hours	Total volunteer hours	Hour(s)	1,019	166	398	178	3,263	192
	Volunteer hours per person	Hour(s)	2.8	2.0	2.7	2.0	40.3	2.2
Community donations		KRW 100 million	3.38	0.02	1.14	0.02	4.49	0.02

Responsible Supply Chain

Category		Unit	2022		2023		2024	
			SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Number of in-house business partners		Number	45	4	45	4	41	4
Procurement spent on in-house business partners		KRW 100 million	0	41	711	45	345	45
Grievance resolution with in-house business partners	Number of grievances reported	Case(s)	183	78	173	84	137	72
	Number of grievances resolved	Case(s)	183	75	170	80	137	70
	Resolution rate	%	100	96.2	98.3	95.2	100	97.2
Number of business partners evaluated on ESG		Number	0	0	0	0	20	0

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	
ESG Data	
GRI Index	
SASB Index	
ESRS Index	
TCFD Index	
Independent Assurance Statement	



ESG Data | Social

Occupational Safety and Health

Category		Unit	2022		2023		2024	
			SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Occupational injury rate	Aggregated	%	0.93	0.97	0.46	4.50	0.23	3.57
	Employees	%	0.74	0.00	0.26	0.00	0.00	0.00
	Business partners	%	1.19	1.47	0.73	6.33	0.61	4.94
LTIFR	Aggregated	Cases/million work hours	5.84	5.55	6.70	24.38	4.64	18.98
	Employees	Cases/million work hours	4.58	0.00	5.38	0.00	3.21	0.00
	Business partners*	Cases/million work hours	7.43	7.21	8.39	30.59	6.42	23.66
Number of injuries	Aggregated	Case(s)	11	1	6	5	3	4
	Employees	Case(s)	5	0	2	0	0	0
	Business partners	Case(s)	6	1	4	5	3	4
Number of injured workers	Aggregated	Person(s)	11	1	6	5	3	4
	Employees	Person(s)	5	0	2	0	0	0
	Business partners	Person(s)	6	1	4	5	3	4
Number of fatalities	Aggregated	Person(s)	0	0	1	0	0	0
	Employees	Person(s)	0	0	0	0	0	0
	Business partners	Person(s)	0	0	1	0	0	0
Fatality rate	Aggregated	%	0.00	0.00	0.08	0.00	0.00	0.00
	Employees	%	0.00	0.00	0.00	0.00	0.00	0.00
	Business partners	%	0.00	0.00	0.18	0.00	0.00	0.00
Injury frequency rate	Aggregated	Cases/million work hours	4.01	5.55	2.01	24.38	1.07	18.98
	Employees	Cases/million work hours	3.27	0.00	1.20	0.00	0.00	0.00
	Business partners*	Cases/million work hours	4.95	7.21	3.05	30.59	2.41	23.66
Injury severity rate	Aggregated	‰	0.47	0.34	2.72	3.83	0.28	2.11
	Employees	‰	0.61	0.00	0.31	0.00	0.27	0.00
	Business partners*	‰	0.30	0.45	5.80	4.80	0.29	2.63
Occupational Health and Safety Management System (ISO 45001) certification	Number of eligible sites	Site(s)	4	2	4	2	4	2
	Number of certified sites	Site(s)	4	0	4	0	4	0
	Certification rate	%	100	0	100	0	100	0

\* LTIFR, injury frequency rate, injury severity rate for business partners have been corrected due to errors in calculating work hours for SeAH Steel's business partners.

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	
ESG Data	
GRI Index	
SASB Index	
ESRS Index	
TCFD Index	
Independent Assurance Statement	



ESG Data | Governance

Board of Directors (BOD)

Category			Unit	2022		2023		2024	
				SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Total number of board members			Person(s)	5	3	5	3	7	3
	By gender	Male	Person(s)	4	3	4	3	6	3
		Female	Person(s)	1	0	1	0	1	0
	By age	Over 50	Person(s)	4	3	4	3	5	3
		30 to 50	Person(s)	1	0	1	0	2	0
		Under 30	Person(s)	0	0	0	0	0	0
	By type	Inside directors	Person(s)	3	2	3	2	3	2
		Outside directors	Person(s)	2	0	2	0	4	0
		Other non-executive directors	Person(s)	0	1	0	1	0	1
BOD operations	Number of board meetings held		Meeting(s)	10	11	7	8	9	10
	Board attendance rate		%	96	100	100	83	97	97
	Agenda	Agenda items for resolution	Item(s)	22	15	16	10	23	15
		Amendments	Item(s)	0	0	0	0	0	0
		Agenda items for reporting	Item(s)	9	0	15	0	15	7

Compliance Management System (ISO 37301) Certification

Category			Unit	2022		2023		2024	
				SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Number of eligible sites			Site(s)	7	2	7	2	7	2
Number of certified sites			Site(s)	0	0	7	0	7	0
Certification rate			%	0	0	100	0	100	0

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	
ESG Data	
GRI Index	
SASB Index	
ESRS Index	
TCFD Index	
Independent Assurance Statement	



ESG Data | Governance

Regulatory Violations

Category		Unit	2022		2023		2024	
			SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Number of regulatory violations		Case(s)	1	1	2	0	3	1
	Environmental violations	Case(s)	1	1	0	0	0	0
	Anti-competitive violations	Case(s)	0	0	0	0	0	0
	Occupational health and safety violations	Case(s)	0	0	2	0	3	1
	Anti-corruption and anti-bribery violations	Case(s)	0	0	0	0	0	0
Fines imposed		KRW million	3.6	0.5	75.9	0.0	13.9	0.0
	Environmental violations	KRW million	3.6	0.5	0.0	0.0	0.0	0.0
	Anti-competitive violations	KRW million	0.0	0.0	0.0	0.0	0.0	0.0
	Occupational health and safety violations	KRW million	0.0	0.0	75.9	0.0	13.9	0.0
	Anti-corruption and anti-bribery violations	KRW million	0.0	0.0	0.0	0.0	0.0	0.0

Information Security

Category		Unit	2022		2023		2024	
			SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel	SeAH Steel	Dong-A Steel
Customer data protection violations		Case(s)	0	0	0	0	0	0
Information security breaches		Case(s)	0	0	0	0	0	0
Percentage of information security investments		%	0.98	-	0.87	-	1.00	-

Membership Associations

SeAH Steel					Dong-A Steel	
Korea Iron & Steel Association	Seoul Chamber of Commerce and Industry	Korea International Trade Association	Korea Management Association	Korea Personnel Improvement Association	Korea Iron & Steel Association	Korea International Trade Association
Steel Structure Center, Korea Iron & Steel Association	Korea Enterprises Federation	Korea-U.S. Economic Association	The American Chamber of Commerce in Korea			
Steel Pipe Council, Korea Iron & Steel Association	Federation of Korean Industries	Korea Listed Companies Association	Korea-U.S. Economic Council			





Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	
ESG Data	
GRI Index	
SASB Index	
ESRS Index	
TCFD Index	
Independent Assurance Statement	

## GRI Index

### GRI Preparation Standards (GRI 1)

Statement of use	SeAH Steel reports its sustainable management activities and key achievements from January 1, 2024, to December 31, 2024, in accordance with GRI standards.
GRI 1 used	GRI1:Foundation2021
Applicable GRI Sector Standards	-

### General Disclosures

Topic	Metric		Page	Remark
General Disclosures	2-1	Organizational details	pp.6, 8	
	2-2	Entities included in the organization's sustainability reporting	p.2	
	2-3	Reporting period, frequency and contact point	p.2	
	2-4	Restatements of information	p.2	
	2-5	External assurance	pp.136-137	
	2-6	Activities, value chain and other business relationships	pp.8-11	
	2-7	Employees	p.116	
	2-8	Workers who are not employees	p.116	
	2-9	Governance structure and composition	p.92	
	2-10	Nomination and selection of the highest governance body	p.93	
	2-11	Chairman of the highest governance body	p.92	
	2-12	Role of the highest governance body in overseeing the management of impacts	p.14	
	2-13	Delegation of responsibility for managing impacts	p.14	
	2-14	Role of the highest governance body in sustainability reporting	p.14	
	2-15	Conflicts of interest	p.92	
	2-16	Communication of critical concerns	p.92	
	2-17	Collective knowledge of the highest governance body	pp.93-94	

Topic	Metric		Page	Remark
General Disclosures	2-18	Evaluation of the performance of the highest governance body	p.94	
	2-19	Remuneration policies	p.94	
	2-20	Process to determine remuneration	p.94	
	2-21	Annual total compensation ratio	p.94	
	2-22	Statement on sustainable development strategy	p.5	
	2-23	Policy commitments	pp.30, 80	
	2-24	Embedding policy commitments	pp.30, 80	
	2-25	Processes to remediate negative impacts	pp.81, 100	
	2-26	Mechanisms for seeking advice and raising concerns	pp.81, 100	
	2-27	Compliance with laws and regulations	p.124	
	2-28	Membership associations	p.124	
	2-29	Approach to stakeholder engagement	pp.18-21	
	2-30	Collective bargaining agreements	p.119	
Material Topics	3-1	Process to determine material topics	p.15	
	3-2	List of material topics	pp.15-16	
	3-3	Management of material topics	p.17	

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	
ESG Data	
<a href="#">GRI Index</a>	
SASB Index	
ESRS Index	
TCFD Index	
Independent Assurance Statement	



GRI Index

Topic Standards

Topic		Metric	Page	Remark
Economic Performance	201-1	Direct economic value generated and distributed	p.6	
	201-2	Financial implications and other risks and opportunities due to climate change	p.35	
	201-3	Defined benefit plan obligations and other retirement plans	p.119	
Indirect Economic Impacts	203-1	Infrastructure investments and services supported	pp.86-90	
Anti-corruption	205-2	Communication and training about anti-corruption policies and procedures	p.119	
Anti-competitive Behavior	206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	p.124	
Tax	207-1	Approach to tax	p.106	
	207-3	Stakeholder engagement and management of concerns related to tax	p.106	
Materials	301-1	Materials used by weight or volume	p.111	
	301-2	Recycled input materials used	p.111	
Energy	302-1	Energy consumption within the organization	p.110	
	302-3	Energy intensity	p.110	
	302-4	Reduction of energy consumption	p.27	

Topic		Metric	Page	Remark
Water and Effluents	303-1	Interactions with water as a shared resource	p.45	
	303-2	Management of water discharge-related impacts	p.45	
	303-3	Water withdrawal	p.112	
	303-4	Water discharge	p.112	
Biodiversity	304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	p.51	
	304-2	Significant impacts of activities, products and services on biodiversity	p.51	
	304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	p.51	
Emissions	305-1	Direct (Scope 1) GHG emissions	p.110	
	305-2	Energy indirect (Scope 2) GHG emissions	p.110	
	305-4	GHG emissions intensity	p.110	
	305-5	Reduction of GHG emissions	p.27	
	305-7	Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	p.113	

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	
ESG Data	
GRI Index	
SASB Index	
ESRS Index	
TCFD Index	
Independent Assurance Statement	



GRI Index

Topic Standards

Topic		Metric	Page	Remark
Waste	306-1	Waste generation and significant waste-related impacts	pp.46-47	
	306-2	Management of significant waste-related impacts	pp.46-47	
	306-3	Waste generated	p.114	
	306-4	Waste diverted from disposal	pp.47, 114	
	306-5	Waste directed to disposal	pp.47, 114	
Employment	401-1	New employee hires and employee turnover	p.118	
	401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	p.77	
	401-3	Parental leave	p.120	

Topic		Metric	Page	Remark
Occupational Health and Safety	403-1	Occupational health and safety management system	p.65	
	403-2	Hazard identification, risk assessment, and incident investigation	pp.64-65	
	403-3	Occupational health services	pp.56-58	
	403-4	Worker participation, consultation, and communication on occupational health and safety	pp.58, 60	
	403-5	Worker training on occupational health and safety	pp.58, 66	
	403-6	Promotion of worker health	pp.59, 61-63	
	403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	pp.53-67	
	403-9	Work-related injuries	p.122	
Training and Education	404-1	Average hours of training per year per employee	pp.79, 119	
	404-2	Programs for upgrading employee skills and transition assistance programs	pp.70-73, 77	
	404-3	Percentage of employees receiving regular performance and career development reviews	p.120	
Diversity and Equal Opportunity	405-1	Diversity of governance bodies and employees	pp.70, 79, 92-93, 118	
Supplier Social Assessment	414-2	Negative social impacts in the supply chain and actions taken	pp.82, 86	

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	
ESG Data	
GRI Index	
<u>SASB Index</u>	
ESRS Index	
TCFD Index	
Independent Assurance Statement	



SASB Index

Topic	Cord	Metric	Page	Remark
Greenhouse Gas Emissions	EM-IS-110a.1	Gross global Scope 1 emissions, percentage covered under emissions-limiting regulations	p.110	
	EM-IS-110a.2	Discussion of long-term and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets	pp.26-31	
Air Emissions	EM-IS-120a.1	Air emissions of the following pollutants: (1) CO, (2) NOx (excluding N <sub>2</sub> O), (3) SO <sub>x</sub> , (4) particulate matter (PM10), (5) manganese (MnO), (6) lead (Pb), (7) volatile organic compounds (VOCs), and (8) polycyclic aromatic hydrocarbons (PAHs)	p.113	
Energy Management	EM-IS-130a.1	(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable	p.110	
	EM-IS-130a.2	(1) Total fuel consumed, (2) percentage coal, (3) percentage natural gas, (4) percentage renewable	p.110	
Water Management	EM-IS-140a.1	(1) Total freshwater withdrawn, (2) percentage recycled, (3) percentage in regions with High or Extremely High Baseline Water Stress	p.112	
Waste Management	EM-IS-150a.1	Amount of waste generated, percentage hazardous, percentage recycled	p.114	
Workforce Health & Safety	EM-IS-320a.1	(1) Total recordable incident rate (TRIR), (2) fatality rate, and (3) near miss frequency rate (NMFR) for (a) full-time employees and (b) contract employees	p.122	
Supply Chain Management	EM-IS-430a.1	Discussion of the process for managing iron ore and/or coking coal sourcing risks arising from environmental and social issues	-	Not applicable
Activity Metric	EM-IS-000.A	Raw steel production, percentage from: (1) basic oxygen furnace processes, (2) electric arc furnace processes	-	Not applicable
	EM-IS-000.B	Total iron ore production	-	Not applicable
	EM-IS-000.C	Total coking coal production	-	Not applicable

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	
ESG Data	
GRI Index	
SASB Index	
ESRS Index	
TCFD Index	
Independent Assurance Statement	



ESRS Index

ESRS 2. General Disclosures

Code	Indicator Description	Page	Remark
ESRS 2 BP-1	General basis for preparation of the sustainability statements	p.2	
ESRS 2 BP-2	Disclosures in relation to specific circumstances	p.2	
ESRS 2 GOV-1	The role of the administrative, management and supervisory bodies	pp.14, 25, 92-94	
ESRS 2 GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	pp.14, 105-106	
ESRS 2 GOV-3	Integration of sustainability-related performance in incentive schemes	-	
ESRS 2 GOV-4	Statement on sustainability due diligence	p.93	
ESRS 2 GOV-5	Risk management and internal controls over sustainability reporting	pp.104-106	
ESRS 2 SBM-1	Market position, strategy, business model(s) and value chain	pp.11-12	
ESRS 2 SBM-2	Interests and views of stakeholders	p.19	
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model(s)	pp.17-18	
ESRS 2 IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	p.16	
ESRS 2 IRO-2	Disclosure Requirements in ESRS covered by the undertaking's sustainability statements	pp.114-119	

ESRS E1. Climate Change

Code	Indicator Description	Page	Remark
ESRS E1-1	Transition plan for climate change mitigation	pp.26-27, 29	
ESRS E1-2	Policies related to climate change mitigation and adaptation	p.31	
ESRS E1-3	Actions and resources in relation to climate change policies	pp.28-31, 36	
ESRS E1-4	Targets related to climate change mitigation and adaptation	pp.27, 29	
ESRS E1-5	Energy consumption and mix	p.110	
ESRS E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	pp.36, 110	
ESRS E1-7	GHG removals and GHG mitigation projects financed through carbon credits	p.27	
ESRS E1-8	Internal carbon pricing	-	
ESRS E1-9	Potential financial effects from material physical and transition risks and potential climate-related opportunities	p.35	

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	
ESG Data	
GRI Index	
SASB Index	
<u>ESRS Index</u>	
TCFD Index	
Independent Assurance Statement	



ESRS Index

ESRS E2. Pollution

Code	Indicator Description	Page	Remark
ESRS E2-1	Policies related to pollution	p.39	
ESRS E2-2	Actions and resources related to pollution	p.40	
ESRS E2-3	Targets related to pollution	p.40	
ESRS E2-4	Pollution of air, water and soil	pp.44-45, 112-113	
ESRS E2-5	Substances of concern and substances of very high concern	pp.48-49, 115	
ESRS E2-6	Potential financial effects from pollution-related impacts, risks and opportunities	p.35	

ESRS E3. Water and Marine Resources

Code	Indicator Description	Page	Remark
ESRS E3-1	Policies implemented to manage water and marine resources	p.39	
ESRS E3-2	Actions and resources related to water and marine resources	pp.40, 45, 50	
ESRS E3-3	Targets related to water and marine resources	-	
ESRS E3-4	Water consumption	p.112	
ESRS E3-5	Potential financial effects from water and marine resources-related impacts, risks and opportunities	p.35	



Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	
ESG Data	
GRI Index	
SASB Index	
<u>ESRS Index</u>	
TCFD Index	
Independent Assurance Statement	



ESRS Index

ESRS E4. Biodiversity and Ecosystems

Code	Indicator Description	Page	Remark
ESRS E4-1	Transition plan on biodiversity and ecosystems	p.51	
ESRS E4-2	Policies related to biodiversity and ecosystems	-	
ESRS E4-3	Actions and resources related to biodiversity and ecosystems	-	
ESRS E4-4	Targets related to biodiversity and ecosystems	-	
ESRS E4-5	Impact metrics related to biodiversity and ecosystems change	p.51	
ESRS E4-6	Potential financial effects from biodiversity and ecosystem-related risks and opportunities	p.35	

ESRS E5. Resource Use and Circular Economy

Code	Indicator Description	Page	Remark
ESRS E5-1	Policies related to resource use and circular economy	p.39	
ESRS E5-2	Actions and resources related to resource use and circular economy	pp.40, 45-47, 50	
ESRS E5-3	Targets related to resource use and circular economy	pp.26, 40, 50	
ESRS E5-4	Resource inflows	p.111	
ESRS E5-5	Resource outflows	p.114	
ESRS E5-6	Potential financial effects from resource use and circular economy-related impacts, risks and opportunities	p.35	

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	
ESG Data	
GRI Index	
SASB Index	
<u>ESRS Index</u>	
TCFD Index	
Independent Assurance Statement	



ESRS Index

ESRS S1. Own Workforce

Code	Indicator Description	Page	Remark
ESRS S1-1	Policies related to own workforce	pp.59, 80	
ESRS S1-2	Processes for engaging with own workers and workers’ representatives about impacts	pp.75, 78	
ESRS S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	pp.81, 100	
ESRS S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	pp.17, 56, 81	
ESRS S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	p.55	
ESRS S1-6	Characteristics of the undertaking’s employees	p.117	
ESRS S1-7	Characteristics of non-employee workers in the undertaking’s own workforce	p.117	
ESRS S1-8	Collective bargaining coverage and social dialogue	p.119	
ESRS S1-9	Diversity indicators	pp.117-118	
ESRS S1-10	Adequate wages	-	
ESRS S1-11	Social protection	-	
ESRS S1-12	Persons with disabilities	pp.79, 118	
ESRS S1-13	Training and skills development indicators	pp.79, 119	
ESRS S1-14	Safety and Health indicators	p.122	
ESRS S1-15	Work-life balance indicators	p.120	
ESRS S1-16	Compensation indicators (pay gap and total compensation)	p.94	
ESRS S1-17	Incidents, complaints and severe human rights impacts and incidents	p.81	

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	
ESG Data	
GRI Index	
SASB Index	
ESRS Index	
TCFD Index	
Independent Assurance Statement	



ESRS Index

ESRS S2. Workers in the Value Chain

Code	Indicator Description	Page	Remark
ESRS S2-1	Policies related to value chain workers	p.82	
ESRS S2-2	Processes for engaging with value chain workers about impacts	pp.82-84	
ESRS S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns	pp.83-84	
ESRS S2-4	Taking action on material impacts on value chain workers, and approaches to mitigating material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	pp.82-85	
ESRS S2-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	p.85	

ESRS S3. Affected Communities

Code	Indicator Description	Page	Remark
ESRS S3-1	Policies related to affected communities	-	
ESRS S3-2	Processes for engaging with affected communities about impacts	-	
ESRS S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	-	
ESRS S3-4	Taking action on material impacts on affected communities, and approaches to mitigating material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	-	
ESRS S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	-	

ESRS S4. Consumers and End Users

Code	Indicator Description	Page	Remark
ESRS S4-1	Policies related to consumers and end-users	-	
ESRS S4-2	Processes for engaging with consumers and end-users about impacts	-	
ESRS S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	-	
ESRS S4-4	Taking action on material impacts on consumers and end-users, and approaches to mitigating material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	-	
ESRS S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	-	

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	
ESG Data	
GRI Index	
SASB Index	
<u>ESRS Index</u>	
TCFD Index	
Independent Assurance Statement	



ESRS Index

ESRS G1. Business Conduct

Code	Indicator Description	Page	Remark
ESRS G1-1	Corporate culture and business conduct policies	pp.95-102	
ESRS G1-2	Management of relationships with suppliers	pp.82-85	
ESRS G1-3	Prevention and detection of corruption or bribery	pp.104-106	
ESRS G1-4	Confirmed incidents about corruption or bribery	p.124	
ESRS G1-5	Political influence and lobbying activities	-	
ESRS G1-6	Payment practices	-	

Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	
ESG Data	
GRI Index	
SASB Index	
ESRS Index	
<u>TCFD Index</u>	
Independent Assurance Statement	



TCFD Index

Category	Recommendation Disclosures	Page	Remark
Governance	a) Describe the board's oversight of climate-related risks and opportunities.	p.25	
	b) Describe management's role in assessing and managing climate-related risks and opportunities.	p.25	
Strategy	a) Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.	pp.32-35	
	b) Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.	pp.32-35	
	c) Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	pp.32-35	
Risk Management	a) Describe the organization's processes for identifying and assessing climate-related risks.	pp.32-35	
	b) Describe the organization's processes for managing climate-related risks.	pp.32-35	
	c) Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.	pp.32-35	
Metrics and Targets	a) Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.	pp.32-36	
	b) Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	p.110	
	c) Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.	pp.26-29	



Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	
ESG Data	
GRI Index	
SASB Index	
ESRS Index	
TCFD Index	
Independent Assurance Statement	

# Independent Assurance Statement

Dear Stakeholders of SeAH Steel Corp.,

## Assurance Outline

Korea Productivity Center Quality Assurance (hereinafter “KPCQA”) was commissioned by SeAH Steel Corp. (hereinafter “SeAH Steel”) to conduct an independent assurance on the 2024 Sustainability Report (hereinafter “the report”) and issue an assurance statement. SeAH Steel has sole responsibility for the preparation of the data within the report. KPCQA’s responsibility is to provide objective opinions on this report with the specified criteria and scope of assurance.

## Scope

This report describes SeAH Steel’s sustainability efforts and performance. The scope of assurance was included on activities from January 1, 2024 to December 31, 2024. Activities through 2025 have, also been used in some areas. The report was assured focusing on the reporting of sustainable management policies, strategies, goals, businesses, and performance, and conformity of data collection and analysis, and the report creation process.

## Criteria

The assurance was carried out in accordance with the following standards:

- AA1000AS v3
- KPCQA ESG Report Assurance Protocol

## Levels

The assurance of this report was conducted in line with the requirements of the AA1000AS v3 Type 1 (Adherence to the AA1000 four principles) at moderate level of assurance. The assurance was applied by professional judgement about materiality. The report has been produced in accordance with GRI Standards. We confirmed that the report complied with reporting principles of GRI Standards, Universal Standards, and Topic Standards based on the data and information provided by SeAH Steel.

## Universal Standards

- |   |              |
|---|--------------|
| · Organizational and Its Reporting Practice | 2-1 to 2-5   |
| · Activities and Workers                    | 2-6 to 2-8   |
| · Governance                                | 2-9 to 2-21  |
| · Strategy, Policies, and Practices         | 2-22 to 2-28 |
| · Stakeholder Engagement                    | 2-29 to 2-30 |
| · Material Topics                           | 3-1 to 3-3   |

## Topic Standards

- |                                   |   |
|-----------------------------------|---|
| · Economic Performance            | 201-1, 201-2, 201-3   |
| · Indirect Economic Impacts       | 203-1   |
| · Anti-corruption                 | 205-2, 205-3  |
| · Anti-competitive Behavior       | 206-1   |
| · Tax                             | 207-1, 207-3  |
| · Materials                       | 301-1, 301-2  |
| · Energy                          | 302-1, 302-3, 302-4   |
| · Water and Effluents             | 303-1, 303-2, 303-3, 303-4                                    |
| · Biodiversity                    | 304-1, 304-2, 304-4   |
| · Emissions                       | 305-1, 305-2, 305-4, 305-5, 305-7                             |
| · Waste                           | 306-1, 306-2, 306-3, 306-4, 306-5                             |
| · Employment                      | 401-1, 401-2, 401-3   |
| · Occupational Health and Safety  | 403-1, 403-2, 403-3, 403-4, 403-5, 403-6, 403-7, 403-8, 403-9 |
| · Training and Education          | 404-1, 404-2, 404-3   |
| · Diversity and Equal Opportunity | 405-1   |
| · Supplier Social Assessment      | 414-2   |



Overview	+
Sustainability Framework	+
Environmental	+
Social	+
Governance	+
Appendix	
ESG Data	
GRI Index	
SASB Index	
ESRS Index	
TCFD Index	
Independent Assurance Statement	

# Independent Assurance Statement

## Methodology

- Review of Sustainability Performance Data and Management System
- Review of the reporting process and data management framework
- Review of materiality assessment process and Internal Analysis Procedure
- Review of media report on sustainability
- Interviews with executives and employees involved in material topics and report preparation
- Review of the overall report

## Limitations

This assurance was conducted as a comparative review of the data provided by SeAH Steel and thus performed a limited assurance within a restricted scope. The assurance has its own limitations depending on the characteristics and calculation method of the data.

## Conclusions

KPCQA conducted assurance on the draft through a revision of the data, an on-site, verification process, and an interview with the employees. It was confirmed that all errors identified during the assurance were corrected.

As a result of the assurance of this report, no material errors or improper descriptions have been found and the conclusions are as follows.

· **Inclusivity: Participation of stakeholders**

SeAH Steel operates stakeholder communication channels to gather opinions from various stakeholders to derive material topics and ensure that they are reflected in decision-making.

· **Materiality: Selection and reporting of material topics**

SeAH Steel presented sustainability performance data without any material omissions. With regard to the material issues presented in the report, nothing had come to our attention that would cause significant concerns in the decision-making process.

· **Responsiveness : Organizational response to issues**

KPCQA has checked and reviewed that SeAH Steel has established an ESG promotion system and endeavors to respond to the needs and interests of both internal and external stakeholders. We confirmed that SeAH Steel has a management process for identifying material topics through a materiality assessment.

· **Impact : Monitoring and measurement of business activities**

KPCQA has verified that SeAH Steel identifies and monitors the impacts of its business activities on stakeholders. we confirmed the impact associated with material issues have been properly measured.

## Independence of Assurance

KPCQA is a 3<sup>rd</sup> Party Conformity Assessment Body that conforms to ISO/IEC 17021:2015 and has documented policies, assessment processes, and quality assurance systems with an assurance team of ESG experts. KPCQA was not involved in any of the business operations of SeAH Steel and the assurance was conducted with independence.



June 2025  
Korea Productivity Center Quality Assurance

President Jang Jean, Kang *Kang Jang Jean*



25, 26, 27F, SeAH Tower, 45 Yanghwa-ro, Mapo-gu,  
Seoul, Republic of Korea  
[www.seahsteel.co.kr](http://www.seahsteel.co.kr)