# Dongwha Electrolyte Code of Conduct



# **Revision and Signoff Sheet**

# **Change Record**

Version	Date	Change reference
1.0	January 8, 2024	Establishment of Dongwha Electrolyte Code of Conduct

Dongwha Electrolyte Co., Ltd. (hereinafter referred to as "Dongwha Electrolyte") is committed to fulfilling its corporate social and ethical responsibilities and aims to grow into a more sustainable company based on trust and cooperation with stakeholders. To achieve this, Dongwha Electrolyte has established the "Dongwha Electrolyte Code of Conduct" (hereinafter referred to as the "Code of Conduct") based on global standards of social responsibility, international norms and standards, as well as legal requirements. The company intends to use this Code of Conduct as the guiding principle for all management activities and the proper behavior of its employees.

Dongwha Electrolyte must strictly comply with the laws and regulations of the countries where their businesses are located, secure a safe working environment, and operate their companies ethically while establishing and maintaining management processes that workers can respect. All provisions included in this Code of Conduct are equally important. If this Code of Conduct's content conflicts with local regulations, the higher standards shall take precedence.

## **Human Rights and Labor**

Dongwha Electrolyte must protect and respect the human rights of workers throughout all stages of corporate activities and treat them fairly. This applies to all forms of workers, including temporary workers, migrant workers, interns, short-term contract workers, directly employed workers, etc. Workers must be guaranteed lawful work and rights according to local regulations.

#### 1. Voluntary Employment

- All work and occupations must be voluntary, and workers should be able to resign freely without any disadvantages after giving reasonable notice of resignation.
- Any form of labor that goes against the workers' will, such as forced or exploitative labor, is prohibited. Dongwha Electrolyte is not allowed to engage in acts such as assault, threats, or confinement to force labor, nor can they exert mental pressure based on economic situations or debt relationships.
- A written employment contract clearly specifying the terms of employment must be provided in a language that workers can understand.
- Dongwha Electrolyte cannot compel workers to transfer government-issued identification, passports, or work permits as a condition of employment.

#### 2. Prohibition of Child Labor

- Dongwha Electrolyte must comply with the 'International Labour Organization (ILO) Convention No. 138, Minimum Age Convention' and the national regulations regarding minimum employment age.
- This means that Dongwha Electrolyte should not employ workers under the age of 15 (or 14 in the case of developing countries, according to the exception of ILO Convention No. 138) or below the minimum employment age specified by national laws.

- Workers under the age of 18 should not be engaged in night work, overtime work, or any
  hazardous work related to safety and health. They must also comply with regulations regarding
  working hours and working conditions.
- All laws and regulations must be complied with when utilizing apprenticeship programs in the workplace.

#### 3. Prohibition of Discrimination and Harassment

- In employment practices such as recruitment, promotion, compensation, and opportunities for education and training, workers should be treated equally without discrimination or harassment based on race, skin color, age, gender, gender identity and expression, sexual orientation, ethnicity or national origin, disability status, marital or pregnancy status, religion, political affiliation, or union membership.
- Dongwha Electrolyte must strive to eliminate workplace harassment and illegal discrimination.

#### 4. Working Hours

- Except in emergencies, working hours, including overtime work, must comply with legal requirements, and workers should not exceed the maximum working hours stipulated by local law.
- All overtime work must be voluntary and adequately compensated with appropriate premiums.

#### 5. Wages

- The compensation provided to workers must comply with all relevant wage-related laws, including minimum wage, overtime pay, and other benefits mandated by law.
- An easily understandable pay statement must be provided promptly with each payment to enable workers to verify that they have been accurately compensated for their work.

#### 6. Humane Treatment

- All workers must be treated with dignity. Any form of rough or inhumane treatment towards
  workers, including harassment, sexual abuse, corporal punishment, mental or physical coercion,
  and verbal abuse, is prohibited, as well as any threats to engage in such behavior.
- Dongwha Electrolyte must clearly define policies and disciplinary procedures to ensure the humane treatment of workers and communicate these policies to the workers.

#### 7. Freedom of Association

Dongwha Electrolyte must recognize the right to freedom of association (including the
establishment of unions) and collective bargaining rights guaranteed by law. Dongwha Electrolyte
should create an environment where workers can communicate with management about working
conditions without fear of discrimination, retaliation, threats, or harassment.

# Safety and Health

Dongwha Electrolyte must recognize that providing a safe and healthy working environment not only minimizes work-related accidents and illnesses but also enhances product and service quality, production consistency, employee retention, and morale. Dongwha Electrolyte should also recognize that ongoing employee education is essential for identifying and addressing safety and health issues in the workplace.

#### 1. Work Environment

- Dongwha Electrolyte must ensure that elements contributing to safety and health hazards (e.g., chemicals, electricity, other sources of energy, fire, vehicles, and falls) are not exposed to workers through appropriate design, engineering and administrative controls, preventive maintenance, and establishment of safe work procedures (locking devices and protective devices). In cases where these measures are not sufficient to adequately control hazards, Dongwha Electrolyte must provide appropriate protective equipment to workers and manage and supervise the proper usage of the protective equipment.
- Dongwha Electrolyte must obtain and maintain necessary safety-related permits to operate business and comply with safety regulations in their countries.
- Dongwha Electrolyte must ensure that vibrations and noise resulting from heavy equipment activities comply with local safety regulations.

#### 2. Emergency Measures

 Dongwha Electrolyte must minimize potential emergencies and accidents by identifying and assessing potential emergencies in advance. These emergency measures and response procedures should include monitoring and reporting emergencies, establishing worker notification and evacuation procedures, and implementing worker education and training.

#### 3. Safety Diagnosis

- Regular safety assessments of the workplace must be conducted, considering its characteristics to identify and evaluate potential hazards.
- The safety of machinery, equipment, and facilities within the workplace must be evaluated regularly to prevent accidents. Furthermore, necessary equipment, such as safety devices and protective barriers, must be installed and regularly inspected.

#### 4. Establishment of Safety Management System

- Dongwha Electrolyte must deploy a dedicated safety management department under the direct supervision of responsible personnel within the workplace, ensuring operational independence to establish an autonomous safety management system.
- They should develop response manuals for safety accidents, which should include immediate action procedures, evacuation protocols, reporting systems, and follow-up measures.

- Dongwha Electrolyte must adequately educate its employees on the response manuals for safety
  accidents and conduct regular preparedness training sessions in accordance with the laws of the
  country where the business operates.
- In the event of a safety accident, efforts should be made to investigate the root cause and devise improvement measures.

#### 5. Safety and Health Communication

- Dongwha Electrolyte must provide appropriate workplace safety and health information and education in a language understandable to workers regarding workplace hazards such as machinery, electricity, chemicals, fire, and physical hazards.
- Dongwha Electrolyte must conduct regular safety and health training for workers. This training should include content aimed at improving workers' safety awareness and enhancing their safety management skills.
- Dongwha Electrolyte should encourage workers to raise health and safety concerns at any time.

#### 6. Health Management

- Dongwha Electrolyte should make efforts to maintain cleanliness of rest areas, restrooms, and dining facilities for workers.
- When Dongwha Electrolyte provides dormitories for workers, they should ensure cleanliness and safety and provide reasonable personal space with emergency exits, hot and cold water, heating and cooling facilities, ventilation systems, lighting, and access control devices.

#### 7. Prevention of Industrial Accidents and Diseases

Procedures and systems for the prevention, management, tracking, and reporting of
industrial accidents and diseases must be established. This should include encouraging
workers to report freely, classifying and recording cases of injury and illness, providing
necessary medical treatment, implementing corrective measures in case of accidents or
illnesses, conducting case investigations, and providing support for return-to-work
regulations.

#### **Environment**

Dongwha Electrolyte must comply with environmental protection laws and regulations, recognizing that environmental protection is a fundamental social responsibility of the company. While minimizing the negative impact on the local community environment and natural resources in manufacturing processes, Dongwha Electrolyte must also make efforts to protect public health and safety.

#### 1. Environmental Permit and Reporting

 Dongwha Electrolyte must obtain, maintain, and manage the necessary environmental permits and registrations and operate according to the latest revisions while complying with reporting obligations.

#### 2. Prevention of Pollution and Reduction of Resource Use

• Dongwha Electrolyte should make efforts to minimize the emission of pollutants and the discharge of waste by modifying production, maintenance, and facility processes, substituting raw materials, conserving materials, and recycling and reusing materials. Additionally, it aims to reduce the consumption of energy, fuel, and resources.

#### 3. Hazardous Chemicals

• Dongwha Electrolyte must accurately identify chemicals and other substances with the potential for environmental pollution and ensure their safe handling, transportation, storage, usage, recycling, or reuse, as well as proper disposal.

#### 4. Waste Management

- A waste management system should be established, considering waste reduction, reuse, and recycling for sustainable resource circulation.
- Dongwha Electrolyte must identify the hazardousness of waste and comply with relevant regulations according to its characteristics for waste disposal. Efforts should be made to minimize waste.

#### 5. Air Pollutants

- Before discharging or disposing of volatile organic chemicals, smoke agents, corrosives, particulates, ozone-depleting substances, and combustion by-products generated from facility operations, industrial processes, and sanitation facilities, Dongwha Electrolyte must first identify their characteristics and then control and manage them within the limits permitted by law.
- Dongwha Electrolyte should regularly check whether the air pollutant emission monitoring system is in operation.

#### 6. Material Regulation

• Dongwha Electrolyte should strive to comply with all regulations regarding the use, prohibition, and restriction of specific substances in production and manufacturing, including recycling and disposal labeling of materials, as well as meeting customer requirements.

#### 7. Water Resource Management

- Dongwha Electrolyte must record and monitor water usage and discharge, seek methods for water conservation, and control contamination pathways.
- Before discharging or disposing of any wastewater, Dongwha Electrolyte should make efforts to identify, monitor, and control its characteristics according to regulations and regularly monitor the performance of wastewater treatment systems.

• Dongwha Electrolyte should make efforts to manage the quality of wastewater and reduce water usage to protect water resources.

#### 8. Energy Consumption and Greenhouse Gas Emissions

- A life cycle assessment must be conducted to understand and manage greenhouse gas emissions resulting from product production and transportation. Environmental data supporting this assessment should be calculated using internationally recognized methodologies.
- Dongwha Electrolyte should establish systems for monitoring the electricity consumption of their facilities and building databases related to greenhouse gas (GHG) emissions. These systems should be aimed at minimizing energy consumption and GHG emissions.
- Dongwha Electrolyte should establish goals for reducing greenhouse gas emissions and consider practical measures such as improving energy efficiency and transitioning to renewable energy to pursue carbon neutrality and respond to climate change.

#### 9. Biodiversity Conservation and Prevention of Deforestation

• Dongwha Electrolyte must identify and manage the risks of potential biodiversity and environmental degradation throughout its business operations. Efforts should be made to protect biodiversity and preserve land, forests, and natural environments.

## **Ethical Management**

Dongwha Electrolyte must comply with the following to fulfill social responsibility and achieve sustainable growth:

#### 1. Business Integrity

 Dongwha Electrolyte must maintain the highest level of integrity in all business interactions, strictly prohibiting any form of corruption, coercion, extortion, embezzlement, and other inappropriate behaviors.

#### 2. Prohibition of Unfair Profits

Promising, proposing, permitting, providing, or accepting bribes or other means to obtain unfair
or inappropriate benefits is strictly prohibited. This includes promising, proposing, permitting,
providing, or accepting bribes through third parties, directly or indirectly, to acquire or retain
business rights or granting business rights to specific individuals or obtaining undue benefits.

#### 3. Compliance with Fair Trade

• Dongwha Electrolyte must comply with relevant laws and regulations related to fair trade and should not engage in practices that hinder fair trading practices.

#### 4. Information Disclosure

- All transactions must be conducted transparently and accurately recorded in the accounting books and internal systems. The company must disclose information regarding labor, health, safety, environmental management practices, business activities, structure, financial status, and performance in accordance with relevant regulations and prevailing industry standards.
- Dongwha Electrolyte should not tolerate the forgery of records or false statements based on conditions or practices.

#### 5. Protection of Identity and Prohibition of Retaliation

- Dongwha Electrolyte must provide confidential and anonymous reporting channels for concerns related to actual or potential adverse impacts within the supply chain of materials supplied to Dongwha Electrolyte.
- Employees and suppliers should be informed of and encouraged to utilize procedures for reporting unethical or illegal behavior or issues within the company without fear of retaliation.
   These procedures should be communicated and maintained to ensure a safe environment for reporting.
- No form of retaliation should be accepted against individuals reporting unlawful acts or participating in subsequent investigations.

#### 6. Compliance with Export Controls and Economic Sanctions

 Dongwha Electrolyte must comply with all applicable domestic and international trade embargoes and sanctions and take all necessary measures to avoid the risks of violation of sanctions.

#### 7. Building a Culture of Trust

• Dongwha Electrolyte must not engage in any actions that hinder the trust of the entire Dongwha Electrolyte, such as publicly disseminating false facts to denigrate suppliers, competitors, or other stakeholders, thereby damaging their reputations.

# **Responsible Raw Material Procurement**

Dongwha Electrolyte must comply with the following for responsible raw material procurement.

### 1. Establishment of Policies and Systems

- Dongwha Electrolyte must establish policies stating that they will not use raw materials acquired through illegal and unethical methods that could result in serious human rights abuses, war crimes, serious violations of international humanitarian law, risks to health and safety, water scarcity, waste, pollution, or environmental destruction.
- Dongwha Electrolyte must include provisions related to conflict minerals and responsible minerals within their relevant policies. If raw materials, components, or products supplied to Dongwha Electrolyte contain tin, tantalum, tungsten, gold (collectively referred to as 3TG),

and cobalt (currently not including such conflict minerals), Dongwha Electrolyte must establish systems to ensure that they do not directly or indirectly provide resources or benefits to armed groups that violate human rights in conflict-affected areas such as the Democratic Republic of Congo or neighboring countries.

#### 2. Conducting Due Diligence According to OECD Guidance

• Dongwha Electrolyte must conduct due diligence according to OECD Guidance on the origin and supply chain of raw materials, components, and products containing 3TG and cobalt when included (currently not including such conflict minerals).

# **Protection of Trade Secrets and Intellectual Property**

Dongwha Electrolyte must not disclose or provide any technical data, information, or intellectual property acquired in transactions to third parties without prior consent from the stakeholders.

#### 1. Management and Protection of Confidential Information

• Dongwha Electrolyte should only use technical data, information, and intellectual property acquired in the process of supplying products and services within the scope permitted by Dongwha Electrolyte, and they must be actively protected.

#### 2. Protection of Intellectual Property

- Dongwha Electrolyte must not infringe upon or illegally use the intellectual property of others, such as patents, software, designs, or trademarks, in the process of supplying products and services.
- The transfer of technology and expertise must be conducted in a manner that respects intellectual property rights.

# **Quality Management**

Dongwha Electrolyte must strive to provide customers with the highest quality products and services.

#### 1. Quality Control

• Dongwha Electrolyte should endeavor to supply self-validated quality products to ensure the production and supply of the highest level of products.

#### 2. Responsibility of Management

 Dongwha Electrolyte must notify customers in advance of factors that may affect quality, such as changes in equipment, materials, or work methods, and make efforts to prevent defects from occurring.

# 3. Quality Management for Suppliers

 Dongwha Electrolyte should contribute to ensuring the quality of suppliers' products and services through technical and quality support to suppliers.