

KD Navien

Human Rights Management Policy

Policy No.: KDNA-B-2401

Chapter 1. General Provisions

1. Background and Purpose

Guided by the corporate philosophy 'Contribution to Society through Business Success', KD Navien recognizes the responsibility to respect human rights as a core value throughout its business operations. The Company hereby establishes this Human Rights Management Policy to uphold the human rights of stakeholders associated with its business conduct and to prevent and address human rights violations. This Policy endorses internationally recognized human rights standards including the UN Guiding Principles on Business and Human Rights (UNGPs), the UN Universal Declaration of Human Rights, ILO conventions, and the OECD Guidelines and Due Diligence Guidance.

2. Scope of Application

This Human Rights Management Policy applies to all employees of KD Navien, its affiliates, and overseas corporations. All employees shall act in accordance with this Policy when engaging with stakeholders associated with business operations, and shall ensure that its spirit is reflected throughout all stakeholder relationships. Affiliates and overseas corporations may establish entity-specific policies based on this Policy, incorporating applicable laws and industry characteristics of each country. This Policy shall serve as the standard for all management and business operations, except where specific provisions exist under applicable local laws or the articles of incorporation or internal regulations of the relevant entity.

Chapter 2. Fundamental Principles

1. Non-Discrimination

KD Navien shall prohibit discriminatory acts and strive to create a workplace free from all forms of discrimination. The Company shall not discriminate on the basis of race, age, gender, ethnicity, nationality, religion, disability, gender identity, or any other characteristic, and maintain a zero-tolerance policy toward discrimination in employment conditions including hiring, training, promotion, compensation, benefits, and retirement on the same basis.

2. Dignity and Respect

- 1) KD Navien shall respect the dignity and inherent worth of all members of its workforce as human beings and strive to ensure no human rights violations occur.
- 2) KD Navien shall prohibit sexual harassment in the workplace, faithfully fulfill its obligations under applicable laws, and strive to prevent sexual harassment. To this end, the Company shall maintain a Sexual Harassment Prevention Committee and notify all employees of the designated contact person and reporting channels at each business site, ensuring that any individual can come forward to report concerns. Upon receiving a report of or becoming aware of an incident of workplace sexual harassment, the Company shall take necessary measures without delay, including the separation of the alleged perpetrator from the victim.
- 3) KD Navien shall prohibit workplace bullying, faithfully fulfill its obligations under applicable laws, and strive to foster an inclusive and respectful corporate culture. To this end, the Company shall maintain a dedicated body for addressing workplace bullying and notify all employees of the designated contact person and reporting channels at each business site. Upon receiving a report of or becoming aware of an incident of workplace bullying, the Company shall take necessary measures without delay, including protecting the victim and launching an investigation.

3. Prohibition of Forced Labor

KD Navien shall not compel employees to work against their will under any form of mental or physical coercion. The Company shall not require the surrender or retention of personal identification documents such as identity cards, passports, or work permits, except where required by applicable laws and regulations, and shall prohibit all forms of forced labor, including payment of fees as a condition of employment and human trafficking. With respect to the prohibition of forced labor, the Company shall support and comply with ILO Convention No. 29 on Forced or Compulsory Labour.

4. Prohibition of Child Labor and Protection of Young Workers

KD Navien shall prohibit all forms of child labor and shall not employ individuals below the minimum working age in each jurisdiction. Where individuals under the age of 18 are employed, the Company shall comply with country-specific applicable laws and ensure that young workers are not engaged in hazardous or harmful work. With respect to the prohibition of child labor and the protection of young workers, the Company shall endorse and comply with ILO Convention No. 138 on Minimum Age and ILO Convention No. 182 on the Worst Forms of Child Labour.

5. Freedom of Association

KD Navien shall uphold the right to freedom of association and collective bargaining in accordance with applicable labor laws in each country, and shall not subject employees to adverse treatment or discrimination on the grounds of forming, joining, or participating in a labor union.

6. Working Hours and Compensation

KD Navien shall comply with applicable labor laws and regulations governing working hours in each country. Overtime work shall be carried out only with the voluntary consent of employees, and employees who perform overtime, night, or holiday work shall receive corresponding premium pay

in accordance with applicable labor laws. The Company shall further ensure that employees are paid at or above the minimum wage level prescribed by pertinent laws in each jurisdiction.

7. Occupational Health and Safety

KD Navien shall strive to prevent occupational accidents by complying with applicable laws and internal regulations on working conditions and safety. To this end, the Company shall establish a safety oversight organization to respond swiftly to any such incidents and continuously work to build a robust safety framework through regular safety training and other initiatives.

8. Data Protection

KD Navien shall strive to protect the personal data of diverse stakeholders including employees and consumers. To this end, the Company shall maintain a dedicated data protection organization and continuously work to bolster information security.

9. Responsible Supply Chain Management

To extend human rights management beyond KD Navien itself to all suppliers with whom the Company has business relationships, the Company shall establish and disseminate the 'Supply Chain ESG Management Policy' and 'Supplier Code of Conduct,' and strive to prevent and remediate human rights risks across the supply chain.

10. Right to a Healthy Environment

Recognizing that the right to a healthy environment is an integral part of human rights, KD Navien shall establish an Environmental Management Policy and Environmental Management Principles to build an environmentally responsible management framework, meet stakeholder expectations, and continuously improve environmental performance.

Chapter 3. Human Rights Management System

1. Governance

KD Navien shall oversee the progress of human rights management initiatives and all aspects of human rights risk management through committees or management meetings attended by the chief decision-maker or key departmental decision-makers, as well as working-level meetings chaired by the decision-maker of the dedicated human rights management department.

2. Grievance Mechanism

1) Reporting and Intake

KD Navien shall maintain reporting channels through which employees and other stakeholders who have experienced human rights violations or who are aware of human rights risks affecting others may submit reports.

- *Reporting channel for human rights violations: Online whistleblowing channel*
(<https://www.kdnavien.co.kr/company/generalReport>)

2) Access to Remedy

KD Navien shall endeavor to determine the most appropriate remedies for reports received by verifying the relevant facts and considering corrective actions and measures to prevent recurrence in accordance with applicable laws and internal regulations. Where necessary, this process may engage relevant departments such as legal counsel, and involve deliberation in meetings attended by key decision-makers.

3) Whistleblower Protection

To protect whistleblowers, KD Navien prohibits employees who are not directly involved with the whistleblower, the victim, the investigation, or remedial procedures from disclosing to any third party or leaking outside the Company any whistleblower personal information, information from which the whistleblower's identity may be inferred, report details, or information related to the investigation or remedial procedures, obtained in the course of their duties or through their position within the organization. No employee shall use or disclose any information obtained in connection with a report except to the extent necessary to handle the report and implement remedial procedures. The Company shall maintain and operate confidentiality protection systems and protective measures in accordance with applicable laws and internal procedures, so that whistleblowers, witnesses, and other persons participating in investigations or remedial procedures do not suffer any disadvantage on the grounds of having made a report or having participated in such procedures.

3. Training and Dissemination

KD Navien shall provide human rights management training for the purpose of deepening employees' understanding of human rights and sharing the Company's internal direction for human rights management. To further disseminate human rights management, relevant information including company policies may be shared with employees as well as stakeholders including suppliers.

4. Human Rights Due Diligence

1) Risk Identification

① Development of Assessment Indicators

KD Navien shall develop and apply assessment indicators to identify human rights risks affecting stakeholders by reflecting the Fundamental Principles of this Human Rights

Management Policy, the UN Guiding Principles on Business and Human Rights (UNGPs), and the OECD Guidelines and Due Diligence Guidance.

② Human Rights Impact Assessment

KD Navien shall implement a process for selecting assessment targets from organizations within the scope of this Human Rights Management Policy and identifying and evaluating human rights risks. Assessments shall be conducted through desk-based review using assessment indicators or checklists provided to the entities under assessment. Based on the results of the desk-based review, on-site audits may be conducted to identify risks in greater detail through interviews and site inspections. Additionally, third-party assurance by an independent body may be conducted to ensure the reliability of desk-based reviews and on-site audits.

2) Risk Mitigation and Remediation

KD Navien shall develop measures to mitigate and remediate human rights risks identified through the assessment process. The Company shall continuously monitor whether relevant departments and other responsible parties are faithfully implementing such measures, and may take necessary action where implementation is expected to fall short.

3) Reporting and Disclosure

① Reporting to Key Decision-Makers

KD Navien shall report risks and mitigation and remediation measures identified through the assessment process to key decision-makers. Assessment findings approved by key decision-makers may be shared with relevant departments and other responsible parties as appropriate.

② External Disclosure

KD Navien shall publicly disclose assessment-related matters — including identified risks and corrective actions taken — through channels readily accessible to stakeholders including the Company's website or Sustainability Report.

Addendum

- 1) Established: June 26, 2023
- 2) Amended: May 1, 2026