
SEWON AMERICA 협력사 행동규범 (책임성명)

(Supplier Code of Conduct) Statement of Responsibility

[Revision History]

Authorized	Establishment	Revision	Details
Pres	2025. 06. 30	2025. 06. 30	New

Management Depart : MLP Team

SEWON AMERICA, Ltd.

SEWON AMERICA Supplier Code of Conduct

(Statement of Responsibility)

Revised 2025.06.30 / Effective 2025.07.01

Chapter 1 General Provisions

1.1 Purpose of the Code of Conduct

SEWON America (hereinafter referred to as the "Company") has established this Code based on its ethical management philosophy, with the aim of building a sustainable supply chain that respects social responsibility and mutual growth.

The Company respects the autonomy and independence of its suppliers and encourages them to faithfully comply with the management systems, environmental standards, ethical practices, labor and human rights, and health and safety principles defined in this Code, aligning with the Company's commitment to responsible business practices.

1.2 Scope and Applicability of the Code

This Code applies to all suppliers that provide goods and services to the Company or are under contract for any other form of business transaction.

This Code does not outline all of a supplier's obligations, and if there is any conflict between the provisions of this Code and applicable local laws, the local laws shall take precedence.

1.3 Supplier Responsibilities and Roles

All suppliers must comply with this Code in their business operations and decision-making processes. Suppliers are also expected to promote adherence to this Code among their subcontractors and business partners throughout the supply chain.

The Company, or a third party authorized by the Company, may inspect and audit a supplier's compliance with this Code to the extent permitted by law. Based on the audit results, the Company may recommend corrective actions, and suppliers must develop and implement improvement plans through mutual consultation.

Chapter 2 Management System

2.1 Public Disclosure of Corporate Statement

- ① Suppliers must communicate their commitment to implementing this Code or an equivalent standard of sustainable management both internally and externally.
- ② It is recommended that suppliers share their commitment to social responsibility (as outlined in this Code or equivalent) internally through management messages (e.g., New Year's address), internal guidelines, and bulletin boards, and externally through websites, business reports, brochures, and promotional materials.

2.2 Appointment of Responsible Personnel

- ① Suppliers must designate a staff member responsible for managing activities.
- ② Suppliers must also appoint a manager to oversee the planning and implementation of CSR-related activities.

2.3 Risk Assessment

- ① Suppliers should make efforts to identify potential risks related to ethics, environment, labor/human rights, and health/safety that may arise during business operations.
- ② If significant risks are identified, suppliers must prepare and implement measures to mitigate them.

2.4 Training and Communication

- ① Suppliers must educate employees about the requirements of this Code, relevant laws, and related regulations.
- ② Suppliers should also share plans and performance related to the implementation of this Code with their employees.

2.5 Information and Record Manag

Suppliers must accurately record and manage relevant information and documents in accordance with applicable laws and internal document control policies.

2.6 Grievance Handling System

Suppliers must operate a grievance handling system that allows employees to report violations of laws and regulations in the areas of environment, ethics, labor/human rights, and health/safety, or to report infringement of their personal rights and interests.

Suppliers must ensure that no employee is subjected to dismissal, threats, retaliation, or any other unfair treatment for filing a report, and the identity of whistleblowers must be strictly protected.

2.7 Code Compliance and Supplier Responsibility

Suppliers must actively develop and implement improvement plans to address deficiencies or violations identified through written assessments or on-site evaluations regarding compliance with this Code.

Suppliers should also communicate this Code to their subcontractors, encourage compliance, and recommend corrective actions if legal or regulatory violations are discovered within their supply chain.

Chapter 3 Human Rights and Labor

3.1 Humane Treatment (Prohibition of Harassment)

- ① Suppliers must respect the human rights and privacy of all employees and must notify and obtain voluntary consent before collecting personal information.
- ② Suppliers must not permit any form of inhumane treatment or harassment, including sexual abuse, corporal punishment, physical or mental coercion, verbal abuse, or unreasonable disciplinary actions by exploiting a superior position in the workplace.
- ③ Suppliers must clearly define disciplinary procedures for inhumane acts and establish measures for remedying or protecting victims. These procedures should be communicated to workers, and upon request, appropriate actions such as transfer or relocation should be taken immediately for the affected employees.

3.2 Working Hours

- ① Suppliers must comply with applicable laws regarding working hours and shall not exceed the legal maximum working hours per week.

- ② Suppliers should avoid requiring employees to work overtime against their will. When overtime work is unavoidable, it must be performed voluntarily with the employee's consent and compensated at a premium rate.
- ③ Suppliers must ensure that employees are provided with at least one day off per week in accordance with applicable laws and regulations.

3.3 Wages and Benefits

- ① Suppliers must pay wages that meet or exceed the legal minimum wage and include overtime compensation, statutory insurance, and benefits. Wage statements showing detailed payment and deduction information must be provided in a language understood by the employee.
- ② Suppliers must contribute to social insurance as required by law to help guarantee the labor rights and livelihood of workers.
- ③ Suppliers must provide a pleasant working environment, implement benefit programs to improve quality of life, and support career development and skills enhancement for employees.

3.4 Non-Discrimination and Respect for Diversity (Inclusion)

- ① Suppliers must not engage in unfair treatment or unreasonable discrimination. Workers must be treated based on principles of diversity, equity, and inclusion.
- ② Employment practices (hiring, pay, promotions, training opportunities, etc.) must not discriminate based on nationality, place of origin, race, skin color, age, gender, gender identity, ethnicity, disability, pregnancy, childbirth, religion, political views, union membership, or marital status. Suppliers must not require medical exams that could be used for discriminatory purposes.
- ③ Suppliers must make good-faith efforts to include vulnerable groups and minorities (such as people with disabilities, the elderly, women, and racial minorities) in the workplace.

3.5 Prohibition of Child Labor

- ① Suppliers shall not employ children under the age of 15 or below the minimum legal working age as defined by applicable laws, and shall not exploit children in any form of labor.
- ② Young workers under the age of 18 must not be assigned to hazardous processes or dangerous work environments, and their work must not interfere with educational or personal development opportunities.
- ③ Interning students must be managed separately from regular workers under a structured training program, and compliance with relevant laws must be continuously verified.

3.6 Prohibition of Forced Labor

- ① Suppliers must prohibit all forms of forced or compulsory labor, including slavery, human trafficking, or involuntary work.

- ② Suppliers must provide employees with employment contracts in a language they understand and must give them a copy. Employees must not be required to submit identification, visas, or other documents that may restrict personal freedom, and physical or psychological coercion (e.g., violence, threats, or confinement) is strictly prohibited.
- ③ Suppliers must not unreasonably restrict workers' movement and must allow employees to resign freely, at their own will.

3.7 Freedom of Association

- ① In accordance with local laws, suppliers must respect employees' rights to freely form and join labor unions and to engage in collective bargaining and peaceful assembly.
- ② Suppliers must foster an environment where employees and their representatives can communicate with management about working conditions and company policies without fear of discrimination, retaliation, threats, or harassment.

Chapter 4 Health and Safety

4.1 Compliance with Health and Safety Laws and Regulations

- ① Suppliers must comply with all occupational health and safety laws and regulations in the countries where they operate and must obtain and maintain all necessary health and safety permits.
- ② Suppliers must communicate industrial health and safety standards in the local language of the employees at each site.

4.2 Establishment of a Health and Safety Management System

Suppliers must operate a health and safety management system that incorporates safety and health policies into management practices. The system should include organization, planning, implementation, and review, in order to prevent workplace accidents and ensure a safe working environment.

4.3 Safety Management of Machinery, Equipment, and Facilities

- ① Suppliers must conduct regular safety inspections of hazardous machinery, equipment, and facilities based on legal requirements and internal manuals and manage safety assessments and evaluations.
- ② Suppliers must install and maintain physical safety devices, guards, and locks to prevent accidents caused by hazardous equipment in the workplace.
- ③ Suppliers must provide personal protective equipment (PPE) to ensure employee safety. PPE must be easy to use and certified for safety performance, and properly maintained.

4.4 Risk Assessment (Safety Inspections)

- ① Suppliers must conduct at least annual risk assessments to identify employee exposure to hazards and take preventive measures. Additional assessments must be conducted when work methods or processes change, or new installations are introduced.
- ② Based on the results, suppliers must implement safe process design, technical and administrative controls, preventive maintenance, integration of safety measures into work procedures, and ongoing training. They must also supervise PPE usage.

4.5 Emergency Response

Suppliers must have an emergency response manual that includes procedures for reporting, responding to, and recovering from emergencies such as natural disasters, infectious disease outbreaks, fires, or safety accidents.

- ② Suppliers must conduct regular emergency drills based on local laws and internally developed emergency plans and manuals.
- ③ Suppliers must install emergency exits, exit signs, fire detectors, fire alarms, and other safety equipment, and conduct regular inspections to ensure proper operation.

4.6 Accident Management

- ① Suppliers must establish a system to track and measure occurrences of workplace injuries and illnesses.
- ② In the event of an industrial accident or serious illness, suppliers must take immediate action, including halting the work and evacuating employees. They must investigate the root cause and implement corrective actions.

4.7 Management of Workplace Hazards

- ① Suppliers must regularly monitor and assess harmful elements in the workplace—such as hazardous chemicals, noise, dust, and physically demanding work—and take measures to minimize employee exposure.

② Suppliers should provide facilities such as break rooms, restrooms, cafeterias, and dormitories, and must ensure cleanliness and safety by maintaining proper signage, lighting, heating/cooling, and access controls.

4.8 Health Checkups and Follow-up Management

Suppliers must conduct general or special health checkups for employees regularly, as required by the health examination laws of the country where they operate. When necessary, they must take follow-up actions such as reassignment, job relocation, or reduction of working hours.

4.9 Health and Safety Training

Suppliers must regularly provide occupational health and safety training to employees in accordance with relevant laws and internal policies/plans. Health and safety information must be displayed clearly in visible areas throughout the workplace.

Chapter 5 Environment

5.1 Environmental Laws and Operation of Environmental Management Systems

- ① Suppliers must comply with all applicable environmental laws and regulations in the countries where they operate and must obtain and maintain all necessary environmental permits and licenses required for business operations.
- ② Suppliers must operate an environmental management system to systematically identify, assess, manage, and improve environmental impacts resulting from business operations.

5.2 Pollution Prevention, Energy Conservation, Greenhouse Gas Emissions Management

- ① To prevent environmental pollution, suppliers must strive to reduce the use of resources/energy and the generation of waste at the source through process improvements, material substitution, conservation, recycling, and reuse.
- ② Suppliers must establish systems to measure and monitor their energy consumption and greenhouse gas emissions.
- ③ Suppliers must make efforts to reduce or minimize their energy consumption and greenhouse gas emissions.

5.3 Water Resource Management

- ① Suppliers must measure, record, and manage their water usage and wastewater discharge.
- ② Suppliers must work to reduce water consumption and increase water recycling. Discharged wastewater and pollutants must be managed in accordance with legal standards or stricter internal criteria.

5.4 Air Pollutant Management

- ① Suppliers must measure, record, and manage emissions of air pollutants generated at their sites and in their operations. This includes volatile organic compounds (VOCs), exhaust gases, particulates, noise, corrosive gases, ozone-depleting substances, wastewater, and waste materials.
- ② Suppliers must minimize air emissions through appropriate means and manage them according to legal standards or stricter internal policies.

5.5 Waste Management

- ① Suppliers must measure, record, and manage their waste generation.
- ② Suppliers must minimize landfill and incineration through appropriate waste management methods and work to reduce total waste generation.

5.6 Chemical Substance Management

- ① Suppliers must ensure the safe transport, storage, use, and disposal of chemicals and must provide or disclose hazard and toxicity information of the chemicals they handle.
- ② Suppliers must work to confirm whether raw materials, components, and parts that are procured, produced, sold, or distributed contain substances harmful to human health or the environment.

5.7 Biodiversity Protection and Animal Welfare

- ① Suppliers must not encroach upon designated biodiversity conservation areas and must assess the potential impact of business operations on biodiversity and make efforts to preserve it.
- ② Suppliers must make good-faith efforts to protect animals in and around their sites, complying with all relevant local laws, regulations, and guidelines regarding animal welfare.

Chapter 6 Business Ethics

6.1 Transparency and Anti-Corruption (Prohibition of Unfair Benefits)

- ① Suppliers must uphold high ethical standards and comply with the laws and regulations of the countries and regions where they operate in relation to transactions with the company.
- ② Supplier employees must not engage in corrupt practices such as bribery, embezzlement, solicitation, or improper requests by abusing their position of power. They must not seek to gain undue advantage by exploiting weaknesses or faults.

6.2 Prevention of Conflicts of Interest

- ① Suppliers must not promise, offer, authorize, or provide improper or inappropriate benefits for unfair gains.
- ② 협Suppliers must avoid situations where personal interests could conflict with the interests of the company. When unavoidable, the interests of the company and its customers must take precedence within the boundaries of the law.

6.3 Fair Trade and Competition

- ① Suppliers must comply with fair trade laws and regulations of the countries in which they operate.
- ② Suppliers must not engage in activities that may hinder fair competition, such as abusing their market position or engaging in unfair trade practices.
- ③ Suppliers must not participate in collusion, price-fixing, bid-rigging, or other anti-competitive behavior related to the price, supply, terms, or geographic market of goods or services.

6.4 Prevention of Counterfeit Parts

- ① Suppliers must not produce or use unauthorized or counterfeit raw materials and components.
- ② Suppliers must verify that their raw materials and components are used and distributed in accordance with the intended business purpose and contractual terms.

6.5 Information Protection

- ① Suppliers must not leak trade secrets or confidential information of customers and business partners. Information obtained in the course of business may not be stored or used without prior permission or approval.

② Suppliers must manage and protect personal data of all stakeholders (including partner companies, customers, and employees) from unauthorized access or leaks, and comply with all applicable data privacy laws when collecting, storing, using, providing, or destroying personal information.

6.6 Protection of Intellectual Property

Suppliers must respect the intellectual property rights (IPRs) of customers and partners (including subcontractors), and must not disclose or misuse any proprietary technologies or information obtained during transactions. Suppliers must also take necessary steps to protect their own intellectual property and regularly check for any potential infringement.

6.7 Whistleblower Protection and Prohibition of Retaliation

- ① Suppliers must maintain accessible channels for reporting unethical behavior or violations of company policies and regulations, while ensuring anonymity for whistleblowers.
- ② Suppliers must operate internal whistleblower protection programs that prohibit any form of retaliation—such as dismissal, demotion, reassignment, or poor performance reviews—against those who report misconduct.

6.8 Responsible Sourcing of Materials

- ① Suppliers must establish processes to identify the origin and smelters/refiners of all minerals and raw materials used, including conflict minerals such as tin, tungsten, tantalum, and gold.
- ② Suppliers must use these processes to check for serious human rights violations, ethical breaches, and negative environmental impacts associated with the sourcing and production of these materials.
- ③ If suppliers are directly handling such minerals or raw materials, they should confirm—either internally or through third-party certifications—that their supply chain is not linked to human rights abuses, unethical practices, or adverse environmental impacts.

6.9 Disclosure of Information

Suppliers must truthfully disclose information related to accounting, labor, health and safety, environment, business operations, governance, ESG performance, financial condition, and other key performance indicators in accordance with legal requirements and standard industry practices.

Supplementary Provision

This regulation shall be revised and enforced from July 1, 2025, and any matters not specified in this regulation shall be governed by the relevant laws and company policies.

Supplier Code of Conduct Compliance Pledge (SEWON AMERICA)

We hereby acknowledge and pledge our active participation in accordance with the *SEWON America Supplier Code of Conduct*(hereinafter referred to as “the Code”), as outlined below:

1. We have reviewed and understood the contents of the Code and recognize that compliance with its requirements is an essential condition for conducting business with SEWON America (hereinafter referred to as “your company”). We will faithfully comply with its provisions.
2. If a representative designated by your company requests to visit our site to assess our compliance with the Code, and requests corrective actions based on the findings, we agree to cooperate and respond sincerely—except in cases where such cooperation would infringe upon our business operations, intellectual property rights, or other legitimate rights.
3. We will ensure that not only our own executives and employees, but also our subcontractors and business partners are informed of and requested to comply with the standards set forth in the Code.
4. We acknowledge that the Code, as posted on the SEWON America group homepage (www.se-won.com), may be revised or supplemented by your company, and we agree to comply with any such updates.
5. Upon becoming aware of any violations of the Code, we will immediately notify your company.
6. We will retain all documents and records related to identified risks and subsequent corrective actions for the period requested by your company and promptly notify you of any violations we become aware of.

This pledge is prepared in two copies—one to be kept by our company and one to be submitted to your company.

Date: July 25, 2025

Company Name:

CEO (Representative Director):(Signature or Seal)

To : SEWON America