

# REGULATIONS ON HUMAN RIGHTS MANAGEMENT

## Chapter 1 General Provisions

### Article 1 (Purpose)

The purpose of these regulations is to establish and implement policies to protect and promote the human rights of members and all stakeholders of CJ OliveNetworks (hereinafter referred to as the “company”) and to set other necessary matters.

### Article 2 (Definitions)

Terms used in these regulations shall be defined as follows:

1. “Human rights” means human dignity, values, freedoms and rights guaranteed by the Constitution and laws of the Republic of Korea or recognized by international human rights treaties and customary international laws to which the Republic of Korea has acceded or ratified.
2. “Human rights management” means preventing human rights violations by the company and conducting human rights-friendly management activities so as to respect and guarantee the human rights in Subparagraph 1 of this article.

It means that the company declares its human rights policy, fulfills its duty to practice and inspect human rights, and provides relief procedures for victims of human rights violations.

3. “Member” means executives and employees working in the company.
4. “Partner” means all corporations and organizations that create additional value that are necessary for the company to provide services.
5. “Stakeholder” means the government, business partners, local communities, customers, etc. that have direct or indirect relationships with the company’s business activities.

### Article 3 (Scope of Application)

- ① Matters related to the human rights management of the company shall be governed by these regulations unless there are special regulations in other laws or the articles of incorporation.
- ② These rules shall apply to company regulations related to the members of the company and the company’s business activities.

## Chapter 2 Principles for Implementation of Human Rights Management

### Article 4 (Basic Principles)

The company shall comply with domestic and international norms and standards related to human rights, such as the Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, UN Global Compact, OECD Guidelines for Multinational Enterprises, ILO, Guidelines for Human Rights Management by the National Human Rights Commission of Korea, Human Rights Management Guidelines by the Ministry of Justice.

### Article 5 (Non-Discrimination in Employment)

The company shall not discriminate against members for employment, working conditions, trainings, etc. for reasons such as race, religion, disability, gender, academic background, age, physical condition, country of origin, region of origin, political opinion, employment type, etc.

### Article 6 (Humane Treatment of Members)

- ① The company shall comply with the legal (hereinafter to as the “local law”) working hours of each country in which it operates and guarantee wages above the legal minimum level to its members.
- ② The company shall operate a welfare system to promote the welfare of its members through social insurance and the in-house labor welfare fund required by the current law.
- ③ The company shall comply with related regulations and create a pleasant work environment to protect maternity of female members during pregnancy and the infant care period.
- ④ The company shall prohibit all acts of harassment in the workplace, including sexual harassment, verbal and physical violence and operate a remedy procedure.

### Article 7 (Prohibition of Forced Labor)

The company shall prohibit all types of involuntary labor against the free will of the members.

### Article 8 (Prohibition of child labor)

The company shall prohibit child labor in accordance with the child standards defined by the local law, and if minors are employed based on the local law, it shall ensure a safe working environment and that educational opportunities are not limited due to labor.

### **Article 9 (Guarantee of Industrial Safety)**

- ① The company shall provide a safe and hygienic working environment to its members and guarantee the right to safety to all members, including vulnerable members such as pregnant women, the disabled, etc.
- ② The company shall promptly provide measures such as proper compensation, etc. in the event of a work-related accident or disease to a member.

### **Article 10 (Responsible Supply Chain Management)**

- ① The company shall not encourage, assist, or aid other companies with whom it has relationships in the course of business to violate human rights.
- ② The company shall require the partners to practice human rights management in accordance with the partner's code of conduct and continuously request corrective actions if significant human rights violations are discovered. Nevertheless, if corrections are not made, it can stop doing business with them and terminate the contract.
- ③ The company shall not obtain any business profits arising from human rights violations such as forced labor, child labor, etc. by its partners.

### **Article 11 (Ethical Principles for Artificial Intelligence (AI))**

The company shall develop technologies and provide services under five AI ethical principles of AI that leads to human happiness, AI that respects diversity without social prejudice, trust relationship AI that grants choices, AI that does not infringe on individual assets and rights, and knowledge sharing for the development of the AI industry.

### **Article 12 (Protection of Human Rights for Local Residents)**

The company shall precaution so as not to violate human rights, such as the safety and health rights of local residents, freedom of residence, etc.

### **Article 13 (Compliance with Environmental Rights)**

- ① The company shall establish and maintain an environmental management system and disclose related information internally and externally.
- ② The company shall comply with environmental laws and regulations to minimize the negative impact on the environment in business operations.

### **Article 14 (Protection of Customer's Human Rights)**

- ① The company shall take all reasonable measures to ensure the quality and reliability of the services provided by the company and shall not enter into exaggerated or false contracts with customers.
- ② The company shall provide accurate and clear service information in a language that customers can understand to protect customers' right to know.
- ③ If damage occurs to the customer due to the delay, etc. of service provided by the company, the company shall notify the customer and make up for it as soon as possible.
- ④ The company shall strive to protect customers' personal information and shall not use customer's information without consent.

### **Article 15 (Protection of Personal Information)**

The company shall respect the privacy of various stakeholders involved in business activities and protect personal information collected and stored by the company by complying with laws and regulations related to the protection of personal information.

## **Chapter 3 Human Rights Management System**

### **Article 16 (Declaration of Human Rights Management)**

The company shall promulgate the Declaration on Human Rights Management that guarantees human dignity and value in all management activities and practice it as a guideline for human rights management, a code of conduct, and a standard for value judgment.

### **Article 17 (Department in Charge of Human Rights Management)**

In order to effectively promote human rights management, a department in charge of human rights management shall be established within the HR department, and the department in charge shall perform the duties under Article 18.

### **Article 18 (Duties of the Department in Charge of Human Rights Management)**

The department in charge of human rights management shall perform the following duties to effectively promote human rights management:

1. Establishment and implementation of human rights management plan

2. Development and execution of policies to guarantee and promote human rights
3. Operation and support for a council of human rights management
4. Development, promotion and implementation of human rights education programs
5. Other matters necessary for the protection and promotion of human rights

#### **Article 19 (Training of Human Rights)**

- ① The department in charge of human rights management shall conduct human rights education at least once a year to raise awareness of human rights among all members.
- ② The department in charge of human rights management may support human rights education for stakeholders such as partners, etc. to spread a culture of respecting human rights.

#### **Article 20 (Fulfillment of Responsibilities to Respect Stakeholder's Human Rights)**

- ① When concluding various contracts, the company may strategically support or act thoughtfully of the other party who is fulfilling the protection and promotion of human rights faithfully. And the terms of the contract may include the imposition of disadvantages when human rights violations are discovered within the contracting party's territory during the contract period.
- ② Strategic support or thoughtful consideration for the other party of the contract can be provided by giving additional points in the selection process within the scope of not violating relevant laws and regulations, and imposing disadvantages can be done through cancellation, etc. of contract. Specific details can be determined through a separate policy.
- ③ The company may request partners to practice human rights management and check whether the partners are implementing human rights management through methods such as a survey, on-site visits, etc.

#### **Article 21 (Disclosure of information about Human Rights Management)**

The company may regularly disclose activities and information about the performance related to the implementation of human rights management externally.

#### **Article 22 (Confidentiality and Non-Disclosure)**

The department in charge of human rights management and the person who received the report shall not divulge any confidential information learned in connection to the meetings or deliberations.

## Chapter 4 Assessment of Impact on Human Rights

### Article 23 (Implementation of Assessment of Impact on Human Rights)

- ① In order to eradicate and prevent human rights violations in the entire business process, the company shall conduct the assessment of impact on human rights to check the current status of human rights.
- ② The department in charge shall oversee and manage the assessment of impact on human rights and may request relevant data from other departments.
- ③ The assessment of impact on human rights may be implemented by entrusting to an outside professional institution.
- ④ Based on the results of the assessment of Impact on human rights, governance can recommend implementation of measures to prevent human rights violations, continuous inspection, etc.
- ⑤ Detailed procedures and methods for the assessment of impact on human rights shall be established and implemented separately according to the case.

### Article 24 (Reporting and Disclosure of the Results of Assessment of Impact on Human Rights)

- ① The results of the assessment of impact on human rights shall be reported to the CEO, and based on this, the CEO shall establish and implement measures to prevent human rights violations.
- ② The company may disclose the results of the assessment of impact on human rights to stakeholders through the website and the media.

## Chapter 5 Relief for Human Rights Violations

### Article 25 (Basic Principles of Remedy Procedures for Human Rights Violations)

- ① All stakeholders related to the company's business activities may use a reporting system to obtain appropriate and expeditious relief when human rights guaranteed by international human rights norms and the Constitution and laws of the Republic of Korea are violated due to the company's business activities.
- ② The company shall designate a person who would be in charge of monitoring human rights within the department in charge.
  1. Human rights monitoring personnel shall be guaranteed of independence in performing their duties.
  2. The company shall provide human rights education and training opportunities to enhance the expertise of human rights monitoring personnel.
- ③ Detailed procedures and methods for remedies for human rights violations shall be operated

in accordance with relevant manuals.

### **Article 26 (Reporting and Registration of Human Rights Violation Cases)**

- ① Anyone whose human rights have been violated due to the company's business activities or finds out that the human rights of others have been violated may report it to the company.
- ② The company shall prepare an in-house registration window for relief of human rights violation cases through an online reporting system.

### **Article 27 (Decision about Human Rights Violations and Progression to Investigation)**

For cases received pursuant to Article 26, the department in charge shall make an initial decision on whether human rights have been violated, and if it is determined that there is a possibility of infringement, a fact-related investigation shall be conducted. However, the case may be dismissed in the following cases. An advice shall be sought from relevant departments (legal affairs or compliance teams, etc.) when necessary in determining infringement or whether to conduct the investigation:

1. If it is clear from a report made by a person who is not the victim that the victim does not want an investigation or deliberation.
2. If reporting is made after more than one year from the date of occurrence of the facts that caused the report. However, this is not the case when the committee has decided to investigate or deliberate facts that caused the report for cases whose statute of limitations for public prosecution or statute of limitations for civil suit has not run out.
3. If a trial, an investigation by an investigation agency, or other remedies for rights under the regulations are in progress or have been terminated for facts that caused the case at the time the case is reported.
4. If the reporter has withdrawn the report
5. If it is clear that the reported case is not related to human rights violations

### **Article 28 (Methods of Investigation)**

- ① The department in charge shall designate a person to be in charge of the investigation, and the person in charge of the investigation may investigate the received case in the following manner:
  1. Demanding to appear, listen to statements, or submit statements to the reporter, victim, respondent (hereinafter referred to as "the party") or related persons.
  2. Requesting the submission of data which is deemed related to the investigation from the parties,

related people, related institutions, etc.

3. On-site investigation or appraisal of places, facilities, or materials that are deemed to be related to the matters of investigation.
  4. Inquiry of facts or information that are recognized as related to the matters of investigation regarding the parties, related people, related institutions, etc.
- ② The person in charge of the investigation shall not divulge the facts learned during the investigation process.
  - ③ When the investigation is completed, the person in charge of the investigation shall prepare an investigation report and report it to the head of the department in charge.

### **Article 29 (Decision)**

- ① The department in charge shall determine whether there is a human rights violation and the direction of actions to be taken based on the details of the investigation by the person in charge of the investigation. And if the details of the case falls under any of the following subparagraphs, a decision shall be made to dismiss the case, and the result and reason shall be notified to the reporter of the case or other stakeholders:
  1. If it is clear that the content of the case is not true, or there is no objective evidence that can be admitted to prove it is true.
  2. If the case doesn't fall under human rights violations or discriminatory acts based on the investigation.
  3. If it is recognized that no separate remedy is necessary, such as damages are already being recovered, etc.
- ② When the department in charge determines that it is a human rights violation, a report for a review of human rights violation shall be prepared and reported to the management (head of the department in charge).
- ③ The department in charge shall manage the status of the decision in Paragraph 2 and report it to the CEO.

### **Article 30 (Corrections and Measures)**

- ① The company shall correct human rights violations and violations of regulations, and for members who have committed human rights violations, necessary measures such as personnel measurement and training to prevent recurrence shall be taken.
- ② In the case of taking disciplinary actions pursuant to Paragraph 1, the type, procedure, effect, etc. of such disciplinary action shall be as stipulated in the employment rules, and if the



human rights violator inflicts a disadvantage on the reporter for reporting, etc., the disciplinary action may be aggravated.

### **Article 31 (Guarantee of the Reporter's Identity)**

- ① The CEO, committee, and people in charge of human rights-related duties shall ensure the confidentiality of the report, including the reporter, victim, and details of violations. And necessary measures shall be taken to avoid disadvantages for reporting.
- ② Members who recognize the identity of the reporter in the course of their duties or by chance shall not disclose the identity of the reporter.
- ③ When the reporter's identity is disclosed, the circumstances shall be investigated. And based on the result of the investigation, necessary measures such as disciplinary actions, etc. shall be taken against the person who is responsible for the disclosure of identity.

### **※ Supplementary Provision**

These regulations shall take effect on July 1, 2023.