
DOOWON ELECTRONICS
Code of Conduct for Business Partners

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1. Overview

a. Purpose of Establishment

The automotive industry is currently undergoing comprehensive innovation driven by technological convergence, including electrification, digitalization, and the expansion of mobility services. In response to these paradigm shifts, Doowon Electronics aims to overcome challenges by building a sustainable supply chain.

This Code of Conduct requires all suppliers to strictly comply with applicable laws and regulations in their business operations, while also striving to adopt best practices in the areas of ethics, environment, labor/human rights, health and safety, and management systems.

Doowon Electronics expects that suppliers' compliance with this Code of Conduct will not only support their growth into more respected and responsible companies, but also promote mutual and sustainable development.

This Code of Conduct is based on the Global Automotive Sustainability Practical Guidance of Drive Sustainability and refers to the Responsible Business Alliance (RBA) Code of Conduct. However, if any recommended practice in this Code conflicts with applicable national laws, such national laws shall take precedence.

b. Scope of Application

All suppliers who provide goods or services to Doowon Electronics, or who have entered into any other form of business agreement with the company, are required to comply with this Code of Conduct.

Suppliers subject to this Code are also encouraged to promote its principles throughout their supply chain, including to their own sub-tier suppliers.

c. Responsibilities and Roles of Suppliers

All suppliers of Doowon Electronics are expected to consider the principles set forth in this Code of Conduct when making business decisions and in daily operations.

Doowon Electronics, or a third party delegated by the company or its customers, may conduct assessments and due diligence within the limits permitted by law to verify supplier compliance with this Code.

Based on the findings of such assessments, Doowon Electronics may recommend improvements regarding identified risks. In such cases, suppliers are expected to develop and implement a risk mitigation plan through mutual consultation.

This Code of Conduct does not list all of a supplier's obligations. It is subject to periodic review and may be updated or revised to further enhance the sustainability of the supply chain. The latest version of the Code of Conduct can be found on the Doowon Electronics official website.

2. Ethics

A. Transparent Management and Anti-Corruption

Supplier executives and employees must comply with the highest standards of integrity applicable in each country where they conduct business.

Supplier executives and employees must not engage in bribery, extortion, embezzlement, solicitation, or requests for favors by abusing their superior position in business transactions, nor should they intentionally seek improper gains by exploiting others' weaknesses or vulnerabilities.

B. Prevention of Conflicts of Interest

Suppliers must perform their duties responsibly in accordance with the designated business regulations.

Supplier executives and employees must not promise, propose, permit, or offer any means to gain improper or inappropriate benefits. This includes any actions that result in damage to the company for the personal gain of employees or receiving personal benefits through a third party.

C. Prevention of Unfair Trade Practices

1. Suppliers must comply with fair trade laws and regulations in each country where they operate.
2. Suppliers must not engage in acts that may hinder fair competition, such as abusing their market-dominant position or transactional power.
3. Suppliers must not enter into agreements with other companies to unfairly restrict competition regarding prices, supply quantities, trading regions, or trading terms for products or services.
4. Suppliers must not obtain information through unfair means from competitors, partner companies, or other entities, nor may they use or disclose information unfairly acquired by the company or third parties.

D. Prevention of Counterfeit Parts

1. Suppliers must not produce or use unauthorized raw materials or components, nor may they use or sell counterfeit raw materials or components.
2. Suppliers must regularly verify whether counterfeit raw materials or components are being used or produced within their workplaces, and if detected, must immediately report the findings to the government or customer.
3. Suppliers must make efforts to ensure that the raw materials and components they produce are used and distributed in accordance with business purposes or contractual terms.

E. Compliance with Export-Related Laws and Regulations

1. Suppliers must comply with country-specific export control laws and international regulations related to export restrictions.
2. Suppliers must not conduct transactions with countries, regions, or individuals subject to export restrictions or economic sanctions.
3. Suppliers must not engage in product dumping and must continuously verify compliance with customs regulations, including ensuring that the country of origin is not falsely reported to evade tariffs.
4. Suppliers must assess their compliance with export control and sanction-related laws and regulations and cooperate with customer investigations if necessary.

F. Information Protection

1. Suppliers must not disclose customer or business partner trade secrets or confidential information without authorization, and information obtained during the course of business must not be stored or used without prior permission and approval.
2. Suppliers must respect the intellectual property rights of customers and business partners, take appropriate measures to protect their own intellectual property, and periodically check for any infringement.
3. Suppliers must collect and use personal information only within the scope of the stated purpose, retention period, and usage period. If any of these conditions change, prior consent must be obtained. Suppliers must also comply with and monitor relevant regulations such as the Personal Information Protection Act in handling and utilizing personal data.

G. Responsible Sourcing of Materials

1. Suppliers must establish a process to identify the origin and smelters of all minerals and raw materials used in their products, including conflict minerals such as tin, tungsten, tantalum, and gold.
2. Suppliers must strive to evaluate social and environmental issues—such as serious human rights violations, ethical breaches, and negative environmental impacts—at the origin and smelter level of minerals and raw materials based on the established process.
3. If suppliers primarily handle minerals and raw materials, they must make efforts to verify—either internally or through external certification—that their mining and processing are not associated with human rights violations, ethical breaches, or negative environmental impacts.
4. Suppliers must cooperate when requested by customers to provide information related to the use and sourcing of conflict minerals, including the origin of such minerals within the supply chain

¹ The four major minerals produced in conflict-affected regions of Africa (including the Democratic Republic of the Congo and nine neighboring countries) have raised international concerns due to serious social issues such as human rights violations and child labor during the mining process, as well as the use of mineral exports to fund civil wars and fuel regional conflicts.

In 2012, the U.S. Securities and Exchange Commission (SEC) issued a regulation requiring publicly listed companies to disclose whether their products contain conflict minerals. In 2015, the European Parliament adopted a regulation requiring mineral importers and others in the supply chain to report the origin of minerals and the results of due diligence to the competent authorities of each member state.

3. Environment

A. Establishment of Environmental Management System

- ① Suppliers shall comply with all applicable environmental laws and regulations in each country where they operate and must obtain and maintain all legally required environmental permits necessary for business operations (e.g., permits or notifications for installation, operation, or modification of emission/prevention facilities).
- ② Suppliers shall operate an environmental management system consisting of organizational structure, planning, procedures, and performance monitoring in order to mitigate the environmental impacts of their business activities.

B. Energy Use and Greenhouse Gas Emissions Management

- ① Suppliers shall progressively establish a system to measure energy consumption and greenhouse gas (GHG) emissions.
- ② Suppliers shall endeavor to improve energy efficiency while reducing energy consumption and GHG emissions.

C. Water Resource Management

- ① Suppliers shall progressively establish a system to measure water usage and wastewater discharge.
- ② Suppliers shall strive to reduce water consumption and increase the reuse of water resources. In addition, water pollutants discharged must be managed in accordance with legal standards or stricter internal standards.

D. Air Pollutant Management

- ① Suppliers shall establish a system to measure emissions of air pollutants.
- ② Suppliers shall minimize air pollutant emissions through appropriate measures and establish and comply with legal standards or stricter internal standards for discharged pollutants.
- ③ If required by applicable laws and regulations, suppliers must identify and monitor the characteristics of emissions before discharge, and manage and treat emissions in accordance with local regulations.

E. Waste Management

- ① Suppliers shall establish a system to measure the amount of waste generated.
- ② Suppliers shall minimize the generation of landfill and incinerated waste through appropriate methods. Suppliers shall also expand reuse and recycling efforts and endeavor to recover discarded raw materials and components.
- ③ Suppliers shall consider the entire life cycle of their products and strive to minimize residual substances with environmental impact during the landfill or incineration of waste.

The ISO 14001 standard is an international standard for Environmental Management Systems (EMS), established by the International Organization for Standardization (ISO) to encourage continuous improvement in environmental performance throughout all aspects of a company's operations. Organizations can obtain certification from an independent third-party body to demonstrate that their environmental management practices conform to this standard.

F. Chemical Substance Management

- ① Suppliers shall endeavor to ensure that chemical substances handled during business operations are safely managed from purchase through transportation, storage, use, and disposal, so as to prevent harm to human health or the environment. Furthermore, suppliers shall label or disclose information that enables the identification of the hazards and risks associated with the chemical substances they handle.
- ② Suppliers shall make efforts to verify whether any raw materials or components procured, produced, sold, or distributed contain substances harmful to human health or the environment. Additionally, suppliers must comply with all applicable local laws and regulations that prohibit or regulate the use and handling of specific substances.

⁴ EU Directive on the Restriction of Hazardous Substances (RoHS) in Electrical and Electronic Equipment (2006)

4. Labor / Human Rights

A. Prohibition of Discrimination

- ① Suppliers shall not discriminate against employees based on gender, race, ethnicity, nationality, religion, disability, age, family status, marital status, pregnancy, social status, political opinions, or any other protected characteristics in employment, promotion, training, or other treatment.
- ② Suppliers shall ensure that no discrimination occurs in wage payment or operation of welfare programs.
- ③ Suppliers shall not require conditions in recruitment and hiring that are unrelated to job performance.

B. Wages and Benefits

- ① Suppliers shall comply with the laws and regulations of the countries in which they operate regarding wage payments. Wages must be paid on time, and pay slips or statements must be provided in a language understandable to employees.
- ② Suppliers shall provide a comfortable working environment and strive to operate welfare programs aimed at improving employees' quality of life.
- ③ Suppliers shall conduct mandatory training as required by local laws and regulations and shall endeavor to support employee career development and skill enhancement.

C. Working Hours Management

- ① Suppliers shall comply with statutory working hours, including rest periods, in the countries where they operate.
- ② Suppliers shall avoid forcing employees to work overtime against their will and provide appropriate compensation for unavoidable overtime work.
- ③ Suppliers shall guarantee employees at least one day off per week on average.

D. Humane Treatment

- ① Suppliers shall respect employees' privacy and refrain from assigning unnecessary work outside of working hours.
- ② Suppliers shall notify employees in advance and obtain voluntary consent when collecting personal information.
- ③ Suppliers shall prohibit workplace harassment, defined as acts that cause physical or psychological distress or deteriorate the working environment beyond the reasonable scope of work, using one's position or relationship at work. For victims of workplace harassment, suppliers shall take appropriate measures such as changing work location or reassignment upon request, and impose disciplinary actions or work location changes on perpetrators as necessary.

E. Freedom of Association

- ① Suppliers shall guarantee employees the freedom to form and join labor unions and engage in collective bargaining and shall allow the establishment and operation of legitimate bargaining bodies.
- ② Suppliers shall engage in sincere negotiations with employee representatives regarding collective bargaining matters.
- ③ If no employee representatives exist, suppliers shall allow individual employees to freely raise negotiation matters.

F. Prohibition of Child Labor

- ① Suppliers shall strictly prohibit any form of child labor and verify the age of employees and job applicants through legitimate documents such as identification cards or birth certificates. The term “child” refers to the legal minimum employment age as defined by local laws.
- ② If employing young workers, suppliers shall not assign them to hazardous tasks that pose safety or health risks, and must ensure that work does not interfere with their educational opportunities.
- ③ Suppliers shall not procure goods or services from any business partners involved in child labor or violating applicable child labor laws. If such facts are discovered, suppliers must take appropriate corrective actions.

G. Prohibition of Forced Labor

- ① Suppliers shall employ workers in compliance with the labor laws of the countries where they operate and prohibit all forms of forced labor or compulsory work against the will of employees.
- ② Suppliers shall not require employees to surrender identification documents, visas, or other personal papers, nor shall they engage in physical or psychological coercion such as violence, threats, or confinement to enforce forced labor.
- ③ Suppliers shall not procure goods or services from business partners involved in physical or psychological coercion or forced labor due to debt bondage or other means. Upon discovering such facts, suppliers must take appropriate measures.

5. Safety / Health

A. Establishment of Occupational Safety and Health Management System

- ① Suppliers shall comply with occupational safety and health laws and regulations applicable in the countries where they operate and obtain and maintain all necessary permits and approvals related to safety and health.
- ② Suppliers shall operate an occupational safety and health management system consisting of organization, planning, procedures, and performance reviews to prevent safety and health incidents related to business operations.
- ③ Suppliers shall provide appropriate safety and health training to employees. Additionally, safety and health information must be posted in easily accessible locations within the workplace.

B. Safety Management of Machinery, Equipment, and Facilities

- ① Suppliers shall regularly inspect and evaluate the safety of hazardous or dangerous machinery, equipment, and facilities within the workplace.
- ② To prevent accidents related to the use of hazardous machinery, equipment, and facilities, suppliers shall install and maintain safety devices, protective barriers, emergency equipment, etc. They shall also conduct ongoing safety training and education on work procedures to prevent accidents.
- ③ Suppliers shall provide personal protective equipment (PPE) to employees. The PPE must be easy and convenient to use and properly maintained to ensure full functionality.

C. Emergency Preparedness and Response

- ① Suppliers shall establish plans to respond to emergencies such as natural disasters, epidemics, fires, and safety incidents. They shall maintain manuals covering reporting, response, and follow-up actions in emergency situations.
- ② Suppliers shall conduct drills and training to prepare for emergencies in accordance with applicable laws, internally established plans, and manuals, ensuring readiness to respond effectively.
- ③ Suppliers shall equip workplaces with emergency exits, emergency lighting, fire detectors/alarms, firefighting equipment, etc., and regularly verify their proper functioning.

⁵ ISO45001, KOSHA18001 Standards, etc.

These standards establish occupational safety and health management principles based on the employer's voluntary policies. They provide a systematic framework for planning, implementing, checking, and reviewing activities to progressively improve the safety and health management system. Internationally, ISO45001 is established by the International Organization for Standardization (ISO), while in Korea, KOSHA18001 was developed by the Korea Occupational Safety and Health Agency (KOSHA).

d. Incident Management

1. Suppliers shall establish a system to measure occurrences of industrial accidents or occupational illnesses.
2. In the event of an industrial accident or serious occupational illness, suppliers must immediately halt the relevant operations and take necessary measures such as evacuating employees.
3. Suppliers shall investigate the causes of industrial accidents or serious occupational illnesses and strive to develop and implement corrective actions.

e. Safety Inspection

1. Suppliers shall regularly conduct safety risk assessments of the workplace to identify if employees are exposed to hazards or harmful factors. The assessment results must be communicated to employees, and based on the results, machinery, equipment, and facilities must be improved.
2. Based on safety risk assessment results, suppliers shall provide employees with information about workplace hazards and harmful factors. This information must be written in a language understandable to employees and be readily accessible.
3. Suppliers shall not assign pregnant employees, young workers, or other vulnerable workers such as persons with disabilities or immigrants to high-risk safety and health tasks and shall strive to provide a working environment that accommodates their needs.

f. Health Management

1. Suppliers may provide rest areas, restrooms, and dining facilities for employees and must strive to maintain cleanliness in these facilities.
2. Suppliers may provide dormitories for employees. If dormitories are provided, they must include safety signs, adequate lighting, heating and cooling, and proper access control to restrict unauthorized entry.
3. Suppliers shall conduct regular general or special health examinations for employees in accordance with the health examination laws of the country where the business operates. If necessary based on examination results, suppliers must take appropriate measures such as changing the employee's workspace, reassigning tasks, or reducing working hours.

6. Management System

a. Public Disclosure of Corporate Statement

- ① Suppliers shall internally and externally communicate their commitment to fulfilling social responsibilities as described in this Code of Conduct or at a comparable level.
- ② Suppliers shall share their commitment to social responsibility within the company through messages from management (e.g., New Year's address), internal guidelines, bulletin boards, etc. Additionally, suppliers are encouraged to disclose this commitment externally via websites, business reports, promotional materials, and other channels.

b. Appointment of Responsible Personnel

- ① Suppliers are encouraged to appoint personnel responsible for social responsibility activities.
- ② Suppliers are encouraged to appoint managers to oversee the planning and implementation status of social responsibility activities.

c. Risk Assessment

- ① Suppliers shall strive to identify potential risks in ethics, environment, labor/human rights, and safety/health areas that may arise during business operations.
- ② Upon identifying significant risks, suppliers shall develop and implement measures to mitigate such risks.

d. Training and Communication

- ① Suppliers shall provide education to employees on the contents of this Code of Conduct and related laws and regulations.
- ② Suppliers shall share plans and performance related to the implementation of this Code of Conduct with employees.

e. Information Management

- ① Suppliers shall accurately record and manage information related to ethics, environment, labor/human rights, safety/health, including financial data and risk status.
- ② Suppliers shall make efforts to transparently disclose such information when requested by laws, industry organizations, or key customers with whom business contracts are made, unless prohibited by law.

f. Grievance Handling System Operation

- ① Suppliers shall operate a grievance system allowing employees to report violations or concerns regarding laws and regulations in ethics, environment, labor/human rights, and safety/health, or cases where their personal rights and interests are infringed.
- ② Suppliers shall protect employees from unfair treatment such as dismissal, threats, retaliation, or ridicule due to reporting. Except where legally prohibited, the identity of the whistleblower must be strictly protected.

g. Management of Subcontractors (Sub-tier Suppliers)

- ① Suppliers shall encourage their subcontractors (sub-tier suppliers) involved in the planning, design, sales, or manufacturing of products or services to manage ethics, environment, labor/human rights, and safety/health factors.
- ② Suppliers shall make efforts to recommend or guide subcontractors (sub-tier suppliers) to improve if they identify any violations of laws and regulations or risks related to ethics, environment, labor/human rights, and safety/health.

h. Compliance with the Code

- ① Suppliers shall cooperate with and provide information regarding compliance and implementation status of this Code of Conduct during document audits or on-site inspections conducted by customers or third parties designated by customers, within the limits permitted by laws of the countries where business is conducted.
- ② Suppliers shall prepare and maintain appropriate documentation to prove compliance with this Code of Conduct. Such documentation must be based on actual and factual business operations.
- ③ Suppliers shall strive to establish and implement timely corrective action plans for any nonconformities or violations identified through document audits or on-site inspections related to compliance with this Code of Conduct.

⁶ "Appropriate documentation" refers to materials such as:

Workplace Safety and Health Management Regulations prepared in accordance with Article 25 of the Industrial Safety and Health Act (Preparation of Safety and Health Management Regulations),

Records of industrial accidents and illnesses prepared in accordance with Article 10 of the Industrial Safety and Health Act (Announcement of the Number of Industrial Accidents),

Employment rules prepared and reported in accordance with Article 93 of the Labor Standards Act (Preparation and Reporting of Employment Rules),

Wage records prepared in accordance with Article 48 of the Labor Standards Act (Wage Ledger),

In addition, documents such as compliance agreements to the Code of Ethics, emergency manuals, working hours logs, and workplace environment measurement results, which are related to the requirements of this Code of Conduct or can be used as evidence for assessing implementation levels in each evaluation indicator.