

Code of Conduct

This Code of Conduct establishes the behavioral standards that all executives and employees of TCC Steel Group must observe to prevent corruption and promote a clean and transparent work environment. The purpose is to ensure integrity and transparency in all business relationships.

1. Fair Performance of Duties

- i. Prohibition of instructions that hinder fair work performance
- ii. Prohibition of misusing budget for unintended purposes
- iii. Avoidance of conflicts of interest
- iv. Transparent accounting practices
- v. No preferential treatment
- vi. Prohibition of personnel-related solicitations

2. Prohibition of Unjust Gains

- i. Prohibition of interference for personal gain
- ii. Prohibition of private use of position or authority
- iii. Prohibition of solicitation or brokerage
- iv. Prohibition of use of undisclosed information
- v. Restriction on using job-related information for transactions
- vi. Ban on insider short-term trading and short selling
- vii. Prohibition of personal use of company assets for profit

viii. Prohibition of receiving money, gifts, or entertainment

ix. Fair contract execution and fulfillment

3. Prohibition of Improper Solicitation and Bribery

i. Prohibition of Improper Solicitation and Bribery

4. Workplace Culture

i. Promotion of a healthy workplace culture

ii. Prohibition of sexual harassment

5. Reporting and Oversight of Violations

i. Reporting of violations

ii. Disciplinary action for violations

iii. Oversight authority to prevent violations

Code of Ethics

1. Commitment to Customers

i. **Customer Respect:** The company always thinks and acts from the customer's perspective and actively embraces their legitimate demands and reasonable suggestions.

ii. **Customer Protection:** The company safeguards the interests, safety, and personal data of its customers and refrains from any unfair treatment.

2. Responsibilities to Shareholders

- i. **Protection of Shareholder Rights:** The company protects the rights of shareholders and respects their legitimate requests and proposals.
- ii. **Protection of Shareholder Rights:** The company protects the rights of shareholders and respects their legitimate requests and proposals.
- iii. **Transparent Financial Reporting:** The company records and manages its financial data in accordance with generally accepted accounting principles, ensuring transparent disclosure of its financial status and business performance.

3. Responsibilities to Business Partners

- i. **Fair Competition with Competitors:** The company respects the principles of free and fair competition in a market economy and competes legitimately with its competitors.
- ii. **Fair Transactions with Partners:** The company ensures that all transactions with business partners are conducted fairly, based on mutual respect and equality.
- iii. **Disclosure of Supplier Code of Conduct:** To foster mutual growth, the company discloses its Supplier Code of Conduct and encourages all partners to comply with it.

4. Roles and Responsibilities of Executives and Employees

- i. **Employee Attitude:** Employees shall take pride in their company and perform their duties with honesty and sincerity, upholding the company's reputation and dignity.
- ii. **Fair Treatment:** The company does not tolerate unfair discrimination and provides fair opportunities based on individual capability and qualifications.

- iii. **Safe and Healthy Work Environment:** The company strives to maintain a safe and healthy working environment for all employees.

5. Contribution to the Nation and Society

- i. **Compliance with Laws and Regulations:** As a responsible member of the nation and local community, the company complies with all relevant domestic and international laws and regulations.
- ii. **Contribution to Economic and Social Development:** The company contributes to national economic and social advancement through increased productivity, job creation, faithful tax payment, and active social contribution.
- iii. **Environmental Protection:** The company complies with environmental laws and actively works to preserve and protect the environment.

6. Basic Ethics for Employees

- i. **Establishment of a Sound Corporate Culture:** Employees shall share the company's management philosophy and align with its goals and values, sincerely fulfilling their respective responsibilities.
- ii. **Prohibition of Conflicts of Interest:** In cases of ethical conflict or potential conflict of interest with the company, employees shall prioritize company interests and make decisions based on the ethical management code.
- iii. **Prohibition on Use of Insider Information:** Employees must not use non-public information acquired through their duties for stock trading or other personal gain.
- iv. **Protection of Company Assets and Confidential Information:**
Employees shall protect the company's tangible assets, intellectual property, and trade secrets, and refrain from using them for private

purposes.

- v. **Prevention of Sexual Harassment:** Employees must refrain from any verbal, physical, or visual conduct that causes sexual humiliation or harms a respectful workplace environment.
- vi. **Prohibition on Political Involvement:** Employees shall not engage in political activities during working hours or use company resources, personnel, or assets for political purposes.
- vii. **Prohibition on Receiving Money or Entertainment:** Employees must not accept money, gifts, or entertainment from stakeholders beyond what is socially acceptable, in accordance with relevant anti-bribery laws.

[Appendix] Supplier Code of Conduct

TCC Steel has established this Code of Conduct to promote mutual growth with its suppliers, including all subcontractors who provide products and services to the company (hereinafter referred to as "Suppliers").

TCC Steel expects its suppliers to create a safe and pleasant working environment, ensure the protection of workers' human rights, and operate in an environmentally friendly and ethical manner.

This Code outlines key responsibilities in the areas of environmental protection, respect for human rights, mutual growth, social contribution, health and safety, and fair trade. All suppliers are required to fully understand and implement the provisions set forth herein.

In the event of any violations, TCC Steel may recommend corrective action and require compliance. Failure to take appropriate action may result in disadvantages in the contractual relationship with TCC Steel.

This Code may be applied more stringently in accordance with local laws and regulations. Through compliance with this Code, TCC Steel hopes to strengthen mutual growth with its suppliers and to reinforce its position as a socially responsible company.

1. Management Commitment

1.1 Goal Setting

Suppliers must establish specific goals aimed at improving social, environmental, health, and safety performance, and regularly monitor progress toward these goals.

1.2 Audits and Evaluations

Suppliers shall conduct internal audits and evaluations to assess compliance with applicable laws and this Code, as well as TCC Steel's expectations.

1.3 Feedback and Corrective Actions

Suppliers must take prompt and effective corrective actions in response to feedback received through audits and evaluations.

1.4 Employee Training

Suppliers shall provide education and training to employees to ensure alignment with the company's goals and management policies.

1.5 Supply Chain Responsibility

Suppliers are expected to actively manage their own supply chains and establish a virtuous cycle of ethical and sustainable supply chain practices.

2. Human Rights and Labor

2.1 Prohibition of Child Labor

Hiring children under the legal minimum age of 15 is strictly prohibited. If such labor is found, the supplier must take corrective measures. Separate protective measures must be provided for workers under the age of 18.

2.2 Prohibition of Forced Labor

All labor must be voluntary. Suppliers must not gain any commercial advantage by coercing employment or exploiting workers under any form of forced labor.

2.3 Compliance with Labor Laws

Suppliers must recognize international labor standards and comply with all applicable labor laws to protect workers' legal rights.

2.4 Non-Discrimination

Suppliers shall not discriminate based on race, skin color, gender, language, religion, nationality, disability, or social status in hiring or human resources practices.

2.5 Freedom of Association and Collective Bargaining

Suppliers must respect the right of workers to communicate openly with management, participate in labor unions, and engage in collective bargaining without retaliation or disadvantage.

3. Health and Safety

3.1 Occupational Safety

Suppliers must proactively monitor potential industrial safety risks and establish preventive maintenance systems and safety regulations in advance.

3.2 Emergency Preparedness

Suppliers shall assess potential accident risks and implement comprehensive emergency response plans, including execution, reporting, and recovery procedures.

3.3 Worker Safety

Suppliers shall monitor employees performing physically strenuous tasks and regularly assess their health. If safety risks are identified, work processes must be improved accordingly.

3.4 Hygiene and Workplace Environment

Work environments must be kept clean, and rest areas must be hygienically maintained. Suppliers shall provide personal lockers, organized workspaces, and other infrastructure conducive to individual work.

3.5 Safety and Health Training

Suppliers must provide employees with preemptive training on all potential risks associated with their tasks and offer clear health-related guidelines.

4. Environment

4.1 Compliance with International Environmental Standards

Suppliers shall support and adhere to environmental standards set by international treaties and continuously assess global environmental developments to maintain compliance.

4.2 Environmental Permits

All required environmental permits must be obtained and managed continuously in accordance with legal requirements.

4.3 Waste Management

Suppliers must establish waste management procedures and dispose of all waste in accordance with relevant environmental laws and regulations.

4.4 Climate Change Management

Suppliers must establish concrete action plans and mitigation measures for air, water, and soil quality, and periodically evaluate and document the implementation status.

4.5 Greenhouse Gas Reduction

Suppliers shall establish targets to reduce greenhouse gas emissions and measure Scope 1 and Scope 2 emissions. Suppliers are also encouraged to strengthen capabilities for managing Scope 3 emissions.

5. Ethics and Fair Trade

5.1 Personal Information Protection

Suppliers must protect the personal information of all stakeholders by establishing and complying with appropriate data protection policies.

5.2 Intellectual Property Protection

Suppliers shall recognize and safeguard intellectual property rights and shall not misuse

or disclose confidential information related to TCC Steel.

5.3 Transparency and Disclosure

All business transactions must be transparent. Suppliers must regularly disclose credible and accurate information related to labor, environment, and governance (ESG factors).

5.4 Prohibition of Unfair Gains

Suppliers must proactively monitor and prevent any acts that could result in unfair or unethical gains.

5.5 Compliance with Fair Trade Practices

Suppliers shall voluntarily comply with fair trade principles and take corrective action if any acts of unfair trade are identified.

6. Social Contribution

6.1 Community Engagement

Suppliers must actively participate in social contribution activities that promote the development of local communities and economies.

6.2 Mutual Growth

Suppliers must engage in responsible management of their own business partners to support a healthy and sustainable industrial ecosystem.

TCC Steel commits to fulfilling its social responsibility by fostering open and reasonable communication with all suppliers based on this Code of Conduct. We pledge to actively support our suppliers in fully complying with these requirements.