

## Policy on Prohibition of Workplace and Sexual Harassment

NEXEN TIRE prohibits workplace harassment, which refers to actions by employers or employees that go beyond the reasonable scope of their duties, utilizing their position or relationship in the workplace to inflict physical or mental pain on others or worsen the working environment.

NEXEN TIRE also prohibits workplace sexual harassment, which involves the use of one's position in the workplace by employers, superiors, or employees to subject other employees to sexual advances or demands, causing feelings of sexual humiliation or aversion, or resulting in adverse employment conditions based on the refusal to comply with such advances or demands.

Furthermore, an Ethics Management Reporting Center is established to allow employees to report incidents of workplace and sexual harassment. The confidentiality of the reporter's identity and the content of the report is strictly guaranteed for the reporter, and a thorough investigation is conducted to determine the factual circumstances without any adverse consequences.

All NEXEN TIRE employees are responsible for adhering to the regulations and guidelines prohibiting workplace and sexual harassment. This applies to employees and suppliers affiliated with NEXEN TIRE, regardless of their employment status. Other matters are governed by domestic Labor Standards Act and adhere to the United Nations Declaration on the Elimination of Violence against Women and the Human Rights Principles of the United Nations Global Compact (UNGC)."

### Principles of Prohibition of Workplace and Sexual Harassment

1. Anyone who becomes aware of incidents of workplace or sexual harassment may report the matter to the employer.
2. Upon receiving a report or becoming aware of an incident, an investigation to verify the facts shall be promptly conducted.
3. During the investigation period, appropriate measures shall be taken to protect the affected employee(s) or employee(s) claiming harm, including changing the workplace, granting paid leave, or other appropriate actions. In this case, no measures shall be taken against the consent of affected employee(s).
4. When incidents of workplace or sexual harassment are confirmed as a result of the investigation, appropriate measures such as changing the workplace, reassignment, or issuing paid leave orders shall be taken upon the request of the affected employee(s).
5. When incidents of workplace or sexual harassment are confirmed as a result of the investigation, necessary actions such as disciplinary measures or changing the workplace shall be promptly taken against the perpetrator(s). Prior to implementing disciplinary or similar measures, the opinions of the affected employee(s) shall be heard.
6. Employees who have reported incidents of workplace or sexual harassment, as well as affected employees, shall not be subject to dismissal or any other adverse treatment.

### Damage Prevention

NEXEN TIRE conducts preventive education for employees to enhance awareness of workplace and sexual

harassment.

## **Responsibilities and Authority**

The responsibilities and authorities for each type of reporting are governed by the 「Instruction of Ethics Management Reporting Center」.

## **Damage Reporting and Relief Procedures**

### **1. Incident Reporting**

- 1) Anyone who becomes aware of incidents of workplace or sexual harassment or whistleblowing may report the matter to the Ethics Management Reporting Center.
- 2) For investigation purposes, the report should be registered through Ethics Management Reporting Center in principle, but anonymity is accepted exceptionally in consideration of the comprehensive facts. The confidentiality of the report is strictly guaranteed and management department should notify that there is no disadvantage to the reporter or the victim.

### **2. Incident Receipt**

- 1) The responsible department personnel shall organize the reported information according to the 6W1H principles, process the submission, and notify the reporter of the incident being received after the submission.
- 2) If necessary for the protection of the victim, the company shall take appropriate measures, such as changing the victim's workplace and granting paid leave. In this case, no measures shall be taken against the consent of victim.

### **3. Investigation of the Facts**

- 1) The management department informs the official procedure, such as confidentiality principle, related laws, company rules, and the type and scope of help that the Ethics Management Reporting Center can provide for the reporter and the alleged.
- 2) The Legal Affairs Team shall conduct a legal review of the finally confirmed report and the alleged misconduct, based on relevant legal statutes, as well as NEXEN TIRE's internal regulations including ethical norms.

### **4. Case closed**

- 1) After composing the final confirmed investigation contents and legal review results, the management department finally writes a document on the ethics report processing results and obtains approval from the authorized person.
- 2) The management department shall close the case according to the result of ethics report processing result report and action review for the reported matter. And the management department notifies the reporter, the alleged, and victim of the result of the closure.

## **Disciplinary and Corrective Measures**

## 1. Further Damage Prevention

- 1) If the person in charge of approval judges feels that it is necessary to hold the HR committee based on the final report result, he/she will propose an agenda in accordance with the HR committee regulation and proceed accordingly.
- 2) The HR Committee deliberates and decides on agendas and takes disciplinary action in accordance with the 「HR Committee Operation Guidelines」.
- 3) The management department shall continuously conduct monitoring after the incident is finalized to prevent further damage.

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