

Human Rights Management Policy

Purpose

Nexen Tire has incorporated its Human Rights Management Policy into its mid- to long-term ESG strategy to actively practice human rights management that "guarantees the dignity and value of all individuals" in all business activities. Based on our Human Rights Management Declaration, Nexen Tire recognizes human rights management as a key task within ESG and establishes this policy to prevent and mitigate human rights risks that may arise in the course of our business operations.

Scope

This Policy applies to all employees and executives of Nexen Tire and its affiliated entities, including sales subsidiaries and subsidiaries (hereinafter collectively referred to as "Nexen Tire"). All Nexen Tire employees are expected to carry out their duties in accordance with this policy. In addition, we encourage our external stakeholders including business partners, suppliers, and customers (such as general consumers, car makers, and dealers) to respect and uphold the principles outlined in this policy or a comparable standard of human rights protection. In cases where the provisions of this Human Rights Policy conflict with local laws or regulations, the higher standard will apply. When necessary, Nexen Tire may establish additional detailed policies or guidelines to support the effective implementation of this policy.

Basic Principles

Nexen Tire is committed to respecting the following principles and fulfilling its responsibilities toward all stakeholders across the value chain, including domestic and international employees, customers, business partners, affiliates, and local communities.

1. Prohibition of Discrimination
2. Prohibition of Forced and Child Labor
3. Freedom of Association and Collective Bargaining
4. Ensuring Occupational Health and Safety
5. Respecting Human Rights and Protecting the Environment in Local Communities
6. Responsible Partner Management and Protection

* Refer to the 'Declaration of Human Rights Management' for details of the Company's basic principles of HR management

Implementation System

1. Responsibility and Implementation of Human Rights Management

The ESG Management Committee serves as the highest decision-making body overseeing the planning, performance, and operational structure of human rights management. Depending on the severity of the issue, the committee may submit matters to the top decision-makers and deliberate and resolve key risks.

Human rights management is driven by GHR BS, the dedicated organizational unit, in collaboration with decision-makers from relevant departments. The main scope of responsibilities includes:

- 1) Establishment and revision of human rights policies
- 2) Development of human rights management implementation plans
- 3) Operation of grievance handling channels
- 4) Conducting human rights risk assessments and recommending corresponding actions
- 5) Providing company-wide opportunities and training related to human rights

2. Operation of Grievance Procedures

1) Human Rights Violation Reporting Channels

Nexen Tire operates dedicated reporting channels to address violations of its Code of Ethics, as well as workplace harassment, sexual harassment, discrimination, and other human rights violations. Anyone who has experienced, witnessed, or become aware of a human rights violation or risk whether employee or stakeholder may report the incident through these channels.

Human Rights Violation Reporting Channels	
Department	Ethics Management Team
Email (Internal)	ethics@nexentire.com
Email (External)	Click the "Report" button at the top of the company website
	→ Report-only outside mail account (nexenethicscenter@gmail.com)
Mailing Address	Ethics Management Team, 7F, The Nexen University, 177 Magokjungang-ro, Gangseo-gu, Seoul, Republic of Korea

2) Human Rights Violation Reporting Process



3) Protection of Whistleblower Anonymity (Whistleblower Protection System)

Nexen Tire strictly respects the intent of whistleblowers in accordance with Article 24 of the *Code of Ethics – Operation of the Ethics Reporting Center*. All information including the identity of the whistleblower, contents of the report, and outcomes of investigations is kept strictly confidential. Furthermore, Nexen Tire protects whistleblowers and cooperating individuals from any form of disadvantage or retaliation. The company also strives to maintain a safe reporting environment by preventing identity exposure and restoring any disadvantages that may occur. Personal information collected during the reporting process is handled in accordance with relevant laws, with prior notification of the collection purpose and retention period.

3. Education and Dissemination

1) Human Rights Management Training

Nexen Tire conducts regular training sessions to raise employees' awareness of human rights and prevent human rights violations. For domestic employees, various topics are covered, including: ▲prevention of workplace bullying, ▲prevention of sexual harassment, ▲improving awareness of persons with disabilities, and ▲personal data protection. These programs aim to foster a culture of mutual respect and inclusion among employees and to create an environment where human rights violations and risks can be actively reported. Through these efforts, the company continuously promotes a culture of respect for human rights and the internalization of human rights management.

2) Dissemination of Human Rights Management

Nexen Tire transparently discloses information related to human rights management including policies, implementation plans, risk assessment procedures, and results through various communication channels, such as the Sustainability Report. In addition, the company is committed to continuously expanding and improving its methods and channels of information delivery to ensure that all stakeholders, including Nexen Tire employees and partner companies, can easily access human rights management information.

Risk Management

1. Nexen Tire's Human Rights Impact Assessment

To proactively prevent human rights risks and strengthen accountability within its supply chain, Nexen Tire has established an internal human rights impact assessment system based on international human rights standards, including the *UN Guiding Principles on Business and Human Rights*, the *OECD Due Diligence Guidance for Responsible Business Conduct*, the *International Labour Organization (ILO) Core Conventions*, and the *EU Corporate Sustainability Due Diligence Directive*. Based on this system, the company applies assessment criteria comprising 12 areas and 218 indicators. Going forward, Nexen Tire plans to gradually expand the scope of assessment to include external stakeholders such as suppliers and local communities, thereby continuously strengthening its human rights risk identification and management system

2. Assessment Procedures

Nexen Tire conducts regular human rights impact assessments to systematically identify the company's human rights status and develop countermeasures for vulnerable areas. The assessment consists of three stages: preliminary diagnosis (survey) → interviews (stakeholder feedback) → on-site inspection. Each stage is carried out as follows:

1) Online Survey

An online survey is conducted with all Nexen Tire employees to assess their level of awareness, experience, and response capabilities related to human rights management. This step serves as the foundation for diagnosing the current human rights status and is designed for easy participation via mobile or PC.

2) Interviews with Internal and External Stakeholders (e.g., vulnerable workers, suppliers)

Interviews are conducted with both internal and external stakeholders—including vulnerable workers and partner companies—to identify key human rights violation factors and potential risks. Based on a standardized questionnaire, more specific and in-depth feedback is gathered through Focus Group Interviews (FGIs)* or one-on-one in-depth interviews as needed.

*FGI: Focus Group Interview

3) On-site Inspection

External human rights experts visit business sites in person to conduct a comprehensive assessment using a human rights evaluation checklist and field inspection. During the site visit, they interview indicator managers from each department to evaluate the alignment between internal self-assessment results and actual practices, and to derive improvement tasks.

Implementation of Risk Improvement

1) Derivation and Consultation of Improvement Measures

Following the Human Rights Impact Assessment (HRIA), Nexen Tire promptly takes corrective actions or establishes improvement plans for identified risks, prioritizing based on their impact and urgency. Relevant organizations within the headquarters and domestic and overseas business sites included in the scope of the HRIA collaboratively discuss the identified risks and derive specific improvement tasks. The outcomes of these consultations are reported to the ESG Operating Committee.

2) Monitoring of Implementation Status

Strategic tasks related to human rights management are submitted to the Social Subcommittee of the ESG Operating Committee, where the progress of ongoing initiatives and future plans are reviewed and discussed. Each responsible department shares detailed information related to the tasks with the committee and cooperates to ensure effective execution.

3) Sharing Information with Stakeholders:

(1) Internal Stakeholder Reporting

Key risks, improvement measures, and implications identified through Nexen Tire's HRIA are reported to major decision-makers, including the ESG Management Committee. Approved reports are shared with relevant departments to enhance awareness and promote human rights management throughout the organization.

(2) External Stakeholder Reporting

Nexen Tire transparently discloses information regarding the status of human rights management efforts, HRIA results, key strategies, and activities to all stakeholders through various channels such as the company website and Sustainability Report.

Appendix

- ① This Human Rights Management Policy shall come into effect as of June 26, 2023.
- ② This policy is prepared in both Korean and English. In the event of any discrepancy between the Korean version and the translated foreign versions, the Korean version shall prevail.
- ③ The detailed risk management policies referenced in this Human Rights Management Policy shall be governed by Nexen Tire's internal guidelines and procedures.

This policy has been confirmed as stated below and is implemented with the approval of the CEO of Nexen Tire Corporation.

Hyeon Suk Kim

Chief Executive Officer

Nexen Tire Corporation



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Date of Enactment	2023.06.26	Date of Revision	2025.05.01
Established by	HR Team	Managed by	ESG Team

< Revision History >

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V1.0	2023. 06. 26	Initial Establishment	HR Team	ESG Team
V2.0	2025. 05. 01	Revision to The HR Management Implementation Framework	HR Team	ESG Team