

Human Rights Policy

Preamble

At Lebe Industrial Co., Ltd., we are deeply committed to respecting and promoting human rights in all our business operations, relationships, and supply chains. We believe that upholding human rights is not only a moral imperative but also fundamental to our sustainable success, responsible corporate citizenship, and the trust we build with our stakeholders.

This Human Rights Policy is guided by internationally recognized human rights principles, including the **Universal Declaration of Human Rights**, the **International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work**, and the **UN Guiding Principles on Business and Human Rights (UNGPs)**. It reflects our dedication to acting with integrity and responsibility, complementing our **Code of Conduct** and **Code of Ethics**, and reinforcing our commitment to **ISO 14001 (Environmental Management System)** and **ISO 45001 (Occupational Health and Safety Management System)**.

1. Our Commitment to Human Rights

Lebe Industrial commits to:

- **Respecting Human Rights:** We commit to respecting human rights as defined by international standards wherever we operate. This means avoiding causing or contributing to adverse human rights impacts through our own activities, and seeking to prevent or mitigate adverse human rights impacts that are directly linked to our operations, products, or services by our business relationships.
- **Zero Tolerance for Abuses:** We have a zero-tolerance approach to serious human rights abuses, including all forms of forced labor, human trafficking, and child labor.
- **Continuous Improvement:** We recognize that respecting human rights is an ongoing journey that requires continuous effort, learning, and adaptation.

2. Scope and Application

This policy applies to all employees, executives, and board members of Lebe Industrial Co., Ltd. We also expect our business partners, including suppliers, contractors, and joint venture partners, to adhere to principles consistent with this policy.

3. Core Human Rights Principles

We are committed to respecting, at a minimum, the following human rights:

- **Freedom from Forced Labor and Child Labor:** We strictly prohibit any form of forced, bonded, involuntary, or trafficked labor. We also strictly prohibit child labor, defined as the employment of anyone under the age of 15, or under the minimum age for employment in the country, if higher, or under the age for completing compulsory education, whichever is higher. We comply with **Articles 7, 64, and 65 of the Korean Labor Standards Act** concerning forced and child labor.
- **Non-Discrimination and Equal Opportunity:** We provide equal opportunities and do not tolerate discrimination based on race, color, gender, sexual orientation, nationality, ethnic origin, social origin, religion, political opinion, disability, age, union membership, or any other protected characteristic. We adhere to **Article 5 of the Korean Labor Standards Act** which prohibits discrimination.
- **Freedom of Association and Collective Bargaining:** We respect the right of all employees to form and join trade unions of their own choosing and to bargain collectively, free from fear of reprisal, intimidation, or harassment.
- **Fair Wages and Working Hours:** We provide fair remuneration and benefits that meet or exceed legal minimums and industry standards. Working hours comply with applicable laws, including the **Korean Labor Standards Act (Article 50-57)**, ensuring appropriate rest periods and fair compensation for overtime.
- **Safe and Healthy Working Conditions:** We provide a safe, healthy, and hygienic working environment for all employees. Our **ISO 45001 Occupational Health and Safety Management System** demonstrates our commitment to systematically managing OHS risks, preventing workplace injuries and ill-health, and ensuring compliance with the **Korean Occupational Safety and Health Act**.
- **Protection from Harassment and Abuse:** We foster a workplace free from any form of harassment, intimidation, or abuse, including physical, sexual, psychological, or verbal harassment.
- **Privacy:** We respect the privacy of individuals and handle personal data responsibly and in accordance with applicable data protection laws, including the **Korean Personal Information Protection Act** and the EU GDPR where applicable.

4. Human Rights Due Diligence

Lebe Industrial is committed to implementing a human rights due diligence process to identify, prevent, mitigate, and account for how we address our actual and potential human rights impacts across our operations and value chains. Our ongoing efforts include:

- **Risk Identification and Assessment:** Regularly assessing our operations and supply chains for potential human rights risks, particularly focusing on higher-risk geographical areas or specific activities.
- **Integration and Action:** Integrating findings from human rights risk assessments into our internal decision-making processes and taking appropriate action to prevent or mitigate identified impacts.
- **Monitoring Effectiveness:** Monitoring the effectiveness of our human rights measures through internal audits (including those under ISO 45001), feedback mechanisms, and supplier engagement.
- **Communication:** Communicating how we address our human rights impacts to our stakeholders.

5. Remediation and Grievance Mechanisms

Should an adverse human rights impact be caused or contributed to by Lebe Industrial's activities, we are committed to providing for or cooperating in its remediation through legitimate processes. Our existing **Whistleblowing Policy** and internal grievance channels are designed to be accessible, confidential, and effective in allowing employees and external stakeholders to raise concerns related to human rights without fear of retaliation. We are committed to investigating all credible reports promptly and taking appropriate corrective actions.

6. Training and Capacity Building

We provide training and awareness programs for our employees, particularly those in procurement, human resources, and management, to enhance their understanding of human rights principles and their role in upholding this policy. We also communicate our human rights expectations to our business partners.

7. Governance and Review

This Human Rights Policy is endorsed by the CEO and reviewed periodically to ensure its continued relevance and effectiveness. Responsibility for overseeing the implementation of this policy rests with Executive Director Lee Jae-woon, Quality Management Team.

8. Publication

This policy is publicly available on Lebe Industrial's website www.lebeind.co.kr and will be communicated internally to all employees.



President
Sangsu Lee
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