

NHN Human Rights Management Charter

NHN regards human rights management as a core value of corporate management and respects the fundamental rights of all stakeholders, including employees, customers, business partners, shareholders, and investors. Through this Human Rights Management Charter, NHN is dedicated to complying with international human rights standards, including the Universal Declaration of Human Rights (UDHR), the UN Guiding Principles on Business and Human Rights (UNGPs), the Ten Principles of the United Nations Global Compact (UNGC), and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. NHN also ensures compliance with relevant domestic and international laws and regulations. Guided by these principles, NHN pledges to diligently fulfill its responsibility to respect human rights.

A. Scope of Application

This Human Rights Management Charter applies to all business activities of NHN, including all employees and business sites. All NHN employees are required to comply with this policy in performing their duties. Furthermore, NHN encourages all stakeholders in business relationships with NHN, including suppliers and business partners, to respect and implement this policy.

B. Fundamental Principles

1. Prohibition of Discrimination

NHN strictly prohibits discrimination in employment, promotion, training, compensation, and benefits on the grounds of origin, race, ethnicity, nationality, gender, disability, religion, age or political opinion. NHN strives to ensure that all employees receive fair and equal treatment.

2. Freedom of Association and Collective Bargaining

NHN respects the rights to freedom of association and collective bargaining as guaranteed under labor laws. The company does not discriminate against employees for forming or joining labor unions or engaging in lawful union activities. NHN guarantees the right to collective bargaining, does not reject it without just cause, and faithfully implements the results of negotiations.

3. Prohibition of Forced Labor

NHN does not tolerate any form of forced labor that violates employees' free will through physical or psychological coercion. Employment must be voluntary, and workers' rights must be protected under applicable laws.

4. Prohibition of Child Labor

NHN strictly prohibits child labor and fully complies with legal employment age requirements. When employing young workers, NHN adheres to applicable laws and regulations and ensures their educational opportunities are not compromised.

5. Compliance with Working Conditions

NHN strictly adheres to legally mandated working hours and provides fair remuneration for their work. The company strives to foster an appropriate work environment that enables employees to perform their duties.

6. Occupational Safety Assurance

NHN faithfully implements its safety and health management policies to provide a safe and healthy work environment for all employees. NHN identifies workplace hazards in advance and takes preventive measures to avoid accidents.

7. Humane Treatment

NHN respects the privacy of all employees and strictly protects personal information. The company prohibits unethical behavior, including workplace harassment, sexual harassment, and verbal abuse, and implements preventive measures and offers support systems for affected individuals.

8. Supply Chain Management

NHN conducts fair transactions with its suppliers and does not impose unreasonable demands by exploiting its superior position. NHN supports its business partners in understanding and complying with the fundamental principles of this Human Rights Management Charter.

9. Protection of Customer Human Rights

NHN actively manages its business operations to prevent human rights violations in the provision of products and services. The company minimizes the collection and storage of customers' personal information in compliance with information protection laws and ensures that the data is not used for any purpose other than that for which it was collected.

10. Transparency and Disclosure

NHN transparently and accurately discloses key corporate information, including business activities, structure, financial status, performance, and governance, in response to the expectations of external stakeholders such as shareholders and investors.

C. Human Rights Risk Management System

NHN conducts systematic human rights due diligence, with the ESG Management Promotion Office serving as the dedicated implementing organization, to prevent human rights violations across its business operations and minimize negative impacts. NHN's human rights due diligence process is carried out in stages, including the identification of potential and actual risks through human rights impact assessments, the establishment of mitigation measures based on the identified risks, and the monitoring of implementation status.

1) Risk Identification and Assessment

The ESG Management Promotion Office conducts regular human rights impact assessments annually for key stakeholders, including employees, business partners, customers, and local communities. Risks are identified through a comprehensive review of checklist assessments reflecting domestic and global human rights standards and stakeholder human rights surveys, among others. NHN assesses the risk level of each human rights issue based on checklist assessment results, likelihood of occurrence,

severity of impact, and other relevant factors. Based on the assessment results, NHN identifies key risks requiring priority management.

2) Establishment and Implementation of Mitigation Measures

The ESG Management Promotion Office establishes specific improvement initiatives and implementation plans for the identified risks through consultation with relevant departments. Each responsible department implements mitigation and recurrence prevention measures in accordance with the agreed plans.

3) Monitoring and Reporting

The ESG Management Promotion Office continuously monitors the implementation status of improvement initiatives and whether the risks have been mitigated, and requests corrective actions if implementation is insufficient or additional risks are identified. The final results of human rights due diligence and key improvements are transparently disclosed externally through the Sustainability Report and other relevant channels.

D. Grievance Procedure

NHN operates internal grievance counseling channels and reporting channels for any stakeholders to prevent human rights violations across its business processes. Internal and external stakeholders who experience human rights violations or become aware of human rights risks can request counseling or report incidents through the following channels. The anonymity of reporters is strictly protected, and all reports are kept confidential.

1) WithU

NHN provides an internal counseling channel for NHN employees to address workplace human rights violations, including harassment and sexual misconduct.

2) Business Ethics Counseling Center

NHN operates a grievance reporting channel where both internal and external stakeholders can report human rights concerns.

※ [Go to NHN Business Ethics Counseling Center](#)

Revision History

Ver No.	Date	Revision Details
1.0	Feb. 28, 2023	Initial Enactment
2.0	Jun. 19, 2025	Full Revision
3.0	Jun. 18, 2026	Partial Revision