



HMM Human Rights Policy

Amended on January 29th, 2026

1. Our Fundamental Principle

We, HMM, are committed to respecting and protecting the human rights of all individuals, including our executives, employees, and stakeholders, as the fundamental principle of our management policy.

This Policy has been expressed at the level of the CEO and other executives and is our explicit commitment to respecting and protecting human rights embraced by all of our employees from the CEO to entry-level staff. We proactively protect the human rights of our employees as well as the human rights of underrepresented groups including women, children, persons with disabilities, and immigrant workers, and recognize our obligation to use our best efforts to prevent or mitigate any risk of human rights violation that may arise in the course of our business activities.

We respect the human rights principles expressed in the internationally recognized human rights instruments, including the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the Convention of the Rights of the Child, International Labour Organization Declaration on Fundamental Principles and Rights at Work, OECD Guidelines for Multinational Enterprises, OECD Due Diligence Guidance, and the Convention on the Elimination of All Forms of Discrimination against Women, the Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, and we comply with all human rights laws in Korea and other countries where we operate.

This Policy has been established based on input from our internal and external stakeholders and experts, and it reflects our major human rights issues and is regularly reviewed and improved. This Policy is applicable not only to our employees but also to all stakeholders connected to us, such as employees of our subcontractors and business partners, customers, and members of our community. We strive to protect human rights ourselves and also require all of our subcontractors to protect the human rights of all individuals and to make equivalent or similar efforts to prevent and mitigate the risk of human rights violations.

2. How We Implement

① Compliance with Working Conditions

We comply with statutory working hours and provide reasonable compensation above the minimum salary as required by the laws of every country where we operate. We also adhere to all other legally required working conditions.

② Prevention of Child Labor

We prohibit child labor and take necessary actions to ensure that children and adolescents are not deprived of educational opportunities due to labor.

③ Prevention of Forced Labor

In any event, we do not compel any labor against the worker's free will, and we are opposed to any measures aimed at forced labor.

④ Non-Discrimination

We respect all employees equally and with dignity, prohibit all forms of discrimination based on ethnicity, color, gender, religion, political view, national origin, social background or status, age, education, or disability, and build a corporate culture respecting diversity.

⑤ Protection of Three Labor Rights

We ensure employees' freedom to form and join labor unions and to take collective action including collective bargaining activities through labor unions without imposing any disadvantages on our employees in connection with these rights.

⑥ Prohibition of Workplace Bullying and Protection of Privacy/Personal Information

We prohibit all forms of physical or mental abuse, harassment, or workplace bullying, including coercive directions, verbal abuse, and bullying, among our employees. Also, we respect and protect the privacy of all employees, and take all necessary actions to prevent any leakage of their personal information.

⑦ Industrial Safety

We comply with all laws, regulations, and standards aimed at industrial safety, take all necessary actions to ensure a safe working environment for all employees, and use our best efforts to prevent any accidents at our sites.

⑧ Protection of Human Rights of Community Members

We always strive to ensure that the human rights of community members residing in the vicinity of our site are not violated due to our business activities and use our efforts to protect their human rights.

⑨ Protection of Human Rights of Underrepresented Groups

We always strive to protect the human rights of underrepresented groups, including women, children and adolescents, persons with disabilities, and immigrant workers.

⑩ Responsible Management of the Supply Chain

We require all of our subcontractors to make the same or similar level of effort to protect human rights. To achieve this, we share guidelines on human rights protection, including this Policy, with our subcontractors and business partners and provide relevant training programs.

⑪ Consumer Rights Protection

We take necessary precautions in accordance with laws and regulations to protect consumers' lives, health, and safety, and conduct regular reviews. To protect consumer's right to know, we provide important information necessary to the rational purchase of our services and accurate and explicit information.

⑫ Protection of Environmental Right

We are committed to protecting environmental rights by developing and offering sustainable services, which includes reducing greenhouse gas and pollutant emissions. We actively contribute to mitigating environmental pollution and risks associated with our business activities, participate in the just energy transition, and

proactively address climate change a critical environmental, economic, and social challenge.

3. Human Rights Policy Management, Monitoring, and Training

Our executives, including the CEO, have the obligation to enhance the level of our human rights management directly or through our department/organization regarding the human rights protection, and to prevent and mitigate any human rights violations that may arise in connection with our business activities.

Our department/organization regarding the human rights protection establishes and implements specific human rights management implementation plans under the direction of the executives, identifies actual or potential risks to human rights through annual human rights impact assessments, evaluates the severity of each risk, and develops and implements measures to prevent, mitigate, and remedy such risks concerning our human rights management based on assessment results. Also, it operates training programs for the employees and frequently engages in internal and external communications relating to human rights.

4. Human Rights Due Diligence

We have established and operate a periodic human rights diligence process to identify actual or potential risks we may pose to human rights through annual human rights impact assessments, evaluate the severity of each risk, integrate and internalize the evaluation results into our decision-making structure and functions, verify the effectiveness of our measures, and make an internal and external report and public disclosure of the outcomes to the stakeholders. We involve our internal and external experts in the human rights due diligence process and also collect opinions from other stakeholders.

① Human Rights Impact Assessment

Through our department/organization regarding the human rights protection, we develop human rights impact assessment indicators addressing major human rights issues at our sites, such as human rights management systems, compliance with working conditions, prohibition of child labor and forced labor, and industrial safety, among other things. These indicators are aligned with this Policy, international human rights standards, and applicable laws, regulations, and standards in Korea and other countries. Based on these indicators, we conduct periodic human rights impact assessments for our domestic and international employees working onshore and offshore, and subcontractors, in the following steps:

Step 1: Selection of assessment subjects

Step 2: Written examination

Step 3: On-site inspection (if necessary)

Step 4: Review by a third party (if necessary)

Step 5: Development and implementation of improvement plans

In cases where actual or potential risks to human rights are identified as a result of the human rights impact assessments, we, together with our internal and external experts, review the measures to avoid or mitigate the direct risk factor at the site where the risks have been identified and the comprehensive improvement measures including

the need to improve our overall human rights protection system. Based on the result of such review, we establish specific improvement plans (including measures to protect victims) and require all relevant personnel to implement these plans.

② Integration and Internalization

We integrate and internalize the results of the human rights impact assessments into our decision-making structure and functions.

③ Monitoring and Verification

Our department/organization regarding the human rights protection, in collaboration with the audit department, frequently monitors the implementation, integration, and internalization status of the foregoing improvement plans (including measures to protect victims) and encourages diligent implementation through appropriate disciplinary actions.

④ Report and Public Disclosure

Our department/organization dedicated to human rights protection communicates with stakeholders by reporting the results of human rights impact assessments and improvement plans along with their implementation status and outcomes, to management, and making a public disclosure of this information.

5. Remedy for Human Rights Violations

Anyone may report any cases of human rights violation arising in connection with our business activities, including violations of this Policy, at the following contact information at any time. Anonymous reporting is also welcomed, and the identity of the reporter will be strictly kept confidential:

- Website: Ethics Hotline page at HMM Ethical Management Website (ethics.hmm21.com)
- Email: ethics@hmm21.com
- Mail: Tower 1, Parc.1, 108 Yeoui-daero, Seoul 07335, Republic of Korea (HMM Corporate Audit Office)
- Phone: (02) 3706-5114
- Fax: (02) 3706-5114

Submitted reports will be immediately forwarded to our department/organization regarding the human rights protection, and remedial actions such as investigations will be promptly initiated in accordance with the Effectiveness Criteria for Non-judicial Grievance Mechanism under the United Nations Guiding Principles on Business and Human Rights. With respect to reported cases, our department/organization dedicated to human rights protection thoroughly reviews applicable laws and regulations and relevant cases with our internal and external experts, and explores and implements the most effective remedial and improvement plans. The results of the remedial procedures will be promptly communicated to relevant personnel, and remedial and improvement plans will not be limited to simply settling individual cases but will also include addressing the corresponding underlying root causes.



(Enacted) October 22, 2019
(Amended) September 7, 2021
(Amended) June 24, 2024
(Amended) January 29, 2026



Attachment. Human Rights Management Statement

HMM Human Rights Management Statement

HMM will conduct people-centered management that respects human dignity and values. HMM will create a culture that values human rights not only for its employees but also for all stakeholders related to corporate management.

HMM will commit to the following three promises.

First, we will comply with human rights policies and guidelines.

Second, we will build an infrastructure based on a set of management systems designed to plan, evaluate, and improve human rights promotion.

Third, we will recognize potential risks related to human rights and establish countermeasures.

HMM will remain committed to complying with our social norms and responsibilities and realizing respect for human rights to bring about a better future.