

# Bumchun Code of Conduct(범천정밀 행동수칙)

Bumchun Precision Co., Ltd. (the “Company”) is doing its best to fulfill social and environmental responsibility and comply with code of ethics in order for employees to work under safe and ethical working environment.

This Code of Conduct will be the guiding standard for everyone in the Company and the outlining standards of conduct for all business partners that supply service or products to the Company.

This Code of Conduct consists of five items: **Labor & Human Rights, Health & Safety, Environment, Ethics and Management System.** The standard for each item is defined as follows:

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## A. Labor & Human Rights(노동인권)

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The Company shall do its best to create fair and ethical working environment for all employees and treat employees with best dignity and respect. All business partners of the Company shall respect the human rights of all employees.

### 1. Prohibition of Discrimination

- ① The Company shall not discriminate against employees on the basis of age, physical disability, national origin, gender, marital status, national background, political bias, race, religion, sexual orientation, or union membership when carrying out recruitment and other employment-related activities (including but not limited to job announcements, job descriptions, job application forms, and job performance and evaluation policies and practices).
- ② The Company shall not engage in discriminatory hiring practices in order to comply with security policies and procedures.
- ③ The Company shall provide reasonable accommodation for employees’ religious activities.
- ④ The Company shall provide reasonable accommodation for employees with disabilities, including appropriate job assignment and support facilities.
- ⑤ Except where required by law, the Company shall not: require pregnancy testing as a condition of employment or continued employment; refuse to hire applicants into non-hazardous positions; terminate employment based solely on an employee’s pregnancy or breastfeeding status; prohibit pregnancy among female employees; or threaten female employees with unfair employment treatment such as dismissal, loss of length of service, reduction of wages, or reduction of benefits for the purpose of discouraging pregnancy. In addition, the Company shall identify tasks considered hazardous to pregnant and breastfeeding employees and notify recruitment and job assignment personnel and the relevant employees before work begins. The Company shall also take reasonable measures to ensure occupational safety and health by assigning employees to non-hazardous positions and providing protection, benefits, and wages in accordance with applicable laws and regulations.
- ⑥ Except where required by applicable laws or regulations, or where justified by reasonable

judgment regarding workplace safety, the Company shall not require employees or potential employees to undergo pre-employment medical examinations, including but not limited to general health conditions, pregnancy status, or mental health conditions, nor shall the Company unfairly discriminate based on the examination results. In addition, even in cases where medical examinations are conducted in accordance with applicable laws and regulations or are determined in writing by a certified occupational health professional based on reasonable judgment regarding workplace safety, the results shall not be used for discriminatory purposes, and the following conditions shall be met:

- The Company shall bear the cost of the medical examination.
- Employees shall be clearly informed of the purpose and specific examination items.
- The original examination report shall be provided to the employee and retained by the employee, and the Company shall not retain a copy unless legally required.

The Company shall not make employment-related decisions that negatively affect employment based on an individual's mental health or medical condition. However, exceptions apply where such decisions are based on essential job requirements or reasonable judgment necessary to ensure workplace safety. In addition, the Company shall provide a reasonable level of support to employees with chronic illnesses, including adjustment of working hours, provision of special equipment, provision of rest time, ensuring time for hospital visits, flexible sick leave, part-time work arrangements, and return-to-work adjustments.

## **2. Prohibition of Harsh Treatment**

- ① The Company shall document disciplinary rules, procedures, and practices necessary for the implementation of a progressive disciplinary system. The disciplinary system shall be fair and impartial and shall include an objective review by third-party management at a higher level than the manager imposing the discipline.

The Company shall maintain a system to discipline supervisors, managers, or employees who engage in physical abuse, sexual harassment, sexual abuse, mental violence, verbal violence, or abuse through measures such as mandatory counseling, warnings, demotion, dismissal, or a combination thereof (this applies regardless of whether the perpetrator is subject to disciplinary management procedures).

In addition, the Company shall not use fines or penalties as a means of managing poor performance or violations of company rules and policies, nor shall access to food, water, toilets, medical examinations, medical treatment, or other basic necessities be used as rewards or disciplinary measures. Employees may be requested to sign documented records of disciplinary actions taken against them, but they shall not be forced to do so.

Disciplinary rules, procedures, and practices shall be clearly communicated to all employees.

- ② When performing security duties, the Company shall ensure that such duties are gender-appropriate, non-intrusive, and conducted in accordance with applicable laws and regulations and local customs. Any physical searches conducted shall meet the following requirements:

- clear communication to employees,
- prior written employee consent,
- strict adherence to standardized protocols,
- respect for local culture and customs,
- conducted by security personnel of the same gender, and
- conducted in an open space.

- ③ The Company shall provide necessary support and assistance to victims of physical assault, sexual violence, sexual harassment, or repeated harassment.
- ④ The Company's policy on harassment and abuse shall include the following elements:
  - a clear definition of sexual harassment;
  - clear definitions of other forms of workplace violence and harassment, including physical violence and assault, bullying, humiliation, threats, all forms of verbal abuse, psychological violence, and harassment;
  - provisions prohibiting harassment and abuse in accordance with this standard and applicable laws and regulations;
  - a description of methods for reporting internal grievances and complaints related to harassment and abuse;
  - disciplinary rules and penalties for perpetrators and false reporters;
  - a non-retaliation policy provision for good-faith reporters of harassment and abuse (including measures to protect complainants, victims, witnesses, and whistleblowers from harm or retaliation and ensuring that all information is collected and handled with strict confidentiality);
  - methods for implementing, reviewing, and monitoring the policy.

The Company shall provide comprehensive training to all personnel responsible for receiving or handling complaints related to harassment and abuse. Security personnel shall receive training on the prevention of harassment and abuse and on their roles and responsibilities, and all employees and supervisors shall receive harassment prevention training during initial orientation and through annual refresher training. In addition, contractors shall provide conflict management training to all employees and supervisors at the workplace.

Training shall include at least the following elements:

- definitions of harassment and abuse, sexual harassment, and workplace violence;
- steps to take when experiencing or witnessing an incident;
- support available to victims of workplace harassment and abuse; and
- relevant disciplinary actions against perpetrators.

### 3. Prevention of Forced Labor

- ① The Company shall allow all employees to work voluntarily and shall not use human trafficking, slave labor, forced labor, bonded labor, contract labor or prison labor. Involuntary labor means the activities to traffic in, hide, hire, move, accommodate or employ people by paying expenses to a person who controls other people for the purpose of exploitation, abduction, coercion and threats.
- ② The Company shall not require, as a condition of employment, the surrender of government-issued employee identification documents or travel documents, or work permits, nor shall it restrict possession of or access to the originals; however, copies may be obtained and retained.

The Company shall not request or require original identification documents from employees for the purpose of renewing employees' visas or meeting other employment authorization requirements, and shall cooperate with relevant parties, including third-party employment agencies, to ensure that all original identification documents are returned to employees in a timely manner.
- ③ The Company shall explicitly specify the terms and conditions of employment in understandable words for employees when making a contract with them.

- ④ The Company shall not impose unfair conditions on employees' movement in the workplace or entry into the Company's facilities.
- ⑤ In case that the Company uses a third recruiting agent, it shall have the agent comply with these regulations and provisions. In case that the Company hires foreign contract workers directly or through a third agent, it shall take care of all expenses exceeding a worker's expected monthly wage.
- ⑥ Employees shall not pay the Company any recruitment or employment-related fees of any kind, including fees for hiring, application, referral, employment, skills testing, placement, processing, renewal, and any recurring fees, for recruitment or extension of employment. If it is found that employees have paid such fees, the Company shall reimburse the employees for those fees.
- ⑦ Employee deposits are prohibited except where deposits are required in accordance with applicable laws and regulations. Where required by law, the Company shall provide an accurate receipt, and such deposits shall be fully refunded as soon as possible within less than one month after termination of employment or within the legally specified deposit return period, whichever period is shorter.
- ⑧ Personal loans to employees or job applicants are prohibited where the repayment terms may be interpreted as debt bondage or forced labor.
- ⑨ All employees of the Company shall have the authority to freely enter into or terminate employment, and the Company shall not restrict or limit employees' freedom of movement, including access to drinking water and employees' dormitory bedrooms, except where necessary for employee safety or permitted by applicable laws and regulations. In addition, except where monitoring workplace health and safety, the Company shall not require employees to wear tracking devices to monitor real-time movement, nor restrict access to toilets by limiting the time and frequency of toilet use, limiting the number of employees using toilets, or withholding wages during toilet use.
- ⑩ All overtime work of the Company shall be voluntary, and all employees shall be guaranteed the right to refuse overtime work. The Company shall not impose overtime work in order to prevent employees from leaving the workplace, nor impose punitive measures such as wage deductions on employees who refuse overtime, exercise any form of coercion, deprive employees of future overtime opportunities, or impose any disciplinary action for refusing overtime work.
- ⑪ The Company shall not set production quotas or piece rates that require employees to work beyond regular working hours in order to earn the statutory minimum wage or the prevailing wage in the relevant industry.
- ⑫ The Company shall not directly manage or access employees' bank accounts except for automatic transfers for compensation.

#### 4. Prohibition of Child Labor and Protection of Young Workers

The Company cannot employ workers under the legal minimum age of employment but may provide them with a legal field trip on the workplace for the purpose of education in accordance with the ILO Minimum Age Convention (No.138-6) or light work in accordance with the ILO Minimum Age Convention (No. 138-6).

- ① The Company shall establish and implement appropriate documentation and verification management systems to ensure that underage workers are clearly identified during the hiring process, and such systems shall cover the Company's operations, TPEA, and certified education programs. The following items shall be included at a minimum:

- Minimum requirements for age verification documentation required by law for employment (government-recognized photo identification). Where official documentation required by law is not available, the Company shall verify and cross-reference validity through at least one of the following: birth certificate, government-issued personal identification card, driver's license, voter registration card, a copy of a "sealed" certificate of school enrollment, a guarantee letter from a representative of the local government, or a foreign employment permit.
  - Robust age verification measures including at least the following:
    - Matching the employee's face with a photo identification card
    - Where possible, verification through third-party sources such as internet records or local government offices
    - Periodic visual inspections within the facility to identify potential underage workers
- ② The Company shall introduce monitoring mechanisms to comply with policies and applicable laws and regulations, including but not limited to the following:
- Distinguishing between permitted and prohibited tasks for young workers (including new tasks) and indicating restrictions in job descriptions
  - Implementing controls to verify that prohibited tasks are not assigned to young workers
  - Management and recordkeeping to verify compliance
  - Providing health examinations in accordance with applicable laws and regulations
- ③ If current underage workers, former underage workers, or underage workers whose employment has been terminated are identified through external audits or internal reviews, the Company shall immediately notify Apple and shall implement the remediation program designated by Apple.
- If a current underage worker is identified, the Company shall immediately confirm that the worker is in the following condition:
    - Physically safe
    - Not subject to threats of retaliation
    - The Company shall not expel the worker from the facility but the worker shall be removed from the workplace
  - The remediation program shall continue for a period of six months or until the worker reaches the minimum working age, whichever period is longer:
    - Tuition and reasonable additional necessary costs (books, school supplies, and basic living-related expenses) to support the worker's return to school
    - Lost wages that the worker could have received at the Company's facility
    - Administrative costs for case management
- ④ When the worker reaches the minimum working age, the Company shall provide the worker with employment at a position equivalent to or better than the previous position at the Company's facility.
- ⑤ The Company shall comply with all applicable laws and regulations that regulate or restrict the nature, frequency, amount of work, and working hours performed by young workers under 18 years of age, and young workers shall not perform overtime work or night work.
- ⑥ For the health and safety of young workers, the Company shall not assign hazardous tasks to young workers, and even where not specified in applicable laws and regulations, the following tasks shall not be assigned:
- Tasks that may potentially harm health due to exposure to hazardous environments, substances, chemicals, or processes such as the following:
    - Work performed in environments or conditions that may cause heat- or cold-related

illness or injury

- Work performed in noise environments requiring hearing protection
- Work involving handling explosives or materials containing explosive components
- Work involving exposure to radium, self-luminous compounds, thorium salts, and radioactive materials exceeding an annual ionizing radiation level of 0.5 rem in accordance with U.S. Department of Labor guidelines
- Tasks performed in inherently hazardous locations such as the following:
  - Underground
  - Underwater
  - At heights exceeding 2 meters
  - In hazardous confined areas
- Tasks involving chemical processes that exceed legal standards applicable to young workers or performed in surrounding areas; where no legal standards or industry regulations exist, young workers shall not exceed 50% of the adult maximum exposure limits (example: if the adult maximum exposure limit is 8 hours at 100 ppm, the limit for young workers shall be 8 hours at 50 ppm)
- Tasks involving the use of the following equipment:
  - Powered hoisting devices
  - Powered mobile equipment without a legal operating permit
  - Stamping, cutting, and laser equipment or equipment where hands may be caught
- Other hazards determined by the Company's Environment, Health and Safety department or certified occupational health professionals to be unsafe for young workers
- Tasks restricted by applicable laws and regulations such as environmental and transportation-related restrictions

## 5. Management of Education Programs

- ① The Company shall permit or employ students to work at its facilities only in the following cases and shall comply with legal limits on the number of students that may be employed:
  - Where the Company directly manages the recruitment, employment, and management of students without the involvement of TPEA
  - Where employment is not intended to meet labor demand or to address short-term gaps in labor supply
  - Where the student's field of study is related to the Company's industry or job function
- ② The Company shall verify that students are eligible for employment in accordance with applicable laws and regulations and are currently enrolled in an academic program at an educational institution.
- ③ The Company shall ensure that students perform all work voluntarily.
- ④ The Company shall enter into a written agreement with the student before the student performs work, and in addition to wages, allowances, and the requirements specified in contract standards, the agreement between the student and the Company and, where required by law, between the student and the educational institution shall additionally include the following conditions. In addition, before performing work at the facility, the Company shall confirm that the student has reviewed the contract terms and has received a copy of the contract:
  - Name and address of the student's educational institution
  - Name and address of the Company
  - Student representative from the educational institution

- Student representative from the contractor
  - Insurance coverage
  - Education and training to be provided by the educational institution
  - Education and training to be provided by the Company
- ⑤ The program period (total cumulative working hours at the Company's facilities) shall not exceed the limits specified in applicable laws and regulations or, where no applicable laws and regulations exist, shall not exceed one year, and shall not be extended beyond the agreed termination date specified in the original contract.
- ⑥ Working hours shall not overlap with the time during which students attend their educational institution, and the Company shall comply with restrictions on working hours as required by applicable laws and regulations for all student programs.
- ⑦ Students shall be paid wages equal to or higher than those of other entry-level employees performing equivalent or similar work, and where such work does not exist, wages shall not be lower than the minimum wage in the relevant region. In addition, all wages shall be paid directly to the student or to an account managed solely by the student worker, and the Company shall not delay wage payments or deduct education fees or placement fees from wages. Where legal requirements differ from the above in certain regions, the Company shall notify Apple and submit evidence of legal compliance for review, and any deviations from payment requirements shall be permitted only after evaluation by Apple.
- ⑧ The Company shall ensure that students are covered by accident or liability insurance and all forms of insurance required under applicable laws or regulations.
- ⑨ The Company shall provide orientation training to students.
- ⑩ The Company shall conduct due diligence prior to selection and ongoing audits of each school to verify that the school holds appropriate and current licenses, certifications, and permits for all operating locations and complies with requirements, and shall notify its student management policy so that all educational institutions involved in student management are aware of it. In case of violations, the Company shall document procedures for corrective actions and impose appropriate sanctions, including termination of the relationship.
- ⑪ The Company shall submit a comprehensive plan demonstrating compliance with this standard at least one month prior to student employment upon Apple's request and obtain approval.

## 6. Working Hours Management

- ① Except in emergency or exceptional situations, the Company shall limit each worker's actual working hours to no more than 52 hours per workweek and no more than six consecutive days. Emergency and exceptional situations shall meet the following conditions:
- Documentation must be maintained to verify that emergency or exceptional situation criteria have been met
  - Return to compliance immediately once the situation ends
  - If rest day requirements are not met during emergency or exceptional situations, workers must be provided rest days immediately
- ② The Company shall provide and compensate for breaks in accordance with applicable laws, regulations, and this Standard, including but not limited to biological breaks, religious accommodation breaks, ergonomic breaks, and meal periods.
- Meal periods: At least 30 minutes must be provided after every 5 hours of work
  - Rest breaks: Ergonomic breaks shall be provided and compensated proportionally during

regular working hours

- Other breaks: In addition to scheduled breaks during working hours, workers may take breaks to meet basic needs
  - Unrestricted biological breaks (restroom use, drinking water)
  - Reasonable religious accommodation (prayer time)

- ③ The Company shall include the following activities in official working hour records:
- Time spent on the production line regardless of whether the line is operating (production time) or not operating (downtime)
  - All mandatory meetings and training conducted during regular shift hours, including orientation training, production planning meetings, assembly meetings, and daily closing meetings
  - Mandatory administrative procedures exceeding 15 minutes in total, including but not limited to:
    - Waiting in line to record attendance
    - Waiting for supervisor approval such as timecard approval
    - Waiting in line to complete facility-required inspections prior to entering the facility
  - Other Company-controlled procedures requiring workers to perform production-related activities regardless of entry status or location within the factory

The Company shall not require workers to arrive early before scheduled shift start or remain after shift end—even for a few minutes—to prepare for work unless counted as paid working time.

- ④ Before requiring night work, the Company shall notify workers of night work requirements and schedules, and immediately notify workers of any changes. The Company shall provide appropriate accommodations for workers' health and safety, including occasional exemption from night work where appropriate. Reasonable rest periods between shift changes shall be provided in accordance with applicable laws and regulations.
- ⑤ Except in emergency or exceptional situations, the Company shall notify workers at least 24 hours in advance if scheduled shifts are canceled or changed.
- ⑥ The Company shall plan production schedules capable of meeting committed production capacity and lead times while complying with the 52-hour weekly working hour limit and six consecutive working day requirement.
- ⑦ The Company shall maintain an official working hour recording system that tracks each worker's working hours and rest days and meets the following requirements:
- Reliable measurement and recording of actual working hours
  - Recording of clock-in and clock-out times in addition to actual working hours
- ⑧ The official working hour recording system shall include the capability to identify workers expected to exceed the 52-hour weekly working hour limit and rest day requirements, track each worker's weekly total working hours and rest days, and provide advance summary reports and warnings to management before limits are exceeded.
- ⑨ The Company shall provide a mechanism that enables workers to understand, challenge, and correct their recorded working hours in the official working hour recording system.

## 7. Wages, Benefits, and Contracts

- ① The Company shall ensure that all workers receive at least the legal minimum wage and shall not require work beyond legally defined regular working hours to earn the minimum wage.
- ② All overtime hours shall be compensated at the applicable overtime premium rate

according to applicable laws, regulations, or employment contracts based on worker classification. In countries where legally defined overtime premium rates do not exist, overtime shall be paid at 125% of the base wage.

- ③ Regular and overtime working hours shall be calculated accurately in hours and minutes to ensure proper wage and benefit payment. If precise calculation is not possible, rounding shall be applied upward to the nearest 15 minutes in favor of the worker.  
(example: 0 - 15 minutes counted as 15 minutes)
- ④ Deductions for tardiness shall be based on exact hours and minutes. If precise calculation is not possible, rounding shall be applied downward to the nearest 15 minutes in favor of the worker.  
(example: 0 - 15 minutes counted as 0 minutes)
- ⑤ Waiver of rights affecting working hours, wages, or benefits by workers or local authorities shall not be permitted.
- ⑥ The Company or its agents shall not deduct wages except where required by law (such as taxes and social insurance) or where services are provided. Where deductions relate to services provided to workers, workers shall have the right to decline such services. The Company shall not deduct union dues or other union fees without consent. Wage deductions as disciplinary measures or reductions in mandatory benefits are prohibited.

Wage deductions include:

- Cash fines
- Payroll deductions
- Account withdrawals

However, unpaid time due to tardiness or absence is excluded.

- ⑦ Worker deposits are prohibited unless required by law. Where required, the Company shall provide receipts and refund deposits in full within one month after termination of employment or within the legally required return period, whichever is shorter.
- ⑧ Workers shall not pay any recruitment-related fees. The Company shall not charge deposits when issuing required PPE, uniforms (except non-returned uniforms), headsets, or replaceable foam pad covers. Pro-rated charges may be applied for unreturned items if requirements are communicated at issuance.

The Company shall not charge workers for:

- Transportation provided for commuting
- Metal-free undergarments for expedited security screening
- Lockers
- Other equipment or items

Any such fees charged shall be fully reimbursed within 30 days.

- ⑨ The Company shall compensate workers for any unpaid amounts owed, including but not limited to:
  - Underpayment of agreed wages, allowances, or bonuses
  - Separation payments — regardless of termination conditions, all workers shall receive owed wages
  - Notification of resignation procedures and any updates when employment begins or procedures change
  - Ensuring accessibility of resignation procedures for all workers, including those who resign without notice
  - No compensation shall be required from workers for failure to provide termination notice unless required by law

- Provision of final wage statements and explanation of deduction reasons

Also included:

- Unauthorized deductions not required by law (deposits, fees, uniforms, medical exams, disciplinary fines, tools, background checks)
- Unpaid statutory benefits (overtime wages, annual leave, paid holidays)
- Wages for mandatory meetings and training conducted outside working hours

⑩ The Company shall pay wages within the legally required timeframe and provide wage statements including:

- Regular working hours
- Overtime hours
- Pay rates
- Definitions and revisions of deductions
- Definitions and revisions of benefits paid

⑪ The Company shall provide mandatory benefits according to worker classification as required by law and provide paid or unpaid annual leave and public holidays where permitted by law.

⑫ Workers shall sign written employment contracts before performing work. Contracts shall be provided in a language understood by workers. The Company shall confirm receipt of signed contract copies. Contracts shall include:

- All legally required employment terms
- Worker's name and date of birth
- Passport number, ID, or equivalent identification
- Emergency contact information
- Nature and location of work
- Living conditions
- Meal and accommodation costs (if applicable)
- Explanation and estimated amount of each wage deduction line item
- Contract term (if applicable)
- Expected regular working hours, overtime hours, rest day frequency, and public holidays
- Base wage for regular working hours
- Clearly defined regular, overtime, and holiday wages including maximum allowable overtime
- Deductions (if applicable)
- Benefits
- All applicable bonuses and allowances
- Deposit repayment date (if applicable)
- Termination/resignation procedures and conditions
- Contract renewal conditions

Contracts shall not include conditions denying workers the right to organize or participate in collective bargaining.

⑬ Where probationary or trainee employment is legally permitted, workers shall receive at least minimum wage and shall not work longer than three cumulative months or the legal maximum period, whichever is shorter.

⑭ The Company shall ensure that contract revisions do not disadvantage workers compared to the original contract unless negotiated through collective bargaining and shall guarantee workers the freedom to terminate contracts.

## 8. Freedom of Association

① The Company is not required to take a leading role in supporting workers' association or organizing efforts; however, it shall create an environment in which workers can exercise their rights in an atmosphere completely free from violence, pressure, fear, intimidation, and threats.

② The Company shall not interfere with the establishment or operation of workers' organizations, including actions intended to establish or promote the strength, financing, or management of such organizations in accordance with law. The Company shall not interfere with workers' authority to draft their constitutions and rules, freely elect representatives, organize administration and activities, and formulate programs.

Worker representatives shall communicate with members in accordance with conditions defined by applicable law or mutual agreement between the Company and the workers' organization and shall be provided facilities necessary for the proper exercise of their authority.

Workers shall be allowed to freely discuss work-related issues with each other during break times or before and after working hours.

③ Workers and potential workers shall not be subject to dismissal, discrimination, harassment, intimidation, retaliation, exclusion from employment, or employment-related decisions for the following reasons:

- Membership in and participation in unions, worker associations, or freedom of association activities
- Exercising legal rights to form unions or participate in collective bargaining
- Participation in organizing lawful strikes and demonstrations
- Raising concerns with management regarding collective bargaining or compliance with other legal requirements

The Company shall not threaten employees, use violence, or deploy military or police forces for the purpose of restricting, interfering with, or dispersing lawful and peaceful activities related to union meetings, operations, assemblies, or lawful strikes.

The Company shall not transfer, demote, promote, dispatch, or reassign workers for the purpose of interfering with participation in negotiations.

Management shall not outsource union members' work in order to interfere with workers' rights to peaceful assembly, and reassignment of production work as retaliation against workers who have formed or are attempting to form unions shall not be permitted.

④ Where collective bargaining agreements exist, the Company shall engage in good faith regarding the conditions of such agreements, and workers covered by such agreements shall retain copies of the agreements.

Where the right to collective bargaining is restricted by law, the Company shall not interfere with lawful alternative means enabling workers to associate and bargain collectively.

⑤ The Company shall implement training programs and mechanisms to build management

capacity to engage constructively, professionally, and transparently with workers and shall document procedures enabling workers to communicate with designated worker representatives during recruitment and arrival.

These mechanisms shall support audit and assessment activities, workplace health and safety management, grievance mechanism design and development, and handling of workers' collective actions.

### 9. Third-Party Employment Agencies (TPEA)

- ① The TPEA shall provide workers with accurate details regarding the nature and location of work, living conditions, employment contract terms (if applicable), base wages for regular working hours, wages for overtime and holiday work, all bonuses promised by the TPEA, refund fees, applicable deductions, and benefits. Workers shall not be charged any fees to cover recruitment or employment costs.

Regardless of recruitment channel, the Company shall reimburse workers in full within 30 days after hiring for any identified fees or payments.

- ② The Company or TPEA shall not request transfer of original identification documents from workers for any reason, possess original identification documents, or restrict workers' access to such documents.

The Company or TPEA may request original identification documents for visa renewal or employment permit requirements but shall not compel submission and shall return them promptly. The TPEA may obtain and retain copies of identification documents.

- ③ Before workers arrive at the worksite, a signed copy of the employment contract shall be provided in the worker's native language.

- ④ The Company shall pay all wages, bonuses, and refund fees in full and on time and shall not make unreasonable deductions from workers' wages or benefits.

Where recruitment or employment-related fees or deductions, underpayment of wages, bonuses, or refund fees occur, the Company shall reimburse workers in full within 30 days. Itemized wage statements shall be provided together with payment of bonuses or refund fees. Except for automatic transfers for compensation purposes, the TPEA shall not directly manage or access workers' bank accounts.

- ⑤ The Company shall provide all statutory benefits required under applicable laws and regulations, including but not limited to social insurance and paid leave.

- ⑥ The Company shall conduct due diligence to verify that the TPEA has obtained all appropriate registrations, certificates, and permits required by applicable laws and regulations and confirm whether the TPEA has ever been sanctioned or penalized by relevant authorities for violations or operational interference.

- ⑦ The Company shall enter into a contract with the TPEA prior to engaging the TPEA in worker recruitment and employment. Where applicable, the contract shall include at least the following:

- Compensation structure covering all wages, allowances, and bonuses paid to workers
- Payment terms between the Company and the TPEA
- Conditions ensuring no unreasonable fees charged to workers, no unreasonable deductions from wages, and no unreasonable deductions from other employment-related benefits
- Conditions including consequences of violations of this Standard up to and including termination of the relationship between the Company and the TPEA
- The Company shall communicate the requirements of this Code of Conduct and this

Standard to all TPEAs prior to establishing business relationships and annually thereafter to ensure adequate understanding and implementation

- ⑧ The Company shall ensure that workers can directly contact TPEA services, including on-site TPEA representatives and online services providing prompt responses.
- ⑨ The Company shall conduct effective regular monitoring and audits of TPEAs engaged in worker recruitment to ensure compliance with specified requirements, applicable laws and regulations, recruitment practices including job postings and interviews, and prohibition of student recruitment through TPEAs.

These shall include:

- Regular worker interviews
- Monthly payroll audits
- Annual audits

For TPEAs involved in recruitment of foreign contract workers, regular audits shall cover both sending-country and receiving-country TPEAs.

The Company shall establish and document procedures for managing TPEA violations of applicable laws and regulations, including appropriate disciplinary measures, corrective action procedures, and termination of business relationships with TPEAs that fail to correct violations.

## 10. Protection of Foreign Contract Workers (FCW)

- ① The Company shall verify that all FCWs possess valid legal work permits.
- ② The Company shall ensure that all FCWs working in another country receive, understand, sign, and retain copies of employment contracts written in their native language before departure from their home country.

In addition to wages, benefits, and contractual requirements specified in this Standard, contracts shall include:

- Conditions regarding custody and possession of identification documents during employment
  - Estimated minimum and maximum expected monthly take-home pay (maximum calculated based on 52 working hours per week)
- ③ The Company shall provide each FCW with secure lockers or storage devices within designated accommodations to safely store passports, identification documents, travel documents, and other personal legal documents.

Such storage must:

- Be freely accessible at any time without assistance or restriction
  - Be lockable
  - Include security measures preventing unauthorized access
- ④ The Company shall provide pre-departure and periodic refresher training to ensure FCWs understand at least the following and include such training within required employee orientation programs:
    - Recruitment and ongoing employment-related fees and costs
    - Grievance reporting channels for concerns regarding recruitment/employment fees, threats, coercion, or other violations
    - Employment conditions under individual contracts
    - Expected cost of living
    - Living conditions
    - Payment terms including expected first salary, deductions, taxable income, expected

amounts, and payment dates

- Relevant labor rights of FCWs
- Applicable laws and regulations
- Company policies
- Other protections under this Code of Conduct and related standards during employment in the receiving country

⑤ The Company shall effectively communicate FCW protection policies to all TPEAs involved in FCW management.

⑥ The Company shall make best efforts to ensure that no FCW is charged employment-related fees, costs, or deposits in accordance with Apple's definitions of fees and costs and shall directly pay the maximum possible recruitment-related costs. The Company shall implement procedures to determine all fees and expenses paid by each FCW prior to employment start.

Additionally:

The TPEA shall conduct due diligence through onboarding verification to ensure applicants understand recruitment risks and shall ensure equal opportunities for all applicants throughout the recruitment process, including those who may have paid intermediaries or labor agents.

⑦ The Company shall bear responsibility for all fees and costs related to recruitment, placement, processing, transportation, or ongoing management of workers in both sending and receiving countries, including:

- Reservation or placement fees
- Informal intermediary and sub-agent recruitment assistance fees and costs
- Recruitment service fees in the sending country (e.g., application or referral fees)
- Recruitment service fees in the receiving country (including one-time and recurring fees)
- Deposits
- Relocation costs where transfer is required after employment begins
- Airfare or ground transportation from sending country to receiving country and airport/border taxes
- Return airfare or ground transportation and airport/border taxes
- Third-party employment agency service fees
- Passport and visa fees
- Quarantine accommodation costs upon arrival or return (unless otherwise required by law)
- Medical examinations, testing, vaccinations, and screenings in sending and receiving countries
- Temporary work or residence permits and renewals
- Documentation fees in sending country (e.g., notarization, translation services, legal fees)
- Insurance
- Government fees
- Background and reference checks
- Photographs (including passport/visa issuance and renewal)
- Quarantine accommodation costs upon arrival and return
- Training fees
- Outsourced training by third-party employment agencies and subcontractors

Unless required by law, the following are exempt:

- Direct transportation costs from the worker's home to local or central recruitment centers before written acceptance of employment

- Fees and costs incurred through unrelated intermediaries or service providers not connected to the TPEA prior to TPEA involvement  
All recruitment-related fees and costs for FCWs shall be clearly specified in contracts between the Company and TPEAs in compliance with the no-fee policy.  
The Company shall require TPEAs to provide each FCW with accurate receipts detailing actual fees and expenses before departure.  
The Company shall implement a non-retaliation policy prohibiting punishment or retaliation against FCWs based on information disclosed during recruitment or employment procedures, and this policy shall be disclosed during interviews.
- ⑧ If the Company becomes aware that an FCW has paid fees or costs related to employment, the Company shall reimburse such fees within 30 days from either the employment start date or the date the Company became aware of the payment, whichever is later.
- ⑨ The Company shall not penalize FCWs who voluntarily terminate employment with reasonable notice in accordance with local law.  
Where not prohibited by law, the Company may allow FCWs who voluntarily terminate employment without reasonable notice to bear actual repatriation costs.  
If repatriation costs exceed 60% of one month's most recent net wages, the excess shall be paid by the employer.  
The Company shall not penalize FCWs who voluntarily terminate employment without reasonable notice by deducting base wages or overtime wages owed.
- ⑩ The Company shall pay repatriation costs for each FCW in the following situations:
  - Completion of employment contracts, termination by the employer, or early termination with reasonable notice
  - Contract termination due to worker misconduct, illness, or incapacity
  - Where the FCW has been subjected to harassment, abuse, or rights violationsExceptions include:
  - Where the FCW obtains employment within the receiving country and is not required to leave under applicable law
  - Where the FCW terminates employment without reasonable notice
  - Where employment termination results from illegal conduct under applicable law
- ⑪ The Company shall take positive measures to protect and support the rights of FCWs who are confirmed to be pregnant after arrival or during employment in the receiving country. Where receiving-country law requires return to the home country for childbirth, the Company shall provide protections required under applicable laws and regulations.  
The Company shall not prevent FCWs from contacting their embassies.

## 11. Worker Participation and Grievance Management

- ① The Company shall establish appropriate grievance reporting channels (posted in locations easily accessible to workers), which shall be disclosed to workers during onboarding and updated annually. The channels may include telephone, email, applications, etc., and at least one channel shall ensure the possibility of anonymous reporting. Such channels shall also be provided in languages understood by workers.
- ② Procedures for grievance handling shall be established as follows, and a non-retaliation policy shall be implemented to ensure protection of reporting workers and witnesses who cooperate in investigations:
  - Selection of qualified and impartial investigation personnel
  - Thorough investigation of relevant facts

- Confidentiality
  - Resolution and, where applicable, implementation of corrective actions and remedies
  - Timely feedback to workers throughout the handling process
  - The right of appeal by parties adversely affected by the investigation outcome
- ③ The Company shall maintain an appropriate recordkeeping system including the following:
- Date, type, and number of issues received
  - Channel through which the grievance was reported or the incident occurred
  - Investigation reports including names and titles of persons participating in the investigation or parties involved in the incident
  - Identified issues and implementation of corrective actions
  - Related resolutions and appeals
  - Feedback provided to workers regarding resolutions, where applicable
  - Time taken to resolve workers' grievances
- ④ Workers or potential workers shall be able to report all grievances and receive feedback and shall be able to participate in investigations in a safe environment free from retaliation or any form of punishment for reports made in good faith.  
The Company shall protect workers' personal information, and confidential and personal information shall be disclosed only to employees and parties permitted access by law and only where necessary for conducting investigations.
- ⑤ The Company shall actively collect feedback through regular surveys (at least once annually), interviews, or channels to assess overall worker satisfaction throughout recruitment, onboarding, employment, resignation, and termination stages.  
The scope shall include:
- Wages and benefits
  - Workplace conditions
  - Employment relationships
  - Medical services and welfare
  - Living conditions
  - Education and training
- The Company shall ensure accessibility in the language used in the workplace for all workers who wish to participate and shall identify areas requiring improvement and develop specific welfare improvement plans.  
Feedback shall be updated regularly and provided to workers.

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## B. Health & Safety(보건안전)

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The Company shall create and maintain safe working environment, and continuously manage health care and safety. The employees shall be allowed the right to refuse dangerous work and report unhealthy working environment.

### 1. Regulatory Permits

The Company shall obtain, retain, and manage valid or current copies of all required workplace health and safety licenses, permits, registrations, and regulatory approvals as required by applicable regulatory requirements.

### 2. Workplace Health and Safety Risk Assessment

① The Company shall establish procedures to identify and document foreseeable workplace health and safety hazards (including physical, chemical, and biological hazards).

Sources or tools for hazard identification may include process diagrams, material inventories, equipment lists, task lists, employee reports, inspection results, and historical incident records.

Examples of risk assessment methods include process hazard analysis, job hazard analysis, and exposure assessment. Depending on the selected method, the assessment shall be conducted by personnel with appropriate expertise and technical capability.

For high-risk processes such as anodizing and plating processes, the Company shall ensure that risk assessments are conducted by qualified experts and, where possible, reviews shall be performed prior to the start of production. (This process applies to all process modifications.)

The Company shall conduct risk assessments for new or modified equipment, workstations, workplace locations, or processes prior to production, and the results shall include implementable risk control solutions for identified hazards.

Additionally, non-production activities shall be specified, including:

- maintenance activities
- storage and transportation of hazardous substances
- waste management
- emergency response preparedness activities

Results shall be documented and followed by appropriate follow-up actions.

Research data shall be periodically reviewed and revalidated. The review cycle shall be at least annually or determined based on hazard characteristics, risk levels, and operating conditions (including environmental, health, safety incidents, and audit results).

② The Company shall eliminate or mitigate identified workplace health and safety hazards using the hierarchy of controls, prioritized as follows:

- Hazard elimination
- Substitution
- Engineering controls
- Administrative controls
- Personal Protective Equipment (PPE)

### 3. Electrical Safety

The Company shall establish procedures and conduct risk assessments to manage electrical safety, identify potential electrical hazards, and develop measures to reduce related risks. These procedures shall apply across the entire supplier facility, including areas that are not frequently accessed such as rooftops, basements, and suspended ceilings, and shall address at least the following:

- All electrical equipment or devices, including wiring, sockets, lighting fixtures, and switches, shall be properly designed, installed, maintained, and considered safe for use
  - Grounding shall be required from design through installation to prevent electric shock and fire hazards and shall be maintained during operation
  - Appropriate overcurrent protection devices such as circuit breakers or fuses shall be installed to protect electrical circuits from overload and short circuits
  - Appropriate insulation materials and enclosures shall be used to prevent accidental contact with energized electrical components
  - Pest control programs shall be implemented to eliminate electrical short-circuit risks and related fire hazards
- All work related to electrical hazards shall be performed only by qualified experts
- Temporary electrical use shall be conducted in accordance with applicable laws and regulations
- Qualified experts shall perform safety inspections and maintenance to ensure electrical equipment or devices remain in good condition

#### 4. Lockout/Tagout

Lockout/Tagout programs shall be implemented during maintenance involving all activities requiring access to chemical supply systems, recirculation lines, pumps (draining or non-draining), electrical devices, and moving equipment, as well as any activities requiring bypassing or disabling safeguards and interlocks.

Barricades and warning signs shall be installed to prevent unauthorized access during maintenance and cleaning activities.

#### 5. High-Risk Work

① Procedures and practices for high-risk tasks shall apply to workers and contractors performing on-site work.

Where maintenance or cleaning activities are required within restricted areas, restricted-area access procedures shall be established and implemented, and work permit procedures shall be implemented together with special precautionary measures.

② Appropriate hot work procedures, including permitting and fire watch requirements, shall be implemented.

③ Appropriate fall protection equipment shall be worn, and work permit procedures shall be implemented when working at heights above 2 meters.

④ Hoist and crane operations shall be documented and supported by appropriate operating procedures. Operators shall obtain all required qualifications and permits prior to performing such operations.

⑤ The Company shall establish and implement a written program to appropriately manage the use of forklift trucks, powered hand trucks, and powered industrial trucks used to lift, lower, or move pallets, boxes, or other containers containing large or small objects.

The Company shall also conduct risk assessments, and all operators and personnel

associated with powered industrial trucks shall obtain the required permits/licenses prior to operation in accordance with applicable laws.

The Company shall ensure that periodic inspections and maintenance of powered industrial trucks are conducted in accordance with applicable laws and shall maintain related records.

## 6. Industrial Hygiene

- ① The Company shall conduct industrial hygiene monitoring/evaluations through qualified experts or external agencies at least once annually or in accordance with applicable regulations and shall perform monitoring/evaluations of hazardous environmental substances in the workplace.

If monitoring results exceed the local regulatory Occupational Exposure Limits (OELs) or the more stringent OELs referenced by Apple, the Company shall take immediate action by implementing appropriate engineering controls or providing interim PPE until three consecutive monitoring results, taken at least one day apart, are below the applicable OELs. Where existing production processes are modified, new production lines are introduced, or new products are manufactured, the Company shall evaluate the Material Safety Data Sheets (MSDS) of hazardous chemicals used in the modified or new processes, as well as related physical/biological occupational hazards, to determine whether additional industrial hygiene monitoring programs are required.

- ② The Company shall ensure that all ionizing radiation equipment (e.g., X-ray) and non-ionizing radiation equipment, regardless of equipment ownership, are operated in compliance with the laws and requirements specified in this document.

Radiation equipment shall meet the following requirements:

- Risk assessments shall be conducted
- Appropriate warning signs, alarms, indicator lights, labels, and markings required by law shall be provided
- Appropriate safeguards (e.g., interlocks, enclosures, ventilation systems) shall be installed on operating doors and service panels as required by law

The Company shall implement the following measures to protect workers from radiation exposure:

- Proper maintenance of radiation equipment and safety devices
- Measurement of radiation levels by qualified personnel at least once annually or at shorter intervals as required by local regulations
- Radiation detection following maintenance activities such as lead chamber servicing or relocation/installation of radiation equipment
- All personnel entering controlled areas during radiation equipment operation shall wear legally required personal dosimeters
- Assignment of appropriate PPE consistent with job risk levels
- Development of Standard Operating Procedures (SOPs)
- Safety inspections after installation or reinstallation of tools including the following:
  - Warning labels
  - Warning indicator lights
  - Safety devices
  - Emergency machine stop devices
  - Training for workers who may come into contact with radiation equipment

The Company shall assign radiation safety management responsibilities to personnel directly

responsible for radiation safety management. Such personnel shall receive radiation safety management training and, where applicable, obtain legally required radiation safety certifications.

Where required by law, the Company shall maintain records demonstrating the suitability of workplace medical examinations for radiation workers.

- ③ The Company shall install local exhaust ventilation systems in work areas to capture and remove airborne hazardous chemicals and shall ensure that airflow velocity, ventilation ratios, airflow volume, and ventilation rates are appropriately controlled through ventilation monitoring to effectively remove hazardous airborne contaminants.

Contaminant capture devices shall be installed as close as possible to the source of contamination to improve capture efficiency. Ducts and pipes shall be constructed from compatible materials and shall be regularly maintained and inspected.

Incompatible chemicals shall not be ventilated through the same exhaust system.

Processes involving toxic or flammable gases, vapors, or combustible duct systems shall be conducted in rooms operating under negative pressure relative to the workspace.

- ④ The Company shall conduct water quality monitoring/evaluations through qualified experts or external agencies at least once annually or in accordance with applicable regulations and shall perform monitoring/evaluations of hazardous environmental substances within the workplace.

To ensure evaluation across the entire facility:

- Drinking water samples shall be collected from containers in each building and analyzed
- Secondary drinking water samples shall be collected from storage tanks and analyzed from all individual tanks present within the facility

## 7. Medical Examinations

The Company shall establish a workplace medical examination system that enables tracking of medical examination records for workers routinely exposed to occupational hazards during their time at the workstation, including pre-placement, periodic, post-employment, and post-emergency medical examinations, in accordance with applicable local regulatory requirements.

Medical examinations shall be conducted through certified medical institutions, and examination results shall be provided to the examined workers upon request.

For workers routinely exposed to workplace hazards, the Company shall provide:

- Pre-placement medical examinations for new workers before starting work
- Periodic workplace medical examinations at least once every two years or more frequently if required by law
- Post-employment medical examinations for workers leaving their positions
- Medical examinations prior to facility closure, merger with another company, or division of the Company
- Medical examinations for workers exposed to hazardous chemicals following emergency incidents

Where workers exposed within Company facilities show abnormal findings in medical examination results:

- Workers shall be immediately transferred from their current tasks to other work within the facility
- The Company shall not terminate employment based on medical examination results
- The Company shall provide medical treatment to the affected workers

- The Company shall provide follow-up medical examinations
- The Company shall bear all costs related to medical treatment, follow-up examinations, and rehabilitation

### **8. Personal Protective Equipment (PPE)**

Appropriate PPE shall be provided to all workers who may be exposed to occupational hazards in the workplace. Provided PPE shall comply with applicable regulations or recommendations from MSDS / risk assessment results.

All workers shall receive training on the correct use of PPE prior to performing work.

PPE shall be properly maintained and stored and shall be periodically inspected and replaced in accordance with manufacturer instructions.

### **9. Ergonomics**

The Company shall document procedures to identify, assess, and control ergonomic risk factors in the workplace.

Ergonomic risk assessments shall include identification of tasks and operations involving potential ergonomic risk factors. Inputs shall include:

- Work observations
- Worker/supervisor feedback
- Worker surveys

For new or modified production lines, equipment, tools, and workstations, ergonomic risk assessments shall be conducted prior to production implementation.

Potential risk factors include:

- Effects on muscles and joints (fingers/hands/wrists/arms/shoulders, neck, lower back, legs, feet), including dynamic movement, static posture, load, and twisting
- Contact pressure (fingers, palms, forearms, etc.)
- Vibration (arms, whole body, etc.)
- Work pace control
- Repetition
- Lighting
- Manual material handling (lifting heavy objects)
- Noise
- Temperature
- Task duration

The Company shall implement control measures to reduce ergonomic risk factors and document implementation processes to eliminate or reduce such risks.

These tasks and operations may be reassessed using ergonomic job analysis prior to implementation to eliminate or reduce risk factors.

### **10. Combustible Dust**

Dust used or generated in the following processes shall be considered potential combustible dust hazards:

- Dust collection processes using dry or wet dust collectors
- Grinding, sanding, cutting, milling, routing, or drilling processes generating dust
- Polishing or buffing processes generating dust
- Any other processes or manufacturing operations generating or handling dust, media blasting, or other powders

The Company shall conduct combustible dust hazard assessments and mitigate risks in accordance with applicable regulatory requirements and combustible dust specifications.

### 11. Contractor Management

The Company shall establish and implement procedures to manage and monitor contractor activities on-site in accordance with applicable laws, including:

- EHS requirement training prior to work commencement, including emergency procedures
- Conducting risk assessments
- Contractor access control procedures
- High-risk work management procedures
- EHS incident reporting

### 12. Health and Safety Worker Committee

The Company shall establish a Health and Safety Worker Committee that includes worker participation. The committee shall receive training and participate in the review and continuous improvement of safety practices.

### 13. Training and Communication

The Company shall implement a workplace health and safety training management system through strategies and execution plans aligned with regulatory requirements, industry standards, and Apple standards.

Workplace health and safety training topics shall be based on regulatory requirements and the types of work performed.

The Company shall provide workplace health and safety training in one or more languages to ensure all workers understand the training content, and health and safety information shall be posted at the workplace in locations visible and accessible to all workers.

### 14. Fire Safety Management

① This standard applies to all properties owned or leased by the Company, including buildings, facilities, utilities, and installations.

The Company shall develop and implement programs to ensure fire safety during the design, construction, renovation, utilization, and decommissioning of assets and shall conduct fire risk assessments through appropriate emergency response planning to mitigate risks and impacts to life, the environment, and property.

② The Company shall obtain, retain, and manage valid copies of all required hot work permits, licenses, registrations, and regulatory approvals as required by law.

The Company shall plan and implement appropriate lead times to ensure that fire-related permits are updated for any changes in property use, processes, modifications, relocation, or alterations as required by law.

③ The Company shall ensure that qualified experts conduct fire safety risk assessments to determine all necessary fire safety measures.

Based on risk assessment results, risk control measures shall be developed.

All identified fire hazards (e.g., combustible dust, chemical-related hazards, electrical fires, battery charging, storage, and disposal) shall be appropriately controlled through adequate fire safety equipment and preventive measures.

Risk assessments shall be conducted at least annually and whenever changes occur, including:

- Building additions
- Renovations
- New equipment installation
- Layout changes
- Procedure changes

The Company shall establish fire safety procedures to ensure appropriate risk assessments are conducted in areas where batteries are used and stored in battery manufacturing and recycling facilities.

These procedures shall include, at minimum:

- Identification of batteries presenting safety hazards such as damage or leakage

Areas where batteries are stored or discharged shall be equipped with preventive fire risk measures including appropriate fire suppression systems.

- ④ The Company shall establish procedures to comply with all applicable fire safety laws, regulations, and standards for all relevant assets.

The overall layout of assets or buildings shall be designed to reduce fire risks and facilitate firefighting and rescue operations.

Fire compartments shall be protected by physical fire barriers such as fire walls.

Where openings exist in fire walls or fire barrier rooms, they shall be protected with self-closing fire doors having the same fire-resistance rating as the fire wall design.

Materials used in construction, remodeling, or renovation—including walls, doors, ceilings (including suspended ceilings), electrical shafts, pipe wells, ventilation ducts, fire barriers, and cleanrooms—shall be fire-resistant or flame-retardant as appropriate for asset purpose, function, and fire risk level.

To prevent fire incidents from spreading between compartments, facility spaces shall be reasonably divided into multiple fire compartments based on function or use to ensure adequate containment and control.

- ⑤ The Company shall document written fire emergency response plans, including procedures for foreseeable fire emergencies.

The Company shall comply with all requirements of emergency preparedness and response standards and shall install and maintain legally required or recommended equipment such as:

- Fire alarm systems
- Smoke detectors
- Fire sprinkler systems

to detect fires, notify occupants, monitor conditions, and suppress fires.

Fire suppression materials containing asbestos (e.g., blankets) are prohibited.

The Company shall periodically test all firefighting equipment in accordance with manufacturer instructions or recommendations to identify malfunctioning equipment and perform repairs.

All inspections shall be conducted at least annually or as otherwise required by applicable laws, and related inspection and maintenance records shall be retained and provided to Apple upon request.

Fire drills shall be conducted as required by law, or at least once every six months where no legal requirement exists.

Drills shall involve all workers, and the Company shall evaluate worker emergency evacuation performance.

Records of all evacuation drills shall include:

- Evacuation speed

- Number of participating workers
- Potential improvement areas

## 15. Emergency Preparedness and Response

- ① The Company shall assess potential emergency scenarios by considering local geographic and weather conditions, as well as production processes, chemical handling, and utility operations.

Emergency scenarios may include fires, explosions, floods, chemical spills, power outages, or natural disasters, and the Company shall document emergency response plans based on potential emergency scenarios to address foreseeable emergencies.

In the event of an emergency, the Company shall follow the procedures specified in the emergency response plan. The plan shall include, at a minimum, the following elements:

The Company shall organize trained workers into Emergency Response Teams (ERTs) at each facility to ensure availability during all work shifts. ERTs shall have the authority and responsibility to lead emergency response efforts and protect worker health and safety, the environment, and property.

The Company shall maintain reliable and effective internal and external communication methods to notify all personnel within the facility of emergencies and subsequent evacuations. Communication methods shall be audible throughout the facility.

The Company shall develop and maintain the capability to notify surrounding communities, the public, authorities, and relevant government agencies of all emergency situations, including environmental releases of toxic substances or chemicals.

In emergencies that may threaten worker health and safety, the Company shall immediately evacuate personnel from the facility. Evacuation shall be conducted under the direction of trained designated personnel and shall guide workers to clearly marked safe assembly points.

Workers shall not return to previously hazardous areas until the emergency has been resolved and the facility has been declared safe by relevant authorities or other trained and authorized personnel.

- ② Pathways between processes and production lines shall be clearly marked and kept free of obstructions or slippery substances. Pathway widths shall comply with local regulations.

The Company shall provide emergency exits appropriate to building size and occupancy in compliance with applicable laws, and the following requirements shall apply:

- Not blocked, obstructed, or locked while workers are inside the facility
- Open outward
- Clearly marked with “EXIT” signs or symbols understandable to all workers and compliant with legal requirements
- Maintained in proper working condition
- Kept closed during normal conditions

Emergency exits and exit signage shall remain visible during darkness or power outages through battery power or backup facility power.

The Company shall post accurate and up-to-date evacuation routes at appropriate locations in all process and production areas, meeting rooms, cafeterias, living areas, and other common areas.

Evacuation routes shall be clearly displayed in one or more languages understandable to all workers and posted at eye level as close as possible to evacuation routes and assembly points.

The Company shall designate unobstructed worker assembly areas through clearly visible signage for emergency situations. Workers evacuating during emergencies shall safely assemble at locations not far from emergency exits without interfering with safe building evacuation.

The Company shall post signs in one or more languages prohibiting elevator use during emergencies in all elevators except those designed for firefighting or emergency use.

- ③ The Company shall install and maintain appropriate types of emergency equipment and systems as required by law.

Functional emergency lighting shall be provided in stairways, pathways, corridors, access roads, routes leading to emergency exits, and other legally designated areas. Emergency lighting shall be powered by batteries or backup generators.

The Company shall install and maintain equipment capable of manually or automatically shutting down hazardous production equipment during emergencies to prevent injuries and damage.

Appropriate medical equipment shall be placed throughout the facility to ensure accessibility for all workers, and the Company shall provide first-aid training to a sufficient number of workers.

- ④ The Company shall periodically test all emergency equipment in accordance with manufacturer instructions or recommendations to identify malfunctioning equipment and perform repairs.

All inspections shall be conducted at least annually or as otherwise required by law. Related inspection and maintenance records shall be retained and provided to Apple upon request.

- ⑤ The Company shall designate emergency contacts for each work unit and all shifts to ensure effective internal communication during emergencies.

Contact information for internal and external emergency response teams and agencies shall be posted in public areas visible to workers in one or more languages understandable to all workers.

- ⑥ The Company shall provide emergency response plan training to all workers.

Where Company policies or procedures related to emergency preparedness change, workers shall be notified at least 30 days prior to implementation.

Training shall be conducted at least annually for all relevant or designated personnel.

The Company shall provide vendors, contractors, and temporary visitors with information regarding evacuation routes, assembly points, emergency contacts, and procedures.

- ⑦ Emergency response drills and evacuation drills shall be conducted as required by law or, where no legal requirement exists, at least once every six months.

Emergency and evacuation drills shall involve all workers, and the Company shall evaluate worker evacuation performance.

## 16. Infectious Disease Preparedness and Response 15. Emergency Preparedness and Response

- ① The Company shall implement documented infectious disease preparedness and response procedures to identify, assess, and control workplace transmission risks and monitor guidance from relevant health authorities to appropriately integrate recommendations into the Infectious Disease (ID) Plan.

This program shall be based on risk assessments of workplace risks associated with infectious disease outbreaks.

In such situations, the Company shall follow procedures specified in the infectious disease

response plan, including the following elements:

- Analysis of potential infectious disease exposure risks to workers, including specific risk factors affecting employees
- Systems to identify and implement control measures necessary to mitigate these risks
- Procedures for identification, isolation, and transfer of confirmed cases
- Cleaning and disinfection procedures for workstations, isolation rooms, dormitories, and other common areas (where applicable)
- Identification of professional service providers for cleaning and disinfection where required
- Identification of medical and laboratory service providers

② The Company shall ensure the following:

- Workers are protected from inappropriate discrimination, harassment, or retaliation related to infectious disease concerns
- Efforts are made to protect worker personal information when confirmed cases are reported in accordance with applicable laws
- Workers receive wages in accordance with applicable laws during medical examinations, quarantine, treatment, leave, and recovery periods related to infectious diseases
- Adequate facilities for handwashing and drying are provided, including handwashing agents, disposable towels, and hand sanitizers
- Workers are encouraged to remain at home when ill
- Where possible, sharing of telephones, tools, or equipment among workers is avoided
- Workers are ensured access to appropriate vaccinations and all health and safety measures required or recommended by local governments are followed

The Company shall maintain inventory levels sufficient to protect workers and control the spread of infectious diseases and shall ensure adequate supply at all times of the following:

- Handwashing agents or, alternatively, hand sanitizers in all restrooms
- Face masks, N95 masks (fit-tested), gloves, gowns (or protective clothing), and protective eyewear
- Cleaning and disinfection supplies including clean towels, soap, and disinfectants
- Supplies used to detect and control disease spread (e.g., thermometers, barriers, test kits, etc.)

The Company shall maintain procedures for hygienic disposal of all such materials.

All airflow and water supply systems shall meet standards in accordance with applicable laws and technical specifications. Ventilation and water systems shall be monitored, properly installed, and maintained according to engineering requirements and manufacturer recommendations.

③ The Company shall establish procedures to appropriately screen infectious diseases occurring within local communities and at national and international levels.

If local authorities declare an infectious disease emergency (epidemic, endemic, or pandemic), the Company shall:

- Strengthen workplace infectious disease prevention measures
- Take reasonable actions to prevent workplace transmission in accordance with guidance from local authorities

The Company shall encourage timely reporting of all infectious disease symptoms.

If suspected or confirmed cases arise within Company facilities, the Company shall:

- Safely isolate and transfer confirmed cases
- Conduct due diligence to identify all individuals who may have had contact with suspected

or infected persons, notify them, and provide testing where necessary

- Enhance facility cleaning and disinfection according to guidance from relevant experts/authorities
- Notify or cooperate with local authorities if infectious disease cases are confirmed within the facility or community (such guidance may include reducing working hours, reducing staffing levels, or temporarily closing facilities)
- Reopen facilities in accordance with guidance from local authorities where necessary

The Company shall establish procedures for reporting suspected or confirmed cases in the workplace and shall report confirmed infectious disease cases to local authorities as required by law.

The Company shall comply with Apple incident reporting requirements and report confirmed cases accordingly.

## 17. Incident Management

- ① The Company shall establish systems enabling workers to report health and safety incidents and near-miss events and maintain mechanisms to track all incidents.

Mechanisms shall include at least the following:

- Incident classification
- Incident investigation
- Incident reporting
- Analysis of overall incident trends

- ② The Company shall regularly analyze incident data—including incident scenes, witnesses, testimony materials, incident tracking records, and medical examinations—and immediately following incident occurrences.

The Company shall conduct root cause analyses to identify direct causes, underlying causes, and management system failures contributing to incidents.

The Company shall implement corrective and preventive actions to mitigate risks and identify and implement at least one corrective and preventive action addressing each direct cause and underlying cause.

Each corrective and preventive action shall be assigned to a responsible individual and tracked until timely closure.

If a worker is injured within Company facilities, the Company shall:

- Provide necessary medical treatment immediately following the incident
- Conduct post-incident medical examinations in accordance with applicable laws by qualified medical professionals
- Not terminate employment based on injuries sustained within Company facilities or during working hours
- Support smooth return-to-work through measures such as work schedule adjustments, provision of special equipment, rest opportunities, leave or partial leave for hospital visits, and other appropriate accommodations
- Bear all costs related to medical treatment, follow-up examinations, and rehabilitation

- ③ The Company shall comply with all applicable laws regarding incident reporting.

In the event of serious injuries, fatalities, or other incidents likely to raise social concern (e.g., multiple serious injuries or multiple individuals affected by epidemic/pandemic conditions), the Company shall report the incident to Apple within 24 hours after occurrence.

Incident reports shall include:

- Facility location and incident
- Incident time
- Site description
- Incident description
- Number of casualties and missing persons
- Control and remediation measures

## 18. Dormitories and Canteens

- ① The company shall obtain, maintain, and manage valid and current copies of all required dormitory and canteen-related licenses, permits, registrations, and regulatory approvals as required by law.
- ② All dormitories shall be located within an appropriate distance from the workplace, with a recommended travel time of less than one hour. Where the company provides transportation for workers, it shall conduct due diligence when selecting third-party transportation providers to ensure the safety and reliability of transportation. Transportation schedules shall be aligned with shift working hours, and pick-up locations shall be safe and convenient.

All dormitory buildings shall be separated from buildings used for production, warehousing, or chemical storage areas. All dormitory rooms shall be fully enclosed spaces with solid walls or partitions from floor to ceiling; temporary partitions such as cabinets, tables, screens, or other movable items are not permitted.

Dormitories shall also be equipped with adequate lighting, heating, and ventilation facilities. The company shall determine appropriate heating and cooling measures by considering the local climate, temperature range, common local practices, and worker feedback, and by conducting regular risk assessments.

Dormitory facilities shall be safe and comply with all applicable laws. All dormitory facilities shall meet the following requirements:

### Beds

Comfortable beds, cribs, or bunk beds shall be provided for all dormitory residents. Provided beds shall meet at least the following requirements:

- Single or double-tier bunk beds
- One bed per person
- Where there are no applicable legal requirements, the following minimum spacing shall apply:
  - At least 0.7 m clearance between upper and lower bunk beds
  - At least 1.2 m aisle width between bunk beds

### Wardrobes and Lockers

Dormitory bedrooms shall provide adequate personal storage space such as individual wardrobes for clothing and other personal belongings. Each dormitory bedroom shall have secure storage boxes or personal lockers for residents' valuables.

### Toilets and Bathrooms

For all toilets and bathrooms within workplaces, dormitories, canteens, or other areas, the company shall ensure they meet the following requirements:

- Clean and hygienic
- Adequate lighting and ventilation
- Appropriate privacy in accordance with local customs
- Located within 61 m (200 ft) of each dormitory bedroom

- At least one toilet and one shower head per 15 persons on each floor, with at least one per gender
- Proper gender separation
- Toilets separated by solid floor-to-ceiling walls according to gender
- Clearly marked “Male” and “Female” in languages understood by workers
- Toilet paper (or equivalent), hand-washing facilities, soap, and drying facilities available at all times
- Floors sloped toward properly designed floor drains
- Water tanks cleaned annually or in accordance with local legal requirements

#### Drinking Water

The company shall provide potable drinking water in all dormitories, meeting the following requirements:

- Freely accessible at any time and within 61 m (200 ft) of each dormitory bedroom
- Safe for consumption and tested at least once annually in accordance with applicable laws

#### Living Space

Dormitory living space shall meet the following requirements:

- No more than 8 persons per bedroom
- At least 3 square meters of personal living space per resident, excluding bathrooms and balconies

#### Electrical Safety

The company shall establish electrical safety protocols in all dormitories, including at minimum:

- All wiring, sockets, lighting fixtures, and switches installed and maintained in accordance with applicable laws
- Electrical equipment not exceeding the rated capacity of outlets
- Updated guidance on safe use of electrical equipment

#### Emergency Equipment

Smoke detectors shall be installed in each dormitory bedroom and all common areas and tested at least annually to ensure continued proper operation. Appropriate firefighting equipment shall be available within 25 m and easily accessible at all times in each dormitory room and common area. Each dormitory building shall provide first-aid kits with appropriate supplies that residents can access at any time.

#### Evacuation

All dormitories shall allow workers to exit freely at any time, and no hardware that could block exits shall be installed. All dormitories and canteens shall have appropriate, unobstructed, and unlocked emergency exits in accordance with applicable laws, or at least two emergency exits—whichever requirement is stricter. All doors shall open outward, and evacuation signage, emergency lighting, and unobstructed evacuation routes shall be maintained at all times. The company shall designate clearly marked, unobstructed assembly areas in open spaces.

#### Training

Fire drills shall be conducted for all residents across all shifts in accordance with regulations, or at least once every six months if no applicable regulation exists. In addition to the above requirements, the company shall comply with all other relevant fire safety management standards. The company shall implement appropriate gender separation in dormitories. Where different genders are accommodated within the same building, separate spaces shall be provided according to gender.

### Security

The company shall implement security measures in dormitory areas to protect workers' safety and property, including:

- Access control to manage unauthorized entry
- Monitoring measures to prevent and deter illegal activities (e.g., security patrols, CCTV, etc.)

### Hygiene

The company shall establish a program to maintain hygiene conditions within dormitories. The program shall include:

- Cleaning and disinfection equipment and procedures
- Pest control programs such as window screens and mosquito nets

- ③ The Company shall ensure that food preparation, processing, storage, and canteen facilities are hygienic and comply with applicable laws.

The Company shall inspect incoming food materials and apply appropriate labeling to ensure the safety and traceability of food materials.

Food processing shall be performed in accordance with applicable hygiene standards, and appropriate management measures shall be taken to prevent contamination or spoilage.

Food storage, including utensils/equipment, labeling, temperature control, and pest control, shall comply with applicable laws.

The Company shall retain food samples in accordance with applicable laws.

The Company shall ensure that canteen spaces are clean and hygienic and equipped with appropriate seating arrangements, lighting, heating, ventilation, and handwashing facilities.

The Company shall store, handle, and manage all waste, including food waste, in accordance with applicable laws.

The Company shall implement effective management systems to maintain hygiene conditions in canteen facilities, including the following in accordance with applicable laws:

- Cleaning and disinfection protocols
- Pest control protocols
- Appropriate personal hygiene practices for food handlers
- Food and water testing conducted in accordance with applicable laws

Water testing conducted at least once annually

- Valid health certificates available for all food handlers

- ④ The Company shall establish documented dormitory and canteen management procedures including at least the following:

- Identification of legal and customer requirements related to dormitories and canteens
- Systems to measure dormitory and canteen capacity to meet worker needs
- Tracking and risk assessment of new or temporary dormitories and canteen services and control measures required to mitigate identified risks
- Pre-selection due diligence procedures for all dormitory and canteen service providers

The Company shall report all dormitory and canteen construction and demolition to Apple upon request.

- ⑤ The Company shall conduct regular audits including periodic safety inspections of dormitories and canteens to ensure compliance with applicable laws and this standard.

### Corrective actions

The Company shall take improvement actions to correct findings identified during audits.

The Company shall regularly share dormitory- and canteen-related audit findings and improvement actions with workers.

- ⑥ The Company shall provide appropriate training and communication regarding dormitories and canteens to all employees.

Training shall include the following:

- Fire safety, emergency evacuation procedures orientation, and smoking guidance
- Electrical safety practices
- Personal hygiene and food safety requirements for food service staff
- Dormitory and canteen rules affecting workers
- Canteen rules and personal hygiene guidance

Training shall be refreshed annually.

- ⑦ In addition to the above requirements, the Company shall periodically evaluate the overall condition of dormitories and canteens to consider necessary changes related to infrastructure, dormitory room conditions, canteen facility conditions, amenities and services, smart home technologies, sustainability, and other factors.

Continuous improvement shall be implemented based on evaluation results and worker feedback.

The Company may refer to Apple dormitory and canteen management guidance regarding best practices and performance benchmarks.

## 19. Machine Safety

- ① The Company shall develop and implement a documented program for the purchase, installation, and operation of machines directly used in the safe manufacture, testing, and recycling of Apple products. The Company shall follow the procedures of the machine safety management program to mitigate risks. The program shall include the following elements:

- Establishment of machine safety management procedures to assess machine hazards throughout the entire life cycle of machines and to maintain the overall effectiveness of risk management
- Implementation of machine safety requirements at various stages of the life cycle
  - Design and purchase of machinery
  - Installation and approval
  - Safe operation
- Implementation of a system to periodically review the implementation status of machine safety management through assessments/audits or other methods to ensure that machine safety is properly implemented

- ② Apple requires that all newly purchased machines based on new DFM (Design for Manufacturing) that are directly used in the manufacture, testing, or recycling of Apple products meet the following requirements:

- The Company shall ensure that the MB (Machine Builder) or SI (System Integrator) complies with the requirements of Apple SMS (Safe Machine Specification) and includes the SMS in machine purchasing documentation
- Where existing machines are modified or upgraded without a new DFM, the Company shall define its own design standards or purchasing specifications in accordance with applicable laws to ensure that safety is included in all changes occurring during machine modification or upgrading

- ③ The Company shall do the following:

- Cooperate with MB/SI to install machine guarding or applicable control devices as necessary as part of machine integration

- Where applicable, provide required local exhaust ventilation to protect workers from airborne chemical and particle exposure
- Provide hazard warning signs on machines in the local language

The Company shall define a documented site risk assessment methodology to identify, evaluate, and implement control measures to reduce risks. Site risk assessments shall be conducted and appropriately revised in the following cases:

- When machines are newly installed
- When machines are modified
- When machines are changed and modified to suit other processes or applications

The Company shall cooperate with MB/SI to perform functional testing of all safety controls to confirm proper operation.

The Company shall perform machine safety approval for newly installed or modified machines.

- ④ The Company shall develop SOPs for each machine to ensure that hazards identified during routine and non-routine work (e.g., maintenance, troubleshooting) and control measures are properly communicated and trained to all relevant personnel (operators, supervisors, maintenance personnel).

The Company shall implement a system to perform periodic inspection, testing, and maintenance of machine safety devices in accordance with the recommendations of the machine manufacturer.



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## C. Environment(환경)

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The company shall make efforts to continuously develop, implement and maintain work, and comply with related laws and regulations to fulfill its responsibility for environment.

### 1. Chemical Management

① The Company shall implement a documented program to identify, evaluate, and control adverse effects of processes and operations involving the handling of chemicals, and the program shall be based on risk assessments of hazards that may arise in relation to chemical operations performed at the facility. In addition, the Company shall develop and implement program documentation to track, review, and approve the use of all hazardous chemicals, and newly purchased hazardous chemicals shall receive internal EHS (Environmental, Health, and Safety) approval before use. The Company shall include an evaluation step for substitute materials that can replace hazardous chemicals in the hazardous chemical selection procedure. The Company shall develop and maintain an up-to-date chemical inventory that details all hazardous chemicals introduced into the facility. The Company shall review and update the hazardous chemical inventory annually to reflect changes in processes, chemical formulas, substances, and products. Chemical data shall be disclosed to Apple in accordance with Apple Regulated Substances Specification (069-0135), and the Company shall ensure that the hazardous chemical inventory includes the following:

- Chemical product information (commercial name, CAS (Chemical Abstract Service) number, chemical manufacturer)
- Purpose of use
- Location of use and storage
- Quantity of hazardous chemicals used annually
- Legally permitted maximum storage limits (where applicable)
- Exposure information (frequency of exposure, duration, and number of exposed persons)
- Application and control information
- Cleaner testing results in accordance with Regulated Substances Specification (069-0135)

The Company shall provide chemical inventory data and supporting documentation when requested by Apple for review. Hazardous chemicals used and stored onsite shall have a chemical compatibility matrix prepared. The Company shall comply with Regulated Substances Specification (069-0135) for all materials and goods manufactured and supplied to Apple.

② When handling hazardous chemicals, the requirements of the IFC (International Fire Code) issued by the International Code Council or relevant standards or regulations shall be followed. Hazardous chemicals shall not be used or handled in locations where spills, fires, or reactions may cause immediate danger to humans or the environment. Hazardous chemical transport equipment shall be provided with means to secure hazardous chemical containers to the equipment, and unless there is no possibility of leakage due to packaging (e.g., sealed metal containers), secondary containment equal to the volume of the transported material shall be provided. Chemicals shall be stored in accordance with applicable laws and regulations and shall meet the following requirements:

- Stored in compatible containers with no damage or leakage and subject to periodic

inspection to verify container integrity

- Not stored in locations exposed to weather effects
- Stored in accordance with the manufacturer's storage instructions
- Segregated from incompatible chemicals according to the Company's chemical compatibility matrix
- Protective measures implemented to prevent falling of all stacked chemicals
- Hazardous chemical containers shall not be stacked in areas where there is a risk of leakage, and metal drums containing liquids (e.g., approximately 208-liter drums) shall not be stacked unless safely secured with stacking devices (devices or equipment specifically designed for drum stacking)

Hazardous chemical storage areas shall meet all of the following requirements:

- Appropriate ventilation
- Appropriate fire prevention and firefighting equipment
- Temperature and humidity measurement and control devices
- Hazardous gas detectors
- Secondary containment
- Barriers to prevent spills from leaving the storage area
- Anti-static equipment and explosion-proof electrical equipment for flammable and combustible chemical warehouses
- Appropriate PPE
- Emergency equipment such as safety showers, eyewash stations, and spill kits

Compressed gases have the following hazards:

- Fire and explosion hazards of flammable, pyrophoric, or reactive gases
- Health hazards of toxic, corrosive, or asphyxiant gases
- Pressure hazards due to high internal pressure of most cylinders causing sudden release followed by violent spinning in place or propulsion (rocketing)
- Safety hazards due to cylinder weight during handling and storage operations

The Company shall evaluate each type of compressed gas and provide appropriate safeguards to address the types of hazards associated with compressed gases. The Company shall store compressed gases at the facility in accordance with applicable laws, or where such laws do not exist, comply with MAQ (Maximum Allowable Quantity) specified in NFPA (National Fire Protection Association) 55 and the International Fire Code for indoor use and storage. Compressed gas cylinders shall be secured with chains and stored in well-ventilated areas. The Company shall install secondary containment for underground storage tanks and conduct tank integrity testing every two years to inspect defects in primary or secondary containment structures or leakage in secondary containment systems. In addition, the Company shall be equipped with systems capable of detecting leakage at an early stage through visual inspection, instrument monitoring, or other methods. The Company shall conduct periodic visual inspections of all secondary containment areas and aboveground storage tanks (including tank systems). When transporting hazardous chemicals to other work areas, they shall be transported in the original shipping containers unless transported in appropriately labeled portable compatible containers. Workers shall use appropriate equipment when transporting hazardous chemicals in large volumes or multiple containers. The registry for underground storage tanks and aboveground storage tanks shall include the following information for each:

- Date of manufacture, manufacturing type, and construction material
- Location, dimensions, and capacity

- Design pressure, operating temperature, and pressure
  - Current status (e.g., in use, temporarily out of service, decommissioned)
  - Auxiliary equipment (e.g., pumps, pipes, valves, gauges, other conduit connections, test ports, instruments, control devices, etc.)
  - Spill/leak prevention systems
  - Spill/leak detection systems
  - Inspection, maintenance, and repair records
- ③ The Company shall disclose the hazards of hazardous chemicals and the corresponding control methods to mitigate risks to workers, and the control methods shall include engineering controls, administrative controls, and PPE controls. Workstations where PPE must be used during operation shall provide PPE instruction signage, and this training and communication shall also be provided when new chemicals or chemical processes are introduced or changed and regarding emergency response related to chemical processes and operations. Material Safety Data Sheets or Safety Data Sheets for hazardous chemicals used at the facility shall be provided in one or more languages so that all workers can understand the information, and shall be made readily accessible to workers in areas where hazardous chemicals are used. All chemical containers and chemical processing tanks in the workplace shall be labeled in accordance with applicable laws, and labels shall indicate the name of the chemical inside and safety and environmental warnings specified in the MSDS (Material Safety Data Sheet) or SDS (Safety Data Sheet). Symbols or pictograms may be used, but the Globally Harmonized System of Classification and Labeling of Chemicals (GHS) shall be followed, and workers shall be aware of the meaning of the symbols and pictograms. When labeling hazardous chemical containers, it is recommended to follow the NFPA (National Fire Protection Association) Standard 704 Hazard Identification System. All chemical transport pipelines in the workplace shall also be labeled to indicate the name of the hazardous chemical being transported and the direction of flow, and pipelines shall use the correct color coding system in accordance with applicable standards and regulations, or where such standards do not exist, follow the ANSI/ASME A13.1 Pipe Marking System.
- ④ The Company's CMT shall perform its own due diligence and verify whether the activities described below are appropriate to protect against the Company's chemical operations. More detailed assessments and controls are required to protect people and the environment from most adverse impacts, and operations involving flammable, toxic, or asphyxiant substances shall be evaluated to determine whether appropriate sensors such as oxygen or LEL (Lower Explosive Limit) monitors strategically positioned to detect the presence of gases and vapors and notify employees through audible and visual alarms are in place. Employees shall be trained to respond appropriately to alarms, and chemical hazards in each area and process shall be properly identified, and the areas shall meet hazardous area classification requirements as required by applicable local regulations. Electrical equipment in classified areas shall be rated for use in those areas. Local exhaust ventilation shall be installed so that chemical vapors do not move toward employees but instead go directly to the ventilation system, and so that employees can work in enclosed locations. Local exhaust ventilation shall be designed to be suitable for specific chemical processes and shall be periodically inspected to verify its effectiveness.
- ⑤ Companies that produce, store, consume, or otherwise manage hazardous materials, flammable materials, explosive materials, or toxic materials exceeding legally established threshold quantities shall establish and implement a documented Process Safety Management system (hereinafter referred to as the "PSM system") to prevent serious

leakage or explosion incidents and minimize the likelihood of occurrence. Accordingly, threshold quantities designated in the applicable region and PSM system regulatory requirements shall be complied with, and where there are no PSM system regulatory requirements in the applicable region or where they do not meet Apple requirements, the threshold quantities and requirements specified in the Occupational Safety and Health Administration (OSHA) PSM system regulation (see 29 CFR 1910.119 for detailed description) shall be complied with.

## 2. Management of Non-harmful substance

- ① The Company shall implement a systematic approach to discern, manage, reduce, dispose and recycle non-harmful substance.

## 3. Water and Wastewater Management

- ① The Company shall obtain, retain, and manage valid or current copies of process water and wastewater permits, licenses, registrations, and regulatory approvals as required by law, including but not limited to the following:
  - Environmental approvals for current production
  - New, additional, revised, or updated permits/registrations prior to implementing changes
  - All wastewater discharge and water use permits required by law
  - Reporting and registration of process wastewater discharges as required by law
  - Where required by law, the Company shall develop and maintain a water monitoring system to ensure the sustainability and effectiveness of water management
- ② The Company shall identify and characterize all process wastewater streams and prepare and maintain a process wastewater stream inventory.
  - The inventory shall include the composition and quantity of each process wastewater stream
  - The Company shall revise the inventory following any changes that may affect process wastewater
  - The Company shall review the inventory annually
- ③ The Company shall install and maintain appropriate process wastewater treatment systems to reduce pollutant discharge levels at each facility to levels required by law. The Company's process wastewater treatment systems shall be operational prior to the use of the corresponding production equipment. The Company shall:
  - Comply with all applicable laws, regulations, and requirements related to process wastewater discharge
  - Update control technologies prior to implementing changes
  - Verify compliance with current process wastewater discharge requirements
  - Not intentionally dilute process wastewater to meet permit requirements and/or regulatory standards
  - Comply with recycling and reuse requirements for process wastewater, cooling water, and boiler condensate in accordance with applicable regulatory authority requirements
  - Treat or discharge process wastewater in accordance with approved environmental permits and other applicable laws and regulations

If process wastewater cannot be legally discharged, the Company shall manage it in accordance with applicable laws and Apple standards. If no local requirements for pollutants are provided, the limits specified in wastewater discharge quality requirements shall apply.

④ The Company shall:

- Monitor process wastewater discharges in accordance with regulatory requirements; selected monitoring parameters shall serve as indicators of pollutants of concern and include parameters specified in permits or laws
- Monitor process wastewater discharges (both pollutant concentrations and generated volumes) at frequencies required by local regulations; where no such regulations exist, monitoring shall be conducted at least monthly to verify compliance with applicable laws
- Monitor all process wastewater discharges at locations or using methods specified in permits or applicable legal requirements
- Submit process wastewater monitoring reports to the relevant regulatory authorities in accordance with regulatory compliance requirements

⑤ The Company shall prepare for emergencies and implement emergency response actions in the event that the onsite process wastewater treatment system exceeds capacity or malfunctions. Emergency response actions include the following:

If the capacity of the wastewater treatment plant (hereinafter referred to as “WWTP”) is exceeded, the Company shall:

- Stop discharging process wastewater from production areas to the WWTP
- Isolate stormwater inlets within the facility to prevent cross-contamination from retained process wastewater
- Store excess process wastewater in backup collection systems or containers

In the event of a WWTP malfunction:

- The Company shall immediately stop discharging wastewater from the WWTP to external destinations
- The Company shall stop discharging process wastewater from production areas to the WWTP
- The Company shall replace or repair WWTP equipment in a timely manner to restore normal operation
- The Company shall report the malfunction to local authorities in accordance with applicable regulations
- If contaminated wastewater exceeding allowable limits is discharged, the Company shall notify local authorities and obtain a variance permit if applicable
- In the event of treatment system malfunction, the Company shall immediately implement all necessary system upgrades, repairs, and/or monitoring programs to meet regulatory discharge standards

The Company shall conduct emergency response drills in accordance with all applicable regulatory requirements.

In the event of complaints, the Company shall monitor process wastewater discharge conditions and immediately implement appropriate corrective actions.

If a notice of violation is received from local authorities, the Company shall communicate with the authorities in a timely manner, inform relevant parties of the violation, and take all corrective actions as directed by the authorities.

⑥ The Company shall establish operational and preventive maintenance programs for the onsite WWTP as follows:

- Clearly define operations, inspections, and maintenance of the WWTP and document worker responsibilities and training requirements
- Establish preventive maintenance standard operating procedures incorporating manufacturer recommendations and industry best practices

- Establish key parameters for monitoring WWTP effectiveness and periodic inspection frequency based on regulatory and permit requirements, preventive maintenance requirements, and other factors. The inspection plan shall include all work shifts during normal facility operations
- Establish documented operating procedures for WWTP shutdown. Prior to shutting down the WWTP for anticipated reasons such as maintenance, capacity exceedance, or malfunction, process wastewater shall be retained within the WWTP to prevent untreated discharge, and connected production equipment shall resume operation only after the WWTP is operating properly

The Company shall establish a program to evaluate the integrity of existing process wastewater collection systems, including wastewater piping, underground drains, wastewater sumps, and onsite WWTP facilities, and shall promptly correct identified deficiencies.

The program shall include periodic integrity testing of process wastewater systems at frequencies based on leakage risks identified during evaluations.

The Company shall develop and utilize a comprehensive water metering monitoring system, including separate meters for domestic and industrial water resources, to support overall water resource performance. Water metering shall meet or exceed requirements specified by local regulations.

The Company shall develop a site-level water balance based on metering data or engineering estimates to effectively evaluate and manage total site water usage. The water balance shall include all inflows, outflows, and losses for both the entire site and major water users.

The Company shall update the water balance at least annually to reflect changes in water use practices.

#### 4. Stormwater Management

- ① The Company shall identify potential sources of pollution that may affect stormwater runoff and prepare the following measures to support identification:
  - A list of industrial activity areas exposed to stormwater and associated pollutant constituents
  - A list and description of potential spills and leaks that may worsen stormwater discharge contamination, and identification of discharge points most likely to be affected
  - A list and description of historical spills and leaks over the past three years that occurred in areas exposed to stormwater or were discharged to the stormwater drainage system
  - A list of non-stormwater discharges and elimination of all unauthorized non-stormwater discharges

The Company shall prepare a facility map including the following information:

- Stormwater drainage areas within the facility, areas influenced by stormwater flowing from surrounding locations, flow direction within each drainage area, on-site water bodies including rivers, lakes, and ponds, and an overview of soil erosion areas
- Locations of nearby receiving water bodies and municipal stormwater inlets receiving stormwater discharges and authorized non-stormwater discharges
- Locations of stormwater collection and conveyance systems, connected discharge points, and flow directions, including structural control measures affecting stormwater discharges, authorized non-stormwater discharges, and spills

- An overview of all areas not affected by stormwater within the facility, including paved areas, buildings, roofed storage areas, and other covered structures
- Locations where materials are exposed to rainfall and locations where significant spills or leaks have previously occurred
- Locations of industrial activity areas that may serve as potential pollution sources

② The Company shall select structural or non-structural controls to prevent stormwater pollution.

The Company shall conduct investigations at least annually to identify any direct connections between industrial production areas and the stormwater drainage system. The Company shall also conduct investigations after any modification that may affect such connections. If any such connections are identified, they shall be immediately disconnected.

The Company shall perform regular inspection and maintenance of stormwater collection, conveyance, and discharge systems. Blockages or debris in the stormwater drainage system shall be removed promptly to ensure proper flow.

Waste generated from stormwater control systems shall be managed in accordance with all applicable regulations.

③ The Company shall conduct periodic monitoring of stormwater discharges in accordance with applicable regulations.

To minimize or eliminate pollutants generated from stormwater runoff, stormwater discharges shall be monitored to evaluate the effectiveness of control measures implemented at the facility.

During rainfall events, the Company shall collect stormwater discharge samples and perform visual evaluations of key stormwater pollution indicators (e.g., color, odor, clarity, suspended solids, foam, and oil). Any abnormal conditions observed during visual evaluations shall lead to additional facility inspections, root cause analysis, and implementation of appropriate corrective actions as necessary.

The Company shall collect stormwater discharge samples at facility discharge points for laboratory analysis. Sampling frequency shall be at least once every six months and shall be based on the potential risk level of stormwater pollution.

Chemical parameters for laboratory analysis shall vary depending on the types of pollution sources identified but shall include at minimum:

- pH
- Chemical Oxygen Demand (COD)
- Color
- Oil and grease

Results shall be compared with allowable pollutant concentration limits applicable to receiving waters. If no local requirements are available, limits specified in wastewater discharge quality requirements shall apply.

If concentrations exceed the limits, stormwater pollution control measures shall be evaluated and corrected.

Where regional or national discharge limit guidelines apply, sampling shall be conducted to verify compliance. If wastewater limits are exceeded, the Company shall implement corrective actions and conduct additional sampling to demonstrate compliance.

The Company shall perform one comprehensive annual evaluation of stormwater control measures including the following:

- Visual observations and review of sampling/analytical data

- Inspection summaries specified in the stormwater management plan
  - Incident reports and corrective action tracking results
- ④ The Company shall designate at least one employee responsible for coordinating all facility stormwater-related emergency response and reporting activities.  
The Company shall operate a system capable of immediately shutting off stormwater discharge outlets that release stormwater beyond the facility boundary in the event hazardous substances enter the stormwater drainage system.  
The Company shall maintain plans and procedures necessary to:
- Notify internal management and local regulatory authorities
  - Take immediate action to address hazardous substance releases beyond facility boundaries
- The Company shall identify areas where stormwater accumulation may occur, such as underground equipment rooms, workshops, and low-lying areas of dormitories.  
Accumulated stormwater shall be drained promptly to prevent facility flooding.  
The Company shall conduct analyses to determine the causes of emergency spill incidents and implement corrective actions.
- ⑤ The Company shall develop, implement, and maintain a written Stormwater Management Plan to support prevention of stormwater runoff pollution.  
Where applicable, the Company shall revise and implement the Stormwater Management Plan prior to changes in industrial activities at facilities where any of the following conditions apply:
- Facilities where pollutants contained in stormwater discharges significantly increase
  - Facilities where new industrial activity areas become exposed to stormwater
  - Facilities initiating industrial activities that introduce new pollution sources within the facility

## 5. Management of Exhaust gas

- ① The Company shall reduce and manage exhaust gas discharged by the work causing air pollution.
- ② The Company shall continuously monitor performance of the exhaust gas control system.

## 6. Boundary Noise

- ① The Company shall identify, control, monitor, and reduce facility-generated noise that affects boundary noise levels. The Company shall engage certified professionals or external agencies to monitor boundary noise and verify compliance with all applicable regulations.  
Third-party consultants shall monitor boundary noise using calibrated sound level meters certified in accordance with applicable regulations and prepare boundary noise monitoring reports.  
Based on the boundary noise monitoring reports, the Company shall identify operations that contribute to boundary noise and prepare an inventory of the relevant operations and equipment. This inventory shall include:
  - Noise ranges generated under normal operating conditions
  - Preventive and control technologies implemented to reduce boundary noise in accordance with applicable regulationsThe inventory shall be updated whenever there are changes in production, equipment, or operating schedules that may affect boundary noise.
- ② The Company shall install and maintain appropriate boundary noise control equipment to manage boundary noise in accordance with applicable regulations.

For installation and monitoring:

- Certified professionals shall determine appropriate boundary noise control methods to ensure compliance with regulatory boundary noise limits
  - The Company shall monitor boundary noise and verify compliance with applicable regulations by confirming the land-use classification of the receiving area
- ③ The Company shall evaluate boundary noise annually, when land-use classification of nearby receiving areas changes, or when community noise complaints are received.

Noise evaluation shall include the following:

- Monitoring for changes in applicable regulatory standards
- Periodic inspections of boundary noise sources, including location, installation conditions, operating rules, control measures, and maintenance records

The Company shall comply with applicable regional boundary noise standards. Where regional standards do not exist, the Company shall follow the boundary noise level criteria specified in the table below.

- ④ The Company shall develop and maintain a Boundary Noise Management Plan in accordance with applicable regulations. This plan shall include monitoring, control, source identification, and evaluation of boundary noise.

The Company shall implement corrective and preventive actions in a timely manner—or as directed by local authorities—to address boundary noise exceedances. Such actions may include:

- Installing boundary noise control equipment
- Adjusting operating schedules of noise-generating equipment

to ensure compliance with allowable boundary noise limits.

## **7. Environment Certificate and Report**

- ① The Company shall acquire necessary environmental permit, keep it up-to-date and comply with it.
- ② The Company shall comply with the requirement to report demanded by related permit and regulations

## **8. Waste Management**

- ① The Company shall obtain environmental permits and other approvals required for current operations and shall establish plans to update existing environmental approvals and permits when changes that may alter environmental impacts occur. The Company shall comply with hazardous waste permitting and reporting requirements in accordance with applicable regulations and shall implement the following measures:
- Register all hazardous wastes in accordance with applicable regulatory requirements
  - Obtain permits required for pollutant discharge, hazardous waste handling, hazardous waste storage, and hazardous waste transportation in accordance with applicable regulatory requirements
  - Report any changes that may affect the registered and permitted hazardous waste generation status to local and national regulatory authorities
- ② The Company shall identify all waste sources and characterize each waste stream as hazardous or non-hazardous waste in accordance with applicable regulations, or in the absence of such regulations, in accordance with this Standard. (For details regarding common waste categories within the supply chain, refer to Apple's recommended waste category list.)

The Company shall prepare and maintain an inventory of all generated waste. The waste inventory shall include the following:

- Monthly waste generation quantities
- Waste categories (hazardous or non-hazardous)
- Recycling or other waste treatment methods
- Names of waste transportation and treatment companies

The Company shall review the facility waste inventory annually and update it whenever process or production changes occur.

The Company shall maintain the inventory in electronic format and make it available for review upon Apple's request.

③ The Company shall segregate hazardous waste from non-hazardous waste in accordance with applicable regulations and this Standard. The Company shall also ensure that responsible personnel perform waste collection and storage activities as follows:

- Collect and store waste in appropriate containers according to chemical and physical characteristics
- Use secondary containment during transportation of hazardous waste from production areas to hazardous waste storage locations
- Apply standardized labeling to waste containers in accordance with legal requirements. Each label shall include the waste type, appropriate hazard warnings, and the waste generation date
- Maintain waste containers in good condition to prevent leakage or spills
- Ensure onsite storage of hazardous waste does not exceed the time limits required by applicable local regulations
- Conduct weekly inspections of hazardous waste containers to maintain container integrity, prevent leaks, and identify and correct missing or incorrect labels. The Company shall document weekly inspection results and retain copies

The Company's hazardous waste storage areas shall meet the following requirements:

- Building materials and electrical equipment compatible with stored hazardous waste
- Posting of signage inside and outside hazardous waste storage areas indicating:
  - Hazards associated with hazardous waste
  - Required PPE for entry
  - Labels specified by applicable regulations and standards
  - Prohibited activities, including smoking
- Prevention of unauthorized access to hazardous waste storage areas
- Protection from exposure to outdoor weather conditions using fencing or other barriers
- Provision of secondary containment systems capable of capturing leaks or spills within storage areas
- Design and construction to prevent contamination of surface water or groundwater and to prevent entry into stormwater drainage systems or sewer systems in the event of spills or leaks
- Availability of firefighting equipment at all times
- Alarm systems capable of notifying facility personnel and external emergency response teams during emergencies
- Installation of forced ventilation systems where volatile, acidic, caustic, or corrosive substances are stored
- Immediate availability of PPE for workers handling hazardous waste
- Maintenance of PPE integrity and functionality in PPE storage rooms located outside

hazardous waste storage areas

- Sufficient space to allow access and movement of emergency response teams and equipment within storage areas

- ④ The Company shall obtain permits and use only licensed hazardous waste transporters. The Company shall conduct due diligence on contracted waste treatment vendors (including hazardous and non-hazardous waste treatment vendors) regarding treatment methods used for waste disposal.

If environmental violations are identified, the Company shall take the following actions:

- Notify Apple of the violations involving the hazardous waste transporter
- Cooperate with the hazardous waste transporter to develop, implement, and monitor corrective actions
- Obtain approvals from all applicable regulatory authorities related to hazardous waste transportation in accordance with applicable regulations
- Maintain written records demonstrating hazardous waste treatment activities in compliance with local and national regulations
- Submit copies of records, supporting documentation, and other required documents to authorities, regulatory agencies, or third parties (transporters and receiving facilities) as required by applicable regulations

- ⑤ The Company shall develop programs or solutions to quantify and monitor landfill diversion rates.

Manufacturers shall provide sufficient documentation for all materials entering and leaving the facility to demonstrate landfill-dedicated practices. Material documentation shall include, at minimum:

- Estimated mass of each waste stream generated at the facility
- Descriptions of management procedures for discarded materials
- Documentation describing the final destination of disposed materials (e.g., recycling, waste-to-energy conversion)

The Company shall report Apple-related landfill diversion rates to Apple annually.

- ⑥ The Company shall review landfill diversion rates annually and establish improvement targets through process changes, material substitution, internal or external reuse, material recycling, or waste-to-energy conversion where diversion rates are below 10%.

For example, the Company may improve recyclability through stronger segregation by material type.

The Company shall monitor progress toward landfill diversion improvement targets and document improvement results for Apple's review and verification.

Upon Apple's request, the Company shall report landfill diversion improvement progress to Apple together with supporting documentation (where applicable) in electronic format for quarterly review.

- ⑦ The Company's pollution control technologies shall be operational prior to waste generation. The Company shall establish plans to allow sufficient time for implementation of control measures and shall obtain approval for any changes that may affect identification, collection, storage, handling, and treatment of hazardous waste.

The Company shall maintain a waste minimization plan to evaluate hazardous waste generation at the site and identify opportunities for reduction.

Where hazardous waste minimization targets are required under facility environmental permits, the Company shall develop and implement plans to achieve regulatory waste minimization targets.

## 9. Air Pollution Management

- ① The Company shall obtain all environmental approvals and permits required for current operations and shall establish plans, allowing sufficient time, to update existing environmental approvals and permits when changes that may alter the environmental impacts of operations occur.
- ② The Company shall identify sources of air pollution, including those from industrial activities, auxiliary equipment, and facilities such as dormitories and cafeterias. Examples of processes contributing to air pollution and associated air pollutants are provided in the section titled Examples of Typical Processes and Pollutants below.

Air pollutants refer to regulated substances that are directly or indirectly emitted into the atmosphere from Company facilities and may generally cause harmful effects on human health or the environment. These include, but are not limited to:

- Volatile Organic Compounds (VOCs)
- Nitrogen Oxides (NO<sub>x</sub>)
- Sulfur Oxides (SO<sub>x</sub>)
- Carbon Monoxide (CO)
- Particulate Matter (PM)
- Ozone-Depleting Substances (ODS)
- Greenhouse Gases (GHGs)

These pollutants may adversely affect the environment, land, and vegetation, contribute to significant environmental and climate impacts, and cause health problems for humans and animals. In addition, toxic air pollutants such as acids, hexavalent chromium, and ammonia may directly or indirectly impact human health and can cause cancer and other chronic or acute diseases.

The Company shall prepare and maintain an air emission source inventory.

The inventory shall include:

- Air pollutant composition
- Mass emission rates
- Emission concentrations
- Associated generation processes or activities
- Air pollution control equipment
- Emission points

The Company shall revise the inventory following production or process changes that may affect air pollution emissions.

The Company shall review the inventory annually.

The Company shall maintain the inventory in electronic format and make it available for review upon Apple's request.

- ③ The Company shall report and register air pollution sources in accordance with applicable regulations and shall install and maintain appropriate air pollution control equipment to regulate air emissions. All control plans shall be approved or permitted by the relevant regulatory authorities.

Examples of processes and associated air pollution control equipment are provided in the table titled Examples of Typical Processes and Air Pollution Control Equipment below.

The Company shall report air emission quantities to relevant regulatory authorities. In addition, for audit purposes, the Company shall report air emission quantities to Apple and update the report annually to reflect emission changes from the previous year.

Residues and wastes generated from exhaust gas control equipment shall be handled, stored, and disposed of in accordance with applicable laws and the Waste Management Standard described above.

- ④ The Company shall develop a program to quantify and monitor air pollution components, including calculations of mass emission rates and treatment efficiencies for each emission source identified in the air emission inventory.

The Company shall conduct periodic analytical testing of air emissions through manual monitoring, online monitoring, or both, in accordance with regulatory requirements and this Standard.

Monitoring frequency shall be at least once annually, or more frequently if required by applicable permits or regulations.

Air emission samples shall be collected under normal operating conditions and tested for parameters identified as potential pollutants.

Air emissions shall not exceed regulatory limits. Upon request from relevant regulatory authorities, the Company shall submit air emission monitoring reports and obtain all necessary permits required for continuous regulatory compliance.

Monitoring reports shall be maintained in electronic format and made available for review upon Apple's request.

- ⑤ The Company shall review the emission inventory annually and establish reduction targets to decrease emissions through process changes, environmental protection initiatives, minimization of fugitive emissions, or other measures.

The Company shall monitor progress toward achieving emission reduction targets and document the results of reduction measures by maintaining emission reduction action reports.

Upon request from Apple, the Company shall submit the emission inventory, reduction targets, and results annually in electronic format together with supporting documentation for review.

- ⑥ The Company shall establish emergency preparedness and response measures for situations such as malfunction, failure, maintenance, or modification of air pollution control equipment, as follows:

For Hazardous Air Pollutants (HAP):

- Process equipment vented to air pollution control devices shall be immediately shut down to prevent uncontrolled emissions to the atmosphere
- If process gas streams containing HAP emissions bypass air pollution control equipment through bypass lines or other means, the Company shall install and maintain automatic shutdown systems that stop all HAP-emitting operations regardless of the situation, including power outages or equipment failure of air pollution control devices

For non-hazardous air pollutants:

- If corrective actions are not taken to prevent uncontrolled emissions to the atmosphere, process equipment vented to air pollution control devices shall be shut down within 72 hours
- If applicable regulations require shutdown within a shorter timeframe, operations shall be stopped within the required timeframe

The Company shall conduct emergency response drills in accordance with applicable regulatory requirements.

If community complaints are received, the Company shall conduct timely air emission monitoring to verify emission conditions and implement corrective actions where necessary.

If the Company receives a notice of violation from government authorities, it shall promptly communicate with relevant regulatory authorities, notify all relevant parties of the violation, and take corrective actions without delay or as directed by authorities.

The Company shall notify Apple within seven (7) days of abnormal environmental conditions and shall also notify all relevant regulatory authorities and other agencies as required by applicable regulations.

In both cases (hazardous and non-hazardous air pollutants), the Company shall identify potential causes of abnormal environmental conditions and document previously implemented corrective or preventive actions.

- ⑦ The Company's pollution control technologies shall be operational prior to the emission of pollutants.

Where changes may affect air emission sources, emission components, mass emission rates, air pollution control technologies, or monitoring requirements, the Company shall establish plans to implement such changes within an appropriate timeframe and obtain required approvals.

The Company shall develop operational and preventive maintenance programs for all air emission equipment, air pollution control devices, and air emission monitoring equipment, including the following:

- Documentation of worker responsibilities and training requirements describing operation, inspection, and maintenance of air pollution control equipment
- Preventive maintenance standard operating procedures incorporating manufacturer specifications, recommendations, and recognized industry best practices
- Documentation of key parameters used to monitor performance of air pollution control devices and determine routine inspection frequency based on regulatory and permit requirements, preventive maintenance requirements, and other operational needs (inspection plans shall include all work shifts during normal facility operations)
- Documentation of operating procedures for shutdown of air pollution control equipment. Prior to shutdown for maintenance or other reasons, process equipment vented to air pollution control devices shall first be stopped to prevent uncontrolled emissions

Process equipment may be restarted only when air pollution control devices are operating properly.

The Company shall periodically inspect air pollution control equipment and repair any identified operational defects. Defects identified and corrected through inspection and maintenance shall be documented and retained as records.

## 10. Greenhouse Gas (GHG) Emissions Management

- ① Where applicable, the Company shall comply with laws and regulations related to GHG emissions, including emission caps/limits, emissions trading schemes, and reduction obligations. Examples include:
- Reporting and registering GHG emission inventories as required by regional or national authorities
  - Controlling GHG emissions to remain below regulated emission levels
  - Retaining copies of permits and maintaining data related to GHG emissions
- ② The Company shall designate a Directly Responsible Individual (DRI) to oversee all aspects of enterprise-wide GHG emissions management, including:
- Development of annual GHG emission inventories and reduction targets
  - Reporting of GHG emission inventories

- Monitoring and reduction of emissions
- Compliance with national and regional emissions regulations

In addition, the Company shall designate a specific DRI responsible for all aspects of GHG emissions management related to Apple products and the Company's attributable carbon footprint.

This DRI shall be responsible for assigning and coordinating designated DRIs at each facility and across the enterprise to comprehensively manage all aspects of GHG emissions management related to Apple products.

This DRI shall disclose GHG management activities to designated DRIs at each facility, including but not limited to relevant requirements, agreements, and supporting documentation.

- ③ The Company shall identify sources of GHG emissions resulting from enterprise-wide operations and identify GHG emissions generated at all facilities associated with Apple products, including emissions from industrial activities, auxiliary equipment, dormitories, and cafeterias.

The annual GHG emissions inventory shall be developed in accordance with the Greenhouse Gas Protocol or an equivalent standard and shall include:

- Scope 1 emissions
- Scope 2 emissions

The Company shall identify and allocate GHG emissions attributable to activities related to Apple products using one of Apple-approved allocation methodologies and prepare an attributable carbon footprint inventory.

GHG emissions associated with enterprise-wide overhead, employee commuting and business travel, administrative activities, and recreational activities shall be excluded from the attributable carbon footprint inventory.

- ④ The Company shall develop or maintain programs or solutions to quantify and monitor enterprise-wide GHG emissions and attributable carbon footprint inventories, including:
- Data collection for each emission source identified in the GHG emissions inventory
  - Updates to emissions calculations

The Company shall report annually, and upon Apple's request, the following to Apple:

- GHG emissions
- Targets
- Emissions reductions
- Progress related to attributable carbon footprint inventories

- ⑤ The Company shall annually review enterprise-wide GHG emissions inventories and attributable carbon footprint inventories and establish targets to reduce GHG emissions.

Targets shall include:

- Absolute reduction targets
- Intensity-based reduction targets
- Or both

Examples of intensity-based reductions include reductions normalized by production volume or economic output.

Apple manufacturing suppliers shall comply with the following additional requirements:

- The Company shall adopt a target to achieve carbon neutrality for the attributable carbon footprint and set a target date to achieve this goal. The target date shall be no later than the end of Apple's fiscal year 2029
- The Company shall monitor progress toward achieving emissions reduction targets and

document results of reduction measures related to enterprise-wide GHG emissions inventories and attributable carbon footprint inventories

- The Company shall report annually, and upon Apple's request, targets and progress related to the attributable carbon footprint and evidence of carbon footprint reduction measures

⑥ Where applicable, the Company shall reduce enterprise-wide GHG emissions and attributable carbon footprint inventories through:

- Process changes
- Emissions reduction initiatives
- Energy conservation
- Use of renewable energy
- Other appropriate measures

Apple manufacturing suppliers shall comply with the following additional requirements:

- The Company shall consume, develop, invest in, and procure electricity from renewable energy sources equivalent to 100% of the electricity used for global manufacturing operations related to Apple products (and goods used in those products), in accordance with the Apple Clean Energy Program requirements
- The Company shall adopt operational efficiencies and technological improvements to maximize reductions in Scope 1 emissions

For unavoidable Scope 1 emissions (hereafter referred to as residual emissions) that cannot be eliminated through operational efficiencies, electrification, technological improvements, or other measures, the Company shall comply with timing, implementation, and criteria requirements in accordance with Apple Specifications: Supplier Carbon Credits for Scope 1 Residual Emissions

To achieve carbon neutrality, the Company shall manage its attributable carbon footprint and develop, maintain, and report plans to achieve this goal. The Company shall, at a minimum:

- Designate a DRI responsible for all aspects of Apple-related GHG emissions management
- Develop and implement plans to reduce emissions at each facility associated with Apple product manufacturing
- Develop and implement plans to comply with Apple Clean Energy requirements
- Establish a target date to achieve carbon neutrality for the attributable carbon footprint (no later than the end of Apple's fiscal year 2029)
- Demonstrate to Apple annual progress toward achieving stated plan targets until completion

⑦ The Company shall provide training, disclosure, and access to relevant documentation for use by the Company's DRIs, including designated DRIs at each facility:

Documentation shall include:

- Enterprise-wide and Apple-related GHG emissions management strategy documentation, including emissions inventories, targets, reduction progress, evidence of emissions reduction measures, signed agreements, and other relevant activities and documentation
- Documentation related to the Greenhouse Gas Protocol or equivalent standards
- Documentation related to reporting tools required by Apple

⑧ All underlying data and documentation used to calculate GHG emissions (such as energy consumption data) shall be made available for review upon Apple's request.

Documents subject to retention requirements include:

- GHG emissions inventories

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- Evidence of GHG emissions reductions, carbon credits, and other decarbonization measures
- Carbon- and climate-related certifications and claims
- Permits, approvals, corrective action records, and other regulatory registration documents (where applicable)

The Company shall retain such documentation for the previous three (3) years or for the duration specified by applicable regulatory requirements, whichever is longer.



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## D. Ethics(기업윤리)

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The Company shall be always ethical in all corporate aspects including relationship, business, procurement and work.

### 1. Responsible Sourcing of Primary, Recycled, and Renewable Materials

① The Company shall establish an appropriate due diligence management system and implement policies and supporting procedures to respect human rights and promote environmental stewardship (including subcontractors and sub-tier suppliers). These policies and procedures shall:

- Be approved by senior management
- Be communicated to the Company's business partners, including the Company itself when producing goods supplied to Apple
- Align with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and other internationally recognized due diligence frameworks
- Be informed by the perspectives of potentially affected rights-holders, relevant internal and external experts, and other stakeholders
- Be periodically reviewed and updated to reflect the evolution of key issues and significant progress in supplier operations

#### ② Risk Identification

The Company shall map all tiers of the material supply chain to identify potential key issues. The Company shall also use multiple information sources to determine or verify the presence of high-risk conditions.

#### ③ Risk Mitigation and Improvement

The Company shall leverage its influence with upstream suppliers to mitigate risks and respect the rights and freedoms of environmental and human rights defenders.

Where appropriate, the Company shall collaborate with these stakeholders and others to improve cumulative impacts and maximize positive outcomes for local communities.

### 2. Facility Siting, Energy, and Environmental Investment

① The Company's human rights and labor policies shall include explicit references to the rights of affected local communities, including Indigenous Peoples, in accordance with the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).

② The Company shall avoid involuntary resettlement wherever possible and minimize adverse social and economic impacts resulting from land acquisition or restrictions on land or resource use by local communities.

③ The Company shall conduct effective and ongoing stakeholder engagement and integrate the knowledge and contributions of local stakeholders into the design, implementation, and monitoring of project activities.

The Company shall also negotiate in good faith agreements regarding the social and economic costs and benefits associated with the well-being of surrounding communities throughout the project lifecycle.

### 3. Release of Information

The Company shall correctly record information of business activities, labor, health and safety, and environmental business, and release such information without falsity or fabrication to all related parties.

#### **4. Protection of Intellectual Property Rights**

- ① The Company shall respect intellectual property rights and protect a customer's information.
- ② The Company shall manage the intellectual property rights of technology or know-how not to be infringed.

#### **5. Protection of a Whistle Blower and an Anonymous Informant**

The Company shall prepare a method that managers or employees can report complaints about the workplace based on anonymity. It shall protect the identity of a whistle blower and prohibit any retaliation.

#### **6. Contribution to Local Community**

The Company shall participate in creating social and economic development atmosphere, and contribute to sustainability of the local community that operates business.



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## E. Management System(경영의지)

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The Company shall comply with laws and these regulations, discern and minimize danger of related work, and implement and maintain the management system to continue improvement.

### 1. Corporate Statement

The Company shall draw up a corporate statement to strictly observe social and environmental responsibility, code of ethics and continuous improvement. The statement shall be posted on all facilities in local language.

### 2. Responsibility and Duty of the Management

- ① The management shall elect the representative who takes care of implementation and regular review of the management system.
- ② The management shall directly report to senior executives and appoint the sustainable representative or the representative on Corporate Social Responsibility who has responsibility and authority to manage the corporate social and environmental requirements.

### 3. Evaluation and Management of Crisis

The Company shall develop and maintain process to discern in advance risk groups of labor, human rights, health and safety, environment and corporate ethics, understand relative importance of each group and perform procedure and management to appropriately control discerned groups.

### 4. Performance goals, and Plan and Method to implement it

The Company shall document standards, performance target and implementation plan including regular performance evaluation of the goals.

### 5. Audit and Evaluation

The Company shall understand compliance with laws and these regulations by regularly evaluating not only facilities and work of business partners including subcontractors but the Company's facilities and work.

### 6. Documents and Record

The Company shall prepare a procedure to discern, understand and perform laws and these regulations, and simultaneously keep records and documents to prove compliance with the procedure.

### 7. Education and Information Delivery

- ① The Company shall develop and maintain a program to train managers and employees to support implementation of a procedure and policy, and accomplish the Company's continuous improvement purpose.
- ② The Company shall prepare a procedure to correctly and explicitly deliver information of performance, work, policy and the expected goal to employees, business partners and customers.
- ③ The Company shall establish and maintain a procedure to create atmosphere for continuous improvement by collecting opinions about these regulations and provisions.

### 8. Corrective Action Plan

The Company shall prepare a procedure to opportunely correct defect or violations of the workplace discerned by internal and external audit, evaluation, inspection, investigation and review.

## 9. Management Systems

- ① The Company shall prepare a corporate statement confirming commitments to regulatory compliance, customer requirements, and other applicable standards, and shall pursue continuous improvement related to social and environmental responsibility.

The Company shall prominently post this statement throughout the facility in languages understood by employees.

- ② At each Company facility, the Company shall assign a full-time employee responsible for overseeing social, health and safety, environmental, and ethical compliance obligations. This employee shall:

- Be at the senior management level and have appropriate authority and access, including the ability to implement changes and allocate necessary resources such as personnel and budget
- Understand and implement applicable legal and regulatory requirements, as well as applicable codes and standards
- Regularly review the effectiveness of management systems and take appropriate actions for continuous improvement
- Be evaluated based on the effective planning and implementation of requirements under applicable laws, customer requirements, and other relevant standards

The Company shall establish and maintain a cross-functional committee led by senior management with clearly defined roles and responsibilities to systematically implement, monitor, and ensure full compliance with applicable laws, codes, standards, and other relevant requirements.

- ③ The Company shall implement a system to identify and monitor current applicable laws, regulations, and customer requirements relevant to the facility.

- ④ The Company shall document policies that ensure compliance with applicable codes, this Standard, and relevant laws and regulations.

The Company shall establish documented procedures and systems to implement labor, health and safety, and environmental policies.

The Company shall comply with these documented policies and procedures at all times.

- ⑤ The Company shall develop and maintain procedures to identify risks related to labor and human rights, health and safety, environmental protection, business ethics, and legal compliance associated with operations.

The Company shall:

- Determine the relative significance of each identified risk
- Implement appropriate procedures and controls to minimize identified risks
- Ensure compliance with legal and customer requirements

These procedures shall be repeated periodically (at least annually) and whenever significant changes occur in applicable laws, regulations, customer requirements, or facility operations.

- ⑥ The Company shall establish procedures to develop improvement objectives and implementation plans.

The Company shall also establish procedures for:

- Regular performance monitoring
- Continuous improvement actions to achieve objectives

- ⑦ The Company shall conduct periodic assessments and audits of facilities, operations, subcontractors, and their companies to verify compliance with applicable laws and customer requirements. These assessments shall be conducted at least annually.

- ⑧ The Company shall implement a process to correct nonconformities identified through internal and external audits and assessments, grievance reports, employee and stakeholder feedback, incident investigations, or other mechanisms.

This process shall include, at a minimum:

- Identification of root causes for all noncompliance incidents
- Development of corrective and preventive actions addressing all similar issues and conditions within the facility to prevent recurrence
- Creation of action plans including assigned owners, deadlines, and verification methods for completion
- Communication of corrective and preventive actions to all affected individuals and departments

- ⑨ The Company shall establish change management procedures and defined protocols for implementing changes that may affect facility layout, workforce deployment types, worker safety, environmental conditions, or the introduction of new materials that may have potential impacts on workers or the environment.

These procedures shall specify actions required to implement necessary changes.

The Company shall ensure that change management procedures and responsibilities are communicated to managers across all functions.

The Company shall ensure that adequate resources are available to support change management when required.

The Company shall promptly notify Apple of planned changes related to manufacturing or services for Apple products, including new production sites, areas, floors, and supporting buildings.

- ⑩ Facilities managed by Apple shall obtain and maintain certification under either:
- ISO 14001, or
  - the Eco-Management and Audit Scheme (EMAS) of the European Union

Copies of certification shall be provided upon Apple's request.

- ⑪ The Company shall provide training and information related to applicable codes and standards to all employees, supervisors, managers, and responsible personnel.

Such training or communications shall be provided:

- During initial orientation
- During annual refresher training

The Company shall also comply with all training and communication requirements specified in applicable codes and standards.

The Company shall provide training to personnel responsible for ensuring effective implementation of management systems related to social responsibility, health and safety, environmental protection, and ethical issues, including:

- Conducting periodic assessments and audits
- Ensuring compliance with applicable laws and regulations
- Meeting customer requirements
- Meeting internal Company standards and other applicable standards

The Company shall communicate its social and environmental corporate commitments so that all employees and managers are aware of them.

Training and communications shall include:

- Compliance with this Code of Conduct and applicable standards
- Worker rights
- Internal policies and procedures

The Company shall establish procedures to clearly and accurately communicate expectations to its employees and customers.

- ⑫ The Company shall establish appropriate document and record control systems to:
- Ensure the use of correct document versions
  - Establish appropriate access control protocols to protect intellectual property

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- Maintain confidentiality for customers, employees, and business partners

Documents and records shall be made appropriately available for review and evaluation purposes. The Company shall retain appropriate documentation and records demonstrating compliance with applicable laws, regulations, and customer requirements and maintain such records for the required retention period.

