

Human Rights Management Policy

I. Overview

1. Purpose

NEXEN TIRE has incorporated its Human Rights Policy into its mid- to long-term ESG strategy to actively promote human rights management that upholds human dignity and rights across all areas of its business. Based on the NEXEN TIRE Human Rights Management Declaration, the Company recognizes human rights management as a key ESG priority. This Policy has been established to prevent and mitigate human rights risks associated with its business operations.

2. Scope of Application

This Human Rights Policy applies to executives and employees of NEXEN TIRE Corporation and its affiliates, sales entities, and subsidiaries (collectively, "NEXEN TIRE"). All employees of NEXEN TIRE shall perform their duties in accordance with this Policy. NEXEN TIRE also encourages external stakeholders, including suppliers, business partners, and customers such as end consumers, automakers, and dealers, to comply with this Policy or with human rights protection principles of a comparable standard. Where the matters addressed in this Human Rights Policy conflict with local laws and regulations, NEXEN TIRE will comply with the more stringent laws and regulations. Where necessary, NEXEN TIRE may establish separate detailed policies or guidelines.

II. Basic Principles of Human Rights Management*

All stakeholders across NEXEN TIRE's value chain, including employees in Korea and overseas, customers, suppliers, affiliates, and local communities, are expected to respect the following principles and fulfill their responsibilities.

1. Non-Discrimination
2. Prohibition of Forced Labor and Child Labor
3. Freedom of Association and Collective Bargaining
4. Compliance with Working Conditions and Support for Stable Livelihoods
5. Occupational Health and Safety
6. Human Rights of Local Communities and Environmental Protection
7. Responsible Business Partner Protection and Management
8. Integrity and Trust

* For details on NEXEN TIRE's basic principles of human rights management, please refer to the Human Rights Declaration.

III. Implementation Framework

1. Human Rights Management Responsibilities and Implementation

The ESG Management Committee serves as the highest decision-making body responsible for overseeing human rights management action plans, performance, and implementation systems. Depending on the significance of the matter, the Committee refers agenda items to the top decision-making authority and deliberates on and decides matters related to key risks. Human rights management is led by the GHR Division, the dedicated organization for human rights management, in cooperation with decision-makers from relevant departments. The key roles and responsibilities are as follows:

- 1) Establishing and revising human rights policies
- 2) Developing action plans for human rights management
- 3) Operating grievance handling channels
- 4) Conducting human rights risk assessments and recommending corrective actions based on the results
- 5) Planning and delivering company-wide internal training on human rights

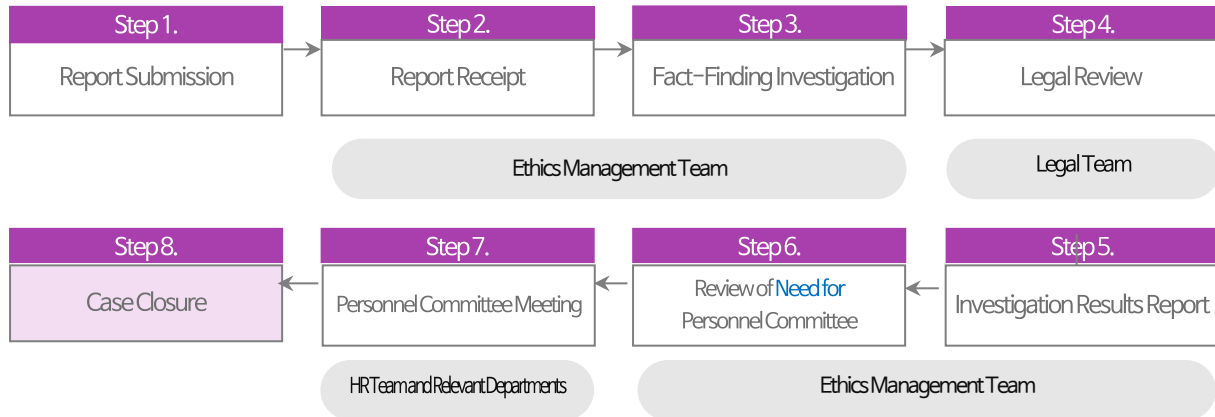
2. Operation of the Grievance Handling Channel

1) Reporting Channel for Human Rights Violations [Submit a Report](#)

NEXEN TIRE operates a dedicated reporting channel for acts that violate the Company's Code of Ethics or constitute human rights violations, including workplace harassment, sexual harassment, and discrimination. Any stakeholder who has directly experienced a human rights violation, witnessed such a violation, or become aware of a human rights risk may file a report through this channel.

2) Human Rights Violation Reporting Process

The reporting process is operated in accordance with NEXEN TIRE's internal procedures for receiving, reviewing, investigating, and resolving human rights-related reports.



Human Rights Violation Reporting Channel

- Department: Ethics Management Team
- Email for internal accounts: ethics@nexentire.com
- External reporting: Submit a report by clicking the “Report” button at the top of the Company’s website → Dedicated reporting email: nexenethicscenter@gmail.com
- Mailing Address: Ethics Management Team, 7F,
THE NEXEN univerCITY, 177 Magokjungang-ro, Gangseo-gu, Seoul, Republic of Korea

3) Protection of Reporter Anonymity (Whistleblower Protection Program)

In accordance with Article 24 of the Code of Ethics, “Operation of the Ethics Management Reporting Center,” NEXEN TIRE fully respects the wishes of reporters as a top priority and keeps all information confidential, including the identity of the reporter, the details of the report, and the outcome of the case. NEXEN TIRE protects reporters and those who cooperate in investigations from any form of disadvantageous treatment. The Company continues to make efforts to create a safe reporting environment by preventing the disclosure of reporter identities and taking remedial measures if any disadvantage occurs. Personal information collected during the reporting process is handled with clear prior notice of the purpose of collection and the retention period and is strictly protected in accordance with applicable laws and regulations.

3. Training and Awareness-Raising

1) Human Rights Management Training

NEXEN TIRE provides regular training to raise employees' awareness of human rights and prevent human rights violations. For employees in Korea, the Company conducts training on various topics, including prevention of workplace harassment, prevention of sexual harassment, disability awareness, and personal data protection. Through these programs, NEXEN TIRE seeks to foster a culture of respect and inclusion among employees and to create an environment that encourages the reporting of human rights violations and related risks. Through these efforts, the Company continues to promote a culture of respect for human rights and to embed human rights management across the organization.

2) Promotion of Human Rights Management

NEXEN TIRE transparently discloses information related to human rights management, including its human rights policies and action plans, human rights risk assessment procedures and results, through various communication channels such as the Sustainability Report. The Company will continue to expand and improve the methods and channels through which human rights management information is provided, so that all stakeholders, including NEXEN TIRE employees and suppliers, can access such information more easily.

IV. Risk Management

1. NEXEN TIRE's Human Rights Impact Assessment

To prevent human rights risks and strengthen responsible practices across its supply chain, NEXEN TIRE has established an internal human rights impact assessment framework based on international human rights standards, including the UN Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidance for Responsible Business Conduct, the ILO Core Conventions, and the EU Corporate Sustainability Due Diligence Directive. Based on this framework, NEXEN TIRE uses assessment items comprising approximately 200 indicators across 12 areas. Going forward, the Company plans to gradually expand the scope of assessment to include external stakeholders such as suppliers and local communities, thereby continuously strengthening its system for proactively identifying and managing human rights risks.

2. Assessment Process

NEXEN TIRE conducts regular human rights impact assessments to gain a systematic understanding of the Company's human rights status and develop response measures for vulnerable areas. The assessment consists of three stages: preliminary assessment through surveys, interviews to collect stakeholder opinions, and on-site inspections. Each stage is conducted as follows.

① Preliminary Assessment (Online Survey)

NEXEN TIRE conducts an online survey for all employees to assess their level of awareness, experience, and remedial capabilities regarding human rights management. As the foundational data collection phase for assessing the human rights status, this first stage is designed to ensure easy participation via devices and PCs.

② Internal and External Stakeholder Interviews (vulnerable workers, suppliers, etc.)

NEXEN TIRE conducts interviews with internal and external stakeholders, including vulnerable workers and suppliers, to identify key factors that may lead to human rights violations and potential human rights risks. These interviews are structured around standardized questionnaires, supplemented by Focus Group Interviews (FGIs) or individual in-depth interviews to gather more specific and comprehensive insights.

* FGI: Focus Group Interview

③ On-Site Inspection

External human rights experts visit business sites and conduct a comprehensive assessment based on the human rights impact assessment checklist and on-site review. During the on-site inspection, experts interview those responsible for each indicator to evaluate the consistency between internal self-assessment results and actual operating practices. Based on these findings, they identify areas for improvement.

3. Risk Mitigation implementation

① Developing Corrective Actions and Consultation

Following the human rights impact assessment, NEXEN TIRE implements immediate corrective actions or establishes improvement plans for identified risks based on their severity and urgency. Relevant departments within the headquarters and domestic/overseas operation sites covered by the assessment collaborate to derive specific improvement tasks for the identified risks. The outcomes are subsequently reported to the ESG Management Committee.

② Monitoring of Implementation Status

The Social Subcommittee of the ESG Management Committee oversees the progress of strategic tasks in human rights management and discusses future implementation plans. In addition, each executing department shares the specific details of these strategic tasks with the ESG Management Committee and carries them out through company-wide collaboration.

③ Information Sharing with Stakeholders

A. Reporting to Internal Stakeholders

NEXEN TIRE reports the key risks, corrective actions, and implications identified through the human rights impact assessment to key decision-makers, including the ESG Management Committee. Approved reports are shared with relevant departments to raise awareness of human rights management and promote its expansion across the organization.

B. Reporting to External Stakeholders

NEXEN TIRE transparently discloses information on the progress of human rights management, the results of human rights impact assessments, key strategies, and related activities to all stakeholders through various channels, including its official website and Sustainability Report.

Supplementary Provisions <Rev.1.0, 2023. 6. 26.>

- ① This Human Rights Policy shall take effect as of June 26, 2023.
- ② This Policy is written in both Korean and English. In the event of any discrepancy between the Korean version and any translated version, the Korean version shall prevail.
- ③ Detailed policies related to environmental risk management associated with this Human Rights Policy shall be governed by NEXEN TIRE's internal guidelines and procedures.

Supplementary Provisions <Rev.2.0, 2025. 5. 1.>

- ① This Human Rights Policy shall take effect as of May 1, 2025.

Supplementary Provisions <Rev.3.0, 2026. 7. 1.>

- ① This Human Rights Policy shall take effect as of July 1, 2026.

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Issued and Revised by	HR Team	Managed by	ESG Team