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INNOCEAN D&I Policy (Diversity & Inclusion Policy)

[Responsibility]

HR Operation Team

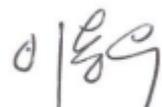
Kang Pill Hyun



[Approver]

C E O

Lee Yong Woo



1. Overview

A. Purpose of enactment

INNOCEAN has established a D&I policy to create an organizational culture that helps diverse talents develop both creative and challenging thinking to contribute to the transition to an inclusive society. We also promise not to discriminate against employees for such reasons as gender, race, ethnicity, nationality, cultural background, disability, age, individual gender identity, political/religious beliefs, or social status without any reasonable reasons. We further vow to create working environments where employees with diverse backgrounds can realize the values of diversity and inclusion. We will also work hard to become a company that respects the diversity and inclusion of customers, partners, local communities, and various stakeholders.

B. Scope of application

This policy applies to all members of INNOCEAN's headquarters, domestic/overseas production and sales corporations, subsidiaries and sub-subsidiaries, and executives and employees of joint ventures. Furthermore, this policy shall apply to various stakeholders within our business influence, such as the products and services we provide, customers, business partners, and local communities with whom we do business. In case the matters covered by this policy conflict with the local country's laws, the local laws shall be followed first. However, this policy must be complied with unless there are special provisions in the local country's laws, the articles of organizations, or the company rules.

C. Management system

INNOCEAN will build an internal system necessary to implement the basic principles of this policy, regularly inspect and improve the status of diversity and inclusion, and fully share the results with stakeholders. Furthermore, the dedicated diversity organization of INNOCEAN affiliates, etc., will implement a diversity and inclusion management system by the principle of good faith by actively reflecting social change. We will also continue to improve the management system to establish a culture of diversity and inclusion throughout business operations.

2. Basic Principle

- **[Employees]** INNOCEAN shall prohibit discrimination against employee's gender, race, ethnicity, nationality, cultural background, age, individual gender identity, differences in political and religious beliefs, weakness in social status, etc., without due reasons, and provide equal opportunities in employment, promotion, education, wages, and welfare.
- **[Products and Services]** INNOCEAN shall consider the diversity of stakeholders, including customers, in the process of designing, producing, and selling products and services. The Group shall ensure that the values of diversity and inclusion are not infringed in marketing, branding, and other internal and external public relations.
- **[Supply Chain]** INNOCEAN shall monitor diversity and inclusion issues in the supply chain to ensure their value is not infringed upon and support all supply chains and individuals to receive fair opportunity and treatment.
- **[Local Community]** INNOCEAN shall not infringe on other rights and interests, such as local community history, culture, business practices, property rights, etc., in the course of business operation. The Group shall strive to promote diversity and inclusion of stakeholders, including community members.

Article 1. Gender

INNOCEAN shall treat all employees and stakeholders equally, regardless of gender, gender identity, sexual orientation, etc., and apply the zero-tolerance principle to perpetrators of sexual harassment and sexual assault. Also, the group shall operate a system that allows both men and women to pursue work-family balance while preventing unfair treatment and disadvantages due to pregnancy, childbirth, childcare, etc.

1. We do not discriminate based on gender, etc., in employment, promotion, education, wages, welfare, etc.
2. We guarantee leave due to pregnancy, childbirth, childcare, etc., and do not discriminate on leave based on gender.
3. We regularly provide education on sexual harassment and sexual assault prevention and gender equality and protect victims' rights.

Article 2. Race, nationality, and cultural background

INNOCEAN shall not discriminate based on its employees' ethnicity, race, nationality, cultural background, religion, etc., without due reasons. We encourage the expression of opinions and active communication of minority groups such as foreigners, immigrants, overseas Koreans, multicultural families, and North Korean defectors, as long as the same does not infringe upon the rights of others. In addition, we support language education, etc., to help minority groups improve their job performance and develop themselves.

1. We respect our employees' diverse cultures, values, and religions and do not allow discrimination based on the same.
2. We pursue harmony of diverse cultures among employees by providing language and cultural education and opportunities for mutual communication.
3. We encourage exchange activities between employees and stakeholders from various backgrounds (Employee Resource Group).

Article 3. Age

The employees of INNOCEAN shall respect and communicate with each other in an open manner, regardless of age, and strive to create an organizational culture that can resolve conflicts from generational differences. In addition, everyone shall be free to express their opinions, and we shall improve organizational productivity and creativity through a work culture that listens to others' views. In particular, we shall not impose unnecessary hierarchies based on age or interfere with others' work unnecessarily.

1. We work with mutual respect and encourage a horizontal atmosphere among our employees.
2. We create an organizational culture where active communication can take place, not restricted by age.
3. We do not impose unnecessary hierarchies or personal needs or infringe on privacy based on age.

Article 4. Disability

INNOCEAN shall not discriminate against employees based on disability or disease without reasonable grounds. We shall create an environment where employees with disabilities or illnesses can work without discomfort. We encourage educational activities and awareness-raising campaigns to eliminate invisible barriers and discrimination as well as physical conditions.

1. We prohibit all acts such as discrimination and harassment in the workplace based on disability or disease.
2. We provide equipment and materials necessary for executives and employees with disabilities to perform their duties without restrictions.
3. We strive to implement a work environment that considers the accessibility of employees with disabilities.

Article 5. Veterans

INNOCEAN honors veterans and their families, such as those of national merit and independence, during the recruitment process. We promote community contribution activities such as education and employment programs, life stability support, and welfare promotion to support the honorable life of veterans who have contributed to national development and security.

1. When hiring, we encourage an employment policy that gives preference to veterans and their families, such as those of national merit and independence.
2. We strive to support economic activities such as education and employment support for veterans.
3. We strive to contribute to the local community by promoting stability in life and the improvement of the welfare of veterans.

3. Employees

INNOCEAN believes that diverse talents and an inclusive organizational culture are the basis for its sustainable growth. The group respects and encourages its employees' creativity and potential regardless of gender, race, nationality, cultural background, or age. INNOCEAN will enhance its

global business competitiveness based on the creativity and potential of its diverse employees.

A. Human Resource Planning

INNOCEAN affiliates are establishing a mid-to-long-term human resource operation plan, taking internal and external environmental changes, business strategies, and the knowledge and skills of employees into account. We will review a workforce plan in the future, considering diversity such as gender, race, ethnicity, nationality, cultural background, and age.

- INNOCEAN affiliates will work hard to provide sufficient opportunities to minority groups in the recruitment and transition placement process, recognizing that embracing diverse talents increases corporate value.
- We will analyze the influence of diversity in the composition of employees on corporate value and establish a human resource management plan to put necessary talents in business activities that realize the value of diversity.

B. Education and Mentoring

INNOCEAN affiliates support individual employees in improving their knowledge and skills through education and competency development activities. We will provide all our employees with equal opportunities to participate in education while developing educational programs that consider diversity and inclusion in the future.

- We will ensure no restrictions on opportunities to participate in education by identifying the needs of various employees' training programs and developing training programs where employees can participate.
- We will check educational satisfaction and achievement by diversity group to learn whether the education programs provided by INNOCEAN affiliates effectively enhance corporate value.

C. Performance evaluation

INNOCEAN affiliates have set organizational and individual goals for employee performance evaluation and have been working hard to achieve them. In the future, we will build a comprehensive performance evaluation system to prevent bias and disadvantages due to diversity in the employee performance evaluation process.

- In the future, we will review and manage performance evaluation to set fair and objective individual performance goals without discrimination against diversity in the future employee performance evaluation process.
- Through fair performance evaluation standards, we will prevent bias and disadvantages in performance evaluation results due to gender, race, ethnicity, nationality, cultural background, age, etc.
- We will respect the diversity in the employee performance management process and manage the performance evaluation results to ensure no discrimination in expressing opinions on the grounds of diversity.

D. Compensation

INNOCEAN affiliates ensure no discrimination or disadvantage in compensation due to gender, race, ethnicity, nationality, cultural background, age, etc. We will build a reasonable and transparent compensation system in the future.

- We will operate a compensation policy, compensation payment standards and procedures, etc., to prevent discrimination in compensation due to differences such as gender, etc.
- In the event of a discriminatory factor against the value of diversity in employee compensation, we will operate a channel to mediate, resolve, and communicate the same.

E. Employee Resource Group

INNOCEAN affiliates encourage ERG activities where employees with a common interest in diversity and inclusion and a common diversity background can communicate and share culture.

We recognize that ERG's active opinions are the foundation for diverse and inclusive corporate growth and support the spread of ERG activities.

- We recognize that it is an opportunity to form better teamwork when executives and employees with a common diversity background share interests and exchange cultures.
- We encourage the formation of various types of ERGs such as women, MZ generation, those ready to retire, the disabled, veterans, black/African, Hispanic/Latin, etc.
- We encourage all our employees to participate in at least one ERG to create a culture of diversity and inclusion within the organization and to spread positive influence among employees.
- We will support external link activities such as mentoring, cultural exchange, job/leadership education, and community participation to promote and spread a culture of diversity while activating the ERG.

F. Operating system

INNOCEAN affiliates operate an organization dedicated to promoting diversity and inclusion within the organization. We are also trying to realize the value of diversity and inclusion at the company level by reviewing essential matters in the spread of diversity and inclusion by the Board of Directors(hereafter BOD).

[Role of the Board of Directors] The BOD receives reports on our agendas related to diversity and inclusion and provides practical recommendations with sufficient review on major agendas.

[Role of the Dedicated Organization] The dedicated organization performs functions such as planning, implementation, inspection, evaluation, and improvement to spread a culture of diversity and inclusion within the organization.

- ① The dedicated organization will establish specific goals based on the basic principles of diversity and inclusion and set annual activity plans to internalize a culture of diversity and inclusion.
- ② The dedicated organization will monitor whether the goals and activities set concerning diversity and inclusion are being implemented as planned every year.
- ③ The dedicated organization will develop/operate/support programs to promote diversity

and inclusion and encourage active participation of employees.

④ The dedicated organization will collect important issues and agendas related to diversity and inclusion at all times and report them to the board of directors or management.

⑤ The dedicated organization will collect activity/performance information related to internal and external diversity and inclusion and actively communicate it to stakeholders.

D&I dedicated organization communication channel

- **Department name: HR Operation Team**
- **Email: phyun@innoccean.com**
- **Phone: +82 02-2016-0096**
- **Mail: 308, Gangnam-daero Gangnam-gu Seoul, Republic of Korea**

[Organizational Diversity Diagnosis] The dedicated organization will carry out the following activities to internalize diversity and inclusion in the organization and manage risks each year.

① The dedicated organization will develop diagnostic indicators based on the basic principles of INNOCEAN's diversity and inclusion to identify the level of diversity and inclusion of the organization and diagnose the related risks.

② The dedicated organization will evaluate the level and risk status of the organization in writing (on-desk) through diversity and inclusion diagnostic indicators and analyze the results to derive priorities for improvement.

③ The dedicated organization will identify potential risks for which high risks are identified as a result of the written evaluation of diversity and inclusion through stakeholder interviews and due diligence (on-site).

④ The dedicated organization will prioritize risks identified through written evaluation and due diligence and prepare future tasks and improvement measures.

⑤ The dedicated organization will identify the implementation status of improvement measures, etc., and support the development of diversity and inclusion in a better direction through a constant feedback process.

4. Products and Services

INNOCEAN will provide products and services that consider accessibility for all customers and lead customer experience innovation that enables customers with diverse backgrounds to use our products and services easily and conveniently anytime, anywhere.

- We will reflect diversity factors in the design and production of products and services.
- We will not discriminate based on diversity in the sales and marketing process of products and services.
- We will try to identify customers' needs from various backgrounds and improve them.
- We will actively collect opinions on diversity issues arising from products and services.

5. Supply Chain

INNOCEAN manages diversity risks such as discrimination in the supply chain, following the supplier code of conduct. In addition, we will support activities to promote diversity and inclusion in the supply chain to spread the value of diversity and inclusion throughout the industrial ecosystem.

- We will spread the value of our diversity and inclusion to all suppliers in the supply chain.
- We will enhance the system to identify, evaluate, and improve risk factors related to diversity in the supply chain.
- We will support education, investment, and mutual exchange activities necessary to promote diversity and inclusion in the supply chain.

6. Local Community

INNOCEAN is spreading the values of diversity and inclusion to the local community through social contribution activities and communication. We will also regularly check whether our business operations violate the values of diversity and inclusion.

- We will spread and share diversity and inclusion education and mentoring with the local

community.

- We will encourage ERG's community participation and interactions with the local community.
- We will consider diversity and inclusion factors in the social contribution program planning process.

A. Diversity Self-Assessment Indicator

<1. Human resource planning >

| CHECKLIST | YES | NO |
|---|-----------------------|----|
| Does the organization establish a human resource management plan by reflecting its mid-to-long-term business strategies and business goals and reflect the principles of diversity and inclusion in the plan? | <input type="radio"/> | |
| Does the organization fairly operate HR policies, procedures, not to mistreat various employees due to prejudice in the HR process? | <input type="radio"/> | |
| Does the organization check whether the underprivileged are sufficiently employed within the organization compared to the average by industry and country? | <input type="radio"/> | |

<2. Compensation >

| CHECKLIST | YES | NO |
|--|-----------------------|----|
| Does the organization determine salaries and benefits fairly and transparently, based on the principles of diversity and inclusion? | <input type="radio"/> | |
| Does the organization operate sufficient programs for work-life balance, such as parental leave, flexible working systems, and work-from-home systems? | <input type="radio"/> | |
| Does the organization communicate salary and benefit-related information to all employees in an accessible and transparent manner? | <input type="radio"/> | |
| Does the organization collect data that can confirm the level of satisfaction or dissatisfaction with the compensation level and welfare benefits? | <input type="radio"/> | |

<3. Employment >

| CHECKLIST | YES | NO |
|---|-----------------------|----|
| Does the organization advertise hiring through various online and offline platforms and media and uses a language that various people can understand? | <input type="radio"/> | |

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|--|---|--|
| Does the organization set diversity principles and standards in the hiring process, and is it sharing them with internal hiring managers and external hiring (agent) companies? | ○ | |
| Does the organization fairly provide opportunities for various candidates to demonstrate their abilities by improving the test method and accessibility of the interview location? | ○ | |
| Does the organization recruit and actively accept people from various regions, cultural backgrounds, and major knowledge? | ○ | |

<4. New employee training >

| CHECKLIST | YES | NO |
|--|-----|----|
| Does the organization recognize new hires' particular needs (chronic disease, disability, etc.) for the work environment and facilities and provide necessary support and adjustments? | ○ | |
| Does the organization identify and respond to each new employee's learning and development needs, advancement opportunities, and coaching and mentoring requests? | ○ | |
| Does the organization collect data on the level of participation of new hires in training courses, their satisfaction with training courses provided by the organization, etc.? | ○ | |
| Does the organization communicate the responsibility of new hires to work in an inclusive and respectful manner and clearly set the organization's behavioral expectations of them? | ○ | |
| Does the organization provide new hires with information (such as descriptions of feedback mechanisms) for assistance in resolving diversity and inclusion issues or complaints? | ○ | |

<5. Learning and development >

| CHECKLIST | YES | NO |
|--|-----|----|
| Does the organization analyze individual and organizational learning needs and establish programs that all employees can use through coaching and mentoring? | ○ | |
| Does the organization reflect diversity principles in learning and development policies, etc., and design learning and development | ○ | |

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|--|---|--|
| activities to raise diversity awareness? | | |
| Does the organization work with trainers, mentors, etc., that reflect diverse perspectives and values, and provide leadership development training about inclusive workforce management practices? | ○ | |
| Does the organization collect data to identify and evaluate the effectiveness of learning and development and data on the development of individuals and organizations? | ○ | |

<6. Performance management >

| CHECKLIST | YES | NO |
|---|-----|----|
| Does the organization establish performance management standards to minimize bias in evaluation and set performance management goals that reflect diversity principles? | ○ | |
| Does the organization provide a mechanism for employees to leave feedback on performance management processes and results and collect data on satisfaction? | ○ | |
| Does the organization have a process in place to respond to potential evaluator biases and inequalities or violations of diversity in the evaluation process when an employee requests additional explanation about performance management results? | ○ | |

<7. Personnel transfer>

| CHECKLIST | YES | NO |
|--|-----|----|
| Does the organization identify and monitor diversity opportunities and risks associated with projects and dispatches that may require relocation, such as overseas dispatches, returning to the country, etc.? | ○ | |
| Does the organization fairly allocate tasks according to skills, knowledge and capabilities, ensure that work content is accessible, and communicate related information transparently? | ○ | |
| Does the organization identify and consider individual circumstances, such as family and health conditions, that may influence decisions to accept or reject work assignments and relocations? | ○ | |

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| Does the organization provide an institutional and cultural basis for individuals who reject personnel transfer to perform and complete work assignments without disadvantages? | ○ | |
| Does the organization collect data to determine satisfaction or dissatisfaction with personnel transfer policies, processes, practices, and results? | ○ | |

<8. Resignation and turnover >

| CHECKLIST | YES | NO |
|--|-----|----|
| Does the organization investigate the influence of diversity factors in the decision-making process before the resignation and turnover of employees and use the results to improve the organizational culture? | ○ | |
| Does the organization receive feedback on prejudice and discrimination in the decision-making process before the resignation and resignation of employees and determine whether there has been any unfair treatment of the resigned employees? | ○ | |
| Does the organization identify potential discrimination by collecting diversity-related data on resigned employees, particularly by identifying groups with high resignation rates? | ○ | |
| Does the organization provide support for prospective resigning employees, such as government support after resignation, information on job opportunities, and grievance counseling? | ○ | |

B. References

This D&I Policy has been established with reference to domestic/international standards and initiatives.

- ① ILO, Promoting Diversity and Inclusion through Workplace Adjustment – Practical Guide (2016)
- ② ISO, ISO30415:2021 Human Resource Management – Diversity and Inclusion (2021)
- ③ S&P Global, CSA Companion – Workforce Breakdown (2021)
- ④ The Centre for Global Inclusion, Global Diversity, Equity & Inclusion Benchmarks (2021)

- ⑤ UNDP, Gender Diversity and Inclusion for a Fair Business Environment (2021)
- ⑥ UNHCR, Policy on Age, Gender and Diversity (2018)
- ⑦ UNSDG Goal 8 – Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all (2016)
- ⑧ WEF, Measuring Stakeholder Capitalism – Diversity & Inclusion (2020)
- ⑨ GRI, Standards 405 – Diversity and Equal Opportunity (2016)

C. Additional clause

- ① This D&I Policy is to be enacted as of 2022. 07. 01 and distributed to INNOCEAN.