POSCO Group Human Rights Commitment

POSCO Group is committed to respecting the human rights of all of our stakeholders, e.g., employees, investors, customers, business partners, and local communities. Our goal is to achieve lasting success by growing with the societies where we operate.

Our commitment to respecting human rights is informed by POSCO Group's Human Rights Policy*, which defines our basic principles and action plans. Hence, systems are in place to implement and monitor our human rights practices in compliance with international standards, e.g., the Universal Declaration of Human Rights, the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the Core Conventions of the International Labour Organization, the OECD Guidelines for Multinational Enterprises, the UN Convention on the Rights of the Child, the UN Declaration on the Rights of Indigenous Peoples, the UN Declaration on Human Rights Defenders, and other international norms specifying the rights of migrant workers, women, and people with disabilities.

* The Policy compiles sections on Human Rights Business Management, Diversity, Equity and Inclusion (DEI), Responsible Minerals, Supply Chain, and Stakeholder Engagement.

This Commitment articulates our firm resolve to protect and advance the human rights of all our stakeholders that include, but are not limited to, POSCO Group employees.

1. Key Areas for Human Rights Protection

In our business operations, we seek to prevent human rights violation and to remedy adverse impacts. Because we recognize that with business expansion and evolving operations, human rights issues and resulting impacts may need occasional reassessment, human rights due diligence is regularly performed and our priorities are continuously updated in consultation with our internal and external stakeholders. Consequently, we have identified key areas in our operations that require attention to protection of human rights:

- **Non-Discrimination**: Discrimination based on innate personal traits, e.g., race, gender, age, disability, nationality and sexual orientation, is prohibited. Equal employment opportunity and access to fair evaluation is granted to all persons.
- **Prohibition of Child and/or Forced Labor**: All forms of child labor, forced labor and human trafficking are prohibited. Every person is guaranteed the right to assume work of one's free will.
- **Freedom of Association and Collective Bargaining**: We respect the right of every employee to freely associate and engage in collective bargaining. Adverse action taken against workers for their involvement in union-related activities is prohibited.
- **Just Transition**: In our quest to build an ecologically sustainable economy, we strive to adopt means deemed most just and inclusive to all of our stakeholders. Hence, we aim to create quality jobs and to ensure that no person is left behind in the process.
- **Occupational Health and Safety**: To create a safe and healthy work environment, we adhere to internationally recognized safety standards and take action to prevent potential occupational hazards.
- **Prevention of Workplace Harassment**: We seek to foster a culture of respect and compassion by preventing all forms of physical and/or mental abuse, which include workplace hostility and sexual harassment.
- **Responsible Supply Chain Management**: To preserve fairness and transparency in our business partnership, we assess potential human rights risks that may arise across our supply chain; moreover, we support the efforts of our partners to advance respect for human rights in their operations.
- **Prevention of Corruption and Bribery**: To uphold fairness in all transactions, we adhere to international and domestic norms and regulations governing anti-bribery and anti-corruption.
- **Environmental Rights**: To restore and preserve the natural ecosystem, we aim to reduce our GHG emissions and enhance efficient use of natural resources and by-products.
- **Human Rights in the Local Community**: To ensure that our business activities do not result in violation of human rights in the communities where we operate, we collect feedback and seek to address human rights issues when they occur. To do so, we perform impact assessment of our operations on the health, safety, and livelihood of local residents and give due consideration to preserving the local culture and biodiversity.
- **Consumer Human Rights**: We heed the voices of our customers and ensure that our products and services do not harm their health and safety. Additionally, data privacy is rigorously guarded to preserve customer trust.

2. Human Rights Management System

POSCO Group upholds the 'Protect, Respect and Remedy' framework set forth in the UN Guiding Principles on Business and Human Rights. To operationalize this framework, we implement the human rights management system to identify, prevent and mitigate human rights-related risks with the goal to systemically manage the human rights of all of our stakeholders including employees.

- **Human Rights Governance:** The Board of Directors and the top management of POSCO Holdings develop the human rights strategy and policies and monitor the Group's general approach to human rights practices. Additionally, POSCO Group's top management is responsible for managing and practicing respect for human rights across all business operations.
- **Human Rights Due Diligence:** To be fully accountable to our duty to protect human rights, we conduct human rights due diligence to identify, prevent and mitigate any adverse human rights impact in our operations, at our affiliates and in the supply chain. Internal and/or external expertise is enlisted to actively address issues uncovered by Human Rights Due Diligence. The effectiveness of the corrective actions taken is periodically reviewed.
- **Grievance Mechanism:** We operate grievance mechanisms to enable reporting and remedy of human rights concerns and to assist all stakeholders to raise grievances without fear of reprisal. Any grievance submitted to the Ethics Counseling Center (Helpline) or the Unethical Conduct Reporting Center (Hotline) is offered adequate response and follow-up measures. The remedy mechanism is regularly evaluated on its effectiveness.
- **Stakeholder Engagement:** We take our response to human rights concerns raised by our stakeholders seriously. All relevant information is disclosed transparently in official reports and through online media platforms. Particular attention is paid to the opinions of marginalized groups based on race, gender, age, disability, nationality and sexual orientation, in our effort to improve our business activities.

POSCO Group is committed to fostering an environment where all stakeholders are respected and to endorsing and enforcing the human rights principles defined by the international community.

On behalf of POSCO Group, this Human Rights Commitment is adopted by the Chairman of the Group and Representative Director of POSCO Holdings and the CEOs of Group affiliates.

February 20, 2025

Chairman, POSCO Group & Representative Director, POSCO Holdings
Chang, In Hwa

CEO, POSCO
Lee, Hee Geun

CEO, POSCO International
Lee, Kye In

CEO, POSCO E&C
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