

# Hyosung Advanced Materials

## **Whistleblowing Process**

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## **1. Purpose**

- 1) Hyosung Advanced Materials Co., Ltd. (here in after the "Company") strives to comply with law and regulations, eliminate unfair infringement of rights of both employees and stakeholders, and contribute to the establishment of a sound transaction order.
- 2) The purpose of the Whistleblowing Process is to enable employees of the Company (as defined below) who observe an unethical or improper practice (whether or not a violation of law, including but not limited to violation of internal regulations, potential fraud, corruption or other serious wrongdoings and irregularities), to approach the 'Whistleblowing Center' without necessarily informing their superiors and without revealing their identity; provided however that in case the Whistleblower's identity is provided, the Company's Code of Ethics, Code of Ethics Practice Guidelines, Human Rights Policy and Principles shall ensure full protection of such identity.
- 3) This process governs reporting and investigation of allegations of improper activities. In all instances, we determine when the circumstances warrant an investigation and, in conformity with the policy and applicable laws and regulations, the appropriate investigative process to be employed.
- 4) The reporting and investigation of allegations of improper activities under this Whistleblowing process may imply the processing of personal data within the meaning of Audit regulations or any other data privacy regulation. Where personal data will be processed, this will be done in accordance with relevant privacy law and the Company's Personal Data Protection regulations.

## **2. Scope of Target**

- 1) Not only employees of the Company but also the companies or people who are not employees but act on behalf of Hyosung Advanced Materials. Co., Ltd. (i.e. sub-contractors)

## **3. Scope of Claims**

- 1) Any violation of the HAMC Code of Ethics and other violations made by the Company's employees that require reporting including but not restricted to :
  - 1)-1. Violation of HAMC's Code of Ethics and related laws

- 1)-2. Corruptions such as demand for and or receipt of money/compensations
- 1)-3. Fair trade violations and other business related complaints
- 1)-4. Workplace harassment
- 1)-5. Employee grievance
- 1)-6. Child and or forced labor
- 1)-7. Human rights violations
- 1)-8. Lack of transparency in selecting suppliers
- 1)-9. Supplier grievances
- 1)-10. Illegal and improper use of company assets
- 1)-11. Manipulation of documents and or false reporting
- 1)-12. Information security breaches
- 1)-13. Other illegal and unfair matters

#### **4. Whistleblowing Procedure**

1) A disclosure may be reported to the Whistleblowing Process through any of the channels mentioned below.

1)-1. Through the following link (Hyosung Advanced Materials Website)

[http://www.hyosungadvancedmaterials.com/kr/others/report\\_index.do](http://www.hyosungadvancedmaterials.com/kr/others/report_index.do)

1)-2. By email to [audit@hyosung.com](mailto:audit@hyosung.com)

1)-3. Complaints against the Whistleblowing Process may be addressed to

[hyosung\\_hr@hyosung.com](mailto:hyosung_hr@hyosung.com)

- 2) When a whistleblowing is submitted, a registration e-mail is sent to the person in charge, and at the same time, a report registration completion e-mail is sent to the whistleblower.
- 3) Upon the assessment of the necessity to investigate, the matter is either replied to the whistleblower as "not applicable for investigation" in case it is not eligible for investigation, or sent to the designated personal for investigation

- 4) The investigation is completed through objective fact relevance checking. The Subject is not to interfere with the investigation. Evidence shall not be withheld, destroyed or tampered with, and witnesses shall not be influenced, coached or intimidated. Any such actions shall be liable for disciplinary proceedings.
- 5) The person in charge of the investigation submits, report on the investigation results along with the evidence to the Whistleblowing Center upon which the decision to take disciplinary actions will be made.
- 6) The case shall be closed when the internal disciplinary actions are finalized according to the internal regulations. If necessary, legal action will be taken and then closed.
- 7) When the informant reports in real name and requests the result feedback expressly, the result of treatment shall be advised to the disclosure unless the legal right and interest of the company are prejudiced. Also it enables to check the progress after anonymous reporting.

## **5. Privacy**

- 1) Hyosung Advanced Materials protects and supports informants based on code of ethics, code of ethics guidelines for practice and human rights policy and principle.
- 2) To invigorate reporting, we protect informants through secret guarantee, disadvantage prohibition, liability reduction.
- 3) Reporting Center do not disclose any information without the informant's consent and thoroughly protect the reporting information about related stakeholders.
- 4) We provide protection to all those who cooperated in the investigation (i.e. make statements or testimony, provide proofs and data, etc.)
- 5) In case the whistleblower or the person who cooperated face disadvantage due to reporting, they may request for correction and protection. Then the company shall take all measures to minimize the disadvantage.
- 6) In cases of voluntary reporting, the reporter may be lessened of his punishment despite of his wrong doings.
- 7) If and when (further) processing any personal data, the Whistleblowing Center shall apply

the principle of data minimization : the Whistleblowing center shall only (further) process personal information that is adequate, relevant and necessary, for the particular case.

- 8) Personal information is thoroughly protected until it is disposed of in accordance with the Personal Information Protection Policy, and is destroyed in a non-recoverable manner according to related regulations.