GINNOLAB

Responsible technology. Sustainable growth.

ESG Policies & Codes

English edition | 19 policies

Human rights · Environment · Health & safety Ethics · Information protection · Responsible sourcing

Korean policy revision published: 23 September 2026 English edition prepared: 24 September 2026

This handbook translates GinnoLab’s published Korean policies. It states commitments and operating standards; it does not certify their implementation. Activities, approvals and certifications require separate supporting evidence.

Policy directory

Online English policy library: https://ginnolab.com/pages/sustainability-resources-en.html

Code of Ethics

Document No. GL-G-2-04 | Revision published 23 Sep 2026 | Established 24 Aug 2026 | Policy owner: Jinho Yoon, CEO

Preamble

GinnoLab (the Company) strives to enhance corporate value through proactive and efficient management, grow together with all stakeholders including customers, employees and suppliers, and earn trust by faithfully fulfilling its duties and responsibilities.

The Company respects domestic and international laws and market order, takes the initiative in establishing fair trading practices, respects social values and customs, and contributes to local communities and national development through a range of community activities.

The Company establishes and actively implements this Code of Ethics to foster a sound and fair corporate culture.

I. Our Customers

1. Respect for Customers

- The Company considers and acts from the customer's perspective and provides products and services of the highest quality that customers can trust and find satisfactory.
- The Company provides accurate product and service information and does not engage in excessive promotion or false or exaggerated advertising.

2. Customer Protection

- The Company protects customers' interests, safety and personal information and does not treat them unfairly.
- The Company respects and complies with applicable laws, including Korea's Framework Act on Consumers and Product Liability Act.

II. Competitors and Suppliers

1. Fair Competition

- The Company respects a fair and free market economy based on free competition and competes fairly with competitors.
- The Company complies with fair trade laws, including Korea's Monopoly Regulation and Fair Trade Act, and does not participate in any form of collusion.

2. Fair Dealings with Suppliers

- The Company pursues mutual development through fair dealings that build trust and cooperation with suppliers.
- The Company does not use a superior bargaining position to compel unfair conduct or exert undue influence, and complies with Korea's Fair Transactions in Subcontracting Act.
- The Company pays within agreed deadlines and does not make unjustified price reductions, returns or demands for technical information.

III. Responsibilities to Employees

1. Fair Treatment

- The Company does not unfairly discriminate against employees based on gender, age, education, place of origin, disability or employment type.
- The Company establishes fair assessment criteria for qualities, capabilities and achievements and uses them for evaluation and compensation.

2. Working Environment

- The Company works to protect employee health and provide a safe workplace, fulfilling its obligations under Korea's Occupational Safety and Health Act.
- The Company respects each employee's autonomy and creativity and provides fair opportunities for development.
- The Company respects employees' individual dignity and fundamental rights and creates an environment for freely offering ideas and suggestions.
- The Company prohibits workplace bullying and sexual harassment and promptly investigates and takes action when they occur.

IV. Responsibilities to Society

1. Compliance with Domestic and International Laws

- As a member of the community, the Company complies with applicable laws and internationally accepted standards.

2. Contributing to Economic and Social Development

- The Company contributes to local economic and social development through improved productivity, job creation, diligent tax payment and community engagement.

3. Environmental Protection

- The Company strives to protect nature and preserve a clean environment in accordance with its Environmental Management Policy.

V. Basic Employee Ethics

1. A Sound Corporate Culture

- Employees share the Company's management philosophy and faithfully carry out their assigned responsibilities.
- Employees build a culture of open communication and mutual trust.
- Employees perform their duties through legitimate means and comply with applicable laws and company rules.

2. Avoiding Conflicts of Interest

- Employees avoid conduct or relationships that conflict with the Company's interests and prioritize the Company's interests when a conflict arises.
- Employees disclose potential conflicts, such as outside employment or private financial transactions with business partners, to the Company in advance.

3. Protecting Company Assets and Important Information

- Employees protect tangible assets, intellectual property and trade secrets and do not use them for private purposes.
- Employees do not use their positions for personal gain or engage in unfair transactions using non-public information obtained through work.
- Employees do not disclose important information that could affect the Company's interests to outside parties.

4. Preventing Sexual Harassment and Bullying

- Employees refrain from physical, verbal or visual conduct that causes sexual humiliation and from any behavior that undermines healthy working relationships.

5. Political Activities

- Employees do not engage in political activities on company premises during working hours or use the Company's organization, personnel or assets for political purposes.

6. Gifts, Money and Hospitality

- Employees do not accept money, gifts or hospitality from stakeholders such as business partners.
- In connection with work, employees do not provide stakeholders with money or gifts or hospitality beyond socially accepted bounds.
- Employees also do not exchange money or excessive gifts or hospitality with one another.

7. Compliance and Reporting

- All employees must faithfully comply with this Code and are accountable for violations.
- Employees must use the reporting channels below if they are pressured to act against this Code or become aware of improper conduct.
- The Company keeps reporters' identities and report details confidential and prohibits retaliation for reporting.

VI. Implementation

Category	Details
Responsible function	Management Support (ethics management)
Reporting channels	Anonymous Grievances & Suggestions / CEO direct contact / internal grievance box / email ceo@ginnolab.com
Training	Ethics training for all employees at least once a year and collection of signed commitments
Review	Annual internal review of compliance with the Code and reporting to the CEO
Establishment and revision	Established and revised with CEO approval; all employees are notified of revisions

Accurate Records and Responsible Dealings

- Accounting and tax records, test results, certifications, delivery records and ESG information must match supporting evidence. Unfavorable facts must not be concealed or performance exaggerated. Errors must be corrected and changes recorded.
- Verify counterparties and payment purposes and do not participate in money laundering, embezzlement, fictitious transactions or counterfeit distribution. For imports and exports, check export controls and economic sanctions applicable to the products, countries and counterparties.
- Provide accurate information on coating applications, test conditions, limitations and handling, storage and disposal precautions to support customer safety and informed decisions. Protect customer and supplier confidential information and intellectual property.

Conflicts of Interest and Reporter Protection

- Disclose personal or family interests that could affect supplier selection, evaluation or contracting, and withdraw from related decisions. Verify the purpose and beneficiaries of donations and sponsorships and do not use them to improperly influence transactions.
- Protect anyone who reports suspected violations in good faith or assists an investigation. A report being unsubstantiated is not, by itself, grounds for adverse treatment of the reporter.

Established 24 August 2026Jinho Yoon, CEO of GinnoLab

Document No. GL-G-2-04 · Revision: Rev.0 · GinnoLab

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02 / GINNOLAB ESG POLICIES

Human Rights

GinnoLab respects the dignity and worth of every person and makes human rights protection a fundamental principle throughout its operations. These principles apply to all employees, and suppliers and their subcontractors are also required to comply.

1. Fundamental Human Rights Principles

- Respect the human rights of all stakeholders connected with our business, including employees, customers, suppliers and communities.
- Support internationally recognized human rights principles, including the Universal Declaration of Human Rights, and comply with human rights laws.
- Strive to prevent human rights abuses arising from business activities and take appropriate measures to protect and remedy affected people when abuses are identified.

2. Prohibition of Forced Labor

- Do not compel work against a worker's free will through violence, threats, confinement or similar means.
- Do not use debt-bonded labor, labor obtained through human trafficking or forced prison labor.
- Do not retain or require surrender of original passports, identity cards, residence permits or other identity documents.
- Do not charge workers recruitment fees. Workers may leave employment freely after reasonable advance notice.
- Do not compel mandatory overtime. Workers may leave the workplace freely after working hours.

3. Prohibition of Child Labor

- Do not employ anyone under 15, including persons under 18 attending middle school, except those holding an employment permit issued by the Minister of Employment and Labor.
- Do not assign persons under 18 to night work between 10 p.m. and 6 a.m. or work on holidays, except where consent and authorization required by law have been obtained.
- Do not assign persons under 18 to hazardous work, including high-temperature or dusty work, hazardous chemical handling or heavy lifting.
- Verify age at recruitment using identity documents or other records and retain the verification records.
- If child labor is identified, remove the child from the work immediately while considering remedies that protect education and livelihoods.

4. Non-discrimination

- Do not discriminate in recruitment, pay, training, assignment, promotion, retirement age, departure or dismissal based on gender, age, religion, disability, marital status, place of origin, nationality, education or employment type.
- Do not require physical characteristics such as appearance, height or weight, or unmarried status, where these are unnecessary for the job.

- Provide equal pay for work of equal value within the same workplace.
- Do not enter into employment contracts that treat marriage, pregnancy or childbirth as grounds for termination.
- Do not subject fixed-term, part-time or dispatched workers to unjustified discriminatory treatment compared with workers performing the same or similar work.

5. Working Hours and Wages

- When entering an employment contract, provide the worker with written terms specifying wages, contractual working hours, holidays and paid annual leave.
- Comply with statutory working hours of 40 hours per week and overtime limits, and guarantee rest breaks and weekly holidays.
- Pay at least the minimum wage directly to workers in currency on a fixed date at least once a month, without wage arrears.
- Pay statutory premiums for overtime, night work and work on holidays.
- Any disciplinary wage reduction must remain within statutory limits.

6. Freedom of Association and Grievance Handling

- Recognize workers' rights to organize, bargain collectively and take collective action. Do not disadvantage workers for trade union membership or activities.
- Even where no trade union exists, provide alternative communication channels for workers to freely express views on working conditions.
- Prohibit workplace bullying and sexual harassment and operate prevention training and reporting, investigation and remedy procedures.
- Do not disadvantage workers for raising grievances and protect reporters' identities.

7. Human Rights Risk Assessment and Improvement

- Regularly identify human rights risks at sites and major suppliers, with additional reviews when introducing new businesses, processes or partners or when serious grievances arise. Listen to workers and affected stakeholders.
- Prioritize risks according to severity, scale, ability to restore the situation and likelihood. Assign responsible persons, deadlines and resources, and verify implementation evidence and effectiveness.
- Where the Company causes or contributes to human rights harm, protect affected people and provide or cooperate in appropriate remedies. For harm linked through business relationships, require suppliers to improve and monitor implementation.

8. Stakeholder Protection and Grievance Remedies

- Respect customers' lives, health and property, residents' living environments and property rights, and Indigenous peoples' lawful land and resource rights. Where relevant, verify required procedures, including free, prior and informed consent.
- Prohibit human rights abuses such as excessive body searches, violence or threats during security and access control. Consider accessibility and protection needs of potentially vulnerable people, including persons with disabilities, pregnant workers and migrant workers.

- After receiving a report, proceed through protection of affected people, an impartial investigation, notification of results, remedy and corrective action, and prevention of recurrence. Matters involving the officer may be referred to the CEO; matters involving the CEO may seek assistance from external experts or relevant authorities.
- Prohibit retaliation for reports, statements or cooperation with investigations, and share case information only on a need-to-know basis. Company procedures do not restrict access to external remedies through labor authorities, investigative agencies or other bodies.

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Environmental Management Policy

Document No. GL-E-1-01 | Revision published 23 Sep 2026 | Established 24 Aug 2026 | Policy owner: Jinho Yoon, CEO

GinnoLab (the Company) recognizes environmental impacts throughout manufacturing activities and declares its commitment to environmentally responsible management through legal compliance and continuous improvement as follows.

1. Environmental Management Principles

- Comply with applicable laws, including Korea's Framework Act on Environmental Policy, Wastes Control Act, Clean Air Conservation Act and Water Environment Conservation Act, and other requirements that must be observed.
- Assess environmental impacts in advance throughout product planning, purchasing, production and shipment, with pollution prevention as the highest priority.
- Minimize energy, water and raw material consumption and practice the 3Rs: Reduce, Reuse and Recycle.
- Measure and manage greenhouse gas emissions and establish and implement annual reduction targets.
- Set environmental objectives and detailed action plans annually, review results quarterly and continuously improve.
- Share this policy with all employees and suppliers and provide necessary training and information.
- Document and display this policy at sites and disclose it to stakeholders on request.

2. Scope

This policy applies to all GinnoLab sites (Room 203, 22 Sicheong-ro, Wonju-si, Gangwon State, Republic of Korea) and all employees. Suppliers and contractors working under the Company's management are also encouraged to comply.

3. Responsibilities

Category	Role	Owner
Overall environmental management	Approve the policy, allocate resources and conduct an annual management review	Jinho Yoon, CEO
Environmental management coordination	Set objectives and plans, maintain the legal register, compile results and deliver training	Management Support officer
Implementation in daily work	Separate waste, conserve energy and manage chemical handling	All employees

4. Implementation

This policy takes effect on its establishment date and is reviewed and revised when relevant laws or business conditions change.

5. Environmental Impacts and Responsible Information

- Review environmental impacts at each stage of research and development, raw material purchasing, outsourced manufacturing, storage and transport, product use and disposal. Check environmental permits and community impacts before establishing or changing sites or processes.
- Identify risks from coatings and raw materials, dust, volatile substances, leaks, wastewater, waste and water use according to the actual handling processes. Maintain SDS and evidence of lawful treatment, prioritizing pollution prevention.
- Record emissions and consumption using verifiable bills, meter readings, purchase records and disposal records. State the boundaries and methods for estimates, and do not report unmeasured quantities as zero or as reductions achieved.
- Describe environmental benefits only when the conditions and scope of testing or calculations are verified. Coordinate biodiversity, forest protection, climate, energy and responsible sourcing policies, and discuss improvements with suppliers.

6. Reviewing Objectives and Stakeholder Communication

- Confirm the actual baseline year and management boundaries before setting feasible objectives, owners and deadlines. Refine them through quarterly record reviews and annual management reviews. Verify certifications and achieved reductions using valid evidence.
- Receive environmental complaints and suggestions, investigate the facts and impacts, and communicate improvements. Clearly state the evidence and reporting period in public information while protecting personal data and trade secrets.

Established 24 August 2026Jinho Yoon, CEO of GinnoLab

Document No. GL-E-1-01 · Revision Rev.0 · GinnoLab

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04 / GINNOLAB ESG POLICIES

Biodiversity Protection Policy

Document No. GL-E-2-13 | Revision published 23 Sep 2026 | Established 24 Aug 2026 | Policy owner: Jinho Yoon, CEO

GinnoLab values biodiversity protection in its operations and recognizes the potential impacts of its business on the environment and biodiversity. We consider biodiversity in decision-making and pursue measures to minimize our operational impacts on the environment.

This policy draws on international instruments including the Convention on Biological Diversity (CBD), the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), and the IUCN Guidelines for Applying Protected Area Management Categories, as well as Korean laws on biodiversity conservation and use and wildlife protection and management.

Principles of Practice

- Prevent, minimize and mitigate biodiversity risks throughout our business. Identify and assess impacts before starting new businesses or processes, and monitor those impacts. Seek to apply these principles to our sites and tier-one supply chain.
- Comply with local, regional and national requirements on land use and biodiversity protection. Do not establish new facilities in protected areas or areas designated Grade 1 on Korea's ecological and natural maps.
- Prioritize the protection of endangered and endemic species, support local, national and global biodiversity initiatives, and provide information to help employees and stakeholders understand biodiversity protection.
- Aim for No Net Loss (NNL) of biodiversity from our business activities by 2030, and reduce environmental impacts including air pollutants, wastewater and waste. Regularly review impacts on river and green-space ecosystems around our sites in Wonju.
- Work with local communities to undertake ecosystem conservation activities, such as cleanups and planting around our sites, at least once a year. Measure policy implementation and periodically review performance.

* No Net Loss (NNL): operating a business without a net reduction in biodiversity. * Net Positive Impact (NPI): investment and activities to conserve, restore and enhance biodiversity.

Established	24 August 2026
Latest published revision	23 September 2026
Document management department	Management Support
Approval	Jinho Yoon, CEO

Assessing Impacts and Dependencies

- Use site locations and key raw material sources to identify relationships with protected areas, rivers, wetlands, forests and important habitats. Update assessments when sites, processes or major suppliers change, or reasonable concerns are raised.
- Review dependencies on nature alongside impacts. Record location screening, dependency and impact assessment, risk and opportunity review, and response planning, retaining evidence such as public maps, field records and supplier declarations.

- Address adverse impacts in the order of avoidance, minimization and restoration. Determine responses to unavoidable residual impacts according to applicable law and expert review. Restoration activities alone do not justify other damage.

Supply Chain and Community Cooperation

- For raw materials with high ecosystem risks, check origin and production or extraction methods and request supplier improvements. Consider input from local residents and experts, and do not participate in illegal use or trade of endangered species.
- Review conservation objectives using the assessment scope, indicators, baseline and actual evidence. Distinguish policy targets from results already achieved in public disclosures.

Established 24 August 2026Jinho Yoon, CEO of GinnoLab

Document No. GL-E-2-13 · Revision Rev.0 · GinnoLab

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05 / GINNOLAB ESG POLICIES

Supplier ESG Code of Conduct

Document No. GL-S-3-49 | Revision published 23 Sep 2026 | Established 24 Aug 2026 | Policy owner: Jinho Yoon, CEO

Issuing company	GinnoLab (CEO: Jinho Yoon)
Address	Room 203, 22 Sicheong-ro, Wonju-si, Gangwon State, Republic of Korea
Applicable parties	All suppliers doing business with the Company, including raw material and component suppliers, subcontract processors, service and transport providers, equipment suppliers, and their subcontractors
Reference standards	UN Guiding Principles on Business and Human Rights, ILO fundamental conventions, OECD Guidelines for Multinational Enterprises, and applicable Korean laws

Chapter 1. General Provisions

Article 1. Purpose

This Code sets out the basic principles and standards on human rights and labor, health and safety, environment and ethics that suppliers doing business with GinnoLab (the Company) must follow, to build a responsible supply chain and support sustainable mutual growth.

Article 2. Scope

- This Code applies to all suppliers with a business relationship with the Company.
- Suppliers and their subcontractors must follow the human rights and labor principles in the separately published Human Rights; these principles form part of this Code.
- Suppliers should seek equivalent compliance from their own subcontractors.
- Where local laws are stricter than this Code, those laws take precedence. Where this Code is stricter, suppliers should aim to meet its standards.

Article 3. Basic Principles

- Legal compliance: comply with all laws and international standards applicable to business activities.
- Respect for people: respect the human rights and dignity of all stakeholders.
- Transparency: keep accurate records and cooperate in good faith with legitimate verification requests from the Company.
- Continuous improvement: conduct self-assessments and address deficiencies.

Chapter 2. Health and Safety

Article 4. Health and Safety Management

- Comply with applicable laws, including Korea's Occupational Safety and Health Act and Serious Accidents Punishment Act, and operate a health and safety management system appropriate to the size of the workplace.

- Conduct regular risk assessments to identify hazards and implement improvements.
- Install guards on machinery and equipment, and follow power isolation and lockout/tagout (LOTO) procedures during maintenance and cleaning.
- Provide workers with suitable personal protective equipment and check its use.
- Provide regular health and safety training, induction training and special training, and retain records.

Article 5. Working Environment and Health Management

- Maintain appropriate ventilation, lighting, temperature, humidity and noise conditions. Conduct workplace exposure monitoring where legally required.
- Provide general and special medical examinations for workers and follow-up care.
- Keep and display material safety data sheets (MSDS), label chemical containers with warnings, and train workers who handle chemicals.
- Provide additional protection for vulnerable workers, including pregnant workers, older workers and workers with disabilities.
- Provide adequate sanitary facilities, including toilets, washing and bathing facilities, rest areas and drinking water.

Article 6. Emergency Response and Accident Management

- Establish procedures for emergencies such as fires, power failures and chemical leaks, and conduct regular drills.
- Keep emergency exits and escape routes clear and inspect firefighting equipment regularly.
- Do not conceal occupational accidents. Report them through legally required procedures and promptly provide treatment and compensation to affected workers.
- Immediately notify the Company of accidents during work at its sites and share recurrence-prevention measures.

Chapter 3. Environment

Article 7. Environmental Compliance

- Comply with environmental laws and permit conditions relating to air, water, noise, vibration and soil, and maintain required registrations and permits.
- Operate emission and pollution-control facilities properly, retain measurement records, and do not manipulate readings.
- Promptly notify the Company of environmental administrative sanctions.

Article 8. Chemicals and Hazardous Substances

- Fulfill registration and reporting obligations under Korea's Chemicals Control Act and Act on Registration and Evaluation of Chemicals.
- Store hazardous chemicals in designated, labeled locations and provide leak-prevention facilities and response equipment.
- Comply with restrictions on regulated substances in supplied products and components, including applicable RoHS and REACH requirements. Submit composition information, safety data sheets and test reports upon request.
- Do not falsify or alter information on hazardous substances in products.

Article 9. Waste and Resource Circulation

- Separate industrial waste by type, store it in designated locations and provide storage labels.
- Use licensed contractors for lawful treatment of designated waste and retain transfer documents and management records.
- Prohibit unauthorized dumping, burial or burning of waste.
- Promote resource circulation through reduced material consumption, recycled materials and reduced packaging.

Article 10. Energy and Greenhouse Gases

- Track energy consumption, including electricity and fuel, and set and manage reduction targets.
- Calculate and record greenhouse gas emissions, pursue reductions, and cooperate with Company requests for supply-chain emissions data.
- Continue feasible measures such as energy-efficient equipment, reduced standby power and more efficient processes.

Chapter 4. Ethics

Article 11. Prohibition of Corruption and Misconduct

- Do not offer or promise improper benefits to Company personnel, including money, gifts, entertainment, hospitality, favors or employment-related requests.
- Do not provide customary holiday gifts or payments for family occasions. Return any unavoidably received items promptly.
- Reject improper benefit requests from Company personnel and immediately notify the Company's CEO.
- Comply with Korea's Improper Solicitation and Graft Act and Act on Combating Bribery of Foreign Public Officials in International Business Transactions.
- Prepare accounting books, transaction records, certificates of origin, test reports and other records accurately; do not falsify or alter them.

Article 12. Conflicts of Interest and Fair Trade

- Notify the Company in writing in advance of actual or potential conflicts of interest, including family, financial or ownership relationships with Company personnel.
- Do not collude with competitors on prices, volumes or bids.
- Do not impose unjustified price reductions, returns, delayed payments or improper technical-information requests on subcontractors. Pay on time.
- Consult the Company and obtain approval before further subcontracting.

Article 13. Information Protection and Intellectual Property

- Do not use the Company's confidential drawings, specifications, process conditions, cost information, customer information or other confidential information for unrelated purposes or disclose it to third parties.
- Limit access to confidential information, manage permissions, and return or destroy it when the contract ends.
- Handle employee and business partner personal data securely under Korea's Personal Information Protection Act.
- Do not infringe patents, trademarks, copyrights or other intellectual property rights, or use counterfeit goods or illegally copied software.

- Immediately notify the Company of cybersecurity incidents that may affect its information.

Chapter 5. Management Systems

Article 14. Self-Assessment

- Suppliers must assess compliance with this Code at least annually and record the results.
- Complete and submit self-assessment forms in good faith when requested by the Company.
- Establish and implement improvement plans for deficiencies identified in self-assessments.

Article 15. Company Verification and Due Diligence

- The Company may verify compliance through document requests, questionnaires and site visits arranged in advance.
- Conduct verification without disrupting normal business operations, and use information obtained only for the stated purpose.
- Suppliers must cooperate with necessary document requests and site access.

Article 16. Corrective Action

Category	Criteria	Action
Minor	Procedural or recordkeeping deficiencies that do not constitute legal violations	Make improvements and report results within 30 days
Major	Legal violations, repeated noncompliance or failure to implement improvement plans	Submit a corrective action plan and complete improvements within 90 days; verify completion
Severe	Forced or child labor, concealment of serious accidents, pollution incidents, bribery, or falsification of records	Immediately consider suspension of business, contract termination and legal action; obtain a commitment to prevent recurrence

- The Company generally provides an opportunity to correct deficiencies and may reduce or end business only where a supplier fails to take corrective action without a justified reason.
- The Company will consider incentives, including priority orders, for suppliers that faithfully implement this Code.

Article 17. Reporting and Protection

- Suppliers and their workers may report violations directly to the Company's CEO.
- The Company keeps the reporter's identity and report confidential and will not disadvantage a supplier because of a report.
- This protection does not extend to deliberately false reports.

Supplementary Provisions

- Article 1. Effective Date: this Code takes effect upon approval by the Company's CEO.
- Article 2. Amendments: the Company reviews this Code when laws or international standards change and notifies suppliers of revisions.

- Article 3. Effect: this Code is incorporated into individual contracts and governs matters not otherwise specified in those contracts.

The Supplier ESG Code of Conduct Compliance Pledge (Document No. GL-S-3-49-1) is provided to suppliers separately when contracts are signed.

Additional Supply Chain Due Diligence Standards

- Suppliers must apply principles on human rights, environment, health and safety, anti-corruption, and responsible material and mineral sourcing, and communicate them to subcontractors. The Company clearly explains the scope to be reflected in contracts and assessments according to the nature of each relationship.
- The Company identifies suppliers, purchased items, production countries, origins and outsourced processes, and selects documentary and necessary on-site assessments based on human rights, environmental, safety and ethical risks.
- Limit due diligence data to what is necessary to verify compliance. Do not request unrelated technical, cost or pricing information, and restrict access to submitted data and its permitted uses.
- Suppliers must not use counterfeit materials or test records or misrepresent origin. Check export controls, economic sanctions, hazardous-substance restrictions and customer requirements applicable to each transaction.
- Take immediate preventive and protective action for serious risks, and assign owners, deadlines and evidence requirements to improvement plans. Close issues after verification. Consider additional impacts on affected people and communities when restricting or ending business.
- Review whether Company purchasing schedules, prices and delivery deadlines cause excessive labor or safety and environmental risks. Promote information and training support to improve supplier capabilities.

Established 24 August 2026Jinho Yoon, CEO of GinnoLab

Document No. GL-S-3-49 · Revision Rev.0 · GinnoLab

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No Deforestation Policy

Environment | Published 23 September 2026

Purpose and Scope

- GinnoLab prevents deforestation risks in site operations and the sourcing of raw materials and packaging. This policy applies to all personnel and relevant purchasing and outsourcing activities; suppliers are encouraged to comply.

Responsible Sourcing

- When purchasing timber, paper, pallets and forest-derived materials, verify the item, source and evidence of lawful production and distribution. Prevent use of materials linked to illegal logging or damage to protected areas.
- Consider reusable and recycled packaging and credibly certified materials. Verify certification against the supplied item, validity period and scope; a certification label alone does not resolve every risk.

Protecting Sites and Stakeholders

- Before site development or expansion, assess effects on forests and protected areas and verify lawful land use. Prioritize avoiding damage and manage unavoidable impacts with minimization and restoration plans.
- Respect local residents' and Indigenous peoples' land, livelihood and cultural rights, and seek their views. Disclose afforestation or offsetting results only where supported by actual implementation and verification records.

Monitoring and Correction

- Purchasing personnel obtain origin and supplier evidence for high-risk items and report suspected damage to the ESG officer. Set corrective deadlines and evidence requirements, recheck results, and consider purchasing holds or alternative sourcing for significant unresolved risks.

Communication and Grievances · Back to all policies

Climate and Energy Management Guidelines

Environment | Published 23 September 2026

Management boundaries

- Manage site activity data such as electricity and fuel separately from emissions information for major outsourced production and transport. First establish consumption and management boundaries for leased offices, research spaces and directly operated facilities.

Measurement and Calculation

- Collect monthly bills, meter readings and purchase records. Record allocation methods for shared meters. Do not mix or double-count direct emissions, indirect emissions from purchased electricity, and other supply-chain emissions.
- Record emission-factor sources, applicable years, units and calculation methods. Distinguish emissions from reductions, and renewable energy use from offsets. Mark periods with missing data as unverified.

Reduction and Cooperation

- After establishing a baseline, select feasible measures such as equipment and process efficiency, standby-power reduction, consolidated transport and packaging reuse. Consider costs and operating conditions before introducing renewable energy.
- Request relevant consumption and reduction data from suppliers and agree on calculation boundaries. Do not claim membership of international initiatives, certifications or carbon neutrality without evidence.

Review and Disclosure

- The ESG officer reviews gaps, duplicates, anomalies and supporting records and reports improvement progress to the CEO. External disclosures must state the period, sites, scope and whether figures are estimates.

Communication and Grievances · Back to all policies

Diversity and Inclusion Policy

Human Rights & Safety | Published 23 September 2026

Equal Opportunity

- GinnoLab does not unfairly discriminate based on gender, race, nationality, age, disability, marital or family status, religion, sexual orientation, gender identity or social background. Do not use job-irrelevant conditions in recruitment, evaluation or compensation.

Inclusive Working Environment

- Identify work barriers relating to disability, health, pregnancy, childbirth, caregiving, language and culture, and consider reasonable accommodations and support. Do not disadvantage employees for using statutory leave or work-family support arrangements.
- Create an environment where people are respected and can speak up. Provide fair access to training and development, and explain evaluation and compensation criteria.

Review and Improvement

- Regularly review recruitment, promotion, training and compensation procedures for bias. In small teams, avoid unnecessary collection or disclosure of sensitive statistics that identify individuals.
- Handle discrimination concerns and accommodation requests through grievance procedures, consider the person's views and working conditions, implement improvements and communicate the outcome.

Communication and Grievances · Back to all policies

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Non-discrimination and Anti-harassment Policy

Human Rights & Safety | Published 23 September 2026

Prohibited Conduct and Scope

- Prohibit discrimination, sexual harassment, sexual violence, verbal or physical abuse, exclusion, humiliation and improper demands based on superior status, regardless of employment type or position. This applies to work-related online communication, travel, gatherings and supplier relationships.

Reporting and Protection

- Promptly establish the facts when concerns are reported or identified, and consider protective measures in light of the affected person's wishes and safety. Do not force unwanted transfers, resignation or settlements on reporters or affected persons.
- People with conflicts of interest must recuse themselves from investigation and decision-making. Where the CEO is involved, independent external experts or relevant authorities may provide advice or investigation.

Fair Investigation and Action

- Give the parties an opportunity to be heard and collect evidence and statements only as necessary. Protect confidentiality and limit access to those needed to establish the facts.
- Take appropriate remedial, preventive and lawful personnel or disciplinary action based on findings, and communicate outcomes as permitted. Prohibit retaliation for good-faith reporting, testimony or cooperation.

Prevention and Follow-Up

- Provide relevant training and explain grievance procedures. Check protection and recurrence after action is taken. Company procedures do not restrict statutory reporting or external remedies.

Communication and Grievances · Back to all policies

Occupational Health and Safety Policy

Human Rights & Safety | Published 23 September 2026

Health and Safety Principles

- GinnoLab prioritizes the lives and health of employees, visitors and supplier workers involved in Company activities. Identify actual risks in research, testing, material handling, storage, transport and outsourced work, and meet applicable legal obligations.

Risk Assessment and Prevention

- Identify hazards using worker input and accident and near-miss information. Consider controls in the order of elimination, substitution, engineering controls, administrative controls and personal protective equipment, and verify their effectiveness.
- Manage safety data sheets, labeling, ventilation, compatible storage and leak response for coatings and chemicals. Define safe work practices and protective equipment for relevant risks, including dust, heat, electricity, heavy loads and maintenance.

Worker Participation and Emergency Response

- Explain how workers can stop work, evacuate and report imminent danger without disadvantage for legitimate reports or work stoppages. Resume work only after safety is confirmed.
- Provide legally required training, health examinations, exposure monitoring and necessary drills, recording actual dates, participants and results. Maintain emergency contacts, evacuation, first aid, incident investigation and recurrence-prevention procedures.

Responsibilities and Improvement

- The CEO determines necessary resources and improvement priorities. Operational personnel and the ESG officer manage inspections, records and follow-up. Verify statutory appointments separately according to applicable requirements.
- Share work risks and agree on safety measures with suppliers. Track unresolved risks through regular reviews. Verify accident-free records and certification status using actual evidence.

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Community Engagement Policy

Human Rights & Safety | Published 23 September 2026

Purpose and Stakeholders

- GinnoLab respects the rights and interests of residents and stakeholders affected by site and value-chain activities. Reduce negative environmental, safety and livelihood impacts and consider cooperation suited to local needs.

Impact Assessment and Consultation

- When reviewing new sites, processes or transport activities, consider noise, dust, chemicals, traffic and local ecosystems. Investigate complaints and concerns, assess necessary improvements and communicate outcomes.
- Respect the lawful land, resource and cultural rights of local residents and Indigenous peoples. Determine whether prior consultation or consent is required under applicable laws and rights-protection standards.

Cooperation and Performance Records

- Consider activities such as cleanups, education and technology applications that match Company capabilities with local needs. Verify donation and sponsorship beneficiaries and purposes, and do not use them for improper influence.
- Record actual dates, participation, costs and results with evidence, and review effectiveness and improvements. Disclose agreements, participation and donations only to the extent verified.

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Anti-corruption and Anti-bribery Policy

Ethics & Information | Published 23 September 2026

Prohibited Conduct

- Prohibit offering, receiving or promising money, gifts, entertainment or favors for improper business benefits, improper solicitation, embezzlement and false expenses. Apply the same standards to indirect provision through agents, suppliers, relatives or other third parties.

Gifts and Facilitation Payments

- Apply the Code of Ethics prohibition on accepting money and gifts. Promptly report unavoidable receipt and record disposal or return. Do not solicit money or gifts through work-related family occasions.
- Do not make unlawful facilitation payments to accelerate routine administration. Where life or physical safety is imminently threatened, first secure safety and promptly report the circumstances, amount and other party.

Transactions and Expenditure

- Verify the purpose, counterparty, amount and supporting evidence for contracts, purchases, donations, sponsorships and hospitality. Check applicable anti-corruption laws for public-official expenditure and overseas transactions, and resolve uncertainty before spending.
- Disclose conflicts of interest in advance and recuse from affected decisions. Check warning signs such as unusual commissions, nominee accounts or cash requests, and withhold payment until concerns are resolved.

Reporting and Review

- Responsible personnel maintain training, report, investigation, gift-return and corrective-action records. The CEO reviews key risks and unresolved issues. Protect good-faith reporters and cooperating persons and prohibit retaliation.

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Advertising and Marketing Ethics Policy

Ethics & Information | Published 23 September 2026

Accurate Product Information

- Accurately state performance, safety, certification, origin, delivery records and conditions of use in all website, proposal, catalog, label, exhibition and social-media communications. Do not omit limitations or risks material to customer decisions.

Evidence and Environmental Claims

- Base heat-dissipation, insulation and fire-resistance claims on valid results for the relevant product, including test methods, specimens, coating conditions and comparisons. Distinguish laboratory results, simulations, estimates and actual field outcomes.
- Support claims such as eco-friendly, non-toxic or carbon-reducing with defined scope and objective evidence. Do not generalize an improvement in one material or process to the entire product. State equivalent conditions and sources when comparing products.

Dignity and Digital Responsibility

- Prohibit content that promotes violence, discrimination or hatred or deceives children or people vulnerable to information asymmetry. Clearly disclose sponsorship or compensation relationships.
- Disclose AI generation where images, video or audio could be mistaken for actual products, tests or people. Use others' likenesses, voices, logos and test data only within verified permissions.

Review and Correction

- Before publication, verify evidence for each claim, usage rights and exposure of personal or customer-confidential information. Suspend or correct content when errors or expired evidence are found, and retain approved versions, evidence and change records.

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Information Security Policy

Ethics & Information | Published 23 September 2026

Protected Information

- Manage formulations, processes, drawings, test data, contracts, pricing, customer and supplier information, work accounts and devices as important information assets. This policy applies to employees and external collaborators handling that information.

Access and External Collaboration

- Grant only necessary access and review, change or revoke permissions upon joining, transfer, departure or contract termination. Avoid shared accounts; apply multifactor authentication for important accounts, security updates and backups.
- Check information classification and recipients before external sharing, and apply necessary confidentiality agreements and access restrictions. Obtain security review and approval before uploading confidential material to public links, personal accounts or external AI services.

Data Integrity and Recovery

- Protect change histories and access logs for test results, approved documents and key records; prohibit unauthorized alteration or deletion. Store backups with separate access permissions and test recoverability.
- Contain suspected incidents, preserve evidence and report immediately to the responsible person. Record root-cause analysis, vulnerability remediation, safe recovery and recurrence prevention.

Training and Improvement

- Verify external providers' return or destruction of data and contractual security obligations. Conduct regular security training and checks. Follow applicable legal and contractual incident-notification procedures.

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Personal Information Protection Policy

Ethics & Information | Published 23 September 2026

Processing Principles

- GinnoLab processes personal data only as necessary for clear purposes and on a lawful basis. Do not collect unrelated information or unnecessary sensitive data, and do not sell personal data.

From Collection to Deletion

- Confirm processing purposes, data fields, retention periods and legal grounds. Review legal requirements for secondary use, third-party provision, outsourced processing and international transfers. Securely delete data when its purpose or retention period ends unless lawful retention is required.
- Minimize access permissions and apply appropriate encryption, access controls, logs and training. Review processors' safeguards and adherence to stated purposes.

Rights and Incident Response

- Receive and address requests for access, correction, deletion or suspension of processing according to legal requirements. Limit identity verification to what is necessary.
- Contain suspected leaks or breaches, investigate, and fulfill applicable notification, reporting and recurrence-prevention duties. Keep grievance and reporting records separate from ordinary business data with restricted access.

Relationship to the Privacy Policy

- The website Privacy Policy explains actual service-specific data collection, outsourcing, disclosures, retention and rights-request contacts. Review that policy and operating procedures when services or processing flows change.

Actual personal data processing and guidance on exercising rights: Privacy Notice

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Tax Compliance Policy

Ethics & Information | Published 23 September 2026

Responsible Tax Compliance

- GinnoLab complies with applicable tax laws and filing and payment deadlines, and responds truthfully to lawful requests from tax authorities. Prepare and retain accurate accounting and tax records.

Tax Risk Management

- Verify the substance of transactions and consistency among contracts, payments and tax invoices. Do not participate in fictitious transactions, false expenses or tax avoidance through nominee arrangements or concealment.
- Review applicable arm's-length standards and reporting obligations for related-party or overseas transactions. Apply statutory deductions and relief only where requirements and evidence have been verified.

Review and Correction

- Review major transactions and filings with tax personnel or external tax professionals and report uncertainties to the CEO. Follow lawful correction procedures when errors are found.
- Ensure public information on taxes, tax benefits and tax risks matches actual filings. Follow applicable disclosure requirements and procedures.

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Responsible Raw Materials Sourcing Policy

Supply Chain | Published 23 September 2026

Scope

- This policy covers raw materials, additives, packaging, outsourced manufacturing and related purchasing for coating research, development and production. Identify actual items and sourcing routes to manage human rights, environmental, safety and ethical risks.

Pre-Purchase Checks

- Verify item names, specifications, suppliers, production countries, origins and necessary regulatory and quality records. Do not treat safety data sheets alone as confirmation of all ingredients, origins or mineral content; request missing information.
- Conduct enhanced checks on materials suspected of forced or child labor, illegal mining or logging, significant pollution or community-rights violations. Prohibit counterfeits, false origin labeling and manipulated test data.

Risk-Based Due Diligence

- Prioritize items based on usage, substitution options, origin risks and severity of harm. Review the scope and validity of supplier declarations, traceability records and certifications; use expert verification or site assessments where needed.
- Coordinate responsible minerals, forest and biodiversity policies. Consider recycled or lower-hazard materials after checking performance, safety and traceability.

Improvement and Records

- Agree on owners, deadlines and actions for identified risks, track progress and recheck effectiveness. Ending a transaction does not end responsibility; cooperate on feasible remedy and improvement. Record purchasing rationale and unresolved questions.

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Responsible Minerals Sourcing Policy

Supply Chain | Published 23 September 2026

Identifying Relevant Minerals

- Identify minerals that may actually be present in materials, including tin, tantalum, tungsten and gold (3TG), cobalt and natural mica. Define scope using product composition, sourcing risks and customer requirements. Do not assert use or non-use where it is unverified.

Origin and Supply Chain Verification

- Request item-specific mineral content, origin, available smelter and refiner information and upstream supply-chain data. Distinguish company-wide responses from product-specific responses, and track unverified and unanswered items.
- Use current RMI reporting templates suited to the scope, such as CMRT, EMRT or AMRT, or customer-specified forms. Check smelter assessment status against the mineral, facility and valid period. Do not present corporate membership as product certification.

Risk Assessment and Action

- Review links to conflict-affected and high-risk areas, forced or child labor, armed-group support, bribery, concealed origin and environmental damage. Immediately report serious risks to the CEO and consider preventive measures such as purchasing holds.
- Agree on supplier improvement plans and verify implementation with evidence. Use independent assessments or third-party verification where needed. Assess actual risks and improvement potential rather than excluding entire regions solely by location.

Reporting and Grievances

- Report management scope, response-rate numerators and denominators, identified risks and improvement status using actual survey records. Do not describe unverified status as conflict-mineral-free, risk-free or certified.
- Receive and investigate mineral-sourcing concerns from workers, suppliers and communities without retaliation and pursue improvements. Limit public reporting to verified and disclosable information.

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Supply Chain Sustainability Management Policy

Supply Chain | Published 23 September 2026

Roles and Scope

- GinnoLab manages ESG risks in major purchasing, outsourced production and logistics relationships. The CEO reviews policies and key improvement and business decisions; purchasing personnel and the ESG officer manage supplier communication, assessments and records.

Due Diligence Process

- Embed policies and responsibilities in daily work, and identify and assess actual and potential impacts using supplier, item, country and process information. Prioritize according to severity, scale, remediability and likelihood.
- Follow documentary assessments with site checks, interviews or expert review as needed. Plan to stop, prevent or mitigate significant impacts, assigning owners, deadlines and verification evidence.
- Track results and effectiveness and communicate with relevant parties. Provide or cooperate in remedy where the Company causes or contributes to harm. Update assessments regularly and review them following major changes or grievances.

Fair Cooperation and Data Protection

- Limit due diligence requests to information with a clear purpose and scope; do not request unrelated technical or pricing information. Provide explanations, training and improvement discussions suited to supplier size and capability.
- Review whether purchasing practices create human rights, safety or environmental risks. Decide on business reduction or termination with regard to unresolved risks, laws, contracts and stakeholder impacts.

Communication and Reporting

- Explain reporting channels to supplier workers and external stakeholders. Protect good-faith reporters and apply impartial investigation, remedy and recurrence-prevention procedures.
- Report supply-chain status, key risks, improvement deadlines and unresolved issues to the CEO. Align public disclosures with actual activities and evidence while protecting personal data and trade secrets.

Communication and Grievances · Back to all policies

CONTACT & ACCOUNTABILITY

Communication & Grievances

GinnoLab listens to employees, suppliers, customers and communities. Send feedback, suggestions and concerns about human rights, environment, safety or ethics through the email or telephone contacts below.

Contact the responsible officer

ESG Officer: Gibeom Kwon

Write an email

coo@ginnolab.com

Telephone consultation

Feedback, suggestions and grievance consultation

Call us

010-9201-2448

Contact the CEO directly

For matters involving the responsible officer, for example

Email the CEO

ceo@ginnolab.com

Information to Provide

Describe your concern or suggestion, when it occurred and how you would like a response. Provide relevant material only as needed to establish the facts. Do not send unnecessary personal information such as national identification numbers.

Communication Channels

GinnoLab publishes and maintains website channels for employees, supplier workers, customers and communities to raise feedback, suggestions, grievances and human rights, environmental, safety or ethical concerns. Update the website and related documents when contacts change.

Contact Points

ESG Officer: Gibeom Kwon / Email: coo@ginnolab.com / Telephone: +82 10-9201-2448. Use the Communication menu to open an email or make a call. For matters involving the officer or concerns that are difficult to raise directly, contact the CEO at ceo@ginnolab.com.

Receipt and Handling

The officer reviews the report and necessary protection, then arranges impartial investigation, correction and remedy, outcome communication, recurrence prevention and follow-up. Where contact details are provided, communicate receipt, progress and outcomes through that channel and explain delays. Restrict access to reports, action records and supporting evidence.

Confidentiality and Non-Retaliation

Do not disadvantage or retaliate against anyone for consultation, reporting, testimony or cooperation. Share identities and case details only with those who need them and do not request unnecessary personal data. Where the CEO is involved, independent experts or authorities may be approached for advice or remedies. Company procedures do not limit external remedies.

Email buttons open your email application. If no application is configured, write directly to the address above. These email buttons do not store reports on this webpage.

Common Principles

These policies apply to GinnoLab business activities and relevant personnel. Explain supplier requirements according to transaction characteristics and contractual relationships, and comply with applicable laws.

The CEO reviews key policies and improvement priorities. Responsible personnel maintain inspection, training, grievance and improvement records. Review policy suitability at least annually and update it when significant changes occur.

Anonymous web submissions

An anonymous form is available without login, a name or contact details. Individual replies and online status tracking are not available. Please read the notice before submitting.

Open the anonymous submission form