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# Responsible Sourcing Policy

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Final Revision Date	September 18, 2025
Revision No	0
Management Team	Process Quality Engineering Team

**Kamtec Co., Ltd.**  
**CEO, Sung-Kun Kim**



## 1. Purpose

Kamtec is committed to fair and transparent supply chain management to ensure responsible sourcing of raw materials used in its products. We strive to build an ethical procurement system and adhere to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas across all sourcing activities.

This policy is established to minimize negative environmental and social impacts—such as deforestation, biodiversity loss, human rights violations, and climate-related risks—and to promote the ongoing protection of the environment and respect for human rights throughout Kamtec's business operations.

## 2. Scope

This policy applies to domestic and foreign corporations, executives and employees, and in-house partners.

It also encourages all stakeholders in a business relationship to respect and comply with this Responsible Sourcing Policy.

If the matters covered in this Responsible Sourcing Policy conflict with the laws and regulations of the local country, the local laws and regulations shall be followed first.

- Kamtec executives and employees and in-house partners
- Kamtec Auto Romania executive and employees and in-house partners
- Zhangjiagang Kamtec executive and employees and in-house partners
- Kamtec business partners (customers and partners, etc.)

### **3. Supply Chain Management & Responsible Sourcing Policy**

#### **Article 1. Ensuring a Sustainable Supply Chain**

1. Kamtec strives to raise awareness of responsible supply chain management.
2. Kamtec conducts supplier evaluations and on-site audits in areas such as environmental performance and occupational health and safety, and implements risk mitigation and improvement initiatives based on the findings.

#### **Article 2. Compliance with Laws & Standards**

1. Kamtec complies with all relevant laws and regulations concerning responsible minerals (e.g., lithium, cobalt, mica, nickel, natural graphite, manganese etc.) and their related compounds used in product manufacturing.
2. Kamtec applies the same principles and standards to conflict minerals (tin, tantalum, tungsten, gold), as well as to raw materials like aluminum, rubber, timber, and commodities regulated by deforestation laws (e.g., palm oil, cocoa, coffee, soy, beef).
3. Kamtec endeavors to comply with the highest behavioral standards required by applicable national and international laws and standards, including the International Labour Organization (ILO), UN Global Compact (UNGCC), and the Universal Declaration of Human Rights.

#### **Article 3. Business Ethics**

Kamtec complies with all relevant financial regulations and prohibits unpaid taxes, fees, or royalties. Kamtec also prohibits bribery, origin falsification, money laundering, extortion, and other unethical practices, ensuring transparent and responsible business conduct.

#### **Article 4. Human and Labor Rights**

1. Kamtec upholds and respects human rights across its entire supply chain, including zero tolerance toward child labor, forced or involuntary labor, human trafficking, discrimination, sexual harassment, coercion, verbal or physical abuse, torture, serious breaches of international humanitarian law, crimes against humanity, or genocide..
2. Kamtec respects employees' rights to form labor unions and engage in collective bargaining in accordance with local laws and regulations, and protects the rights of women, indigenous peoples, minorities, and other underserved or marginalized communities.

#### **Article 5. Occupational Health & Safety**

Kamtec protects the health and safety of all employees in good faith, in compliance with applicable domestic and international occupational safety and health regulations.

#### **Article 6. Environmental Sustainability & Biodiversity Protection**

1. Kamtec minimizes environmental harm from business activities by reducing greenhouse gas emissions; preventing air, soil, and water pollution; protecting biodiversity; safely managing hazardous substances and waste; conserving water, soil, and forests; and promoting renewable energy use.
2. Kamtec prohibits sourcing raw materials from protected areas (e.g., wetlands, Ramsar sites, UNESCO heritage sites) where development, deforestation, or ecosystem disturbance may occur. In such cases, Kamtec seeks alternative sources to mitigate risk.
3. Kamtec verifies raw material origins via origin certificates and CMRTs to determine if sourcing is linked to ecosystems like wetlands, coastal habitats, or rare species areas. If identified as coming from a protected area, Kamtec prohibits sourcing those raw materials.

#### **Article 7. Raw Material Efficiency & Reuse of Production Waste**

1. Kamtec continuously improves manufacturing processes to optimize raw material usage under planned production aligned with business strategy, production scheduling, and inventory management.
2. Kamtec reuses recyclable waste and by-products (e.g., scrap metals, wood waste, paper) within its production process or transfers them to external recycling industries or facilities.

#### **Article 8. Responsible Sourcing from Conflict-Affected and High-Risk Areas**

1. Kamtec prohibits using cobalt or conflict minerals (tin, tantalum, tungsten, gold) obtained through illegal or unethical methods such as severe human rights violations, war crimes, genocide, health or safety hazards, or significant environmental damage (e.g., pollution, waste).
2. Kamtec does not allow direct or indirect support for non-state armed groups or security forces through the extraction, handling, transport, or export of minerals.

#### **Article 9. CSR in Procurement**

1. Kamtec complies with all laws and regulations related to product quality and safety when purchasing raw materials.
2. Kamtec ensures that directly purchased raw materials are managed to minimize carbon emissions and waste during production and logistics, and confirms that they are not associated with human rights violations—including child or forced labor.

#### **Article 10. Expectations for Suppliers and Contractors**

1. Kamtec requires suppliers and partners to understand and comply with its Responsible Sourcing Policy.
2. Kamtec expects suppliers to comply with legal requirements related to safety, environmental protection, and quality, and regards adherence to this policy as a

mandatory condition for doing business with Kamtec.

3. Kamtec expects suppliers to work toward reducing environmental impacts throughout operations and protecting human rights in raw material production.

4. Kamtec expects suppliers to promote health and safety for employees involved in raw material production.

5. Kamtec collaborates with suppliers and stakeholders to identify, assess, and mitigate actual or potential adverse impacts across the supply chain, and requests suppliers' cooperation in implementing CSR and sustainable business practices with Kamtec.

#### **Article 11. Implementation & Goals**

1. Kamtec encourages suppliers to adhere to this Responsible Sourcing Policy and its Supplier Code of Conduct.

2. Kamtec should encourage internal and external awareness for internalization of policies and norms, and take measures to manage and improve related issues if they are identified.

## **4. Management System**

### **1) Governance**

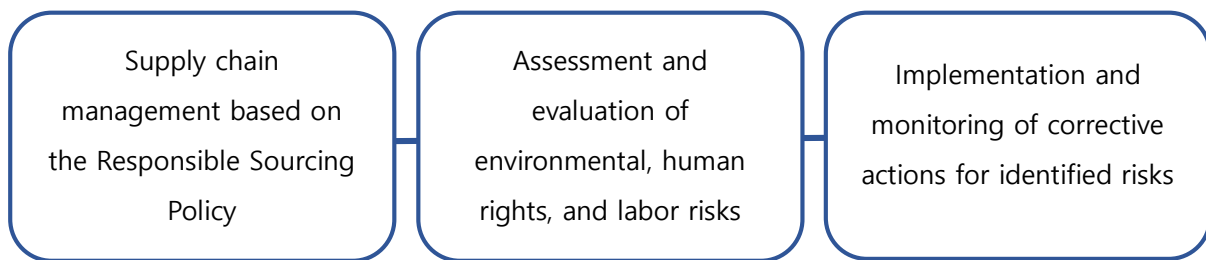
Kamtec manages and supervises the current status of responsible sourcing of raw materials through working-level meetings led by the decision-makers of the team in charge of responsible sourcing.

In cases where an issue is deemed to have a significant impact on Kamtec's business operations or reputation, it shall be subject to review and deliberation by the company's highest decision-making bodies, such as the Board of Directors or the Executive Management Meeting.

## 2) Implementation System

Kamtec implements supply chain management for responsible sourcing of raw materials in accordance with this policy.

The company assesses the potential environmental, human rights, and labor risks throughout the procurement process and supply chain management, and establishes, executes, and monitors corrective actions when necessary.



## 5. Grievance and handling (Cyber audit office)

### 1) Report received

Anyone may report the details of any violation of this policy or related grievances, and Kamtec shall take appropriate measures, such as conducting an investigation without delay, when receiving a report.

#### ▣ Reporting Channel

- Team name : General management team
- E-mail : 5257602@seohan.com
- Tel : 043-530-3721
- Cyber audit office : [https://www.kamtec.co.kr/dh/sustain08\\_1](https://www.kamtec.co.kr/dh/sustain08_1)

### 2) Handling procedures

When reporting and receiving reports, take measures according to the following steps.



- ① The schedule of action varies depending on the contents of the report or the confirmation procedure, and may be transferred to the relevant department depending on the nature of the report.
- ② The notification of the results of the processing shall be substituted by posting it on this website without a separate written reply procedure.
- ③ The deadline for processing shall not exceed 30 days from the date of receipt, and shall be extended if further investigation is required.
- ④ The informant may raise an objection within 10 days of notification of the result.

### 3) Protection of informants

Confidentiality : Prohibits the act of disclosing or implying the identity of the informant without the consent of the informant.

Security of identity : Protects against disadvantages or discrimination from business relationships or affiliated departments for reasons such as reporting, statements, and submission of data.

Liability reduction : Disciplinary action may be reduced or exempted for the informant if the informant's negligence or error is found in connection with the informant.

## 6. History of enactment and revision

No	Date	Contents	Remark
0	Sep 18, 2025	The first enactment	-