

ORION

Business Partners Code of Conduct

Version 1.0

Purpose

Orion strives to build a sustainable supply chain and fulfill its social responsibilities based on its Code of Ethics, "Right Way, Better Life, Better Future." Guided by this principle, we are committed to conducting ethical business practices that consider all stakeholders.

To that end, we have established the Code of Conduct for Business Partners, which reflects global standards and guidelines.

This Code aims to ensure that not only Orion employees but also all employees of our Business Partners within the supply chain carry out their duties in accordance with legal and ethical standards, while also upholding their responsibilities toward society and the environment.

Scope of Application

This Code of Conduct covers four key areas: Ethical Management, Human Rights, Health and Safety, and Environmental Management.

All business partners engaged in transactions with Orion are expected to respect and comply with the principles set forth in this Code of Ethics. In addition, they are encouraged to promote and require compliance with this among their own partners.

Compliance Guidelines

Orion's Business Partners are expected to take into account the principles outlined in this Code of Conduct when making management decisions and conducting business operations.

They must evaluate their ability to meet the requirements of the Code through internal assessments and determine whether appropriate policies, procedures, and systems are in place.

If any gaps are identified, partners are expected to develop corrective action plans or enhance existing practices to ensure compliance.

To verify adherence to this Code, Orion may conduct assessments or audits either directly or through an authorized third-party. Business Partners may be asked to provide relevant documentation or allow on-site inspections. Based on the findings, Orion may recommend corrective actions for any significant violations or potential risks identified, and Business Partners are expected to cooperate in good faith to develop and implement improvement measures.

This Code does not define all obligations of business partners and may be updated regularly to promote a sustainable supply chain. Future revisions will be available on the Orion website.

If any conflict arises between this Code and local laws, the stricter standard shall apply.

1. Ethical Business Practices

Business Partners must comply with all applicable laws and regulations in the course of their operations.

They are expected to uphold the highest standards of ethical conduct, including the following principles, to support sustainable growth and fulfill their social responsibilities.

1) Business Integrity

Business Partners shall maintain the highest standards of integrity in all business activities and adopt a zero-tolerance policy toward all forms of bribery, corruption, and embezzlement.

They shall not promise, offer, authorize, give, or accept bribes or any other improper or unlawful benefits in order to gain or retain business advantage.

2) Fair Trade Practices

Business Partners must comply with all applicable fair trade and competition laws.

They shall not engage in unfair practices, including abusing superior bargaining positions or participating in collusion or bid-rigging.

3) Disclosure of Information

All operations and transactions shall be conducted with transparency and accurately reflected in the business partner's books and records.

Business Partners are expected to disclose information related to labor practices, health and safety, environmental management, business activities, organizational structure, financial status, and performance in accordance with relevant laws, regulations, and prevailing industry standards.

4) Protection of Intellectual Property

Business Partners shall respect intellectual property rights and ensure that the transfer of technology and know-how is conducted in a manner that safeguards such rights.

They shall also protect Orion's proprietary information and ensure its confidentiality and security.

5) Information Protection

- ① Business Partners shall not use any information obtained during the course of business operations for any purpose other than the execution of their designated business activities.
- ② Business Partners shall make reasonable efforts to protect the personal information of all individuals associated with corporate operations, including suppliers, clients, consumers, and employees.

They are expected to establish a comprehensive management system covering the storage, processing, transmission, and sharing of personal data, and to comply with the Personal Information Protection Act and all applicable laws/Regulations.

6) Identity Protection and Prohibition of Retaliation

- ① Business Partners shall maintain whistleblower protection programs that ensure anonymity and confidentiality as required by law. Such programs shall be designed to prevent any form of disadvantage or retaliation resulting from lawful whistleblowing activities.

7) Responsible Sourcing of Raw Materials

- ① Business Partners shall assess and manage significant social and environmental risks—such as human rights violations and environmental degradation—that may arise during the production and distribution of raw materials.

2. Human Rights Management

Business Partners commit to respect the human rights of workers and treat them with dignity. This applies to all types of workers, including those employed directly or indirectly, such as temporary workers, migrant workers, student workers, contract workers, and directly hired employees.

The following labor standards shall be upheld:

1) Prohibition of Forced Labor

- ① All work shall be voluntary. Any form of forced labor, including bonded labor (debt repayment), indentured labor, involuntary prison labor, slavery, and human trafficking—is not permitted.

2) Prohibition of Child Labor

- ① Child labor shall be excluded at all stages of manufacturing. A “child” refers to any individual under the age of 15, or under the minimum age for employment or the age for completing compulsory education as defined by applicable laws—whichever is highest.

Workers under the age of 18 (young workers) shall not be assigned to night shifts, overtime, or any work that may put their health or safety at risk.

3) Working Hours

- ① Working hours shall not exceed the maximum limits set by applicable local laws. In accordance with the core conventions of the International Labour Organization (ILO), working hours—including overtime—shall not exceed 60 hours per week, except in emergency or exceptional circumstances.
- ② All overtime shall be voluntary. Workers shall be provided with at least one day off every seven days.

4) Wages and Benefits

- ① Business Partners must comply with all applicable wage-related laws, including those concerning minimum wages, overtime pay, and legally mandated benefits.
- ② Wages shall be paid on time, and a clear, understandable pay statement shall be provided to workers.

5) Prohibition of Discrimination, Harassment, and Inhumane Treatment

- ① Business Partners shall not discriminate against or harass workers in any hiring or employment-related decisions—including promotion, compensation, and access to training—on the basis of race, color, age, gender, sexual orientation, ethnicity or national origin, disability, pregnancy, religion, political affiliation, or marital status.
- ② Business Partners shall not subject workers to any form of inhumane treatment, including sexual harassment, corporal punishment, mental or physical coercion, or verbal abuse.

6) Freedom of Association and Collective Bargaining

- ① Business Partners shall respect workers' rights to freedom of association, collective bargaining, and collective action, in accordance with applicable constitutional and labor laws.
- ② Business Partners shall ensure that workers are able to communicate freely with management regarding working conditions and business practices without fear of discrimination, retaliation, threats, or harassment.

3. Health and Safety Management

Business Partners shall recognize that a safe and healthy working environment not only minimizes work-related injuries and illnesses, but also contributes to product and service quality, production consistency, employee retention, and morale.

They shall also understand that continuous worker engagement and training are essential for identifying and addressing health and safety issues in the workplace.

The following standards apply to Health and Safety:

1) Industrial Health and Safety

- ① Business Partners shall identify, assess, and manage potential occupational health and safety risks that workers may be exposed to. Based on the assessment results, they shall establish and implement corrective actions and improvement measures.

If such risks cannot be fully controlled through these efforts, Business Partners shall provide workers with appropriate personal protective equipment (PPE) and educational materials related to the identified hazards.

2) Emergency Preparedness and Response

- ① Business Partners shall identify and assess potential emergency situations and events, and implement appropriate emergency plans and response procedures to minimize potential harm.

Such emergency measures and procedures shall include emergency reporting, employee notification and evacuation protocols, as well as worker training and drills.

3) Occupational Injury, Illness, and Hygiene Management

- ① Business Partners shall establish procedures and systems for the prevention, management, tracking, and reporting of occupational injuries and illnesses.
- ② They shall identify, assess, and control tasks that place excessive physical strain on workers.

- ③ To ensure a safe and sanitary working environment, Business Partners shall identify, assess, and control chemical, biological, and physical hazards that may cause risks to workers' health and safety.

4) Hygiene and Facility Provision

- ① Business Partners shall provide workers with access to clean toilet facilities, potable drinking water, and sanitary food preparation, storage, and dining facilities.
- ② If worker dormitories are provided, they shall be maintained in a clean and safe condition. Adequate emergency exits, sanitation, lighting, ventilation, and secure personal storage shall be ensured. Dormitories shall also provide reasonably sized personal space with appropriate access control systems.

5) Health and Safety Training

- ① Business Partners shall provide workers with appropriate health and safety information and training regarding workplace hazards, delivered in a language the workers can understand.

Health and Safety information shall be clearly posted within the facility and made accessible to all workers.

4. Environmental Management

Business Partners shall recognize that environmental responsibility is essential to the production of world-class products across all business functions.

They are expected to identify their environmental impacts and take actions to minimize any negative effects on local communities, the environment, and natural resources. Business Partners shall also comply with all applicable environmental laws and regulations.

The following standards apply to environmental practices:

1) Environmental Permits and Reporting

- ① Business Partners shall obtain, maintain, and keep up to date all required environmental permits, approvals, and registrations (e.g., emissions monitoring), and comply with all applicable operational and reporting requirements.

2) Pollution Prevention and Resource Reduction

- ① Emissions, discharges, and waste generation shall be minimized or eliminated at the source, or through means such as adding pollution control equipment, modifying production, maintenance, and facility processes, or implementing other effective methods.
- ② Business Partners shall improve resource efficiency through continuous efforts, such as process optimization, material substitution, and recycling or reusing materials.

3) Hazardous Materials Management

- ① Business Partners shall identify chemical substances, waste, and other materials that may pose a risk to human health or the environment, and manage them safely during handling, transport, storage, use, recycling, reuse, and disposal. They shall also track and document hazardous waste data.
- ② Business Partners shall comply with all applicable laws and customer requirements regarding the prohibition or restriction of specific substances used in production and manufacturing.

4) Waste Management

- ① Business Partners shall identify all types of waste generated and ensure that they are managed and treated in accordance with applicable laws and regulations prior to discharge or disposal. They shall also make efforts to minimize waste generation.

5) Air Emissions Management

- ① Business Partners shall identify, monitor, and control air pollutants generated from manufacturing processes, as required by relevant laws and regulations, before emission. All emissions shall be treated and managed in accordance with local regulations.

6) Water Resources Management

- ① Business Partners shall manage the use and discharge of water in accordance with the laws and regulations of the countries and regions in which they operate.

They shall measure and manage water usage, wastewater discharge, and water pollutants, and make efforts to reduce them.

7) Energy Consumption and Greenhouse Gas Emissions

- ① Business Partners shall gradually identify energy consumption and greenhouse gas emissions at both corporate and site levels. They should seek ways to improve energy efficiency and minimize energy use and greenhouse gas emissions.

[Reference]

Standards and Conventions:

■ ILO Fundamental Conventions

- Freedom of Association and Protection of the Right to Organise Convention, 1948 (No.87)
- Right to Organise and Collective Bargaining Convention, 1949 (No.98)
- Forced Labour Convention, 1930 (No.29)
- Abolition of Forced Labour Convention, 1957 (No.105)
- Minimum Age Convention, 1973 (No.138)
- Worst Forms of Child Labour Convention, 1999 (No.182)
- Equal Remuneration Convention, 1999 (No.100)
- Discrimination (Employment and Occupation) Convention, 1958 (No.111)
- Occupational Safety and Health Convention, 1981 (No.155), and the Promotional Framework, 2006 (No.187)

■ OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

■ OECD Guidelines for Multinational Enterprises

■ United Nations (UN) Guiding Principles on Business and Human Rights

■ Universal Declaration of Human Rights

■ United Nations Convention Against Corruption

■ United Nations Convention on the Rights of the Child

■ United Nations Convention on the Elimination of All Forms of Discrimination Against Women

■ United Nations Global Compact

Other Useful References:

- Dodd-Frank Wall Street Reform and Consumer Protection Act
- Eco Management & Audit System
- Ethical Trading Initiative
- ILO Code of Practice in Safety and Health
- ISO 14001 and related standards – Environmental management
- ISO 45001:2018 - Occupational health and safety management systems
- National Fire Protection Association
- Social Accountability International (SAI) - SA8000
- United States Federal Acquisition Regulation