

The JX Metals Group Whistleblowing System

The JX Metals Group is committed to taking appropriate procedures to remedy any conduct within the Group which constitutes or may constitute a violation of relevant laws, regulations, or internal rules, if and when such conduct comes to light. We have established corrective and remedy processes which affected parties can access under such circumstances. The JX Metals Group Hotline is a reporting channel available to Group Company personnel and personnel of some contractors. The JX Metals Group Supplier Hotline is a reporting channel available to JX Metals Group's suppliers and their personnel. Internal rules on whistleblowing mechanisms have also been established, which cover whom a report may be filed against, how a report will be handled, whistleblower protection, and related matters. An outline of our whistleblowing system is as follows.

1. Conduct that may be reported

Conduct which constitutes or may constitute a violation of laws, regulations, or internal rules

2. Who can file a report

(1) JX Metals Group Hotline

- Officers and personnel (employees, secondees, temporary staff, and dispatched employees) of JX Metals Group Company
- Personnel of contractors and others working on JX Metals Group Company projects (those who resigned within one year are also entitled to file a report)

(2) JX Metals Group Supplier Hotline

JX Metals Group's suppliers and their personnel

3. Ways to file a report

(1) JX Metals Group Hotline

- Email an external entrusted party or law firm. The law firm also accepts sealed letters. A report may be made anonymously.

(2) JX Metals Group Supplier Hotline

- Email an external entrusted party. A report may be made anonymously.

4. Handling of a report

- After a report is received, the reporting channel will notify the company that a report has been made. The company will confirm the details of the report and, under the direction of top management, investigate and take corrective and other measures.
- The status of the investigation, etc. will be notified to the whistleblower through the reporting

channel (except for some cases, such as when a report was made anonymously).

- No person related to the case will be involved in the investigation and corrective or other actions.

5. Protection of whistleblower and investigation cooperators

- The company will not treat the whistleblower and his/her employer unfavorably because a report was made.
- Information that may lead to the identification of the whistleblower will not be disclosed to anyone other than the secretariat and the minimum number of persons required to respond to the report at any stage of the process, including receipt of the report, investigation, and the corrective process.

6. Severe punishment against violations and remedy and recovery measures

- In the event of any conduct in violation of the rules concerning the whistleblowing system, officers or personnel who committed such violations will be severely punished and, if such violations caused any damage or loss, appropriate remedy, recovery, or other measures will be taken.

7. Operational structure

- The president of JX Metals shall be the person chiefly responsible for the whistleblowing system of the JX Metals Group.
- The Legal Department of JX Metals will administer the whistleblowing operations appropriately as the secretariat.