2024-2025 Modern Slavery and Human Trafficking Prevention Declaration

I. Introduction

- POSCO International declares that slavery and human trafficking are strictly prohibited, and that such acts of human rights violations are never permitted. The Company will make continuous efforts to respect and protect human rights in all business activities and will cooperate with all suppliers and partners to this end.

- POSCO International will actively work to identify and eliminate the risks of slavery and human trafficking throughout the Company's value chain. We will also provide education and training to protect human rights so that all employees can share and practice their understanding and responsibility for human rights. These efforts will ensure that the Company's business operates in a sustainable and ethical manner and will play an important role in fulfilling the Company's social responsibilities.

- As part of the expression of this will, the CEO of POSCO International announced the following in the company-wide CEO Message in April 2024.

  "The Company complies with the global Modern Slavery Act (MSA) in the UK and is strengthening its management system to ensure that any form of modern slavery and human rights violations does not exist in the Company's premises as well as in the supply chain. If we find any related infringements, we will respond promptly and transparently."

- Additionally, in February 2025, through the POSCO Group Human Rights Management Declaration, POSCO International expressed its commitment to the protection of human rights as follows:

  “We declare that we will do our utmost to protect and promote the human rights of not only POSCO Group employees but all stakeholders. (Omitted)
  POSCO Group takes a leading role in preventing human rights violations and remedying victims by considering the following human rights impacts in all management activities. Furthermore, recognizing that priorities in human rights impact management may change due

to shifts in the business environment or expansion, we continuously adjust the areas of human rights impact management through regular human rights due diligence and consultation with internal and external stakeholders. We prohibit forced labor, human trafficking, and child labor, and ensure that all workers have the right to work voluntarily."

II. Declaration Entity

- In accordance with the Modern Slavery Act 2015 of the UK, POSCO International publishes 2024-2025 Modern Slavery and Human Trafficking Prevention Declaration. This Declaration contains the actions and future plans that we have undertaken to mitigate the risk of human rights violations related to modern slavery and human trafficking, across our own or managed premises and supply chain.

III. Corporate Structure, Business and Supply Chain

1. Corporate Structure

- POSCO International is an affiliate of POSCO Group, and POSCO Holdings is the parent company that is the largest shareholder of POSCO International.
- As of March 2025, POSCO International has a total of 47 subsidiaries, including 7 domestic companies and 40 overseas companies as consolidated subsidiaries.

2. Business Operation

- POSCO International is a member of the POSCO Group, which has developed into a global steel company based on constant efforts toward innovation and technological development. The Company operates in various fields such as steel, energy, and food, and is rapidly reborn as a global general business company operating in various business groups beyond the traditional trading company. We are expanding our new business-linked investments, including the various areas mentioned above, and working with domestic and global suppliers. As of March 2025, POSCO International employs a total of 8,833 employees with 1,754 at the headquarters and 7,079 at overseas operations and has more than 80 corporate/branch offices and networks in 43 countries.

3. Supply Chain

- POSCO International's main industrial ranges in its supply chain are steel, steel materials (coal, slag, iron ore, etc.) and secondary battery minerals (lithium, nickel, etc.), agricultural products (rice, wheat, corn, etc.), vegetable oil (palm oil), biomaterials (bioplastics, synthetic

rubber, etc.), automobile parts (motor core, etc.), energy (natural gas, LNG, hydrogen, etc.), and renewable energy (wind power, solar power, hydrogen, etc.).

- As of March 2025, there are a total of 49 countries with approximately 1,100 suppliers providing goods and services to POSCO International.

IV. Risk of Modern Slavery Practices

- POSCO International's main business is investment, international trade, and manufacturing, and it operates manufacturing facilities including natural gas fields in Myanmar, palm oil farms in Indonesia, and cotton factories in Uzbekistan. Special attention and protection are needed in our business areas, especially in overseas manufacturing facilities.

V. Relevant Policies and Operational Guidelines

1. Company Regulations, etc. Related to the Obligation to Respect Human Rights

- On February 20, 2025, POSCO Group proclaimed a Human Rights Management Declaration with the participation of six subsidiaries, including POSCO International. Based on the Universal Declaration of Human Rights, the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the International Labour Organization Fundamental Conventions, the OECD Guidelines for Multinational Enterprises, the United Nations Convention on the Rights of the Child, the United Nations Declaration on the Rights of Indigenous Peoples, the Declaration on the Right and Responsibility of Individuals, Groups and Organs of Society to Promote and Protect Universally Recognized Human Rights and Fundamental Freedoms, and other international standards that specify the rights of migrant workers, women, persons with disabilities, etc., we aim to establish and operate a system for practicing and monitoring human rights management.

- The Human Rights Management Policy sets forth the Company's principle of not only not forcing workers to work against their free will by means of violence, intimidation, confinement, and other means of unjustly restraining their mental or physical freedom, including human trafficking, but also prohibiting the estimation of compensation for non-performance of labor contracts, not restricting the status of workers by money lending, and prohibiting additional compulsory contracts incidental to labor contracts. In addition, POSCO International prohibits child labor in principle, and underage labor conditions and minimum

working age standards comply with national labor laws and international standards.

- POSCO International has established a human rights management process to supplement and improve the weak areas in the mid- to long-term by regularly checking the status of the company's human rights management based on the OECD Business Due Diligence Guidelines, and operates a field-oriented human rights management process that puts the protection of human rights of all members at home and abroad as the top priority. Along with external professional organizations, we have developed a human rights due diligence checklist based on international human rights norms such as UN companies and human rights implementation guidelines and are conducting human rights impact assessments centered on major overseas investment sites.

- To emphasize the importance of human rights across the enterprise, POSCO International has established rules that respect and comply with internationally recognized global human rights principles and standards, including the Modern Slavery Prevention Act, in its Code of Ethics Practice Guidelines, personnel regulations, and local employment management guidelines.

  POSCO International manages long-term work through supply chain management, which prioritizes observance of statutory working hours, guarantee of sufficient leave, fair employment and compensation without gender discrimination, and protection of human rights and safety in accordance with the International Labor Organization major conventions and personnel regulations based on domestic labor laws., We conducted a survey on overseas investment corporations equipped with manufacturing and production facilities on the exploitation of child labor, the performance of harmful tasks for the vulnerable, including female workers, and the hygiene management status of employees' accommodations. By improving the operative regulations the business is using, we are providing a safe and vibrant work environment by blocking factors that threaten our business activities and the health and safety of supply chains. Through those efforts, POSCO International respects basic human rights and creates a healthy working environment.

2. Regulations or Guidelines for the Prevention of Labor Exploitation at the level of Supply Chain

- POSCO International clearly recognizes that environmental and social issues arising from partners, including human rights violations, may affect our sustainability. In order to create a robust industrial ecosystem, we manage supply chain risks based on the POSCO Group's Supplier Code of Conduct and support the development of capabilities and the protection of

human rights in the supply chain.

- POSCO International's supplier code of conduct ensures that all companies dealing with us are committed to sustainability and human rights protection. The Supplier code of conduct consists of 21 items in a total of 7 categories related to the basic norms in the fields of human rights, labor, environment and anti-corruption, as set out in the UN Global Compact. Recently we revised the basic human rights respect items of our employees among our suppliers' code of conduct to comply with modern slavery laws in the United Kingdom.

- POSCO International has established a supply chain policy, establishing supplier code of conduct on basic matters concerning labor rights, environment, safety and health, ethics, and management systems that suppliers and subcontractors who supply products and services to companies and their affiliates, joint ventures, etc. should comply with. In particular, through the Labor Rights section, we are stating that all suppliers of the Company shall not tolerate illegal minor labor, human trafficking, forced labor, etc. in accordance with the UN Guiding Principles On Business and Human Rights, the Universal Declaration of Human Rights, and the ILO (International Labor Organization) International Labor Standards, and shall do their best to respect and protect the human rights, working hours, and freedom of association and collective bargaining of all workers, and shall not discriminate against workers on the grounds of race, nationality, gender, age, academic background, religion, region, disability, marital status, gender identity, etc..

- POSCO International recognizes the importance of responsible minerals as a global corporation and intends to join the international community's efforts to create responsible procurement practices for companies, such as cooperation in the policy of responsible minerals from customers and support for responsible mineral management of suppliers. In principle, we restrict transactions with suppliers that have a negative social impact, and we try to avoid using mining minerals in disputed areas. Based on the POSCO Responsible Mineral Management Guidelines, a separate POSCO International Responsible Mineral Management Guidelines reflecting the characteristics of the industry as a general business company was established and since then a more effective responsible mineral management system has been operated.

VI. Human Rights Protection Due Diligence and Risk Management

1. Human Rights Impact Assessment

- POSCO International participated in the POSCO Group Human Rights Management Task Force in 2024 and contributed to the establishment of a group-wide human rights management system. Based on this, we are strengthening human rights due diligence to protect the rights of employees at domestic and overseas business sites.

- In particular, in April 2025, we conducted on-site due diligence on palm plantations located in Indonesia in collaboration with a third-party human rights due diligence expert organization. The results of this due diligence will be detailed and disclosed in the Sustainability Management Report, which is scheduled to be published in July 2025."

2. Risk Management at the Supply Chain Level

- Supply Chain Management Process:

  POSCO International is building a company-wide supply chain management system that reflects the industrial characteristics of global general business companies in order to proactively respond to the EU's Corporate Sustainability Due Diligence Directive (CSDDD) and systematically manage the negative human rights/environment that may occur in the Company's entire supply chain.

  As stated in the 2022 MSA Declaration, after the merger of POSCO Energy on January 1, 2023, the company promoted a task that further reflected the supply chain analysis results of the energy business in its supply chain management system. Through this, we are reorganizing our policies related to the supply chain, our criteria for classifying the importance of the supply chain, and our checklists and guidelines for supply chain due diligence, and we are establishing a unified supply chain management system at the enterprise level.

  In particular, in the checklist for written due diligence on the supply chain, a question was added to confirm whether regular risk assessments were conducted and there is any case of modern slavery practices and violations of laws and regulations related to modern slavery to prevent any forced labor, illegal child labor, or human trafficking in the company's supply chain.

  As of March 2025, POSCO International is developing a cloud-based supply chain ESG management solution to promote practical prevention and improvement activities regarding negative human rights and environmental impacts for approximately 1,100 supplier companies. A beta test of document-based due diligence was conducted with 96 companies to verify the system's effectiveness. Starting in May 2025, we plan to actively carry out

document-based due diligence using this solution.

- Responsible Mineral Management Process:
  POSCO International has established a responsible mineral policy to express the company's willingness to use only the mined minerals in a way that respects human rights and protects the environment by prohibiting the use of conflict minerals such as 3TGs [Tin, Tantalum, Tungsten, and Gold], which have served as funds for warlords and anti-government organizations in African countries such as the Democratic Republic of the Congo, and minerals such as cobalt, which pose human rights and environmental issues during the mining process. Based on this, we cooperate with customers' policies on responsible minerals and support suppliers' management of responsible minerals.

- Responsible Minerals Management Process of POSCO Group:
  In accordance with the POSCO Group's Guidelines for Responsible Minerals Management, POSCO International restricts transactions with suppliers that have a negative impact on the environment and society and prohibits the trade of minerals mined in conflict zones. Based on the CAHRA (Conflict Affected and High Risk Area) criteria, CAHRA targets are selected by investigating relevant countries and territories, including Africa conflict zones. The Company conducts investigations on the supplier's management information and whether or not it has a policy on responsible minerals to identify possible risk of responsible minerals from the supplier registration stage. It also determines whether the smelter associated with the supplier is CAHRA and verifies that the company is certified by third-party due diligence from Responsible Minerals Initiatives (RMI). If the company is judged to be ineligible through this screening process, it may be excluded from the supplier registration. The Company obtains consent from registered suppliers to comply with the Company's Responsible Mineral Policy and confirms the status of Conflict Mineral Report Template/Cobalt Report Template (CMRT/CRT) requests and smelter certification.

  Furthermore, responsible mineral risk assessments are conducted for suppliers in transactions, and the results are divided into three classes: "high-risk suppliers", "controlled suppliers", and "general suppliers." In the case of high-risk suppliers, we request professional due diligence from third-party independent organizations to conduct risk inspection and improvement activities. If necessary, we actively support suppliers' improvement activities, such as providing educational contents for responsible minerals, and confirm that improvement activities are completed within 120 days of the notification of the results of the due diligence. If improvement activities are not completed, the supplier may be removed from the

registration pool.

As of March 2025, POSCO International does not conduct business related to conflict minerals (tin, tungsten, tantalum, gold) or other minerals such as cobalt, which are highly likely to involve modern slavery practices.

3. Other Due Diligence and Risk Management Measures

- Conducting a Survey on the Labor Environment of Overseas Investment Corporations: POSCO International is conducting a survey on overseas investment corporations equipped with manufacturing and production facilities on the exploitation of child labor, the performance of harmful tasks for the vulnerable, including female workers, and the hygiene management status of employees' accommodation.

- International Key Organizations Compliance Legal Due Diligence: In order to inspect the compliance and legal system of major overseas business sites, POSCO International has been conducting on-site due diligence by the Compliance Department of the Legal Office from the first quarter of 2024. The Compliance due diligence examines the violation of local mandatory laws by major overseas workplaces, the status of legal compulsory education under local laws, and the status of responses related to corruption risks. In particular, we check the personnel labor system at each workplace to see if illegal forced labor is being carried out, and we provide awareness-raising education to prevent it. In March 2025, compliance training was conducted in local languages for high-risk organizations in countries such as Mexico, Indonesia, Vietnam, and South Africa, etc. These activities included listening to the concerns of local employees, preventing risks of violations of local mandatory laws, and checking legal systems, thereby strengthening compliance efforts.

- Conducting Integrity Due Diligence and Receiving Compliance Covenants from Third Parties, including Agent:
  POSCO International is conducting an Integrity due diligence for third party representatives such as Agent, who interact with public officials in the process of acting on behalf of the Company or performing services for the Company. All third parties who wish to do business with the Company will be subject to Integrity Due Diligence and will undergo an integrity reputation survey through external professional institutions. The Company intends to eradicate bribery, money laundering and other corrupt practices through a thorough integrity due diligence. In addition, all third party representatives who do business with the Company must submit a compliance pledge promising compliance with the Company's Code of Ethics,

Anti-Corruption Compliance Guidelines, and the Company requires it to be renewed least once every three years.

- Enhanced Investment Risk Management from ESG Perspective:
  From the initial stage of the investment review, it was specified in the investment management regulations that the proposal department should consult with the in-house specialized departments on whether to fulfill the corporate social responsibility to the local community and reflect it in the investment plan. In the investment review stage, ESG risk was set as a major investment management item, the attendance of the in-house ESG department was mandated, and even if the investment was already in progress, it was possible to start determining whether the business would continue in the event of an ESG-related issue.

VII. Grievance Handling and Employee Training

1. Grievance Handling System

- One-Voice Process for Response to ESG Issues:
  POSCO International has established an ESG issue response process for questions frequently received from various stakeholders to promote One-Voice response to issues. Received ESG issues are reported to management and the board of directors through the ESG Council after the analysis and status check, and One-Voice responses are conducted according to the response direction established based on the discussions.

- Operation of Stakeholder Communication Channels:
  POSCO International operates various communication channels for each stakeholder. (1) In the case of the supply chain, opinions can be received through the website and e-mail; and (2) In relation to community members, the local community-level grievance settlement system is operated, while opinions can also be received through the website and e-mail.

- Establishment of a New Department to Establish a Corporate Culture of Respect for People:
  In 2023, POSCO International established the Ethics Management Bureau consisting of five employees in the Righteousness Management Office, to revitalize the in-house grievance handling channel.

- Guidance and Promotion of the Internal Grievance Settlement Reporting System:
  POSCO International always guides the reporting center through an ethical campaign held once a month under the theme of ethical management/human respect, and has improved

accessibility by attaching QR stickers to work spaces such as office walls and conference rooms. Regular and class-specific training always includes relevant content such as regulations and reporting channels. In addition, we conduct executive-led ethics dialogues, require executives to sign ethics pledges, provide separate ethics training for high-risk departments, produce a case book on ethical dilemmas, establish investigation manuals for violations of human dignity, and conduct investigations into violations of human dignity with the help of external experts.

- Active Performance of Preliminary Diagnosis and Monitoring of Human Respect:
  POSCO International conducts a monthly survey of all executives and employees on witnessing/experiencing unethical/human respect violations through a mobile work app. In addition, for domestic and overseas officials and executives, the Company conducts a regular anonymous ethical level diagnosis survey once a year for subordinated employees.

2. Improvement of In-house Culture and Training of Executives and Employees

- Translation of Five Major Compliance and Ethics Codes into 10 Local Languages and Distribution of Educational Videos in Local Languages:
  In 2023, POSCO International translated and distributed the code of ethics, anti-corruption compliance guidelines, conflict of interest prevention guidelines, workplace sexual harassment prevention guidelines, and supplier code of conduct out of the rules of the Company into 10 languages (English, Myanmar, Chinese, Indonesian, Vietnamese, Uzbek, Portuguese, Spanish, Turkish, and Ukrainian) in consideration of the location of major workplaces of the company and compliance risks by country so that domestic and foreign executives and employees can understand major compliance codes. In addition, lawyers in each jurisdiction produced 10 local-language educational videos that described five compliance ethics norms in each local language and distributed them through e-learning tools to help local executives and employees better understand and comply with POSCO International's major compliance ethics norms. The code of ethics includes compliance with the Modern Slavery Prevention Act.

- Implementation of English Translation of Company Rules and E-learning Explanation of the Company Rules in English:
  The Company produces online English explanation videos through external experts on compliance control regulations, ethical norms, and compensation guidelines for reporting unethical acts and provides them to all executives and employees.

- Requiring All Employees to Sign an Ethics Pledge:
  At the beginning of each year, the Company seeks a pledge of ethics to all employees to comply with the Company's code of ethics, to comply with domestic and foreign anti-corruption and fair trade laws, to avoid any act that undermines human respect, such as violation of sexual ethics or harassment, and to prioritize ethics if the Company's interests and ethics conflict. In 2024, we are extending the target to global staff.

VIII. Consultation Process

- Procedures for Consultation with the Relevant Departments
  The ESG Strategy Section of the Legal Affairs Office, the Ethics Management Bureau in Righteousness Management Office and the Sustainability Management Group, which are departments related to POSCO International's compliance with the MSA, held several consultations from 2023 to the first half of 2025 to collect MSA compliance measures, related all enactments and revisions and implementation details, shared opinions on preparing measures to comply with the MSA and writing a declaration, and discussed future human rights protection due diligence and risk management plans.

IX. Effectiveness Evaluation and Future Plans

1. Effectiveness Evaluation

- Annual Evaluation of the Corporate Ethics Index of POSCO Group Companies: In conducting the annual evaluation of the POSCO Group's corporate ethics index at the level of POSCO, the evaluation items include the operation of ethical norms and systems, human respect surveys, and measures to prevent recurrence, and are being submitted to POSCO for evaluation.

2. Future Plan

- POSCO International plans to continuously conduct compliance management for third parties and assess compliance risks for overseas organizations. Additionally, the company intends to strengthen compliance support and oversight for compliance management across all overseas organizations.

- In the next fiscal year, if there are organizations that need improvement after conducting an ethics diagnosis of overseas organizations as before, the relevant organizations and related

departments will be notified of the improvement so that measures can be taken.

- Regarding the supply chain ESG management system, starting in 2025, we plan to actively utilize the cloud-based supply chain ESG management solution to request suppliers, selected based on business importance and ESG risk assessment, to agree to the supply chain code of conduct and to conduct document-based due diligence using an ESG checklist.

- We plan to conduct regular due diligence on trading corporations/branches and investment corporations. When visiting due diligence, we plan to use a checklist to inspect and report on the risk of violating modern slavery regulations on the employment status of trading corporations/branch offices and the institutional processes of investment corporations.

- We operate external counseling/investigation channels to enhance the expertise and fairness of ethics counseling/investigation. We would like to promote ethical counseling for executives and employees by operating in a way that guarantees more professionality and confidentiality through linkage with external specialized institutions.

- We will conduct on-site inspections to check compliance, including compliance with modern anti-slavery laws, at major overseas workplaces, and if we find anything to supplement, such as compliance education or counseling support, we will actively support it.

This report was approved by the Board of Directors of POSCO International and signed by the CEO.

June 26, 2025

POSCO International Corporation

CEO Kye-in Lee