



Supply Chain ESG Management Policy

Date of Revision	June 10, 2025
Date of Approval	June 13, 2024
Monitored by	Purchase

1. Purpose and Objectives

NAVER Corporation (hereinafter referred to as “NAVER” or the “Company”) strives to carry out and spread sustainable management across its supply chain. It seeks to build a system for win-win growth by minimizing ESG risks within the supply chain and strengthening cooperation with its partners.

2. Scope of Application

The Supply Chain ESG Management Policy (the “Policy”) applies to NAVER’s business sites, executives and employees of the company and its affiliated companies, as well as suppliers and subcontractors under the company’s supervision and monitoring.

3. Definitions

The terms “partner” and “Green Partner” in this Policy are defined as:

① “Partner”

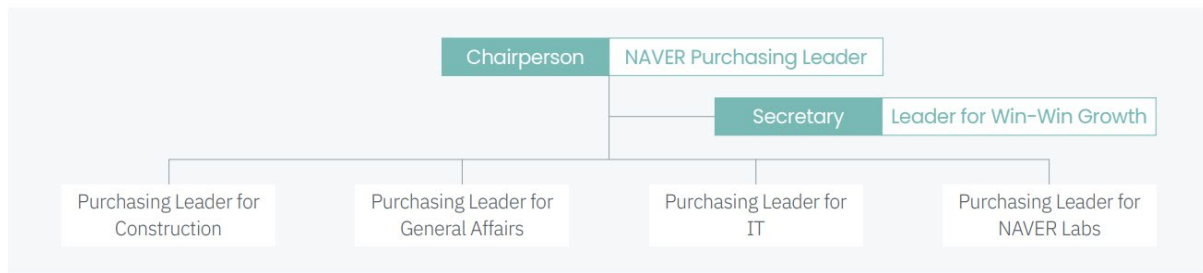
Refers to companies in general that supply products and/or services to NAVER and are therefore registered suppliers in the prescribed supplier registration process of the company

② “Green Partner”

Refers to a group of selective, significant suppliers that are selected annually based on annual transaction amount, number of transactions, and their overall impact on the supply chain in general

4. Roles and Responsibilities

NAVER operates a company-wide Purchasing Review Committee once a week, which deliberates and inspects major issues related to fair trade and shared growth under the leadership of the head of the purchasing organization under Chief Financial Officer (CFO). Departments that oversee win-win growth and legal affairs also provide support for fair-trade related risk management and issue response.



* Includes NAVER and its major subsidiaries

Additionally, should critical issues related to ESG management and win-win growth within the supply chain arise, ESG Committee within the Board of Directors of NAVER may take part in managing and supervising on the issues.

5. Core Principles

NAVER's partners must apply and comply with this Policy and the Sustainability Management Practice Agreement in the four major areas of NAVER's sustainable management: human rights, health and safety, environment, and business ethics.

1) Human Rights Management

NAVER and its partners must protect and respect human rights of all types of workers.

① Prohibition of forced labor and child labor

Prohibit all forms of forced labor, including involuntary labor and unfair exploitation

Prohibit child labor and in cases of any unavoidable circumstances where the hiring of young worker is compulsory, NAVER and its partners firmly adhere to relevant regulations and ensure young workers' opportunities for education are not limited due to labor engagement

② Prohibition of discrimination and respect for diversity

Prohibit all forms of discrimination in its practices including but not limited to hiring, promotion, wages and compensation, and welfare benefits based on factors such as gender, race, age, sexual orientation, gender identity, country of origin or ethnicity, disability, marital status, pregnancy status, religion, political affiliation, union membership, among others

③ Humanitarian treatment

Prohibit any acts of harassment, including but not limited to sexual harassment, sexual violence, mental and physical coercion, bullying, public shame, and verbal abuse in the workplace

④ Guarantee of freedom of association and collective bargaining

Respect labor-related laws, including the Labor Standards Act, and guarantee freedom of association and collective bargaining for all workers

Do not treat unfairly or discriminate workers based on their membership or formation of a labor union

⑤ Compliance with working conditions

Comply with the statutory working hours of employees stipulated in the Labor Standards Act, guarantee the minimum wage in accordance with the Wage Act, and do not force employees to work overtime

⑥ Product and service human rights impact management

Strive to manage and improve human rights impact of products and services provided by the Company and its partners

2) Health and Safety Management

NAVER and its partners must put the health and safety of workers as the top priority in all types of work.

① Occupational health and safety

Conduct monitoring regularly to control potential safety hazards for workers

② Emergency response management

Identify, evaluate, and control all possible hazardous situations and accidents in advance

③ Disaster status management

Identify, evaluate, and control risks associated with exposure to work that may cause physical or mental harm to workers

④ Communication

Communicate mutually about workers' health and safety to prevent and control health and safety risks

3) Environmental Management

NAVER and its partners must strive to keep the natural environment healthy and clean.

① Energy-saving

Manage and reduce overall energy consumption at the workplaces

② Greenhouse gas reduction

Manage and reduce greenhouse gas emissions at the workplaces

③ Reduction of environmental impact and promotion of circular economy

Prepare environmental management plans proactively to understand environmental factors and influences, as well as potential emergencies associated with all types of work

Make continuous improvements to reduce environmental impact through post-event evaluation

In addition, make efforts to reduce waste generated from business, prioritize the use of eco-friendly products such as eco-friendly packaging materials, and promote practices associated with circular economy

④ Legal compliance

Comply with environmental laws faithfully by identifying relevant laws and continuously monitoring compliance with the management and treatment of water and wastewater, as well as waste and hazardous materials

4) Business Ethics Management

NAVER and its partners comply with fair trade principles and local laws to conduct business transparently and trustworthily.

① Operational transparency

Conduct business with integrity and do not engage in illegal activities, corruption, bribery, or unfair collusion

② Protection of privacy and personal information

Protect personal information to a reasonable level by complying with NAVER's personal information and privacy guidelines and policies when collecting, storing, processing, and sharing personal information

③ Intellectual property protection

Protect and respect intellectual property rights when transferring technology and know-hows

6. Risk Management

NAVER manages supply chain sustainability risks by assessing ESG risks at various stages of the transaction process with its partners, including partner selection, contract signing, and post-contract period.

Supply Chain Sustainability Risk Management Process

Stage	Purpose	Risk Management Tool	Methodology
1. Partner Selection	Assessment on ESG risk level of prospective partners	ESG Assessment Checklist for Prospective Partners	<div>·Conduct the ESG Assessment Checklist on prospective purchasing partners registering for new transactions</div> <div>Basis of ESG Assessment Checklist for Prospective Partners<ul style="list-style-type: none">· ESG related laws and regulations· NAVER Code of Conduct "Integrity Code"· NAVER Sustainable Management Practice Agreement</div> <div>·For prospective partners with outstanding ESG performance, incentives such as awarding additional points for ESG-related proposals in competitive bidding and giving prior consideration for request for proposal (RFP) may be provided</div>
2. Contract Signing	Mutual agreement on the direction of ESG-centered business practices upon contract	Signing of the Sustainable Management Practice Agreement	<div>·Sign "Sustainable Management Practice Agreement" with partners for all types of contracts, including new contracts and renewals</div> <div>· Establish clear mutual understanding on NAVER's expectations on its contractors for their sustainable business practices in areas of human rights/labor, health and safety, environment protection, and ethics through the agreement</div>

3. Post-contract	Prevention of potential ESG risks in NAVER's supply chain Supporting partner companies' ESG management and empowering their ESG risk response measures	ESG risk assessment for Green partners and due diligence (when necessary)	<p>· Select key purchasing partners within the supply chain as 'Green Partners' based on factors such as transaction size and frequency, their influence on overall supply chain, and sustainability related importance</p> <p>· Conduct annual ESG risk assessments (once a year) on Green Partners to identify potential and actual risks in four areas of corporate sustainability: human rights, health and safety, environmental protection, and business ethics. In such cases where actual risks are identified, corrective actions will be followed</p> <table border="1" data-bbox="702 694 1386 1482"> <thead> <tr> <th colspan="4" data-bbox="702 694 1386 745">Areas of Annual ESG Risk Assessment</th></tr> <tr> <th data-bbox="702 745 884 880">Human Rights Management</th><th data-bbox="884 745 1021 880">Health and Safety</th><th data-bbox="1021 745 1204 880">Environmental Protection</th><th data-bbox="1204 745 1386 880">Business Ethics</th></tr> </thead> <tbody> <tr> <td data-bbox="702 880 884 1482"> <ul style="list-style-type: none"> - Prohibition of forced labor and child labor -Humanitarian treatment -Working conditions and labor rights - Human rights impact management of products and services </td><td data-bbox="884 880 1021 1482"> <ul style="list-style-type: none"> -Industrial Safety -Health and safety education and training </td><td data-bbox="1021 880 1204 1482"> <ul style="list-style-type: none"> -GHG reduction -Circular economy -Green purchases </td><td data-bbox="1204 880 1386 1482"> <ul style="list-style-type: none"> - Operational transparency - Protection of personal information - Intellectual property - Anti-bribery - Information disclosure </td></tr> </tbody> </table> <p>· For Green Partners rated as "FLAGGED" or improvements needed as significant risks, such as major legal violations, are found, additional due diligence is conducted. Measures of additional due diligence include written memos, disclosed discussions or site-visits, in-depth inquiries to discuss risk mitigation measures and monitor progress on improvement</p> <p>· Incentives are provided to small and medium-sized Green Partners with "ADVANCED" ratings. Such incentives include prior consideration when selecting Fair Trade Agreement partners</p> <p>· Purchasing partners that manage ESG risks effectively are granted additional points for bidding processes with ESG evaluations</p>	Areas of Annual ESG Risk Assessment				Human Rights Management	Health and Safety	Environmental Protection	Business Ethics	<ul style="list-style-type: none"> - Prohibition of forced labor and child labor -Humanitarian treatment -Working conditions and labor rights - Human rights impact management of products and services 	<ul style="list-style-type: none"> -Industrial Safety -Health and safety education and training 	<ul style="list-style-type: none"> -GHG reduction -Circular economy -Green purchases 	<ul style="list-style-type: none"> - Operational transparency - Protection of personal information - Intellectual property - Anti-bribery - Information disclosure
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		ESG management support for small and medium-sized partner companies	<ul style="list-style-type: none"> · Online/offline ESG education sessions · Online ESG self-assessment · ESG consultations
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7. Communication

Both NAVER and its partners strive to conduct transparent and ethical management. NAVER Business Ethics Consulting Center is a channel for any stakeholders including partners to consult on and/or report NAVER and its affiliated companies' executives and employees' suspected or actual violations of corporate ethics, including the principles stated in this Policy.

Soo-yeon Choi 
CEO
NAVER Corporation

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