
	Grievance Resolution Policy	Doküman No : ISG-T10 Yayın Tarihi : 07.01.2014 Rev.Tarihi : -- Rev.No : 00 Sayfa No : 1/1
SUBJECT: Grievance Resolution Policy of Labor		

HWASEUNG is committed to respecting all internationally recognized human rights and ethic rules for external or other stakeholders We conduct due diligence to prevent and manage adverse impacts of our business activities in accordance with our “Global Human Rights Principles”. Where the company causes or contributes to negative impacts on the rights of individuals or groups, we are committed to providing access to remedy to the affected individuals or groups via our grievance channels. The company’s grievance channels are available to all employees of HWASEUNG, all partners in our value chain, consumers, civil society, and everyone else who has legitimate concerns regarding actual or potential adverse impacts caused or contributed by HWASEUNG. We are committed to promptly investigating allegations and providing fair and effective remediation by ourselves and/or in cooperation with other stakeholders.

HWASEUNG’s grievance handling mechanisms and procedures are based on Pillar 3 of the United Nations Guiding Principles on Business and Human Rights (UNGPs) and we are committed to complying with the effectiveness criteria for non-judicial grievance mechanisms outlined in Principle 31 of the UNGPs. This policy provides an overview of our objective and consistent handling of all grievances reported to HWASEUNG, and complies with international standards, local laws and regulations related to grievance handling. Our grievance channels are complementary to other worker engagement efforts such as our yearly temperature check survey and engagements via works councils, unions, committees and other meetings as well as close engagement with key external stakeholders. In order to secure the effectiveness of our grievance handling mechanisms and procedures, we will continue to communicate with internal and external stakeholders and update the policy as needed

1. Definitions A grievance — according to the UNGPs — can be understood as a perceived injustice evoking an individual’s or a group’s sense of entitlement, which may be based on law, contract, explicit or implicit promises, customary practice, or general notions of fairness of aggrieved communities. A grievance may include a complaint, concern, dispute, risk, harm, damage or other types.
2. A grievance mechanism — according to the UNGPs — refers to any routinized, state-based or non-state-based, judicial or non-judicial processes through which grievances concerning business related human rights abuses can be raised and remedy can be sought. A grievance mechanism mentioned in this policy refers to HWASEUNG operational-level grievance mechanism administered either by the company or in collaboration with other third parties and it is accessible to all stakeholders
3. A complainant is a person, group or organization such as an employee or stakeholder of HWASEUNG, or (a worker of) partner companies that is affected or has reasonable

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grounds to believe that they have been adversely affected by business operations of HWASEUNG. The person who raises the grievance and the person who experiences it may differ. In this case, the ultimate complainant is the individual or person who represents a group or organization who directly experiences the grievance

A human rights defender is defined by the Office of the United Nations High Commissioner for Human Rights as “people who, individually or with others, act to promote or protect human rights in a peaceful manner”. Human rights defenders include affected communities, NGOs as well as individuals such as journalists, lawyers, judges, academics, government officials, civil servants, campaigners or employees such as whistleblowers.

2. Scope This policy applies to all grievances reported via HWASEUNG channels. Although HWASEUNG has various channels through which all stakeholders are able to directly report their grievances, partners doing business with HWASEUNG are expected to operate their own grievance handling mechanisms within their business operations and supply chain, and to observe Section 5 of this policy, on “Principles of Grievance Handling”


3. Grievance Channels

HWASEUNG operates a wide range of grievance channels across the organization, both globally and locally, to receive grievances from internal and external stakeholders. A complainant may report a grievance anonymously or choose to be identified. HWASEUNG is committed to upholding the confidentiality of the grievance and protecting the complainant in all cases. At the same time, we do not tolerate retaliation against the complainant in response to filing a grievance. Reported grievances are assigned to different organizational unit(s) based on the nature of the grievance and, if necessary, several organizational units work together toward effective remedies

Informing Person	stakeholder	Grievance Channels and Scope of Grievances
Employee or etc	Employees of Huwaseung including contractual and non-regular employee	Channel(s): (EthicsPoint) Hotline, online (Email), employee representative bodies

4. Grievance Handling Procedure

HWASEUNG promptly and carefully reviews all grievances it receives and is committed to providing fair and effective remedies. While grievances are generally processed in the order of when they are received, higher-priority complaints are dealt in an urgent manner due to their severity in line with the UNGPs rationale, considering that delayed responses could lead to irremediable harm.

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The grievance procedure consists of four steps — receipt, investigation, notification, and resolution

Receive the grievance.

Assign an organizational unit and person in charge of HWASEUNG to be responsible for managing the grievance handling process. - Inform the complainant that the grievance has been successfully received and of further steps; use different communication methods such as Email or Ethic Points Hotline

Verify and investigate the grievance.

Verify the grievance and facts to determine their eligibility (e.g. via document reviews, interviews). - Engage with the complainant about the desired remedy and start the investigation. - If necessary, conduct interviews with individuals who can provide insights into the case such as the respondent or witness(es), complying with principles of confidentiality and non-retaliation in mind. - If necessary, with consent from the complainant, a third-party expert is brought into the process


Design remediation plan and notify the outcome of the grievance to the complainant.

*Design a remediation action plan proportionate to the scale and significance of the grievance. - For grievances of greater severity, HWASEUNG's Labor and Human Rights Council, a company-wide consultative body, shall discuss the remediation action plan and any other relevant measures. - Inform the complainant of the investigation and remediation action plan. * Information shall be shared with the complainant to the extent possible in accordance with local laws such as privacy laws and to the extent it does not violate the rights of others*

5. Principles of Grievance Handling

Generally, it is recommended to make an attempt first to settle grievances directly between the affected parties. Where this has failed or where the grievance itself makes the direct settlement impossible or inappropriate, a complainant shall raise it through a formal grievance channel. □ Alignment with UNGPs Effectiveness Criteria: In accordance with Principle 31 of the UNGP

Direct Settlement of Complaints: Generally, it is recommended to make an attempt first to settle grievances directly between the affected parties. Where this has failed or where the grievance itself makes the direct settlement impossible or inappropriate, a complainant shall raise it through a formal grievance channel.

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Alignment with UNGPs Effectiveness Criteria: In accordance with Principle 31 of the UNGPs, HWASEUNG is committed to providing effective grievance mechanisms that are legitimate, accessible, predictable, equitable, transparent and rights-compatible as well as a source of continuous learning and based on engagement and dialogue. This includes but is not limited to operating grievance channels in various languages, eliminating factors that hamper the accessibility of the channels, providing a gender lens to the grievance handling procedure and handling reported grievances for fairness.


No Retaliation: HWASEUNG respects the rights of complainants in good faith to file a grievance without any fear of retaliation, intimidation, disadvantage or punishment for filing a grievance. We also provide confidentiality and anonymity during the investigation process to prevent risks of retaliation. Complainants or witnesses who believe they are being retaliated against for filing a grievance should immediately raise their concerns with the company. HWASEUNG is committed to investigating and addressing such complaints promptly and impartially.

Support of Human Rights Defenders: HWASEUNG recognizes the importance of promoting and protecting the human rights of human rights defenders and does not tolerate nor contribute to any threats, intimidation or physical attacks against them. We are committed to constructively communicating and consulting with human rights defenders who raise concerns on the human rights impacts of our business activities.

Maintaining Confidentiality and the Rights to Privacy: HWASEUNG is committed to maintaining strict confidentiality of grievances, and verbal and written information provided by the complainant and related parties with respect to the rights of privacy and data protection. There are internal guidance and processes in place to avoid exposing any information that may identify the complainant without gaining the complainant's explicit consent.. Only when it is necessary for investigation purposes, related information will be disclosed to the relevant personnel in compliance with applicable legal obligations.

Guaranteed Participation in External Grievance Mechanisms: HWASEUNG respects the rights of a complainant to participate in or to utilize other judicial and non-judicial grievance processes. HWASEUNG does not interfere with or obstruct their rights to do so and is committed to collaborating with state-based judicial and non-judicial mechanisms as needed.

Remediation: Where HWASEUNG identifies that the company has caused or contributed to an adverse human rights impact, we are committed to providing proper remedial measures through legitimate processes and cooperating with a third-party where deemed necessary. A decision on the outcome of the grievance is made by taking the complainant's desired remedy into account. Effective remediation may include apologies, restitution, rehabilitation, financial or non-

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financial compensation and punitive sanctions, as well as the prevention of harm through, for example,

injunctions or guarantees of non-repetition. Dedicated policies including HWASEUNG Migrant Worker Policy and Child Labour Prohibition policy outline how HWASEUNG is committed to remediating infringements experienced by vulnerable groups

This policy will be continuously updated based on industry best practices and stakeholder expectations.

PREPARER Management Representative	Management Representative / Publisher Managenet Representative	Approver Factory CEO
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