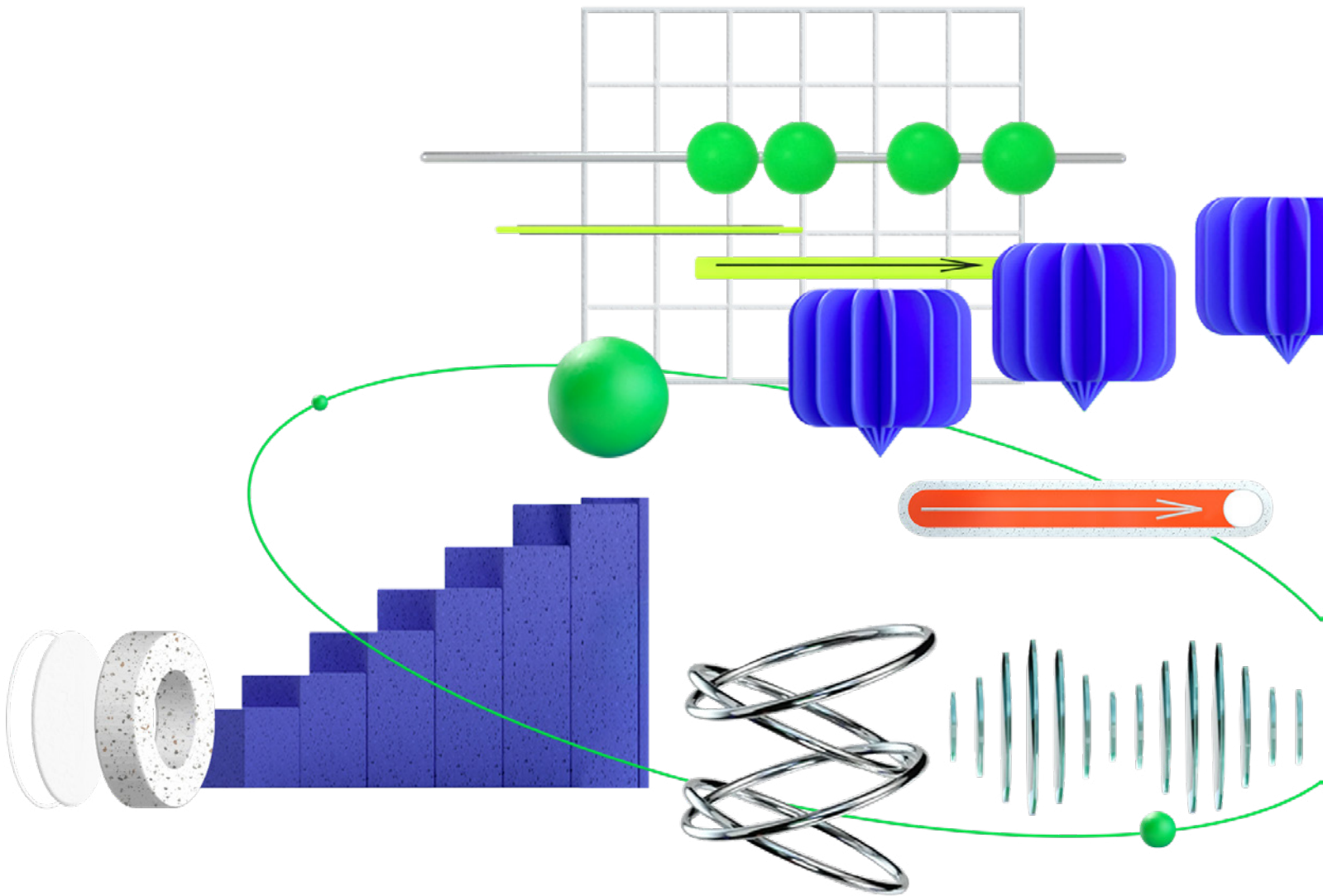

NAVER

HUMAN RIGHTS MANAGEMENT POLICY



NAVER

I. OVERVIEW

As a member of the global community, NAVER Corporation (hereinafter "NAVER") commits to respect international standards related to human rights, including the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights (UNGPs), the International Labor Organization (ILO) Conventions, the OECD Guidelines for Multinational Enterprises, and the Ten Principles of the UN Global Compact (UNG), and based on these standards, it has established its human rights management policy (hereinafter referred to as the "Policy")

The Policy, established in accordance with the [CEO's Human Rights Management Declaration](#), applies to all of NAVER's domestic and overseas business sites. All employees of NAVER must comply with the Policy when performing their duties. In case of conflict between the Policy and local laws of the countries in which the company operates, NAVER seeks to respect the local laws and regulations, whilst striving to follow higher standards. Furthermore, NAVER does its best to ensure that its partners and service users understand and implement the basic principles of NAVER's human rights management.

Going forward, based on the Policy, NAVER will make every effort to identify and prevent/mitigate adverse human rights impacts caused by its business activities. When human rights violations are caused inevitably, NAVER takes measures to minimize the impacts in accordance with the company's remedy procedures.

STAKEHOLDERS OF NAVER'S HUMAN RIGHTS MANAGEMENT



EMPLOYEES

The building blocks of NAVER's business competence and growth



PARTNERS

NAVER's partners in business, including suppliers



USERS

General users that share values with NAVER

II. BASIC PRINCIPLES

1. Prohibition of Child Labor and Forced Labor

NAVER strictly prohibits any forms of child labor in its company principle. In cases of any unavoidable circumstances where the hiring of young worker is compulsory, NAVER firmly adheres to relevant regulations and avoid assigning them to hazardous or unsafe tasks. NAVER provides them with education and additional safety measures to ensure their well-being and development. Furthermore, NAVER strictly prohibits any form of forced labor in employment practices. Under no circumstances should work be conducted against employees' will. They may retire at any time without any penalty if they give notice as stated in the contract. Also, NAVER does not source manpower from companies involved in any acts of illegal child labor or forced labor. In case such acts may be detected, NAVER shall take corrective measures immediately.

2. Prohibition of Discrimination

NAVER strictly prohibits 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. All employees must respect each other's dignity and treat each other fairly.

3. Prohibition of Workplace Harassment, Sexual Harassment, and Sexual Violence

NAVER strictly prohibits 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. Most notably, NAVER strives to prevent sexual harassment and sexual violence in the workplace, particularly when it involves exploiting a position of power. A victim of workplace bullying, sexual harassment, or sexual violence can report the incident through the company's anonymous grievance and feedback channels. NAVER conducts investigation into the reported case objectively and takes measures to protect the reporter. All reporters are guaranteed anonymity, and any form of unfair treatment towards them is strictly prohibited.

4. Guarantee of Freedom of Association and Collective Bargaining

NAVER guarantees freedom of association and collective bargaining in accordance with labor laws of the countries and region in which it operates. NAVER respects its employees' right to form and join labor unions. NAVER prohibits unfair treatment or discrimination against union membership or organization. Moreover, NAVER respects the rights of workers to bargain collectively and bargains in good faith with the employees' representatives. NAVER also respects and faithfully implements the mutually agreed results of collective bargaining.

5. Compliance with Working Conditions

NAVER ensures that its employees' working hours do not exceed the maximum working hours stipulated in the labor laws of the countries in which it operates in. For example, Korea's labor laws stipulate that an individual's working hours must not exceed 52 hours per week and all overtime work must be voluntary. NAVER makes intensive efforts to manage its employees' working hours. Furthermore, NAVER complies with all wage/compensation-related laws, such as the Minimum Wage Act and the Labor Standards Act, regarding minimum wages, overtime pay, and statutory allowances. Additionally, NAVER actively implements necessary measures such as supporting capacity to promote the welfare of its employees.

II. BASIC PRINCIPLES

6. Guarantee of Occupational Health and Workplace Safety

NAVER faithfully implements its [safety and health management policy](#) and provides a safe and pleasant working environment for its employees. To this end, NAVER regularly inspects facilities and equipment at its business sites and provide appropriate protective equipment. NAVER also provides safety and health education to employees who work in dangerous working environments. In addition, NAVER regularly implements necessary safety measures, such as emergency evacuation drills, to provide vulnerable groups such as pregnant women and people with disabilities with a safe environment. NAVER promises to implement appropriate measures promptly, such as investigating the causes of work-related illnesses and workplace accidents as well as preventing recurrence. Furthermore, NAVER takes measures to prevent industrial accidents at its supply chain, such as conducting safety evaluations for the suppliers.

7. Responsible Management of Supply Chain

NAVER continuously monitors and supports the human rights management status of its partners and suppliers, and takes necessary measures, such as requesting correction in the event of a serious human rights violation. Moreover, NAVER has set and made the "Sustainability Management Practice Agreement" compulsory for its business partners and suppliers to motivate them to take part in human rights management. NAVER promises to respect and protect the intellectual property rights of its business partners.

8. Protection of Customer and User Rights

NAVER actively takes measures to ensure the protection of users' human rights when providing products and services. Particularly, NAVER strives for users' personal information and privacy protection, digital safety (management of illegal and obscene posts, etc.), compliance with AI ethics, freedom of expression, and guarantee of equal accessibility. NAVER requests and stores user personal information to a minimum, and strictly complies with the obligation to notify users in advance of the storage of their personal information. Users are free to manage, modify, and delete their information. NAVER establishes top-notch security system to prevent leakage of personal information. Moreover, NAVER respects and guarantees its users' freedom of expression, whilst continuing to build "barrier-free" services.

9. Respect for Diversity, Equity, and Inclusion (DE&I)

NAVER strives to spread a culture that respects diversity, equity, and inclusion. This culture contributes to further protect the human rights of vulnerable groups that need special attention, such as children, the technologically vulnerable (such as people with disabilities and the elderly), and human rights defenders. NAVER is committed to taking further steps and encouraging all its stakeholders who have business relationships with the company to adopt a culture of diversity, equity, and inclusion.

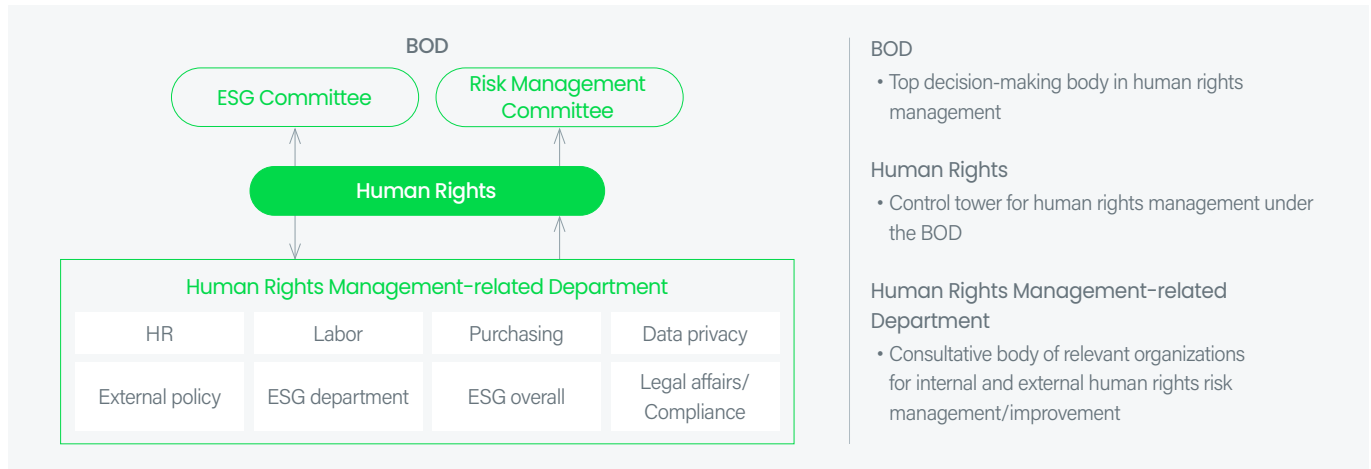
10. Efforts to Protect the Environment

NAVER recognizes that the environment is a critical factor that directly affects the daily life and health of a mankind. Based on this awareness, NAVER will faithfully implement its [environmental policy](#), prevent and manage adverse impacts caused by its business activities, and continue to make efforts to protect and restore the environment in the best possible way.

Furthermore, NAVER pledges to strive persistently for the implementation of exemplary human rights management that goes beyond mere legal compliance. This commitment involves regular policy reviews and proactive human rights risk management. NAVER remains dedicated to fulfilling its corporate social responsibility, adhering to policies that benefit various stakeholders, and prioritizing human rights management.

III. HUMAN RIGHTS MANAGEMENT GOVERNANCE

NAVER has set in place a company-wide human rights management system. With the "Human Rights Division" reporting directly to the Board of Directors (BOD) and the top management, multiple departments work collaboratively to manage human rights related matters of the company. The Human Rights Division, dedicated to human rights management, is established under the BOD and works to identify, assess, and mitigate human rights risks.



IV. HUMAN RIGHTS RISK MANAGEMENT SYSTEM

NAVER has established a comprehensive "Human Rights Assessment Framework" in accordance with the requirements of external stakeholders and major global guidelines. Specifically, the framework encompasses the results of Human Rights Impact Assessment (HRIA), employee engagement survey, and ESG ratings agencies' assessments. With the framework, NAVER identifies areas for improvement and actively work towards enhancing performance by cooperating with the relevant departments. For details, please refer to the NAVER Integrated Report 2022.

[NAVER Integrated Report 2022](#)

V. GRIEVANCE MECHANISM

I. Internal Reporting Channel

NAVER operates an internal reporting channel where anyone can consult and report human rights grievances related to work, including workplace bullying and sexual harassment. Anonymous consultation and reporting are also possible.

With U

"With U" is a channel specialized in dealing with bullying and sexual harassment cases in the workplace. Employees who suffer or witness workplace bullying or sexual harassment can report anonymously through "With U" online channel. An in-house investigation unit then verify facts of the cases received through the channel and formally investigate them. Disciplinary deliberation based on the results of the investigation is conducted by the deliberation committee chaired by the CEO and staffed by employees.

Human Rights Division Hotline

The Human Rights division, an independent organization under the Board of Directors (BOD), in charge of protecting human rights within the company and handling grievances such as workplace bullying and sexual harassment, operates a hotline to enable direct reports of human rights violations or grievances. The received information undergoes fact verification process and if deemed necessary, the case is handled through the internal investigation and deliberation process described below.

INVESTIGATION PROCESS



kNock

"kNock" is an integrated in-house channel where NAVER's employees can consult on the company's standards and policies casually. When an individual submits a grievance to "kNock", the person in charge of the relevant field provides a detailed reply to the inquiry and further examines what needs to be improved in the company's standards and policies after the case is closed.

V. GRIEVANCE MECHANISM


NVO (NAVER Valuable Opinion)

NAVER employees can also file grievances through the consultation bulletin board operated by the labor-management council titled "NVO (NAVER Valuable Opinion)." The bulletin board is a communication channel established in accordance with the Act on the Promotion of Employees' Participation and Cooperation. Run by three of NVO members, the bulletin board privately receives and collects complaints that cannot be disclosed publicly through the regular bulletin board. The NVO members forward the collected complaints to the management and the relevant departments, and discuss potential improvements in the company's system.

NAVER informs that those who have been disciplined for sexual harassment or bullying in the workplace may be restricted from being appointed to management positions. Also, in a bid to prevent recurrence, the company shares the cases of internal disciplinary actions company-wide.

Additionally, employees who are identified as victims of sexual harassment or bullying are designated as recipients of special support and thus are eligible for a full coverage of in-house psychological counseling for a year.

2. External Reporting Channel

 **The NAVER Business Ethics Consulting Center** is an accessible platform where individuals can seek advice and report any instances of NAVER employees violating laws and regulations, including but not limited to the Fair-Trade Act, undue demands based on one's position, provision or receipt of money, goods, entertainment or conveniences, complaints related to payment, leakages of confidential information, and any other corrupt or unlawful conduct. The Business Ethics Consulting Center protects the identity of whistleblowers and the contents of consultations in accordance with relevant procedures, whilst striving to process the reported matters as soon as possible.

VI. REVISION HISTORY

- Establishment of NAVER Human Rights Management Policy: November 11, 2021
- Revision of NAVER Human Rights Management Policy: August 01, 2023

NAVER