

2024 Report under the Fighting Against Forced Labor and Child Labor in Supply Chains Act

May 30, 2025.

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POSCO Holdings

Introduction

This report has been prepared jointly by POSCO Holdings Inc., POSCO, POSCO International Corp.(collectively, “POSCO Holdings”) in response to the reporting requirements under Canada’s *Fighting Against Forced Labor and Child Labor in Supply Chains Act (the “Act”)* for our fiscal year ending December 31, 2024.

POSCO Holdings is committed to respecting the human rights of people impacted by our operations and supply chain, consistent with the International Bill of Human Rights, ILO Core Conventions, UN Guiding Principles on Business and Human Rights, and OECD Guidelines for Multinational Enterprises.

Organizational structure, activities, and supply chain

Organizational Structure & Activities

POSCO Holdings, as the group's holding company, plays the role of a future business portfolio developer by establishing growth strategies for the whole group, discovering future business opportunities, and promoting new businesses. Major subsidiaries and affiliates include the steel sector, which supplies steel products to industries such as automotive, shipbuilding, and home appliances, and the infrastructure sector, which conducts businesses in trade, energy, construction, logistics, and IT. Additionally, there is the battery material sector, which engages in businesses such as lithium, nickel, cathode materials, anode materials, and recycling, as well as other sectors.

Supply Chain

The companies that operate the supply chain among POSCO Holdings, POSCO, and POSCO International are POSCO and POSCO International. POSCO supplies steel products to industries such as automotive, shipbuilding, and electronics, while POSCO International operates businesses

including trade, resource development, production processing, infrastructure development and operation, power facilities, and LNG terminal operations, which include the supply chain of related businesses.

Steps to prevent and reduce the risks of forced labor and child labor

POSCO Holdings has taken the following measures to prevent and reduce the risk of forced labor and child labor within its operations and supply chain through its human rights policy:

- ✓ Mapping activities;
- ✓ Mapping supply chains;
- ✓ Conducting an internal assessment of risks of forced labor and/or child labor in the organization's activities and supply chains;
- ✓ Contracting an external assessment of risks of forced labor and/or child labor in the organization's activities and supply chains;
- ✓ Developing and implementing an action plan for addressing forced labor and/or child labor;
- ✓ Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily;
- ✓ Addressing practices in the organization's activities and supply chains that may cause or contribute to the risk of forced labor and/or child labor;
- ✓ Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labor and/or child labor in the organization's activities and supply chains;
- ✓ Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labor;
- ✓ Requiring suppliers to have policies and procedures for identifying and prohibiting the use of forced labor and/or child labor in their activities and supply chains;
- ✓ Developing and implementing child protection policies and processes;
- ✓ Developing and implementing anti-forced labor and/or -child labor contractual clauses;
- ✓ Developing and implementing anti-forced labor and/or -child labor standards, codes of conduct and/or compliance checklists;
- ✓ Auditing suppliers;
- ✓ Monitoring suppliers;

- ✓ Enacting measures to provide for, or cooperate in, remediation of forced labor and/or child labor;
- ✓ Developing and implementing grievance mechanisms to address complaints in the workplace;
- ✓ Developing and implementing training and awareness materials on forced labor and/or child labor;
- ✓ Developing and implementing procedures to track effectiveness in addressing forced labor and/or child labor;
- ✓ Engaging with supply chain partners on the issue of addressing forced labor and/or child labor;

Further details on these activities are provided in the following sections of this report.

Policies and due diligence processes

Policies

POSCO Holdings prohibits all forms of forced and child labor not only in company's activities but also throughout its supply chain via following policies.

- ✓ Supply Chain Policy: Sets expectations for suppliers regarding labor practices, business ethics, and environmental responsibility.
- ✓ Responsible Mineral Sourcing Policy: Requires suppliers to ensure minerals are sourced responsibly and are not associated with human rights abuses.
- ✓ Human Rights Management Policy: Prohibits forced and child labor in accordance with international standards (UNGPs, ILO), applicable to all business partners and supply chain participants.

Due Diligence processes

POSCO Holdings identifies potential negative human rights impacts within the company, its subsidiaries, and supply chain through human rights due diligence, and fulfills its responsibility to prevent and mitigate these impacts. Issues discovered through due diligence are actively resolved with the help of internal and external experts, and the effectiveness of improvement measures is regularly reviewed.

In addition, POSCO also incorporated internal management systems and identified risks in supply chain in accordance with the OECD due diligence guideline for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas. Information regarding internal management system and the results of assessment and analysis is publicly available on POSCO's sustainability website.

Forced labor and child labor risk

As of our 2024 due diligence and risk assessment activities, POSCO did not identify any cases or reasonable indications of forced labor or child labor within our operations or supply chain. In particular, on-site audits were conducted for 50 primary domestic suppliers in South Korea, and no evidence or credible risk of forced or child labor was found.

POSCO Holdings will continue to take all reasonable measures to identify and address any potential risks of forced or child labor within our global supply chain.

Remediation measures and remediation of loss of income

In line with the UN Guiding Principles on Business and Human Rights, POSCO has publicly committed—via its corporate website—to taking all necessary measures to mitigate actual or potential adverse human rights impacts. This includes a clear statement of intent to provide remedy where the company has caused or contributed to such impacts.

This commitment is disclosed at the Human rights policy and it reflects POSCO's recognition of its responsibility to respect human rights and to actively address any negative impacts linked to its operations or supply chain, including through appropriate remediation efforts.

Employee training

POSCO Holdings conducts an annual ethics pledge for employees at all global business sites to enhance their understanding and practice of human respect and promotes regular training and campaigns. Additionally, to increase employees' understanding of human rights management and to inform them about the company's human rights management system, essential educational content for employees has been developed.

Specific guidance on participation in human rights impact assessments and the use of grievance procedures has been provided to emphasize the establishment of the company's human rights management policies and systems within the organization. This educational content has been produced in the form of e-learning and included in the mandatory training courses for all employees.

Assessing effectiveness

POSCO Holdings monitors the implementation of corrective actions derived from supply chain due diligence by using their implementation rate as a key performance indicator, in order to mitigate the risks of forced labor and child labor in the supply chain. This approach also enables POSCO Holdings to assess the effectiveness of its due diligence efforts.

Also, POSCO Holdings has established an internal procedure process to evaluate the effectiveness of due diligence when conducted, through the enactment of Human Rights Due Diligence Guidelines.

Approval and attestation

In accordance with the requirements of the Act, I attest that I have reviewed the information contained in the report for the entity or entities listed above.

Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Signature: _____

I have the authority to bind POSCO Holdings Inc.

Name: Jutae LEE

Title: Representative Director & President

Date: May 30, 2025