

Enactment Date	2026-02-27
Responsible Department	Human Resources Management Division

GC Biopharma Human Rights Management Policy

1. Purpose

GC Biopharma places human rights management principles at the core of its management values and practices human rights management based on this Human Rights Policy. Internally, the company continuously strives to strengthen the protection of employees' rights, and externally, to identify and prevent potential human rights risks that may arise throughout its business activities. Furthermore, GC Biopharma is committed to spreading human rights principles across all aspects of management, making every effort to protect the rights and interests of all stakeholders—including employees—and to uphold respect for human rights.

In pursuit of human rights management, GC Biopharma actively endorses the fundamental principles of human rights protection and respect set forth in international human rights and labor standards, including the Universal Declaration of Human Rights (UDHR), the UN Guiding Principles on Business and Human Rights (UNGPs), the UN Convention on the Rights of the Child (CRC), the International Labour Organization (ILO) Declaration on the Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises. GC Biopharma also complies with domestic and international labor laws and regulations applicable in the countries and regions where it operates.

2. Scope of Application

This Human Rights Management Policy applies to all officers and employees of GC Biopharma's domestic and overseas entities, and covers GC Biopharma's direct operations as well as its products and services. Additionally, GC Biopharma expects all stakeholders—including business partners with contractual relationships such as its supply chain and partner companies—to respect and implement this Policy. Where any provisions of this Policy conflict with the laws of a local jurisdiction, the local laws shall take precedence. The Policy may also be revised to reflect the legal requirements and industry characteristics of the relevant country. Except where special provisions exist under the laws, articles of incorporation, or internal regulations of the country or organization, all officers and employees of GC Biopharma shall conduct their work in accordance with this Human Rights Management Policy.

3. Definitions

The terms used in GC Biopharma's Human Rights Management Policy are defined as follows:

- ① "Human Rights" refers to the dignity, value, freedom, and rights inherent to all human beings, as guaranteed by the Constitution and laws of the Republic of Korea, and recognized under international human rights treaties and customary international law to which the Republic of Korea is a signatory.
- ② "Human Rights Management" refers to the practice of preventing human rights violations in all business activities and conducting human rights-friendly management, which includes declaring and implementing human rights management principles, fulfilling monitoring obligations, and providing appropriate and effective remediation procedures for victims in the event of human rights violations.
- ③ "Officers and Employees" refers to executives and employees who work for the company, regardless of the form of their employment contract, whether regular or non-regular.
- ④ "Partner Companies" refers to companies that have various transactional relationships with GC Biopharma across its business activities, including domestic and overseas subsidiaries, supply chain partners, and customers.
- ⑤ "Stakeholders" refers to those directly or indirectly affected by business activities, including officers and employees (including non-regular workers), shareholders and investors, partner companies, customers, government, and the local community.

4. Fundamental Principles

① Non-Discrimination and Respect for Diversity

GC Biopharma does not discriminate against officers or employees on the basis of gender, race, ethnicity, nationality, religion, disability, age, political opinion, family status, or region of origin in any personnel matters or internal activities, including recruitment, hiring, promotion, compensation, benefits, and training. The company respects the values of diversity and inclusion.

② Humane Treatment

GC Biopharma respects the privacy of all officers and employees and protects their personal information. The company strictly prohibits any form of harassment, including physical or psychological violence, among officers and employees.

③ Prohibition of Forced Labor and Child Labor

GC Biopharma prohibits forced labor that is contrary to the free will of officers and employees, and strictly prohibits the employment of children in accordance with the laws and regulations of the countries and regions where each business site is located.

④ Respect for Freedom of Association and the Right to Collective Bargaining

GC Biopharma respects labor relations laws applicable in each country. The company respects freedom of association and the right to collective bargaining, does not impose any disadvantage for joining or participating in labor unions, and encourages labor-management cooperation.

⑤ Compliance with Working Conditions

GC Biopharma complies with the statutory working hours of each country where it operates and guarantees minimum wage. The company evaluates and compensates individual performance and capabilities based on fair criteria, and provides various self-development opportunities to improve job competency. The company complies with labor laws applicable in the region where each business site is located with regard to regular and overtime working hours, and pays fair remuneration commensurate with work performed.

⑥ Creating a Safe and Healthy Work Environment

GC Biopharma complies with workplace health and safety laws and regulations, creates a safe working environment through regular inspections of facilities and equipment, and implements appropriate measures to prevent physical and psychological risks, operating a follow-up management system. The company also continuously improves working conditions so that employees can maintain a work-life balance and fully exercise their capabilities.

⑦ Responsible Supply Chain Management

GC Biopharma strengthens fair and transparent transactions with partner companies based on mutual respect and responsible management, adheres to the principles of integrity-based contracting in all transactions, and does not make unjust demands such as gifts or entertainment. The company does not abuse superior bargaining positions, establishes fair trade practices to prevent unfair conduct, and actively communicates with and supports partner companies in adopting and implementing human rights management.

⑧ Protection of Customer Human Rights

GC Biopharma thinks and acts from the customer's perspective, provides the best products and services to achieve customer satisfaction, and provides services equally without discrimination on the basis of gender, race, ethnicity, nationality, religion, disability, age, political opinion, or region of origin. The company continuously improves accessibility and convenience for diverse users, including persons with disabilities and the elderly, ensuring that everyone can use its services safely and fairly. The company collects only the minimum information necessary to provide services, and rigorously operates personal data protection measures, including consent, purpose limitation, and guaranteed rights of access and deletion.

⑨ Protection of Local Community Human Rights

GC Biopharma takes care to ensure that its business activities do not negatively affect the human rights of local community members, reviews potential impacts on the local community and environment in all business decisions and investment processes, and considers social issues. The company minimizes the impact of its business activities on local communities, and actively engages in social contribution activities, including support for the underprivileged, to contribute to local community development.

5. Implementation Measures

5.1. Human Rights Management Governance

The Board of Directors, the highest decision-making body of GC Biopharma, is responsible for fulfilling and overseeing the duty of respect for human rights across all business activities. The organization responsible for human rights management (Human Resources Management Division) is in charge of establishing human rights management policies, setting directions, and monitoring implementation. It also conducts human rights education, information disclosure, human rights due diligence, and victim remediation, and supports the smooth operation of the Board of Directors. The risk management oversight department comprehensively advances the Group-level ESG risk management system on a regular basis and continuously identifies and reviews potential human rights-related risks.

5.2. Human Rights Management Education

To prevent human rights violations, GC Biopharma conducts regular human rights education for officers, employees, and partner companies, and promotes various activities to raise human rights awareness.

5.3. Human Rights Risk Management Process



① Risk Identification through Human Rights Grievance Receipt and Human Rights Impact Assessment
Human Rights Impact Assessment (HRIA) is part of human rights due diligence—a process of identifying actual and potential impacts of business activities on human rights, and deriving “key human rights issues.” This process utilizes methods such as stakeholder engagement, surveys, and checklist diagnostics. As GC Biopharma considers HRIA a core element of human rights management, the organization responsible for human rights management (Human Resources Management Division) conducts an annual HRIA on matters affecting the human rights of officers, employees, and stakeholders in business operations. Potential human rights risks are also identified on an ongoing basis through human rights-related grievances received through the grievance channel.

1. Scope of Risk Identification:

- Own Operations: Identifies human rights risks within GC Biopharma’s own operations, including employee working environment and internal management systems.
- Value Chain and Related Activities: Assesses human rights risks that may arise in relation to partner companies, supply chains, and partnerships.

2. Key Human Rights Issues Considered:

The assessment includes internationally recognized core human rights issues such as forced labor,

child labor, freedom of association, collective bargaining rights, and discrimination.

3. Applicable Group Scope:

During the HRIA process, the company identifies stakeholders who are vulnerable to human rights risks and includes them in the scope of assessment.

② Prevention and Improvement Activities

For identified human rights risks, GC Biopharma implements improvement activities at its own business sites, and requires corrective action or improvement plans from partner companies and those in the supply chain. These may include victim protection and recurrence prevention as part of the remediation procedures.

③ Performance Evaluation and Monitoring

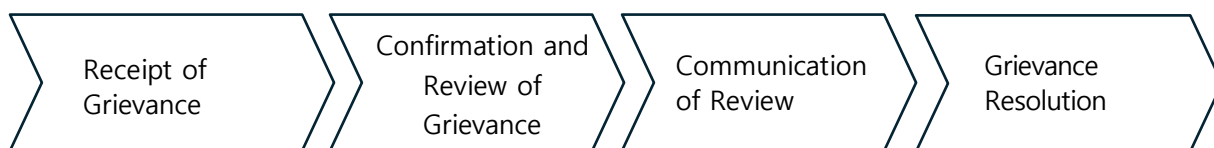
GC Biopharma evaluates and shares the performance of prevention and improvement activities, and monitors whether improvement measures are implemented and maintained at its own business sites and at partner companies. Where necessary, the company establishes supplementary measures and requires corrective action.

④ Transparent Disclosure and Stakeholder Engagement

GC Biopharma transparently discloses to stakeholders the plans, implementation, and results (including identification of key human rights issues) of HRIAs.

5.4. Operation of Human Rights Grievance Handling System (Human Resources Management Division, Ethics Management Team)

To prevent human rights violations and unethical conduct that may arise in its business activities, GC Biopharma operates a human rights grievance handling system (counseling cafe, online reporting platform) that is accessible to all internal and external stakeholders at any time. All reporters are fully protected in terms of their identity and anonymity in accordance with internal regulations, and any disadvantage or retaliation for reporting is prohibited.



① Receipt of Grievance

Human rights-related grievances from officers and employees are received on an ongoing basis through the grievance handling channels (counseling cafe, online reporting platform).

② Confirmation and Review of Grievance

The facts of the received report are carefully verified. During this process, measures to protect the reporter are implemented as a priority, and appropriate response measures are reviewed for each case.

③ Communication of Review Results

The results are communicated to the reporter, and the accused party is given an opportunity to present their views and provide an explanation, ensuring fairness.

④ Grievance Resolution

Based on the results, personnel measures such as disciplinary action are taken, and if necessary, prevention-of-recurrence education is conducted.

CEO, GC Biopharma