

# Global Grievance Resolution Policy

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People Team, Employee Engagement Group

Samsung MedisonCo., Ltd. (hereinafter referred to as “Samsung Medison”, “Samsung”, the “company”, “we”, “us”, or “our”) is committed to respecting all internationally recognized human rights. 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 Samsung, 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 Samsung. We are committed to promptly investigating allegations and providing fair and effective remediation by ourselves and/or in cooperation with other stakeholders.

Samsung’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 grievance channels, handling procedures and principles. It also serves as a standard for objective and consistent handling of all grievances reported to Samsung, 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.

**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 Samsung’s operational-level grievance mechanism administered either by the company or in collaboration with other third parties and it is accessible to all stakeholders.

**A complainant** is a person, group or organization such as an employee or stakeholder of Samsung, or (a worker of) partner companies that is affected or has reasonable grounds to believe that they have been adversely affected by business operations of Samsung. 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 respondent** refers to an employee of Samsung who is the subject of the reported grievance. Depending on the case, Samsung or a specific unit of Samsung may be the subject of 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.

**Remediation** refers to both the process of providing a remedy for negative human rights impacts and the substantive outcomes that can address or mitigate the negative impacts. Its ultimate aim is to restore the rights of individuals or groups when harm has occurred and to prevent reoccurrence.

## 2. Scope

This policy applies to all grievances reported via Samsung’s channels. Although Samsung has various channels through which all stakeholders are able to directly report their grievances, partners doing business with Samsung 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

Samsung 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. Samsung 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.

#### [ Grievance Channels for Different Categories of Stakeholders ]

Organizational Units	Stakeholders	Grievance Channels and Scope of Grievances
People Team	Employees of Samsung, including contractual and non-regular employees	<ul style="list-style-type: none"> <li>- <b>Channel(s):</b> Hotline, online (Email), employee representative bodies , offline (suggestion box), etc.</li> <li>- <b>Language(s):</b> Provided in the language used by workers of each business site</li> <li>- <b>Scope of grievances:</b> All grievances related to our business operations, including but not limited to:               <ul style="list-style-type: none"> <li>· All human rights violations (e.g. child/forced labor, harassment, discrimination, health and safety risks)</li> <li>· Working conditions (e.g. overtime work wage violations)</li> </ul> </li> </ul> <p>* All business sites of Samsung across the world operate grievance channels; there are several business sites that have additional third-party whistleblowing systems in place.</p>
Audit Group	Employees of major direct suppliers such as manufacturing and service providers	<ul style="list-style-type: none"> <li>- <b>Channel(s):</b> Hotline and Email</li> <li>- <b>Language(s):</b> Provided in the language used by workers at each business site</li> <li>- <b>Scope of grievances:</b> Grievances including but not limited to:               <ul style="list-style-type: none"> <li>· Grievances arise from business relations with Samsung and working environment at partner companies</li> </ul> </li> </ul>
Audit Group	External stakeholders	<ul style="list-style-type: none"> <li>- <b>Channel(s):</b> <a href="mailto:audit.sm@samsungmedison.com">audit.sm@samsungmedison.com</a></li> <li>- <b>Scope of grievances:</b> All grievances related to our business operations</li> </ul>

## 4. Grievance Handling Procedure

Samsung 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.

The grievance procedure consists of four steps — receipt, investigation, notification, and resolution — and the goal is to handle and close grievances within three months. However, depending on the characteristics of the grievances such as where the grievance involves external stakeholders or possible violation of the law, the procedure may take more than three months and there may be changes to the procedure. Additionally, the company may close an ineligible grievance such as where the facts cannot be verified or where the grievance is unfounded, exaggerated or deceiving. In such cases, the grounds for closing the grievance will be communicated. Furthermore, the company may reinvestigate the closed case only when reasonable grounds are provided.

### [ Grievance Handling Procedure ]

#### **[Receipt] Receive the grievance.**

- Assign an organizational unit and person in charge of Samsung 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 a pop-up message to inform the complainant.

#### **[Investigation] 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.

#### **[Notification] 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, Samsung'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.

#### **[Resolution] Implement and monitor the agreed remedial measures.**

- Where the respondent is an employee of Samsung, remedies may incorporate reconciliation, disciplinary action and dismissal of the respondent that comply with internal policies, including the rights of workers to defend themselves against the allegations.
- Where the respondent is Samsung or a specific unit of the company, remedies may include outcomes outlined under "Remediation" in Section 5 of this policy.

## 5. Principles of Grievance Handling

Samsung is committed to complying with the following principles throughout the entire procedure to handle grievances reported via our internal grievance channels and third-party channels.

- **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.
- **Alignment with UNGPs Effectiveness Criteria:** In accordance with Principle 31 of the UNGPs, Samsung 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:** Samsung 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. Samsung is committed to investigating and addressing such complaints promptly and impartially.
- **Support of Human Rights Defenders:** Samsung 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:** Samsung 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:** Samsung respects the rights of a complainant to participate in or to utilize other judicial and non-judicial grievance processes. Samsung 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 Samsung 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-financial compensation and punitive sanctions, as well as the prevention of harm through, for example,

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

## **6. Implementation and Effectiveness of Grievance Mechanism and Remediation**

Samsung recognizes and utilizes grievance channels as an effective human rights due diligence tool and early warning system to detect adverse impacts on human rights. Samsung's grievance mechanisms are part of our wider due diligence process. In other words, our findings from grievance handling are incorporated into the process of setting our strategic plans to prevent and mitigate adverse impacts on human rights. Overall, our grievance channels serve as a source of information that can be used to enhance the quality of human rights due diligence, making our efforts to prevent and mitigate human rights-related risks more effective.

Dedicated teams and professionals are in charge of operating grievance channels, handling cases, providing effective remedial measures and monitoring the actual implementation. All Samsung employees are trained to be aware of existing global and local grievance channels, reporting methods, and their rights to access to remedy via on-boarding and annual human rights training, posters and other advocacy communication. In addition, the regular training for persons in charge of handling grievances focuses on effective grievance management. The training is conducted at the business site level in consideration of different characteristics of countries and subsidiaries. Channels available to external stakeholders are communicated via online platforms, in the case of suppliers, via posters. Samsung's suppliers are expected to have their own grievance channels in place in alignment with Samsung's commitments and Samsung is committed to collaborate with suppliers to address grievances

Samsung strives to listen to the opinions of various stakeholders to provide fair and effective grievance handling procedure. When establishing this grievance policy, we engaged with employee representative organizations and external stakeholders to reflect their voices. Additionally, when conducting on-site inspections on our partner companies or compliance management workshops, we encourage those who work at the partner companies to participate in updating Samsung's grievance handling procedures by collecting their thoughts on how to improve our hotline system through interviews. Furthermore, we regularly collect all filed cases and analyze trends to identify the root causes of adverse impacts to prevent recurrence via policies and processes. These monitoring and evaluation activities are planned and executed individually by the country, subsidiary, and responsible organizational unit of Samsung. We publish aggregated grievance data on a regular basis.

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

\* Miscellaneous: In case of discrepancy and/or inconsistency between the English version and other language versions, the English version shall prevail.