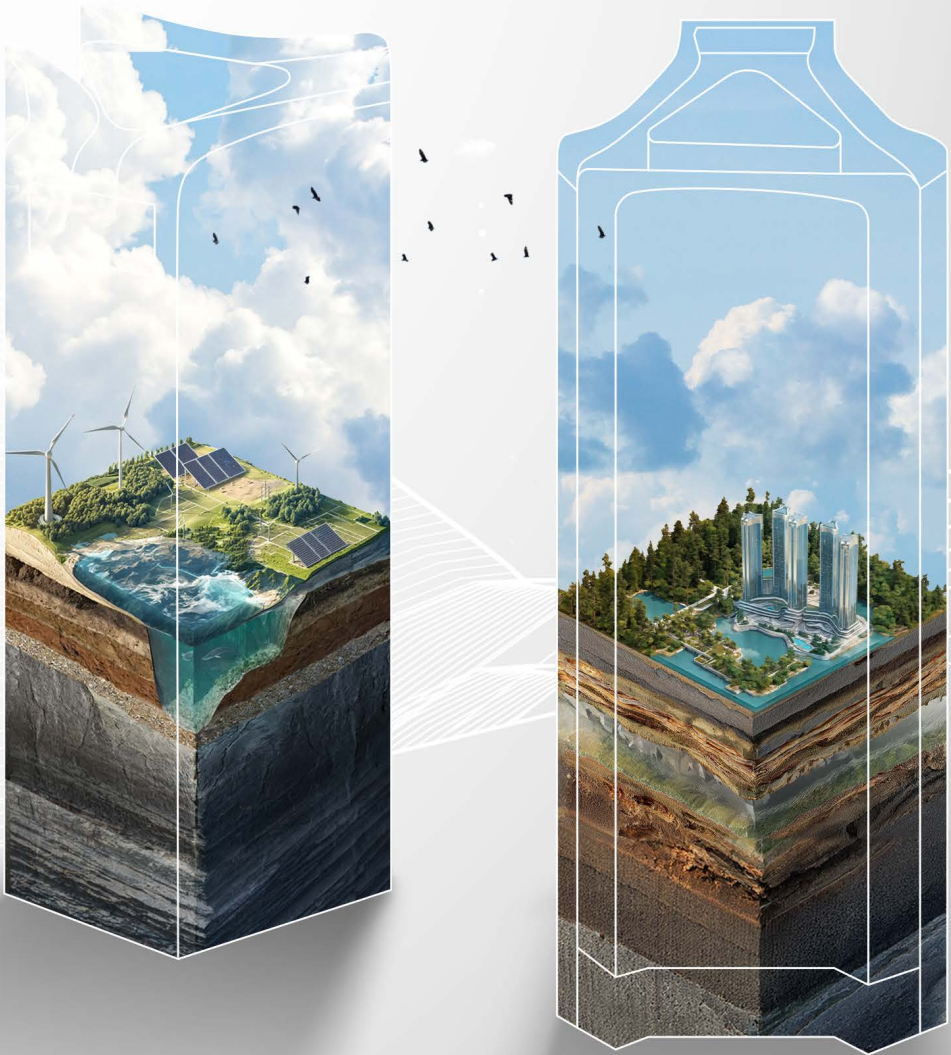


POSCO E&C SUSTAINABILITY REPORT

2025 POSCO E&C Sustainability Report



About this Report



This image projects the forward-looking value of “construction that coexists with nature,” in which blue skies, green spaces, renewable energy, and buildings come together in harmony. The path of sustainable construction that POSCO E&C has steadily built up accumulates as firmly as layers of sediment upon the earth. This accumulated history is an unbroken, precious legacy to be passed on intact to the next generation.

Overview

This is the fifteenth sustainability report of POSCO E&C. Through this report, POSCO E&C aims to transparently disclose to its stakeholders the company's sustainability management activities and performance across the economic, social, and environmental areas.

Reporting Period and Boundary

The reporting cycle of this report is annual, with the previous report published in June 2025. The reporting period spans from January 1 to December 31, 2025, and includes activities from the first half of 2026 for certain key issues. The report covers the performance of major sustainability management activities at POSCO E&C's headquarters and its domestic and overseas worksites, and discloses three years of data from 2023 to support comparability. Any differences in reporting boundary are noted separately.

Reporting Standards

This report is prepared in accordance with the GRI (Global Reporting Initiative) Standards 2021, the global guidelines for sustainability reporting, and with reference to ISO 26000, the UN Global Compact Principles, the sector-specific standards of the SASB (Sustainability Accounting Standards Board), and the disclosure recommendations of the TCFD (Task Force on Climate-related Financial Disclosures). Financial information is presented on a consolidated basis in compliance with the K-IFRS (Korean International Financial Reporting Standards). Data on energy use and greenhouse gas emissions were prepared based on third-party assurance results, and any other significant changes are noted separately in the relevant sections.

Interactive Guide

This report provides convenience features such as page navigation, previous/next, and table of contents buttons, so that readers can browse the information with ease.



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Assurance

To enhance the internal and external credibility of its content, this report was assured by Samjong KPMG, which provides integrated third-party assurance for POSCO Group, thereby securing the reliability and fairness of the preparation process, the disclosed data, and the content. The independent assurance statement is provided on pages 105-106 in the Appendix.

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CEO Message



A Sustainable Leap Toward Greater Trust

Dear Valued Stakeholders,

On behalf of POSCO E&C, I would like to express my sincere gratitude to our clients, supply chain partners, and employees for your continued trust and support.

It is a privilege to share, through this year's Sustainability Report, the values that POSCO E&C pursues, along with our strategic action plans and progress toward the future.

The global business environment has undergone significant transformation in recent years — driven by accelerating climate change, heightened macroeconomic uncertainty, and wide-ranging supply chain restructuring. The construction industry, in particular, faces considerable headwinds from escalating raw material costs and a prolonged contraction in the real estate market. Against this backdrop, POSCO E&C remains committed to strengthening its long-term sustainability.

In pursuit of carbon neutrality, we secured validation of our near-term greenhouse gas (GHG) emissions reduction targets by the Science Based Targets initiative (SBTi), reinforced our internal GHG monitoring framework, and are implementing greenhouse gas emissions reductions across both our corporate headquarters and project sites. On the governance and social dimensions, we have maintained our AAA rating under the Fair Trade Compliance Program (CP) and received recognition as a Certified Community Contribution Company — reflecting our ongoing commitment to the ethical and social standards expected by our stakeholders.

Building on this foundation, POSCO E&C is focused on three strategic priorities going forward:

First, achieving zero-harm operations by embedding safety as a core value.

Safety is an absolute value at POSCO E&C — one that admits no compromise. We will continuously strengthen our on-site safety management systems and foster a proactive safety culture, ensuring that all employees and subcontractor workers can operate in an environment built on open communication and trust.

Second, accelerating progress on our carbon neutrality roadmap.

We will scale the adoption of low-carbon construction methods and sustainable materials to drive continuous GHG emissions reductions across our construction value chain. We will also pursue the climate transition as a strategic opportunity — building competitive capabilities in low-carbon sectors including hydrogen reduction ironmaking (HyREX), small modular reactors (SMR), offshore wind energy, and zero-energy buildings (ZEB).

Third, establishing transparent and accountable governance.

Grounded in an ethical management framework that upholds stakeholder rights and ensures compliance with applicable laws and regulations, we will continue to fulfill our corporate responsibilities to our investors, communities, and the broader society.

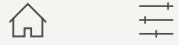
Dear valued stakeholders, POSCO E&C's vision extends beyond constructing buildings. We are committed to creating sustainable environments where people and nature can coexist. We will channel today's uncertainties into opportunities for growth, and continue to move forward steadily on our journey toward becoming a lasting enterprise. We look forward to your continued support and engagement.

Thank you.

June 2026

Representative Director & CEO **Song Chi-young**

송 치영



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Since its founding in 1994, POSCO E&C has gone beyond conventional construction to transform the value of our lives and spaces. From developing smart cities and industrial plants that drive economic growth, to delivering infrastructure that connects communities across the world, we have successfully led numerous projects on the global stage. Grounded in a commitment to continuous innovation, POSCO E&C is at the forefront of building a better future where sustainable progress and low-carbon technologies come together.

Company Profile

As of 2025

Representative Director & CEO	Song Chi-young
Headquarters	307, Jungheung-ro, Buk-gu, Pohang-si, Gyeongsangbuk-do, Republic of Korea
New Orders in 2025	KRW 15.2376 trillion
Date of Establishment	December 1, 1994
Business Areas	Plant, Building ※The Infrastructure division is integrated into the Plant Division
Credit Rating (corporate bonds)	A+ (Korea Ratings, NICE Investors Service, Korea Investors Service)
Number of Employees	5,795 ¹⁾
2025 ENR Global Contractors	101st

Financial/Non-Financial Performance

As of 2025

Financial Capital²⁾

Revenue	KRW 6,903,100 million
Operating Profit	KRW (451,500) million
Earnings per Share	KRW (11,341)

Manufacturing Capital²⁾

Revenue from Building Division	KRW 4,505,300 million
Revenue from Plant Division	KRW 2,413,000 million

Intellectual Capital

R&D Achievements	55 cases
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Global Network

As of June 2026

22

Total Global Projects

5

countries, 5 subsidiaries

Overseas Subsidiaries

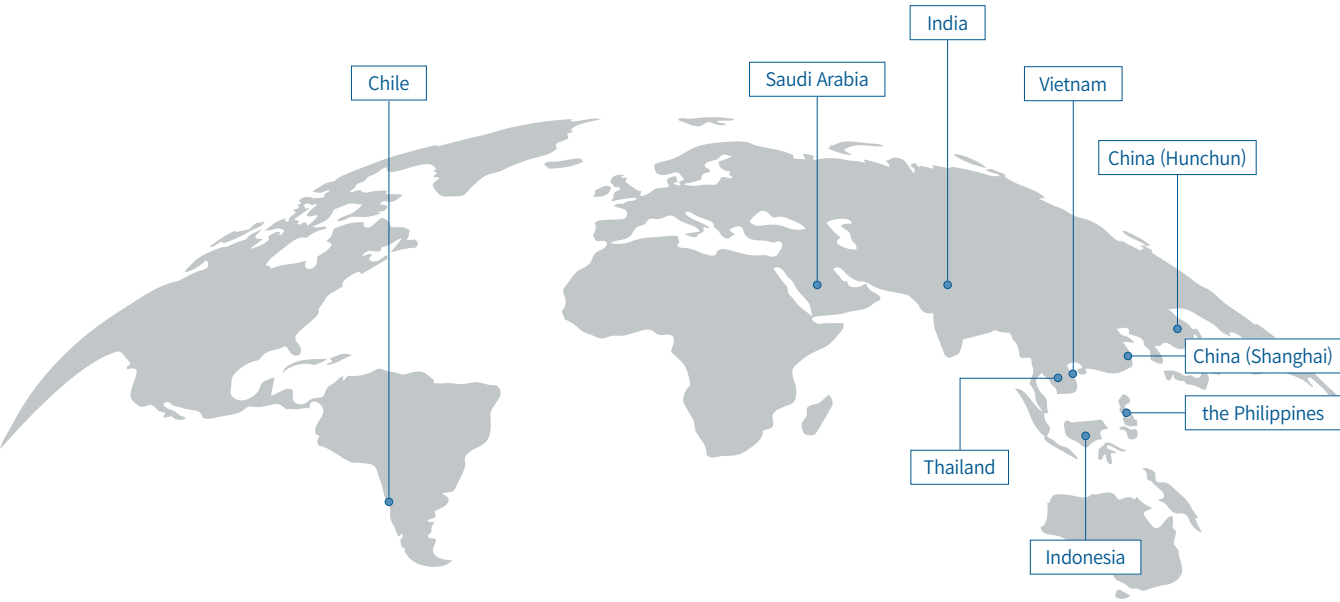
China (Shanghai, Hunchun Logistics),
Indonesia, Malaysia, the Philippines

5

countries, 5 branches

Overseas Branches

Asia Vietnam, Indonesia, the Philippines
Middle East Saudi Arabia
South America Chile



Human Capital

Total Training Hours	177,328 hours
Total Training Cost	KRW 1,755 million
Training Hours per Employee	30.6 hours
Training Cost per Employee	KRW 0.3 million

Social and Relationship Capital

Social Contribution Hours	70,779 hours
Social Contribution Hours per Employee ³⁾	15.4 hours

1) Differs from the classification criteria used in the business report
2) Prepared on a consolidated financial statement basis
3) Social contribution hours relative to the number of participants



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POSCO E&C is an integrated engineering and construction company established on the foundation of steelworks engineering and construction technology, delivering end-to-end EPC solutions across three core business areas: plant, infrastructure, and building.

Building on deep technical expertise and a proven track record on the global stage, POSCO E&C has established a strong competitive position in the EPC market. Going forward, we will continue to build capabilities in emerging businesses and technologies that advance a sustainable future — creating long-term value in partnership with stakeholders across our value chain.





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POSCO E&C delivers EPC solutions across key industrial sectors — including steel, secondary battery materials, hydrogen, LNG, and chemicals — while actively expanding its low-carbon business portfolio to advance toward a sustainable future.

Steel and Materials



POSCO Group is advancing the development and commercialization of hydrogen reduction ironmaking (HyREX) technology, which can lower the fossil-fuel dependence of the steelmaking process and significantly reduce carbon dioxide emissions. This is an innovative technology that uses hydrogen instead of coal to reduce iron ore and produce molten iron, supporting carbon neutrality in the steel sector.

Secondary batteries help reduce reliance on fossil-fuel-powered internal combustion engines and contribute to greenhouse gas emissions reductions. They are also key components used in robotics and a strategic material for POSCO Group's future growth. In line with the Group's secondary battery business, POSCO E&C is carrying out a range of projects, including a brine lithium project in Argentina, a cathode-material plant in Gwangyang, and an anode-material plant in Sejong.

Chemicals



An LNG terminal is an industrial facility that unloads and stores liquefied natural gas (LNG) and regasifies it for supply to power plants and other destinations. POSCO E&C has successfully carried out LNG terminal projects both domestically and internationally — including Samcheok, Gwangyang, Panama, and the Dominican Republic — demonstrating proven expertise in liquefied gas storage construction. Building on this project portfolio, we plan to continue expanding our presence in the LNG sector.

Chemical plants are integrated industrial facilities that process raw materials such as crude oil and gas through physical and chemical processes to produce essential energy fuels and high-value-added petrochemical products. POSCO E&C has successfully delivered chemical plants across a range of global markets — including Tanjung Sekong in Indonesia, LSP in Vietnam, Daesan E1, and the Gwangyang LPG tank — and is currently executing the TTT Chang ethane terminal project in Thailand.

HyREX 0.3MT Demo Plant



POSCO E&C is performing mechanical and electrical (M&E) works for a HyREX demonstration facility with an annual capacity of 300,000 tons at Pohang Steelworks. This project applies core technologies — including Fluidized Bed Reactors (FBR) and an Electric Smelting Furnace (ESF) — to validate the commercial viability of HyREX technology at scale.

Gulf MTP LNG, Thailand



POSCO E&C is conducting a project at the Map Ta Phut Industrial Park in Rayong, Thailand — a key hub of the Southeast Asian energy industry — to install two 250,000 m³ LNG tanks, unloading facilities, and regasification and send-out facilities with an annual send-out capacity of 8 million tons. Serving as a critical regional energy infrastructure asset, this project leverages our proven domestic and international project expertise to deliver a facility of strategic importance to the region.



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To advance a low-carbon society through the delivery of sustainable energy, POSCO E&C is strengthening its competitiveness across low-carbon energy sectors such as nuclear power, offshore wind, and offshore facilities.

Low-Carbon Power Generation



Nuclear power can generate electricity efficiently with relatively low greenhouse gas emissions. Through its Nuclear Power Business Division, POSCO E&C is strengthening its competitiveness in nuclear power generation and small modular reactors (SMR), executing various projects including the main facility construction for Shin Hanul Nuclear Units 3 and 4, the demonstration and analysis building for a nuclear decommissioning research institute, and the new heavy-ion accelerator facility at Seoul National University Hospital.

Offshore wind is one of the most capital-intensive and fastest-growing renewable energy sectors. Although installation is technically complex and costly, it offers high generation efficiency and strong growth potential. POSCO E&C operates an Offshore Wind Power Project Team to develop various technologies to strengthen its competitive position in this sector. We are also advancing the Gochang Offshore Wind Power Project, which is set to open a new chapter for Korea's offshore wind landscape, targeting groundbreaking in the second half of 2026.

Gochang Offshore Wind Power Project



POSCO E&C is developing the Gochang Offshore Wind Power Project in Sangha-myeon, Gochang-gun, Jeollabuk-do, with a total installed capacity of 76.2 MW. This project involves the installation of twelve fixed-bottom offshore wind turbines with a capacity of 6.35 MW each, incorporating core technologies such as substructure foundations, submarine cables, and tower and blade assembly—ensuring reliable offshore wind power generation through precision engineering and proven construction expertise.

POSCO E&C has successfully carried out a wide range of building projects — including redevelopment, reconstruction, and remodeling — building a distinctive track record in construction. In line with the national Zero Energy Building (ZEB) Roadmap, we are developing and applying technologies to minimize building energy loads and improve energy independence. Building on The Sharp brand, we launched HAUTERRE, a new high-end residential brand, to deliver an elevated living experience to our customers.

Prime Living



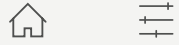
POSCO E&C is advancing technologies across multiple disciplines — including interior design, landscaping, and smart home systems — to create next-generation living spaces. To improve building energy efficiency, we have established optimal design guidelines for each ZEB (Zero Energy Building) grade. In 2023, we obtained ZEB Grade 1 certification for a detached-residential complex within the Jack Nicklaus Golf Club, and HAUTERRE Banpo, completed in June 2026, voluntarily sought Zero Energy Building certification.

Remodeling improves the performance and functionality of aging buildings through major renovations and extensions while retaining the existing structural frame, thereby generating less waste than reconstruction. As a leader in domestic remodeling, POSCO E&C has successfully delivered projects such as Gaepo The Sharp Trielle and The Sharp Dunchon Foret, and is currently executing multiple projects, including The Sharp Bundang Tiereone.

HAUTERRE Banpo



HAUTERRE Banpo is the first high-end multi-family residential project completed in Jamwon-dong, Seocho-gu, Seoul. As the first multi-family housing to apply color BIPV (Building-Integrated Photovoltaics) on the building facade, this project simultaneously achieved an improved exterior design and reduced carbon emissions, while introducing a smart home system (AiQ) to provide a future-oriented residential environment.



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Drawing on its extensive experience with diverse projects at home and abroad, POSCO E&C has accumulated the capability to build smart infrastructure that contributes to both a sustainable future and local communities — across areas such as mixed-use facilities, data centers, transportation, and marine sectors.

Smart City



In step with the rapidly changing digital ecosystem, POSCO E&C is leading the way in building high-value, energy-efficient data centers. Notably, we successfully completed Phase 1 of the CapitaLand Goyang Data Center for Equinix — the world's No. 1 data center company — and have further strengthened our expertise by undertaking SL2x-2, SL3x, and additional projects.

Based on core technologies such as fire-resistance and pumping technologies for high-strength concrete, together with composite structural systems using high-strength steel, we have completed mixed-use buildings of the highest level in Korea. We have successfully delivered iconic mixed-use landmarks including LCT (2nd tallest in Korea, 411.6m), Yeouido Parc.1 (3rd, 333m), and POSCO Tower-Songdo (4th, 305m)¹⁾. Through the Seoripul site mixed-use development that broke ground in 2026, we aim to solidify our position in the mixed-use facility sector.

Seoripul Business Complex Development Project



This is a project to develop a mixed-use complex with a total floor area of approximately 180,000 pyeong (595,044 m²) in a core business district of Gangnam, Seoul (the former Defense Intelligence Command site). As the largest real estate project finance (PF) development in South Korea, the southern plot will comprise a B7/F19 structure accommodating office, retail, and cultural & assembly facilities, while the northern plot will feature a B4/F7 structure housing office and neighborhood commercial facilities.

Urban Development



Urban Development is a complex undertaking that goes beyond simple construction, organically integrating every process from project conceptualization, market analysis, land acquisition, and financing through to marketing, sales, and construction. By successfully leading the Songdo International Business District Development, POSCO E&C has demonstrated to the market its distinctive development capabilities and construction skills spanning from initial planning through project completion. Leveraging the deep expertise and technical capabilities built through Songdo International Business District Development, we aim to continue pursuing new-town development and private mixed-use urban development both domestically and internationally, thereby driving regional economic growth and enhancing quality of life through the creation of smart, sustainable urban environments.

Songdo International Business District



To develop Songdo International Business District, which is optimized for global business, POSCO E&C has built not only office facilities such as POSCO Tower-Songdo and Booyoung Tower but also key infrastructure and amenities, including Central Park, international schools, Convensia, and the Jack Nicklaus Golf Club. Songdo International Business District continues to evolve as a landmark international city and the premier business hub of Northeast Asia.

1) Ranking and heights of Republic of Korea's tallest buildings



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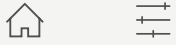
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Board of Directors

Roles and Responsibilities of the Board

Under Article 11 of the Board Operating Regulations, the Board of Directors of POSCO E&C serves as the highest decision-making body for ESG management. The Board integrates environmental, social, and governance risks and opportunities into the company-wide risk management framework. It further supervises executive accountability through the approval of ESG goals and strategies and monitoring of implementation progress. The Board conducts an annual review of the ESG management plan, and additional agenda items may be raised at any time at the request of the Chair or a director. In addition, the ESG Council under the Board received the results of the 2025 Double Materiality Assessment, ensuring company-wide management and oversight of issues expected to have the most significant impact on the company.

Board Operating Regulations

Article 11 (Matters Submitted) The matters to be submitted to the Board are as follows.
② Matters concerning management
d. Annual ESG management plan

Board Composition

The Board of Directors of POSCO E&C comprises six members: three Executive Directors and three Non-executive Directors. The Board operates in accordance with the Articles of Incorporation, and under Article 38 of Chapter 6 of the Articles, the role of Board Chair is concurrently held by the Representative Director & CEO, contributing to swift decision-making. Directors are appointed upon approval by a majority of the voting rights of the shareholders present at the General Meeting of Shareholders and at least one-quarter of total issued shares. Provisions for the limitation of director liability to the Company are set forth in Article 33 of the Articles of Incorporation. In addition, POSCO E&C maintains directors' and officers' (D&O) liability insurance to mitigate associated liability risks.

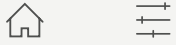
Board Expertise

Beyond its Executive Directors, who bring expertise in management and finance, the Board appoints Non-Executive Directors from POSCO Holdings leadership and overseas specialists with distinguished credentials in global business and investment, thereby ensuring effective and expert deliberation of agenda items. Newly appointed Representative Director & CEO Song Chi-young served for three years as Head of the Safety and Health Center at POSCO E&C, and Director Lee Dong-ho, who currently serves as Chief Safety Officer (CSO), brings dedicated safety expertise to the Board. In 2026, ESG Council participants, including Executive Directors, are scheduled to receive training on ESG policies and regulatory developments.

Board Composition and Board Skills Matrix

Category	Name	Gender	Current Position and Career	Term	Board Skills Matrix				
					Management	Finance	Safety	Global Business	Global Investment
Executive Director	Song Chi-young (Chair)	Male	Current) Representative Director & CEO, POSCO E&C Former) TF Leader of Facilities Competitiveness Improvement, POSCO	Until the 2027 General Meeting of Shareholders	●		●		
	Kim Sang-yong	Male	Current) Head of Strategic Planning Division, POSCO E&C Former) Head of Strategic Planning Office, POSCO	Until the 2027 General Meeting of Shareholders	●	●			
	Lee Dong-ho	Male	Current) CSO, POSCO E&C Former) Deputy Director of Pohang Steel HSE, POSCO	Until the 2027 General Meeting of Shareholders			●		
Non-Executive Director	Kim Seung-jun	Male	Current) CFO, POSCO Holdings Former) Head of Strategic Planning Office, POSCO	Until the 2027 General Meeting of Shareholders	●	●			
	Jacobo F. Solis	Male	Current) Managing Director, Saudi PIF	Until the 2027 General Meeting of Shareholders		●		●	●
	Ahmed A. Al-Subaey	Male	Current) CEO, Saudi Bahri Former) Vice President, Saudi ARAMCO	Until the 2027 General Meeting of Shareholders	●			●	

To avoid duplication, disclosures related to the highest decision-making body within the governance disclosures have been consolidated in this section, covering all material topics identified during the reporting period. Each topic-specific disclosure page presents the organizational structure from the management level downward.



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Board Operations

In 2025, POSCO E&C held nine Board meetings to deliberate on agenda items related to business and ESG management activities, reviewing a total of 36 agenda items including the 2026 management plan.

Sustainable Management Committee | Since 2025, POSCO E&C has operated a Sustainable Management Committee at the request of shareholders to strengthen governance and enhance management transparency. Serving as an additional forum for communication and discussion in support of Board decision-making, the Committee regularly reviews, together with shareholder representatives, whether the company's management activities are conducted ethically and transparently. The Committee comprises two members from POSCO E&C (Kim Sang-yong, Head of Strategic Planning Division, and Jung Hyun-woo, Standing Auditor), one member from POSCO Holdings (Oh Young-dal, Head of Infrastructure Business Management Office), and two members from PIF (Senior Director Rakaan Alsalloum and Senior Principal Jae Hyung Moon). Key agenda items are selected primarily based on shareholder interests related to internal control, and the Committee meets once per quarter.

Director Compensation

Directors' compensation is paid within the limit approved by the General Meeting of Shareholders and consists of base salary, role-based pay, performance-based pay, activity allowances, and severance pay. Performance evaluation incorporates both financial and non-financial indicators, including the advancement of the construction industry and ESG management activities. The calculation criteria and compensation amounts are disclosed in the business report.

Approach to Considering ESG Risks and Opportunities

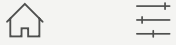
When approving management strategies, the Board considers the environmental and social risks and opportunities as key factors. From an environmental perspective, the Board considers climate-related business areas such as HyREX, electric arc furnaces, and secondary battery recycling, while on the social perspective, it reviews factors related to social responsibility such as safety and health and local communities. New business and investment proposals are approved following an assessment of their impact on the company's portfolio and financial performance.

Board Review of ESG Performance

In accordance with the Board Operating Regulations, the Board of Directors of POSCO E&C annually oversees the ESG management plan and key performance outcomes, and makes decisions on ESG management activities. In the environmental area, the Board receives reports on environmental management performance, including progress on climate change response and carbon neutrality initiatives. In the social area, it receives the safety and health plan at least once a year pursuant to Article 14 of the Occupational Safety and Health Act, and reviews the implementation status of key social value creation activities — such as employee welfare and community contribution — while deliberating future directions. Board activities and status are disclosed to stakeholders through the company's website and business report.

Key ESG-related Agenda Items

Date	ESG-Related Agenda Item		Key Details	Reported/Resolved
25.06.17	2025 Safety and Health Plan	• Safety and health management policy • Safety and health organization and budget operation • Operating plan for priority safety and health activities		Resolved
25.05.20	Appointment of CSO	• Appointment of the Chief Safety Officer		Resolved
	Appointment of Compliance Officer, Fair Trade Compliance Officer	• Appointment of Compliance Officer, Fair Trade Compliance Officer		Resolved
	2025 ESG Management Plan	• Achievement status of 2024 key ESG KPIs • 2025 carbon neutrality roadmap implementation plan and measures to strengthen the human rights management system • ESG disclosure strategy aligned with global reporting frameworks and rating requirements		Resolved



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Management Councils

The Board delegates the strategic execution and day-to-day management of ESG-related risks and opportunities to the ESG Council and its specialized subcommittees. Centered on the ESG Council, POSCO E&C operates the Climate Change Subcommittee and the Human Rights Subcommittee, systematically managing ESG across the environmental, social, and governance areas.

ESG Council | The ESG Council is chaired by the Representative Director & CEO and comprises senior executives including division heads, center heads, and office heads along with external experts, convening on a semi-annual basis. In accordance with the ESG Council Operating Rules, the Representative Director & CEO holds ultimate responsibility and authority over sustainability management matters, including company-wide ESG strategies and plans, implementation performance, and carbon neutrality strategies. In 2025, two external advisors discussed and approved agenda items covering greenhouse gas emissions and reduction measures, as well as human rights and diversity. From 2026, the number of external advisors has been expanded to three, with expertise further strengthened through alignment with the Climate Change and Human Rights Subcommittees and the ESG Policy Response Council.

ESG Council Activities (2025) ※ The ESG Council was not held in the second half in consideration of the company's management circumstances

Session	Date	Agenda	
1	05.22	• 2025 ESG strategic directions • Greenhouse gas emissions and reduction measures	• Human rights management status and plan • Diversity assessment results and improvement tasks

ESG Council Operating Rules

Article 2 (Function) The Council functions to share and discuss key internal and external issues related to the company's ESG and carbon neutrality, and to reach agreement when necessary. Article 5 (Chair) ① The CEO serves as the Chair of the Council, and the Chair convenes the Council and oversees related affairs.	Article 10 (Agenda) ② The main agenda items of the Council are as follows. a. ESG: company-wide and organization-specific ESG strategies and plans, ESG implementation performance, sharing of external ESG trends. b. Carbon neutrality: company-wide and organization-specific carbon neutrality strategies, sharing of external issues. c. Other: matters related to sustainability management
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ESG Council External Advisors

Member	Affiliation	Area of Expertise
Director Lee Eun-kyung	UN Global Compact	• Social area - including human rights and ethics
Partner Shin Eon-bin	ERM Korea	• Environmental area - including climate change mitigation
Partner Attorney Min Chang-wook	Jipyong LLC	• Overall ESG Issues

Climate Change Subcommittee | The Climate Change Subcommittee is chaired by the Head of the Brand Value Office and comprises the Head of the Plant Business Office, the Head of the Procurement & Contract Office, the Head of the Strategic Planning Office, along with external advisors, convening on a quarterly basis. Each quarter, key issues reviewed by the operational group are reported to the Subcommittee with feedback subsequently shared at the ESG Council, and response measures are deliberated as climate-related issues arise. This process enables expert and effective decision-making on climate change response and carbon neutrality initiatives.

Climate Change Subcommittee Activities (2025) ※ The number of Subcommittee meetings was reduced in 2025 in consideration of the company's business conditions

Session	Date	Agenda	
1	04.10	• Company-wide greenhouse gas emission status and reduction targets by division	• 2025 climate change response activity plan
2	08.01	• First-half greenhouse gas emission status and climate change response results	• External trends and second-half plan

Human Rights Subcommittee | The Human Rights Subcommittee is chaired by the Head of the Human Resources & Culture Office and comprises the Head of the Risk Management Office, the Head of the Building Works Planning Office, the Head of the Infrastructure Business Office, the Head of the Strategic Planning Office, along with external advisors, convening on a quarterly basis. The Subcommittee reviews and decides on human rights policies, impact assessments, internalization activities, and performance, with outcomes reported to the Representative Director & CEO and executives via the ESG Council. At the working group level, we operate the Human Rights Working Group and 'DIBE(Diversity, Inclusion, Belonging, and Equity)'.

Human Rights Subcommittee Activities (2025) ※ The number of Subcommittee meetings was reduced in 2025 in consideration of the company's business conditions.

Session	Date	Agenda	
1	04.09	• Introduction of the group human rights management system and 2025 human rights impact assessment plan • Corporate diversity index assessment results and response plan	
2	07.28	• 2025 human rights impact assessment results and first-half human rights and diversity activity results • External trends and second-half plan	
3	10.30	• Report on 2025 human rights management activity results • Experience of a diversity awareness improvement program	

ESG Policy Response Council | Newly established in 2026, this working-level council responds swiftly to rising regulatory risks by monitoring ESG regulatory changes, developing response measures, and reviewing greenwashing risks. Chaired by the Head of the Strategic Planning Office, it comprises the heads of the Sustainability, Legal Affairs, Fair Trade, Public Relations, Labor & Welfare, and Business Planning departments.



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KPI Management

ESG-related indicators, including low-carbon product development, the number of serious accidents, Lost Time Injury Frequency Rate (LTIFR), and customer satisfaction (CS) enhancement strategy, are embedded as Key Performance Indicators (KPIs) in management performance evaluations. These indicators are applied on a differentiated basis according to each executive's role and responsibilities, and are incorporated as key evaluation criteria in the calculation of short-term incentives and bonuses.

Auditor

Audit Body Operation | To reinforce internal control, POSCO E&C has appointed an Auditor responsible for overseeing related-party transactions and self-dealing activities. Following the resolution of the General Meeting of Shareholders in May 2024, the company appointed one Auditor with expertise in accounting and finance, for a three-year term. The Auditor exercises accounting and operational audits based on the authority to attend Board meetings and state opinions, request business reports, and inspect and review relevant documents. The exercise of these rights and obligations is governed by the company's dedicated Audit Regulations. The Corporate Audit Department, operating under the direct mandate of the Auditor, is accountable for financial and accounting audits, internal control system evaluation, domestic and overseas project audits, and the formulation of ethical management policies and improvement of related systems and procedures.

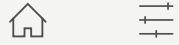
➤ Risk Management

Risk Management Governance

At POSCO E&C, the Chief Financial Officer (CFO) oversees the formulation of company-wide risk management strategies and operating directions, and holds authority to review and approve the enactment and amendment of related internal regulations. At the operational level, the Risk Management Office administers the end-to-end risk assessment and management process, monitoring risks and implementing corrective actions for high-risk areas.

Business Development Phase | Before securing a contract, a company-wide Risk Assessment Meeting — convening relevant departments including Risk Management, Finance, Legal affairs, and Procurement & Contract — is held to identify risks and evaluate mitigation measures. The risks and proposed responses identified through this process are reported to the Project Review Council and incorporated into senior management's final decision on whether to pursue a new project.

Execution Phase | To enable timely responses to material risks and issues during project implementation, a Risk Solution Committee—comprising cross-functional teams including Cost & Scheduling, Safety, Legal, and Quality Assurance—convenes monthly. In addition, for projects identified as high-risk, mega-projects, or impending site openings, potential risks and mitigation strategies are analyzed through a Risk Strategy Meeting to support proactive decision-making. Best practices and lessons learned from successful risk prevention are disseminated organization-wide to continuously strengthen the overall risk response framework.



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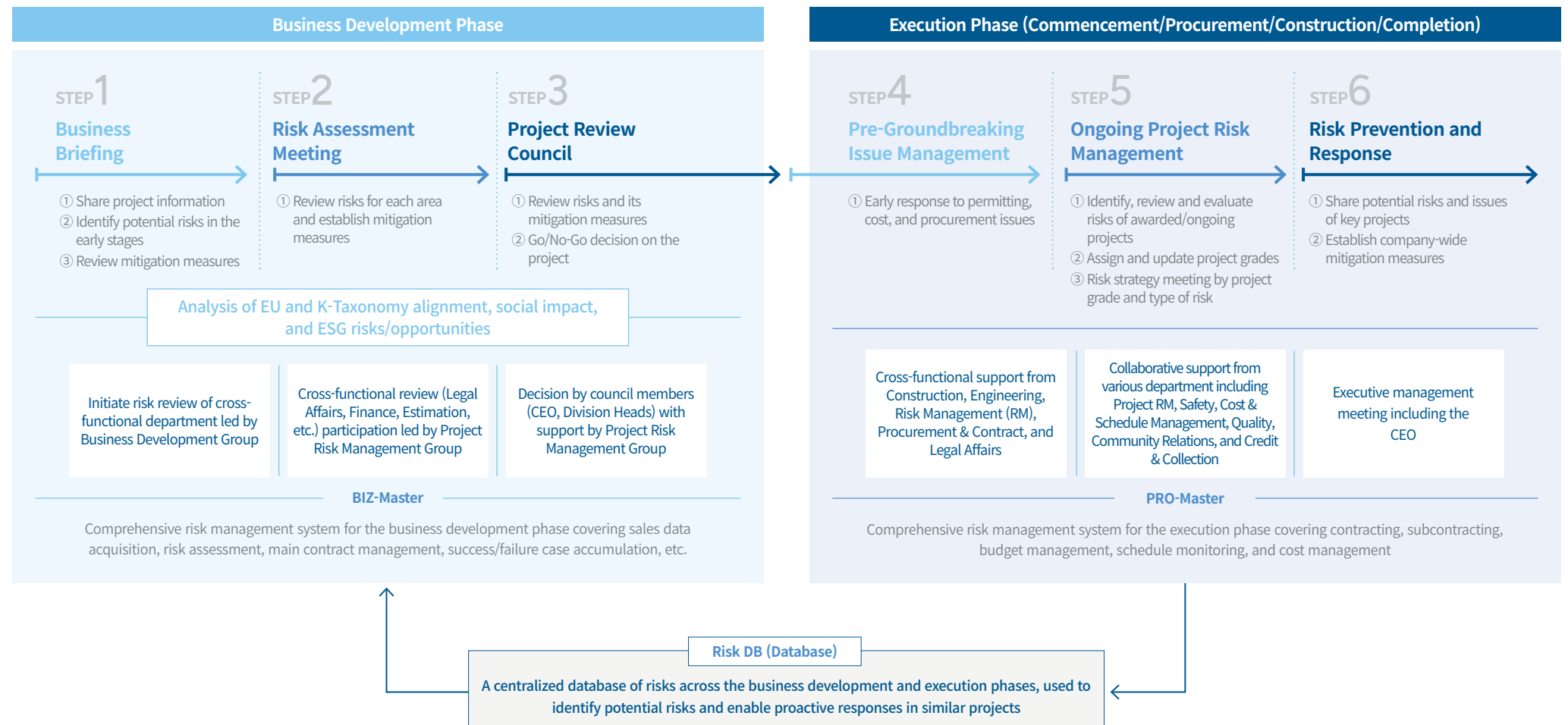
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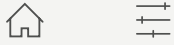
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> Risk Management

Risk Management System

POSCO E&C operates a company-wide risk management system that identifies and manages potential risks through all project stages, from project award through completion. During business development phase, the Risk Assessment Meeting and Project Review Council are held to comprehensively review potential issues — including unfavorable contract clauses and climate and ESG risks — and establish mitigation measures. The execution phase involves routine management to track project budgets (including profit and loss) and schedules from project commencement through completion, accompanied by focused monitoring for prioritized and high-risk projects. Key risks and mitigation strategies derived from this framework are captured in a database to inform risk management for future projects.





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Risk Management by Type

Reflecting ESG Risks within Integrated Risk Management

POSCO E&C comprehensively reviews ESG-related risks through its enterprise-wide risk management system and incorporates the results into management decision-making. We determine whether to proceed with new projects through the Project Review Council attended by senior management and operate an ESG assessment process at the bidding stage alongside financial reviews. Through this process, we assesses alignment with the EU Taxonomy and K-Taxonomy, evaluate potential social impacts, and review ESG checklist to identify measures for addressing ESG risks and leveraging related opportunities. We also incorporate ESG assessment scores into the overall project assessment results.

ESG Assessment Items at Business Development Phase

EU and K-Taxonomy alignment	Social impact	ESG Risk Response and Capitalizing on Opportunities	Positive / Negative factors
- Review of alignment with EU and K-Taxonomy criteria	- Analysis of the validity of social contribution based on major domestic and overseas assessment indicators	- Early identification of ESG risks and opportunities through checklists - Development of response measures for identified factors	- Positive factors: ESG relevance of the client and project funding sources - Negative factors: macro-level country risks, including the corruption perceptions index and the crime index of the target country

Key Risk Identification and Response Activities

Based on its company-wide risk management system, POSCO E&C classifies and manages key risks by type.

	Key Risk	Risk Definition	Impact on Business	Response Activities
Financial Risks	Cost and procurement price volatility risk	Rising major input costs — including raw materials, subcontracting, equipment, and transportation — and procurement instability	• Reduced profitability due to rising construction costs • Schedule delays due to disruptions in material supply	• Precise monitoring of profit/loss and risk via the BIZ-Master and PRO-Master systems • Preemptive reflection of contingency reserves and selective bidding focused on high-quality projects
	Liquidity and PF risk	Funding risks arising from a slowing real estate market, rising interest rates, and a tightening project finance (PF) conditions	• Delays in recovering construction costs • Increased burden of guarantees and contingent liabilities	
	Exchange rate and interest rate risk	Exposure to exchange rate and interest rate volatility arising from overseas projects, foreign-currency material procurement, and increased borrowings	• Increased financial costs • Volatility in overseas project profitability	
Non-financial Risks	Climate and environmental risk	Risks from tightening greenhouse gas regulations, increasing extreme weather events, growing demand for low-carbon buildings, and stricter on-site environmental regulations	• Damage to facilities from extreme weather events such as heavy rain, heat waves, and cold waves • Weakened competitive positioning in project bidding when clients' environmental requirements are not met	• Obtained approval of the SBTi 2030 near-term emissions reduction targets and pursuing greenhouse gas emission reductions • Development of an optimal design package for Zero Energy Buildings (ZEB)
	Safety and health risk	Risks of serious and occupational injuries and fatalities arising from high-risk work operations	• Strong legal sanctions under the Serious Accidents Punishment Act and other laws • Economic damage and reputational harm from construction stoppages	• Screening of high-risk projects and conducting special inspections • Expansion of on-site safety management personnel
	Supply chain risk	Supply chain risks arising from inadequate safety, human rights, and environmental management capabilities among suppliers	• Reputational damage to the principal contractor when supplier risks materialize • Disruption to business continuity, including project schedule delays	• Introduced and mandated a supplier ESG assessment system, a first in the construction industry • Supporting capability development through the mobile Safety Bus and the POSCO E&C Honored Partners (PHP) program
	Ethics and compliance risk	Risks of fraud, corruption, and regulatory non-compliance arising across bidding, subcontracting, permitting, and site operations	• Bidding restrictions, fines and penalties, contract termination, and reputational damage with public and private sector clients	• Declaration of a revised Code of Ethics and Conduct, with ongoing monitoring by the Corporate Audit Department • Ethics training for all employees and operation of an anonymous reporting and whistleblowing hotline

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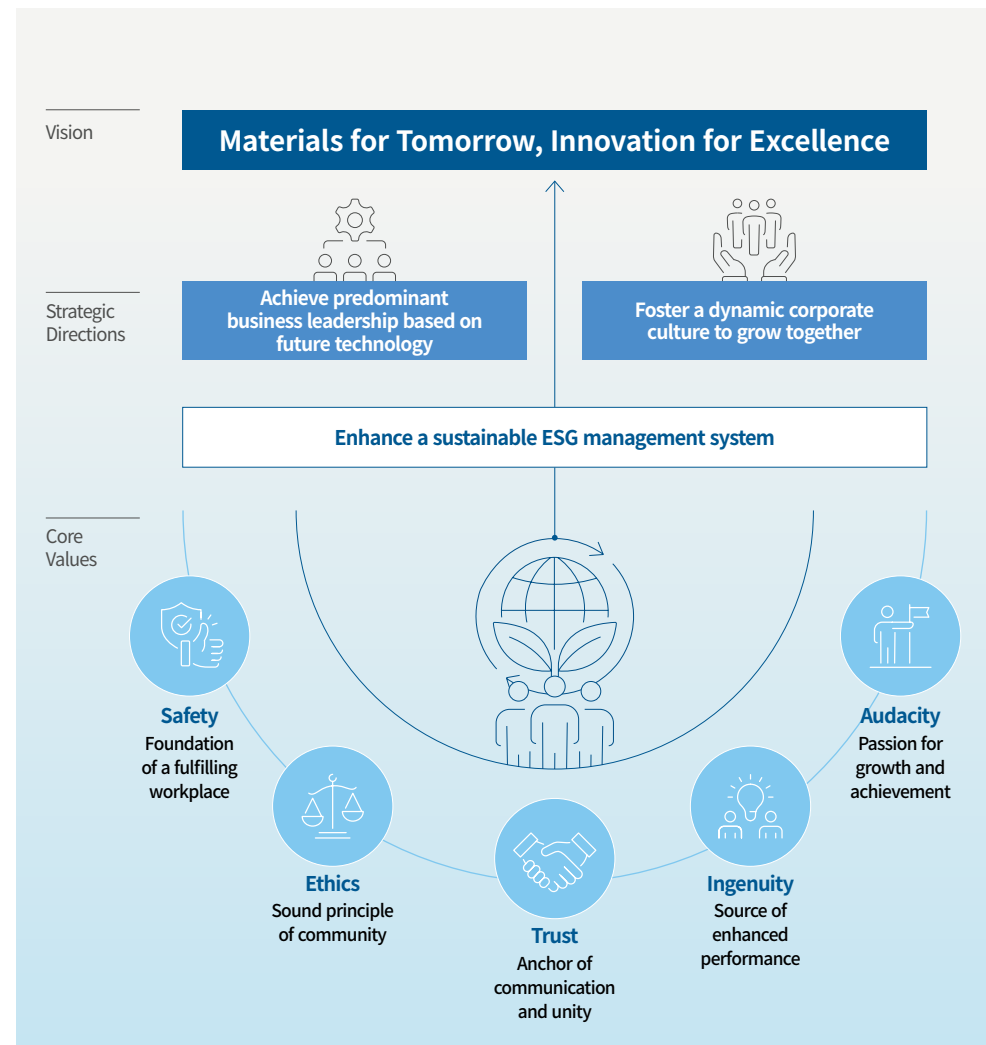
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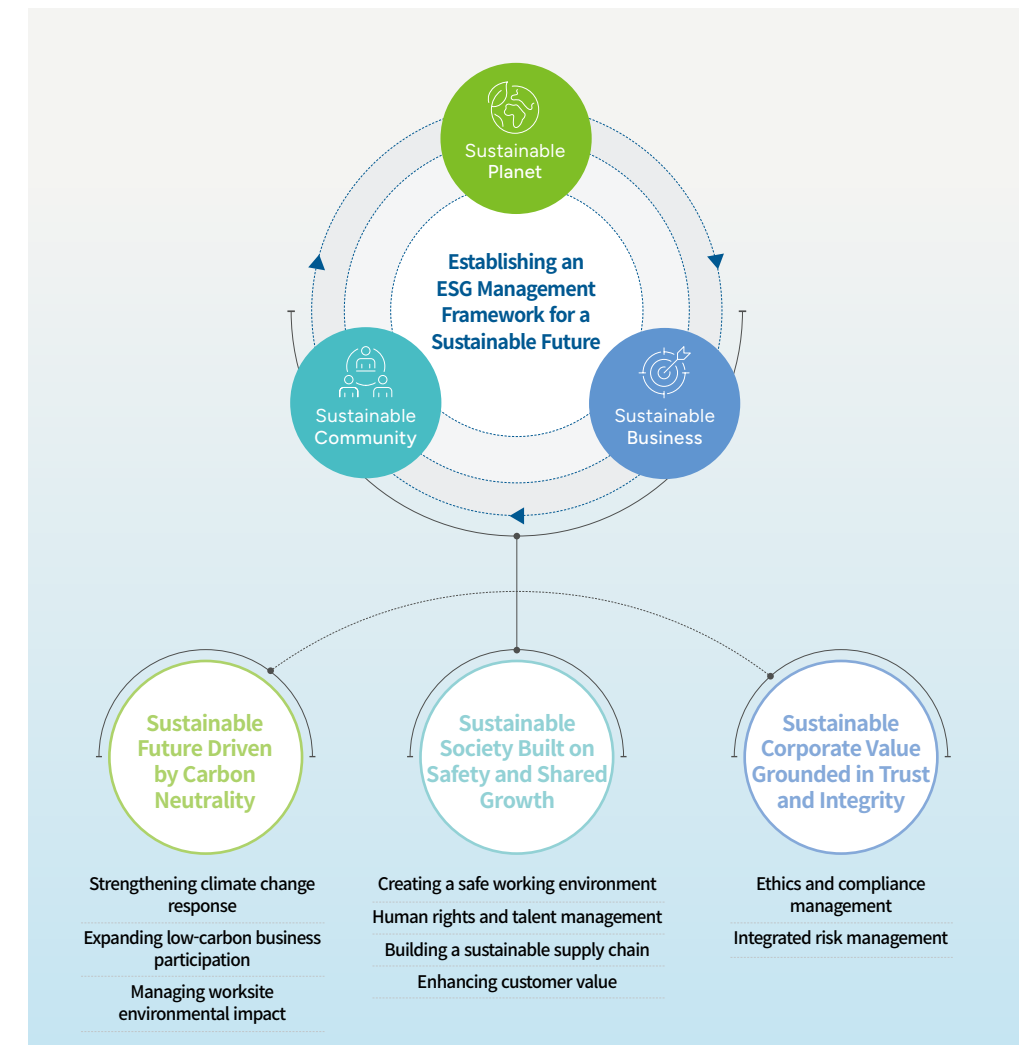
ESG Strategy

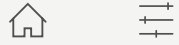
POSCO E&C continues to move forward to a sustainable future for humanity. We have established and are implementing strategies across each ESG area, including climate change response to realize a low-carbon society, building safe worksites, forming solid relationships of trust with local communities, and establishing transparent and sound governance. POSCO E&C will continue to fulfill our social responsibilities and build a secure and sustainable future for all.

POSCO Group Management Vision



POSCO E&C ESG Strategy





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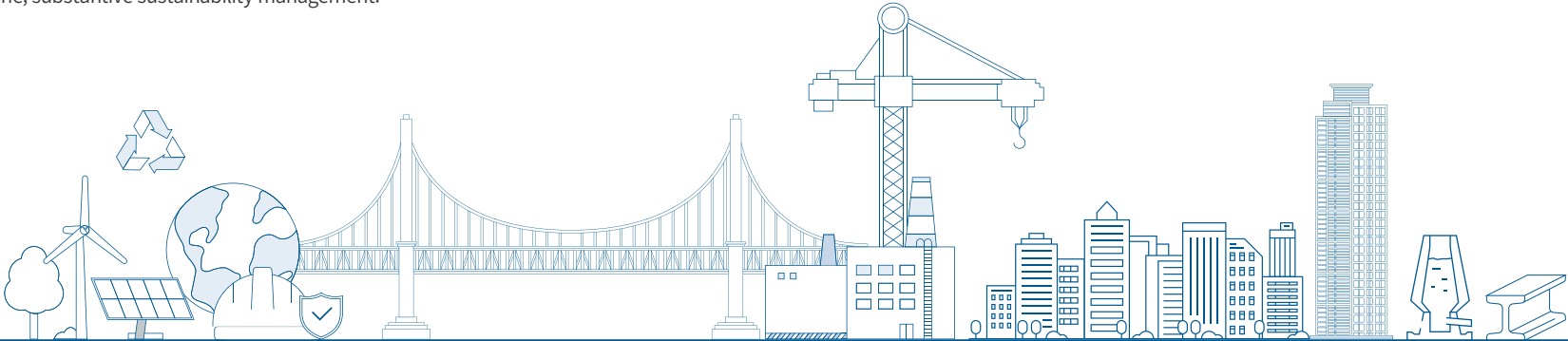
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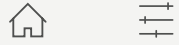
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Key ESG Performance

Since declaring its commitment to ethical management in 2003, POSCO E&C has worked to enhance its sustainability performance over more than two decades. In 2021, we announced our carbon neutrality strategy; in 2024, we received SBTi validation of our 2030 near-term emissions reduction targets; and in 2025, we achieved significant milestones across all ESG dimensions, including the adoption of the POSCO Group's integrated human rights policy declaration and certification to the ISO 37301 compliance management system. Building on these achievements, we will continue to strengthen our foundations in line with global standards and advance our commitment to genuine, substantive sustainability management.



2003-2017	2018-2020	2021-2022	2023-2024	2025-2026
2003 · Declaration of Ethical Management 2008 · Declaration of Win-Win Management 2013 · Family-Friendly Company certification 2014 · Information Security Management System (ISO/IEC 27001:2013) Certification 2016 · Environmental Management System (ISO 14001:2015) Certification	2018 · Occupational Health and Safety Management System (ISO 45001) Certification 2020 · Establishment of a dedicated ESG organization	2021 · Announcement of the 2050 Carbon Neutrality Strategy · First in the Korean construction industry to develop a supplier ESG assessment model · ESG bond issuance (KRW 140 billion) 2022 · CDP Climate Change Leadership rating · Highest grade among construction companies in the Smart Construction Company Index (SCCI) (2 consecutive years) · Establishment of the Human Rights Charter	2023 · Disclosure of the CEO Human Rights Policy · Energy Management System (ISO 50001) Certification · Health-Friendly Company certification 2024 · SBTi validation of 2030 near-term emissions reduction targets · CDP Sector Honors · Recognized as an Honorary Company in the Win-Win Growth Index — highest grade (3 consecutive years) · Level 5 recognition as a Community Contribution Company — highest grade (6 consecutive years) · AAA rating in the Fair Trade Voluntary Compliance Program — highest grade (2 consecutive years) · Information Security and Personal Information Protection Management System (ISMS-P) Certification	2025 · Declaration of POSCO Group-wide Human Rights Management · CDP Climate Change B rating · Nuclear Quality Management System (ISO 19443) Certification · Compliance Management System (ISO 37301) Certification · Recognized for Rural ESG Practice



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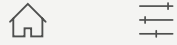
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Key ESG Performance

Under our three ESG strategic directions, POSCO E&C has identified key management areas and is delivering tangible sustainability outcomes through systematic implementation. Aligned with the UN SDGs, we practice responsible management across environmental, social, and governance dimensions.

Sustainable Planet 	Strengthening Climate Change Response	- Operating an environmental and energy management system based on ISO 14001 and 50001 - Managing the 2050 carbon neutrality roadmap and integrated Scope 1, 2, and 3 reduction targets	- Operating biodiversity conservation and marine ecosystem restoration projects - Installing rooftop solar power systems at Yanghak Town	   
	Expanding Low-Carbon Business Participation	- Strengthening competitiveness in green building businesses such as zero-energy buildings and green remodeling - Expanding the sustainable portfolio, including offshore wind, HyREX, and secondary batteries	Generated KRW 1.364 trillion in sustainable portfolio revenue (20% of total revenue)	
	Managing Worksite Environmental Impact	- Managing construction site pollutants such as fugitive dust, noise, vibration, and waste - Expanding construction waste recycling through the development of upcycled materials	- Obtained Environmental Product Declaration certification for upcycled materials developed from construction waste - Implementing site-specific environmental compliance management to ensure regulatory adherence and prevent violations	
Sustainable Community 	Creating a Safe Working Environment	- Operating a safety and health responsibility management system at the management and Board levels - Strengthening the company-wide safety and health management system, including the establishment of the Construction Safety & Behavior Laboratory and expansion of safety organizations across business divisions	- Assessing and monitoring safety and health risks across all stages from order to construction - Establishing checklists based on serious accident causation factors and conducting intensive on-site inspections	 
	Human Rights and Talent Management	Conducting annual human rights impact assessments (checklist assessments, surveys, in-depth interviews, and others) and focusing management on vulnerable groups	Operating the diversity collaborative group 'DIBE' to raise employee awareness of diversity	 
	Building a Sustainable Supply Chain	Assessing ESG risks (human rights, labor, safety, environment, and others) at the new project bidding stage and reflecting them in business deliberation	- Supporting supply chain carbon neutrality through procurement of EPD-certified product - Achieving the highest grade in the Win-Win Growth Index for three consecutive years	
	Enhancing Customer Value	- Operating a global certification-based quality management system and site quality control by business division - Driving quality control innovation through digital technologies, including AI-based quality prediction, integrated data management, and on-site task automation	- Enhancing customer convenience through advancement of the e-BLUET customer IT system - Ranked first in the apartment category of the Korean Standard-Quality Excellence Index (KS-QEI)	 
Sustainable Business 	Ethics and Compliance Management	- Operating a dedicated ethical management system centered on the Corporate Audit Department, together with reporting and counseling channels - Managing employee ethics risks based on the pledges to comply with the Code of Ethics, three core values, four types of unethical conduct, and five prohibited practices	- Operating a four-stage compliance system based on ISO 37301 Compliance Management System certification - Maintaining the highest grade (AAA) in the Compliance Program (CP) for three consecutive years	
	Integrated Risk Management	Operating an integrated management system for risks that may arise at every project stage from order to completion	- Incorporating ESG assessment scores into the new project bidding process - Conducting ESG RM assessments for a cumulative total of 278 projects from 2020 to 2025	



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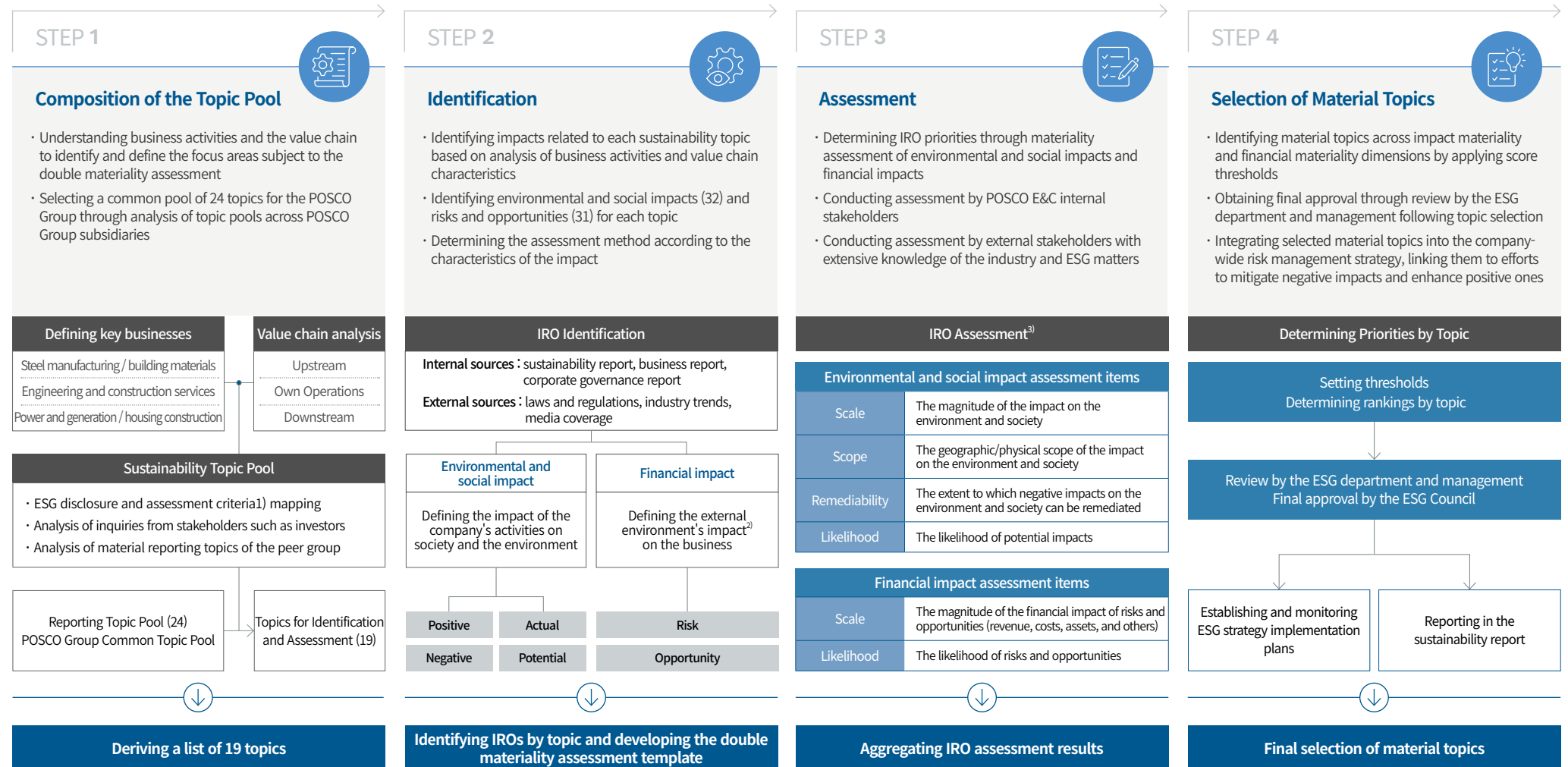
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Double Materiality Assessment

To identify material topics for disclosure in its sustainability report, POSCO E&C conducts an annual materiality assessment based on the double materiality principle. The assessment evaluates both impact materiality — the significance of the impacts of the company's activities on the environment and society — and financial materiality — the significance of external factors on the company's financial position. Assessment topics were derived from an analysis of the POSCO Group's common topic pool, informed by global disclosure standards and peer benchmarking. Following evaluation by internal and external stakeholders and review by management, three final material topics were selected.

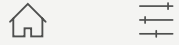
Double Materiality Assessment Process



1) SASB, MSCI ESG Rating

2) Laws, regulations, international community issues, and others

3) Assessment of Impacts, Risks, and Opportunities



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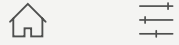
Double Materiality Assessment

Double Materiality Assessment Results

Based on the POSCO Group's common topic pool, POSCO E&C identified 19 topics for assessment, reflecting both the internal and external business environment and our core business characteristics. This year, to respond more effectively to increasingly diversified business risks, we tightened the materiality assessment criteria and raised the selection threshold to prioritize management of key issues. All assessed topics were classified into three tiers — High, Medium, and Low — based on criteria applied separately across financial materiality and impact materiality dimensions. From these, climate change, safety and health, and customer satisfaction were designated as the highest-priority material topics. The materiality assessment results confirmed that climate change and safety and health — both regarded as core pillars of our sustainability management — were selected as key management areas for the fourth consecutive year, while customer satisfaction was selected for the second consecutive year, each achieving high scores across both financial materiality and impact materiality dimensions. Topics not designated as material are classified as mid-to-long-term management areas; we recognize these as potential risks and will continue to manage them systematically over the medium to long term.



Priority Rank	2025 Topic Name	2024 Material Topic	Change from 2024
1	Climate change	Carbon neutrality and climate change response / expansion of energy transition business	Maintained (integrated)
2	Safety and health	Safe working environment	Maintained
3	Customer satisfaction	Customer satisfaction (trust, quality, safety)	Maintained
4	Waste and resource circulation	-	-
5	Air pollution	-	-
6	Value chain workers' rights	Sustainable supply chain management	Transitioned to general topic
7	Own workers' training and capability development	Human rights management	Transitioned to general topic
8	Customer social inclusion	-	-
9	Own workers' working conditions	Human rights management	Transitioned to general topic
10	Fair trade	Fair trade	Transitioned to general topic
11	Water pollution	-	-
12	Corporate ethics and compliance	Ethical management and compliance	Transitioned to general topic
13	Soil pollution	-	-
14	Biodiversity and ecosystem protection	-	-
15	Local communities	-	-
16	Substances of concern	-	-
17	Equal treatment and opportunity for own workers	Human rights management	Transitioned to general topic
18	Water resources	-	-
19	Child/forced labor across the value chain	Human rights management	Transitioned to general topic



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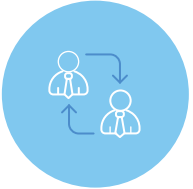
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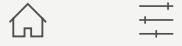
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Stakeholder Engagement and Communication

POSCO E&C defines the stakeholders who influence corporate activities and decision-making as employees, suppliers, customers, investors, local communities, and ESG organizations. We maintain diverse communication channels tailored to each stakeholder group to identify their interests and expectations and reflect them in our management practices. Going forward, we will continue to expand these channels to further strengthen trust and collaboration with our stakeholders.

Stakeholder Classification						
	Employees	Suppliers	Customers	Investors	Local Communities	ESG Organizations
Key Topics	• Human rights management • Safe working environment • Work-life balance • Employee satisfaction • Fair performance evaluation • Talent acquisition	• Sustainable supply chain management • Fair trade • Safe working environment	• Customer satisfaction • Quality management and defect response	• Ethical management and compliance • ESG risk management • Information disclosure and transparency	• Protection of residents near worksites - Fugitive dust, vibration, noise, safety, and others • Protection of the environment around worksites	• Carbon neutrality and climate change response • Expansion of energy transition business • Corporate social responsibility
Communication Channels	• Talk concerts, town hall meetings, Young Board activities, and others • Open dialogue sessions (Gong-gam talks/lunch talks) • COP activities • Diversity Council • Labor-Management Council • Labor law firm reporting and counseling center	• Shared Growth Support Group • Mobile app suggestion box for on-site workers • Supplier grievance handling center • Meetings with suppliers' on-site staff • Operating the safety report channel	• Conducting customer satisfaction surveys • Smart customer response system • Sharpist homemaker advisory group • Official social media, YouTube POSCO E&C TV	• Company-level investor relations sessions (quarterly) • Electronic disclosure • Credit rating response	• Operation of an online channel for receiving complaints • Dedicated personnel for stakeholder communication at each site	• Sustainability report • Various seminars and associations
Response Activities	• Talent development for new businesses • Strengthening core talent development • Building an inclusive organizational culture • Operating the Diversity Council	• Operating shared growth programs • Financial assistance and shared-growth support • Operating the fair trade compliance programs	• Site-focused quality inspection system • AI algorithm system • Development of new quality-related technologies • Resident participation programs (BLUET service)	• Securing Board expertise • Monitoring of the four categories of unethical conduct • Launch of the revised Code of Ethics and designation of five zero-tolerance behaviors • Establishing a risk management cycle framework • Business report disclosure • Publication of the sustainability report	• Residential environment improvement initiatives linked to construction operations • Support for vulnerable groups in local communities • Environmental conservation activities • Community revitalization projects	• Low-carbon technology development • Implementation of the 2050 carbon neutrality strategy • SBTi approval • Participation in various initiatives such as CDP and UNGC



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Climate Change

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Role of Management

The Board of Directors delegates responsibility for strategy execution and day-to-day management of climate-related risks and opportunities to the CEO and the ESG Council. To strengthen execution, a dedicated Climate Change Subcommittee operates under the ESG Council. The Subcommittee is chaired by the Head of Brand Value Office and comprises the Head of Plant Business Office, the Head of Procurement & Contract Office, the Head of Strategic Planning Office, and external advisors. It convenes quarterly to discuss and decide on key measures related to climate change response and carbon neutrality. In 2025, it reviewed agenda items including GHG emission status, progress against reduction targets, and climate response activity plans.

Dedicated Organization

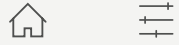
Climate response measures are implemented and overseen primarily by the Strategic Planning Office and the respective business divisions. The Strategic Planning Office leads carbon neutrality target-setting and reduction strategy execution, and is responsible for identifying and assessing climate-related risks and opportunities, developing response strategies, and engaging with climate-related initiatives. Through collaboration with the Plant Engineering & Construction Division, the Building Works Division, and others, we advance business-specific response activities — including expanding our sustainable portfolio and implementing measures to address physical risks at construction sites.

KPI Management

POSCO E&C incorporates ESG action items—including environmental management indicators— into executive Key Performance Indicators (KPIs). GHG emissions have been designated as a key organizational KPI, with a target of reducing emissions by 2% year on year. KPI achievement levels are reflected in the short-term compensation of department heads.

Climate Change Governance





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➤ Risks and Opportunities

Climate-Related Risks and Opportunities



Climate Change									
	Type		Risk and Opportunity Factors	Value Chain Position	Financial Impact	Time Horizon*			Response Strategy
						S	M	L	
Physical risks	Acute	Extreme weather conditions (typhoons, heavy rainfall, heat waves, and cold waves)	Physical damage to facilities, equipment, and materials at construction sites	Own operations	• Increased operating costs due to restoration costs and repurchasing of materials	●	●	●	• Pre-assessment and management of climate-related risks by business type • Survey of climate change damage cases and response status at project sites • Deployment of mobile solar-powered shelters to protect workers during extreme heat periods • AI-based on-site weather information service for prevention of damage from extreme weather events such as heavy rainfall and heatwaves
			Work stoppages and extended rest periods due to safety incident risks, including electric shock, slope collapse, frostbite, and heat-related illness	Own operations	• Increased construction costs and higher labor cost burdens from suspension pay obligations	●	●	●	
			Increased risk of construction schedule delays due to adverse weather conditions	Own operations	• Increased operating costs from revenue loss, liquidated damages, and rising incidental expenses	●	●	●	
	Chronic	Rise in average temperature	Accelerated asset deterioration and shortened lifespan due to rising temperatures, resulting in reduced asset value	Own operations	• Shortened equipment replacement cycles, higher maintenance costs, and increased depreciation due to reduced durability of construction equipment and facilities	●	●	●	• Pre-assessment and management of climate-related risks by business type
Transition risks	Market	Rise in electricity costs	Rising electricity production costs driven by government carbon neutrality and energy transition policies	Own operations	• Higher direct construction costs due to increased electricity charges at construction sites • Deterioration in cost competitiveness of power-intensive processes	●	●	●	• Energy consumption management and reduction (BIM design, process optimization, etc.) • Increased energy self-sufficiency at construction sites through on-site solar power generation • Building energy management at headquarters (maintaining optimal heating and cooling temperatures, cutting standby power, etc.)
	Policy and regulation	Response to the Emissions Trading Scheme (ETS)	Rising emission allowance costs from the introduction and tightening of carbon pricing mechanisms	Own operations	• Increased operating costs from carbon allowance procurement obligations proportional to GHG emissions upon inclusion in the ETS	●	●	●	• Approval of the 2030 near-term carbon reduction targets by SBTi • Expansion of low-carbon transportation (replacement with hybrid vehicles, introduction of CNG and hydrogen commuter buses) • Implementation of GHG reduction activities and emission allowance-linked projects
Opportunities	Market	Growth in offshore wind project orders	Increased order intake and revenue from participation in renewable energy projects	Downstream	• Improved revenue and operating profit from increased construction orders driven by expanded renewable energy investment	●	●	●	• Expansion into overseas markets and business entry in renewable energy and adjacent sectors • Investment in carbon emission allowance projects
	Market	Expansion of Zero Energy Building (ZEB) market	Expansion of related construction orders driven by growth of the ZEB market	Downstream	• Expansion of low-carbon construction order opportunities from the wider adoption of mandatory ZEB certification • Higher revenues from increased high-value-added project wins	●	●	●	• Development of ZEB package technologies • Expansion into sustainable new businesses and value chain extensions
	Cost	Expansion of green procurement	Expansion of opportunities to procure low-carbon construction materials, including EPD-certified materials	Upstream	• Reduced financing costs by linking ESG performance, such as the green procurement ratio, to lower lending rates	●	●	●	• Development of low-carbon construction material transition scenarios • Development of carbon-reducing concrete technologies

* Short term: within one year (2026); medium term: more than one year and up to five years (2027–2030); long term: more than five years (2031 onward)

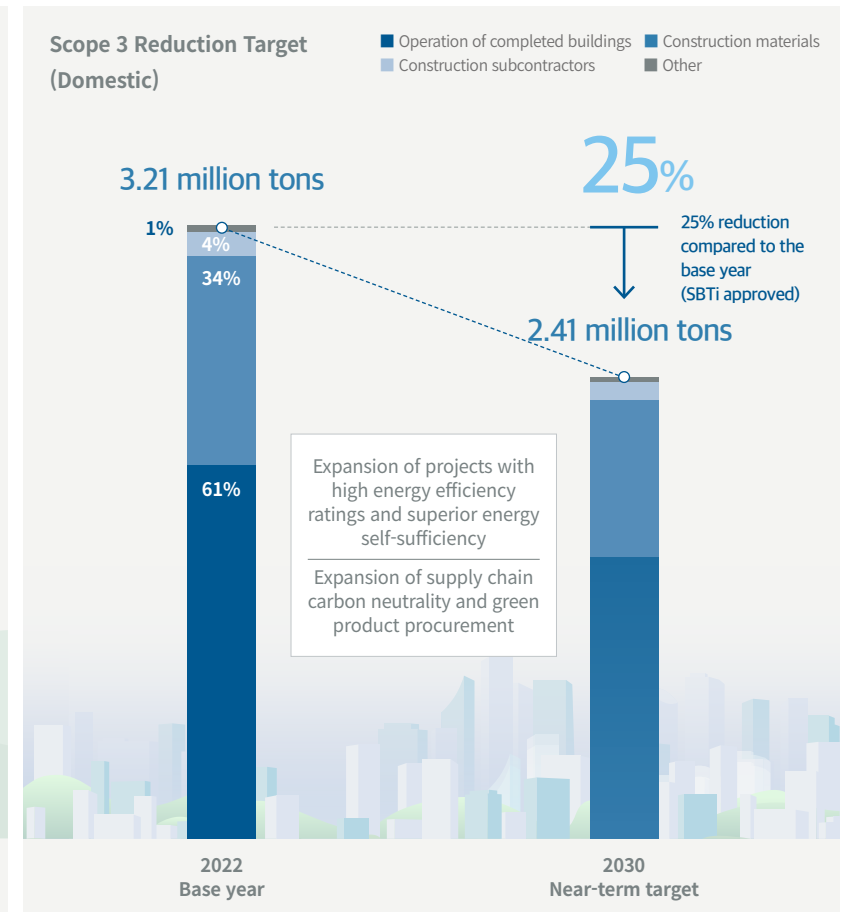
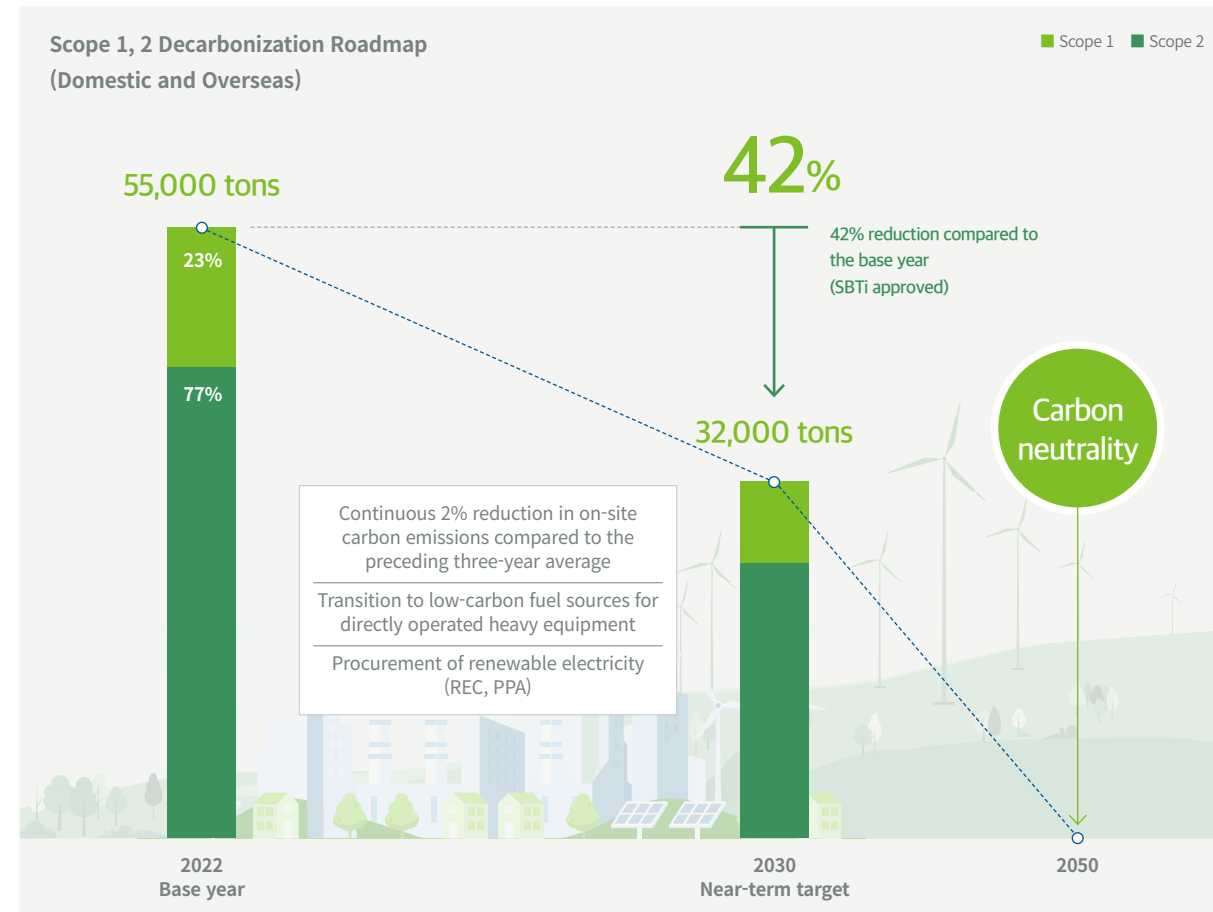
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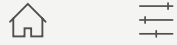
Strategy

➤ Strategy and Response Measures

2050 Carbon Neutrality

POSCO E&C has defined the boundary of its GHG reduction targets to encompass direct emissions from owned and operated worksites (Scope 1), indirect emissions from purchased electricity (Scope 2), and emissions arising across the value chain — including construction materials, suppliers, and the operation of completed buildings (Scope 3). To achieve carbon neutrality by 2050, we target a 25% reduction in total GHG emissions by 2030 against the 2022 base year. Within this target, Scope 1 and 2 emissions are to be reduced by 23,000 tCO₂e (approximately 42%) and Scope 3 emissions by 810,000 tCO₂e (approximately 25%) relative to 2022 levels. Our 2030 near-term carbon reduction target has been validated by SBTi, the Science Based Targets initiative. Our company-wide GHG reduction targets and decarbonization roadmap are subject to deliberation and approval by the Board of Directors and the ESG Council, and the same governance procedure applies when pursuing major reduction investments and projects. To achieve our carbon reduction targets, we monitor key indicators — including GHG emissions by division, reduction performance, and green procurement — on a quarterly and annual basis and report the results to the ESG Council and the Board of Directors.





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➤ Strategy and Response Measures

Carbon Reduction Strategy

POSCO E&C develops and implements action plans for carbon reduction tailored to the emission characteristics of each Scope. In 2025, we conducted pilot carbon reduction consulting with the Korea Environment Corporation for construction sites and will build on this to strengthen site-specific reduction activities from 2026 onward.

Carbon Reduction Strategy and 2025 Performance

Scope	Key strategies	2025 performance
Scope 1	• Transition to electrified processes and alternative construction methods	• Transition to alternative concrete curing methods to reduce kerosene consumption (expansion of electric hot-air blowers)
Scope 2	• Enhanced power monitoring at sites and offices to identify and eliminate energy waste • Installation of on-site renewable self-generation systems in company-owned buildings	• Development of a real-time electricity monitoring system for each site linked to KEPCO Power Planner • Installation of 161.7 kW rooftop solar power at Yanghak Town in Pohang (employee housing)
Scope 3	• Expanded use of low-carbon materials • Expanded recycling of construction waste • Enhanced energy efficiency in the building operation phase	• Expanded application of low-carbon materials, including PosMent ¹⁾ and glass fiber reinforced polymer (GFRP) rebar - Green procurement ²⁾ share of 40% in 2025 (KRW 441.6 billion) • Development of upcycled building materials from three types of construction waste (waste concrete, waste soil and rock, and construction sludge) • Development of energy-saving technologies for apartment housing - Automation of data extraction for AI-based zero-energy building (ZEB) performance analysis - Standardized installation methods for building-integrated photovoltaic (BIPV) modules with verified fire safety performance



Rooftop solar power installation at Yanghak Town in Pohang

Strengthening Low-Carbon Transition Businesses

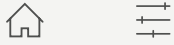
POSCO E&C is expanding its sustainable business portfolio in response to climate change. We manage offshore wind, HyREX, and secondary batteries as low-carbon businesses, while also pursuing transition activities such as LNG. As of 2025, revenue from low-carbon transition businesses reached KRW 1.364 trillion, accounting for approximately 20% of total revenue.

Strategy for Low-Carbon Transition Businesses

Category	Details
 Offshore wind	• Strategic partnerships with global energy companies such as DNV, Ørsted, RWE, and Equinor • Execution of the front-end engineering design (FEED) for the Ulsan Banditbul offshore wind project, targeting 750 MW of power generation by the early 2030s • Technology development in hybrid floating substructures for offshore wind turbines and automated optimal design of substructures
 Hydrogen Reduction Ironmaking	• HyREX — POSCO's proprietary hydrogen reduction ironmaking technology — produces molten iron by reducing iron ore using hydrogen instead of coal, reducing GHG emissions from the steel manufacturing process • Design and construction of HyREX pilot facilities (target completion of a 300,000-ton annual demonstration plant by 2027) • Execution of FEED for an electrolysis demonstration project in Australia • Development of a pressure swing adsorption (PSA) process model to separate and recover hydrogen contained in exhaust gases
 Secondary Batteries	• Construction of secondary battery raw material plants, including a brine lithium plant in Argentina • Construction of key secondary battery material plants, including cathode material plants in Pohang and Gwangyang, and an anode material plant in Sejong
 LNG	• Operation of a dedicated organization for LNG terminal projects and carrying out numerous LNG terminal projects, including LNG tanks, dock facilities, and regasification and send-out facilities • Construction of LNG terminals, such as Gulf MTP (Map Ta Phut) in Thailand, Gwangyang, and Dangjin

1) Resource-recycling cement developed by POSCO Group (using blast furnace slag, a byproduct of the steel production process)

2) Products with verified environmental impact reduction effects, such as Environmental Product Declaration certified products and Good Recycled (GR) certified products



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➤ Strategy and Response Measures

Health Protection Measures against Physical Risks

Based on climate-related scenario analysis conducted across major construction sites, POSCO E&C projects a sustained rise in average annual temperatures. This trend is expected to increase the risk of heat-related illness in outdoor work environments. Heat-related illness not only threatens workers' health but can also lead to reduced work efficiency and construction schedule delays — representing a key physical risk with adverse implications for project financial performance. To address this risk, we have implemented on-site safety management measures including stricter work suspension thresholds during heat waves and the deployment of cooling equipment.

Category	Details
Measures to protect workers during extreme heat periods	To protect the health of outdoor workers and maintain work efficiency, we define work restrictions and rest periods according to heat wave risk levels, and operate an intensive management system for vulnerable groups ¹⁾ . All sites are equipped with sufficient rest facilities and cooling equipment, and for work in confined spaces, we have strengthened the proactive monitoring and management of heat-related illnesses, including headaches, dizziness, and exhaustion.
Operation of an emergency response team during extreme heat periods	To maintain continuous preparedness for heat wave situations, we operate a dedicated emergency response unit comprising support, response, and inspection teams. We monitor weather conditions in real time, issue biweekly heat-related illness prevention bulletins, and make prompt work suspension decisions upon heat wave warning alerts.
Introduction of the Construction Weather Information System	To proactively safeguard worker safety, we operate the Construction Weather Information System (AccuWeather) across domestic and overseas construction sites. The system delivers hourly weather data — including temperature and humidity — and generates site-specific 'Daily Safety Weather Maps' and 'Work-Type Weather Maps' to support real-time decision-making. This enables preemptive responses to extreme weather events such as heat waves, ensuring both worker safety and operational efficiency.

1) Vulnerable groups: older workers (aged 60 and above), workers newly assigned to outdoor work, individuals with a history of heat-related illness, and those with pre-existing medical conditions.

Environmental and Energy Management Certification

POSCO E&C has obtained the Environmental Management System (ISO 14001) and the Energy Management System (ISO 50001), the international standards for environmental and energy management, to build environmental and energy management systems that meet global standards. Third-party verification by accredited certification bodies ensures the objectivity and reliability of these systems. To maintain certification each year, we continuously monitor environmental and energy performance and advance our management systems through regular surveillance audits and triennial renewal audits.

Environmental and Energy Management Certification Status

Environmental Management System (ISO 14001:2015) • Certification body: LRQA • Certification scope: business management, research and development, engineering, design and procurement, construction, construction management, commissioning and operation • Valid until: September 30, 2026	Energy Management System (ISO 50001:2018) • Certification body: LRQA • Certification scope: business management, research and development, engineering, design and procurement, construction, construction management, commissioning and operation • Valid until: September 7, 2026
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Participation in Climate-Related Global Initiatives

POSCO E&C participates in global initiatives to enhance the transparency of our environmental management. Since 2022, we have participated annually in CDP (Carbon Disclosure Project), disclosing the results of climate risk and opportunity analysis and reporting GHG reduction targets and progress. We have also committed to the Science Based Targets initiative (SBTi), with our 2030 near-term emission reduction targets validated against scientific criteria. Furthermore, through our endorsement of the TCFD (Task Force on Climate-related Financial Disclosures) and TNFD (Taskforce on Nature-related Financial Disclosures), we systematically manage climate- and nature-related risks and opportunities, integrating them into both management decision-making and external disclosures.

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➤ Strategy and Response Measures

Natural Environment Conservation Activities

As part of our climate change response, POSCO E&C continuously pursues ecosystem conservation and natural environment restoration activities.

Marine Environment Conservation Activities: Bye Blackcarbon

Since signing a memorandum of understanding with the Korea Coast Guard in November 2020, POSCO E&C has operated the 'Bye Blackcarbon, Hi Bluecarbon' program, conducting ongoing marine cleanup activities along coastal areas. We have organized 'Clean Ocean Volunteer Groups' near our major coastal worksites in Incheon, Buan, Gwangyang, Pohang, and Busan to collect marine waste (Blackcarbon), including plastics, that may flow into the ocean. In 2025, we carried out 10 marine cleanup activities across 7 sites.



Clean Ocean activities: marine waste collection

Strengthening Carbon Sinks and Restoring Tidal Flat Ecosystems through Halophyte Colonies: Hi Bluecarbon

POSCO E&C is advancing the 'Hi Bluecarbon' project — a nature-based solution that develops halophyte colonies across Incheon, Buan, and Gwangyang to expand marine carbon sinks and restore coastal ecosystems. Blue carbon refers to carbon absorbed from the atmosphere and stored by coastal and marine ecosystems. Beginning in 2023 at the former salt farm in Yeongjong, Incheon and Julpo Bay in Buan, and subsequently expanding to Sorae Marsh in Incheon and the Seomjin River estuary in Gwangyang, we have conducted systematic halophyte seeding, management, and monitoring — establishing colonies totaling approximately 132 ha (40,000 pyeong) as of 2025. These efforts have contributed not only to expanding carbon sinks, but also to restoring tidal flat ecosystems and enhancing biodiversity. The sites now serve as marine ecology and environmental education spaces for local residents and the wider public. In addition, we operate the Hi Bluecarbon online training platform to provide educational content on marine ecology and carbon sinks for youth and citizens, contributing to raising the environmental awareness of future generations. In 2026, we plan to strengthen cooperation with local governments such as the Korea Coast Guard, Incheon City, Gwangyang City, and Buan County, as well as Incheon National University and civic groups, to expand halophyte seeding along major coastlines nationwide. This initiative targets the restoration of an additional 30,000 pyeong, bringing the total restored tidal flat area to approximately 231 ha (70,000 pyeong).

2023-2025 Halophyte colony restoration performance

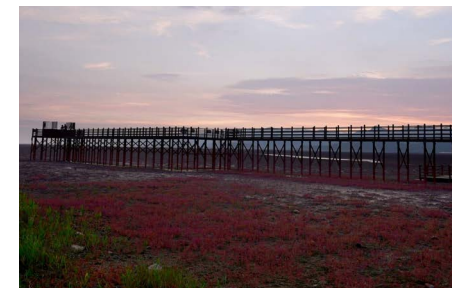
- Restoration of 10,000 pyeong of former salt farm at Seaside Park, Incheon
- Restoration of 10,000 pyeong at Sorae Marsh, Incheon
- Restoration of 15,000 pyeong at the Julpo Bay Ramsar wetland, Buan
- Restoration of 5,000 pyeong of tidal flat at the Seomjin River estuary, Gwangyang
- Development of 10 botanical illustrations of halophyte species
- Colony site experiential activities for children and youth (October)
- Development of the Bluecarbon training website (www.hibluecarbon.kr)



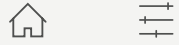
Seed sowing (Sorae Marsh, Incheon, March)



Seed sowing (Sorae Marsh, Incheon, March)



Colony restoration (Julpo Bay, Buan, October)



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➤ Resilience Assessment

Physical Risk Scenario Analysis

Through scenario analysis, POSCO E&C systematically assesses the impact of physical risks from climate change on business activities. The assessment draws on the scientific climate scenarios of the IPCC (Intergovernmental Panel on Climate Change), comprehensively considering domestic and overseas climate trends, cases of physical damage in the construction industry, worksite-level exposure, physical impacts within the value chain, likelihood of occurrence, and financial and non-financial impacts. The assessment period is divided into short-term (2026), medium-term (2027-2030), and long-term (2031-2050) to evaluate the long-term impacts of physical climate change in stages. For target worksites, we selected 15 priority worksites from a total of 125 projects, based on current-period contract value and regional diversity. We applied three pathways of the IPCC's SSP scenarios (SSP1-2.6, SSP2-4.5, SSP5-8.5) and utilized Korean climate change scenario data provided by the Korea Meteorological Administration's climate information portal. Among the business impacts associated with the five key physical risks identified, the principal risks included damage to facilities and increased compensation costs resulting from construction delays caused by typhoons, heavy rainfall, heat waves, and cold waves, as well as the increase in worker rest time due to heat waves. Financial impacts from physical risks were also found to increase most significantly under SSP5-8.5, the high-emission scenario. On this basis, we have established a pre-assessment and response framework for climate-related risks by project, and operate a database of on-site damage cases alongside a system for monitoring response status. We also implement practical response measures, including the deployment of mobile solar-powered worker shelters for health management during extreme heat periods and the development of an AI-based on-site weather information system to prevent damage from extreme weather events such as heavy rain and heat waves.

Financial Risk by Worksite

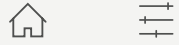
Very Low Low Medium High Very High

Worksite location	Materiality grade		
	SSP1-2.6	SSP2-4.5	SSP5-8.5
Seocho-gu, Seoul	VH	VH	VH
Sasang-gu, Busan	VL	M	M
Buk-gu, Daegu	L	VH	VH
Namdong-gu, Incheon	VL	M	M
Seo-gu, Gwangju	L	M	H
Seo-gu, Daejeon	VL	M	M
Jung-gu, Ulsan	VL	M	M
Goyang-si, Gyeonggi-do	L	H	H
Sokcho-si, Gangwon	VL	L	L
Cheongju-si, Chungcheongbuk-do	L	H	H
Dangjin-si, Chungcheongnam-do	M	VH	VH
Jeonju-si, Jeonbuk	L	H	H
Gwangyang-si, Jeollanam-do	L	H	H
Pohang-si, Gyeongsangbuk-do	VL	M	M
Gimhae-si, Gyeongsangnam-do	VL	M	M

Physical Risk Analysis Results

Low carbon Medium carbon High carbon

Physical risk		Business impact	Details	Financial impact (KRW 100 million)
Acute	Typhoons, heavy rainfall, etc.	Facility damage	• Direct damage to or quality deterioration of facilities and construction materials at construction sites	
	Cold waves, heavy rainfall, etc.	Work stoppage	• Increase in the number of work stoppage days to ensure the health and safety of construction site workers against accident risks such as electric shock, soil collapse, frostbite, and slipping	
	Heat waves	Increase in rest time	• Extension of rest time to ensure the health and safety of construction site workers against accident risks such as exhaustion, dehydration, burns, and skin diseases	
	Heat waves, cold waves, etc.	Delay penalties	• Increased likelihood of construction stoppages and delays due to direct damage, such as structural damage and flooding, and reduced worker productivity	
Chronic	Rise in average temperature	Decline in asset value	• Decline in asset value due to accelerated asset aging and shortened lifespan from rising temperatures	



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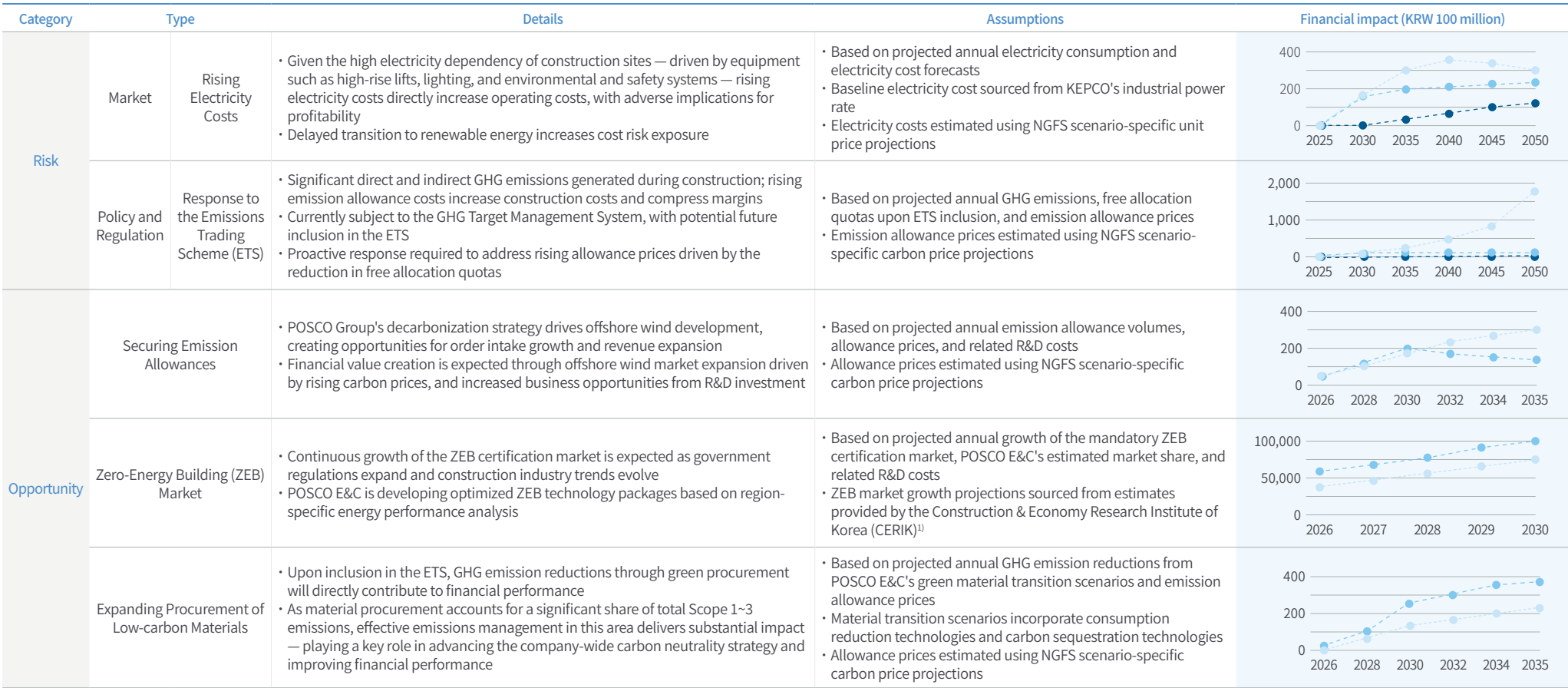
➤ Resilience Assessment

Transition Risk and Opportunity Scenario Analysis

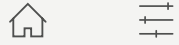
POSCO E&C analyzed the financial impact of climate-related transition risks and opportunities using the NGFS (Network for Greening the Financial System) climate scenario methodology. The analysis applied three NGFS scenarios — Net Zero 2050, Nationally Determined Contributions (NDCs), and Current Policies — with assessments based on projected electricity costs and GHG emission allowance prices under each scenario. The transition risk assessment was based on a long-term outlook through 2050, quantifying incremental transition risks arising from future business activities based on POSCO E&C's electricity consumption and GHG emissions performance data. The transition opportunity assessment applied a medium-term outlook through 2030-2035 to quantitatively calculate the construction sector's potential contribution to carbon neutrality and associated revenue opportunities.

Transition Risk and Opportunity Analysis Results

● Low carbon ● Medium carbon ● High carbon



1) If the 2030 zero-energy building certification mandate roadmap is 100% implemented, the market is forecast to potentially grow to KRW 93-107 trillion



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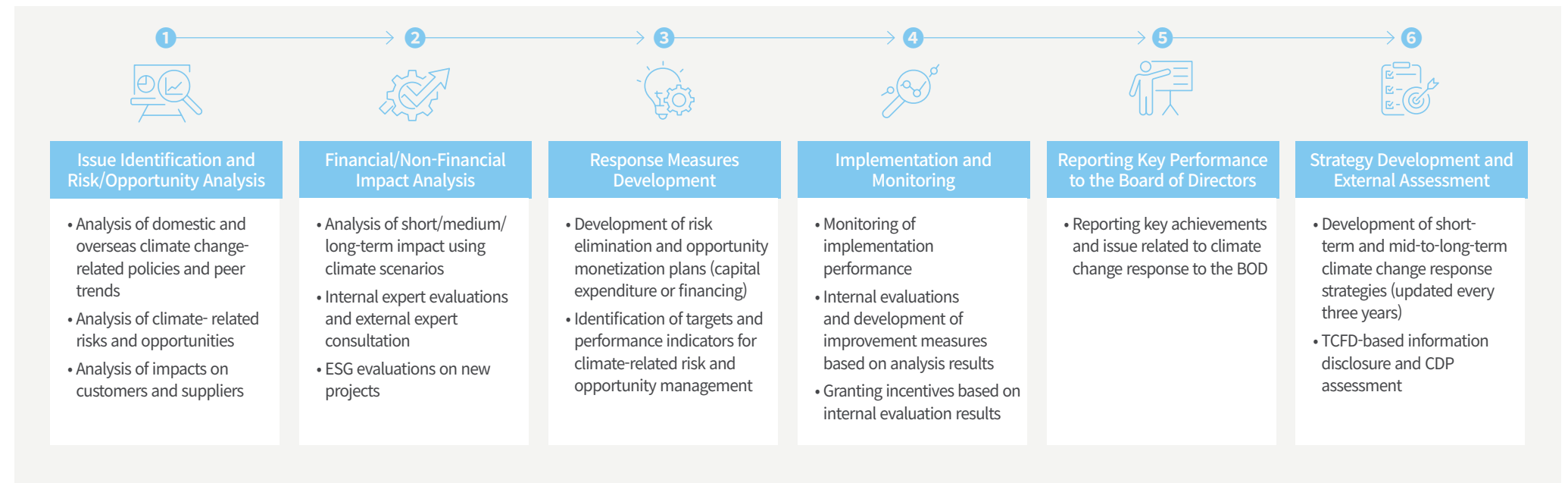
Risk Management

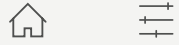
➤ Risk Management Process

Risk and Opportunity Identification and Assessment Process

POSCO E&C operates a climate change risk management process to integrate climate-related risks and opportunities into our business strategy and operations. In executing projects, we systematically manage risks across all stages from order to completion. By analyzing climate scenarios and historical project cases, we develop mid-to-long-term response strategies based on annual and regional data, as well as ESG risk response strategies for projects under pursuit.

Climate Change Risk Management Process





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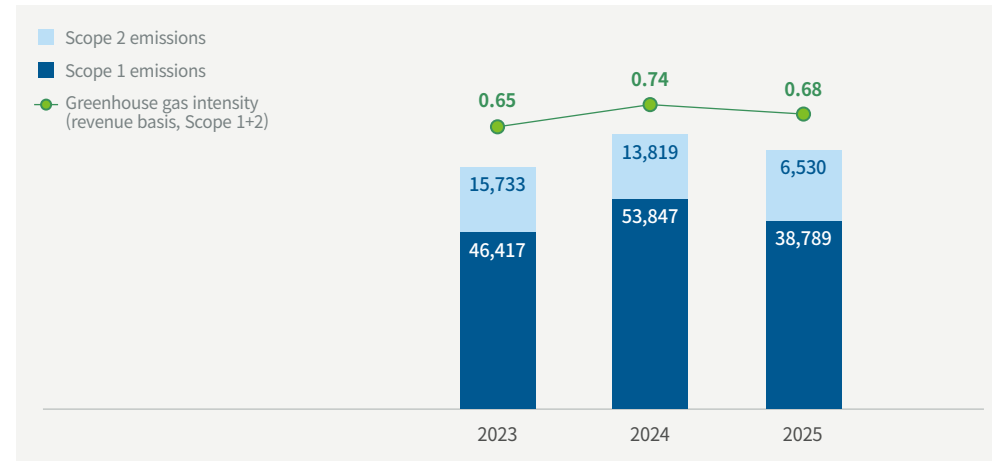
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Metrics and Targets

> Metric

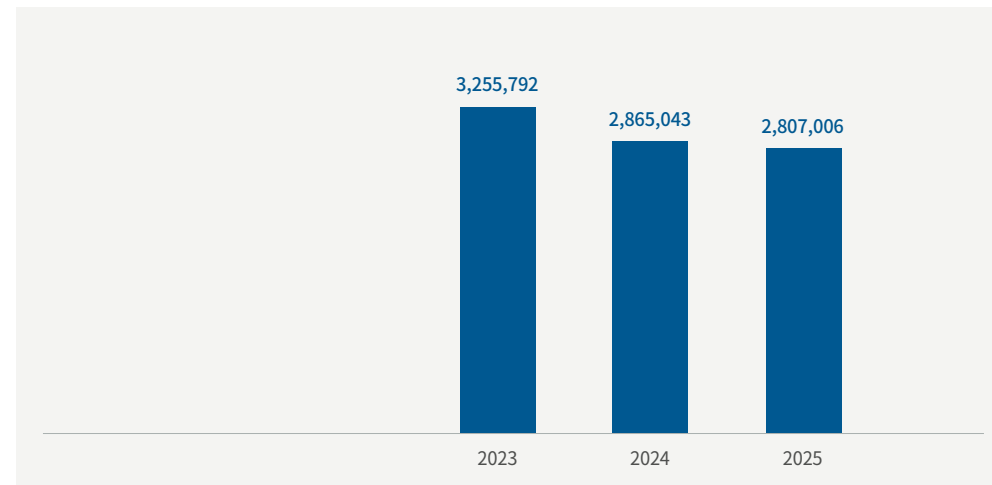
Scope 1, 2 Emissions

(Unit: tCO₂e, tCO₂e/KRW 100 million)



Scope 3 Emissions

(Unit: tCO₂e)



> Target

Greenhouse Gas Emission Targets

Target indicator	Purpose	Scope	Target type	Unit	Base year (2022)	Interim target (2030)	Final target (2050)
Scope 1, 2 emissions	Climate mitigation	Separate basis	Absolute target	tCO ₂ eq	55,000	32,000 (42% reduction)	Net Zero
Scope 3 emissions	Climate mitigation	Separate basis	Absolute target	tCO ₂ eq	3,210,000	2,410,000 (25% reduction)	-

Alignment with the Latest Climate-Related Agreements and Jurisdictional Targets

National and International Commitments (NDC) | POSCO E&C has set and is implementing interim targets of reducing Scope 1, 2 emissions by 42% and Scope 3 emissions by 25% by 2030 compared to 2022, to contribute to achieving the Nationally Determined Contribution (NDC, a 53%-61% reduction by 2035 compared to 2018) submitted by the government.

Legal and Regulatory (ETS) Response | As a company subject to the GHG Target Management System, we pursue systematic management of Scope 1 and 2 emissions in full compliance with regulatory requirements. We further advance decarbonization efforts through the adoption of low-carbon vehicles, equipment, and construction methods, alongside continuous energy efficiency improvements. In preparation for the designation as a company subject to allocation under the Emissions Trading Scheme (ETS) from 2026, we proactively identify potential legal and financial risks and have established structured response processes to effectively mitigate such exposures.

Science-Based Targets and Transition Pathway | The 2030 near-term carbon reduction target has been validated by the SBTi (Science Based Targets initiative).



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Governance

> Management

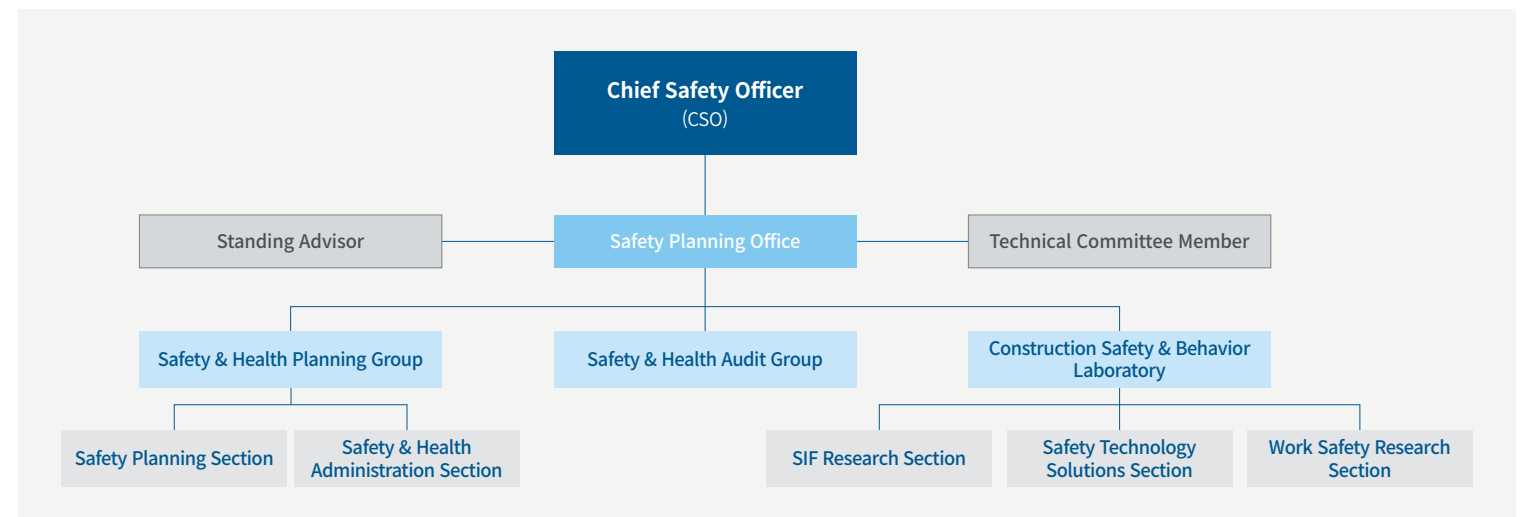
Role of Management

The Board of Directors delegates to the Chief Safety Officer (CSO) responsibility for developing and implementing strategies related to major occupational health and safety risks and opportunities, as well as for day-to-day management oversight. The CSO, appointed by the General Meeting of Shareholders, submits and discusses occupational health and safety status as an agenda item at monthly management meetings, and escalates material issues to the Board as they arise. Annual health and safety performance results and plans are reported directly to the Board. In addition, POSCO E&C conducts regular occupational health and safety assessments of all worksites at least semi-annually to identify and remediate risk factors, thereby advancing the level of occupational health and safety management. Executive performance evaluations incorporate the number of serious accidents and the Lost Time Injury Frequency Rate (LTIFR) as key performance indicators (KPIs), with health and safety KPI outcomes directly linked to individual executive assessments to reinforce management accountability for occupational health and safety.

Dedicated Organization

POSCO E&C reorganized our structure to strengthen occupational health and safety management in order to fundamentally prevent construction accidents. We established the Construction Safety Research Institute to enhance research- and analysis-based prevention capabilities, and expanded safety organizations within business divisions to implement division-specific action plans aligned with the company-wide safety strategy. Under the leadership of the CSO, the Chief Safety Officer, the Safety Planning Office comprises three dedicated units — the Safety & Health Planning Group, the Safety & Health Audit Group, and the Construction Safety & Behavior Laboratory — each with distinct functional responsibilities. The Safety & Health Planning Group is responsible for developing and operating the company-wide occupational health and safety strategy. The Safety & Health Audit Group establishes on-site safety inspection criteria and supports safety audits across business divisions. The Construction Safety & Behavior Laboratory conducts research- and analysis-based prevention activities, including analysis of serious accident cases and development of recurrence prevention measures.

Occupational Health and Safety Governance



For information on the highest decision-making body for the occupational health and safety topic, please refer to ESG Management > Corporate Governance > Board of Directors.

Safety and Health

Strategy

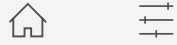
> Risks and Opportunities

Occupational Health and Safety-Related Risks and Opportunities



Safety and Health							
Risk/ opportunity	Value chain	Risk and Opportunity Factors	Financial impact	Time horizon ¹⁾			Response strategy
				Short term	Medium term	Long term	
Risk	Own operations	- Heightened compliance requirements driven by increasingly stringent occupational health and safety regulations, including the Occupational Safety and Health Act and the Serious Accidents Punishment Act - Growing client demand for verification of occupational health and safety management capabilities and accident response frameworks	- Increased project costs and reduced profitability resulting from project schedule delays caused by safety accidents - Exposure to fines, penalties, and litigation costs in the event of regulatory non-compliance - Rising compensation costs associated with safety incidents	●	●	●	- Reinforcing the Safety-First System - Focusing on practical accident prevention activities through enhanced field-level operability - Strengthening supplier accountability and worker safety ownership - Improving the level of on-site safety management through strengthened Check & Feedback mechanisms

1) Short term: within one year (2026); medium term: more than one year and up to five years (2027–2030); long term: more than five years (2031 onward)



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➤ Strategy and Response Measures

Occupational Health and Safety Management System

POSCO E&C has established an Occupational Health and Safety Management Policy, placing occupational health and safety as the highest priority in our management. The policy applies to all worksites and employees, and suppliers are encouraged to comply with this policy or an equivalent standard, promoting occupational health and safety across the value chain. The policy clearly defines our occupational health and safety management philosophy and decision-making principles — encompassing the provision of a safe working environment, compliance with applicable laws and internal regulations, and occupational health and safety risk management — and is enacted upon final approval by the Chief Safety Officer. Since obtaining ISO 45001 certification, the international standard for occupational health and safety management systems, in 2018, we have continuously maintained and advanced our occupational health and safety management system in line with global standards through annual surveillance audits and triennial recertification audits.

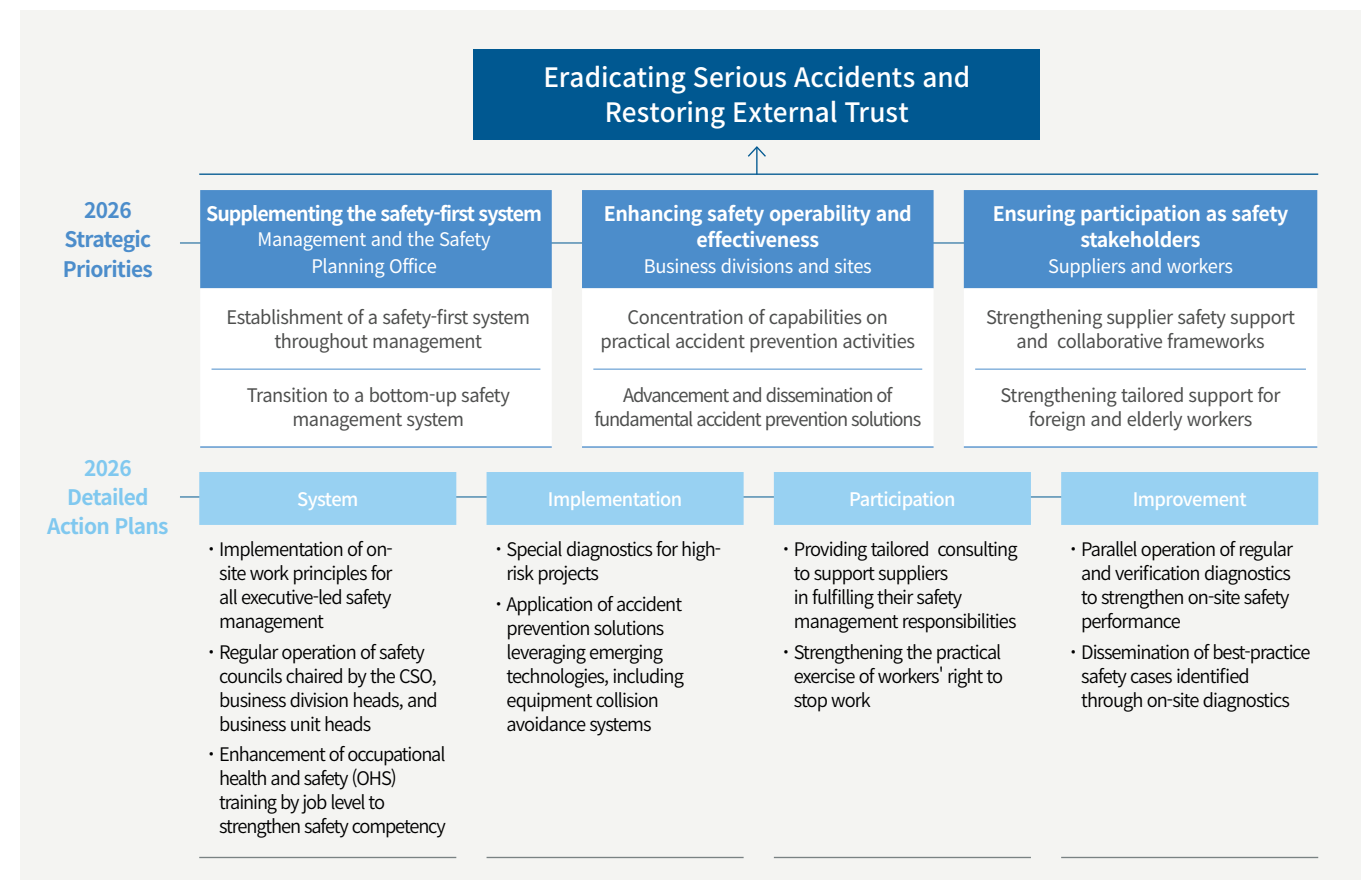


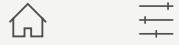
Occupational Health and Safety Management Policy

Occupational Health and Safety Strategy

Based on a comprehensive analysis of the existing safety management system and activities conducted through an external specialized institution, POSCO E&C established our 2026 strategy with the goal of 'eradicating serious accidents and restoring external trust.' To this end, we have set three key strategies: supplementing the safety-first system at the management and Safety Planning Office level; enhancing safety operability and effectiveness across business divisions and worksites; and ensuring the participation of suppliers and workers as active safety stakeholders. Furthermore, through detailed strategies spanning four areas — system, implementation, participation, and improvement — we will establish a management framework that places safety above all else.

Occupational Health and Safety Strategy Framework





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➤ Strategy and Response Measures

Occupational Health and Safety Risk Management Activities

Activity	Main content	2025 performance
 Advancing SMART Safety Technology	- Remote-control technology development for heavy equipment operation at construction sites - AI-based geotechnical design technology development - Operation of the "Intelligent Site" — an integrated smart-technology construction platform - Construction site accident data analysis and risk-prediction algorithm development - Proactive OHS risk identification across bidding, design, and construction phases using 8D BIM	- Pilot deployment of excavator remote control technology and development of an operation manual - Development of Vertical AI technology for ground design review and filing of 2 patents - Advancement of robotic construction automation, AI-driven construction management automation, and site information digitalization through pilot operation of the 'Intelligent Site' - Establishment of project safety management plans using 8D BIM (cumulative 18 projects from 2023 to 2025)
 Operation of the Safety Academy	- Occupational health and safety capability-building training for employees and suppliers - Group training sessions for supplier management and safety officers - Provision of KRW 500,000 in welfare points upon obtaining the Construction Safety Engineer or Industrial Safety Engineer certification - Provision of tailored safety content for high-risk workers and foreign workers	3,706 employees completed Safety Academy occupational health and safety (OHS) training 8,047 participants engaged in outreach OHS training 51 employees obtained the Construction Safety Engineer or Industrial Safety Engineer certification 2,966 workers completed tailored training for high-risk operations and foreign-national workers
 Supplier Safety Support	- Support for establishing suppliers' occupational health and safety management systems - Compliance inspection of the Serious Accidents Punishment Act and recurrence prevention system development for accident-prone suppliers - Sharing of major accident cases with supplier executives and facilitation of discussions on serious accident elimination - Provision of safety equipment for work at heights and in confined spaces	- Safety consulting provided to 145 suppliers; OHS management system certification support extended to 10 suppliers - Supplier executive safety forums attended by 133 representatives from 126 companies - Serious accident elimination forums conducted for 35 high-risk suppliers
 Worker Health Protection Program	- Priority medical services for vulnerable workers such as the elderly and foreign workers - Catering and emotional care services for on-site workers - Deployment of mobile solar-powered worker rest shelters (Eco&Rest) - Provision of the 'With Hyu Psychological Counseling Support Program'	- Distribution of ventilated cooling vests during extreme heat periods (1,030 vests across 103 sites) - Catering service for on-site workers (25 sites) and deployment of mobile cooling shelters (7 sites) - Deployment of 11 Eco&Rest units (43 units cumulative) - Employee mental health and stress management support through in-person (internal and external) and remote counseling (up to 8 sessions per person)
 Strengthening Site-Centered Occupational Health and Safety Capabilities	- Development of site-specific tailored safety activity plans - Enhancement of education and awareness campaigns for the safety reporting channel and workers' right to stop work - Feedback and performance rewards for workers' safety opinions - Standardization of safe work plans for high-risk operations - Cross-inspection of accident-prone equipment, including tower cranes and lifts, by external experts - Identification and remediation of risk factors in high-risk construction equipment	- Development and implementation of site-specific safety activity plans across all sites 2,013 work suspension requests received, with a 100% remediation completion rate - Cross-inspection of 229 high-risk equipment units such as tower cranes and lifts

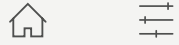
CASE STORY

POSCO E&C

With 休(Hyu) Psychological Counseling Support Program

POSCO E&C operates the 'With Hyu Psychological Counseling Support Program' to support the mental health of on-site workers and employees. This program offers various counseling formats, — in-person (internal and external) and remote — tailored to individual preferences and circumstances. Licensed counselors provide support across a range of psychological concerns, including work-related stress, interpersonal issues, and personal challenges, with particular focus on workers in the high-stress environment of construction sites. In 2025, a total of 374 employees participated in the counseling program, receiving support for mental health management and work stress relief.





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Safety and Health

Risk Management

➤ Risk Management Process

Occupational Health and Safety Risk Management System

POSCO E&C's occupational health and safety (OHS) system is grounded in its OHS Management Policy and operates through a continuous Plan → Do → Check → Act (PDCA) improvement cycle. This framework enables systematic management of hazards and risk factors across all sites, ensuring proactive OHS risk management.



ISO 45001 certificate

Occupational Health and Safety Management Index Assessment

POSCO E&C conducts the Occupational Health and Safety (OHS) Management Index assessment twice annually across all worksites to evaluate the maturity of its management system. The assessment covers 154 items across 10 domains, including the OHS management system, OHS training, hazard and risk prevention measures, and controls for hazardous substances. Identified gaps are addressed through corrective actions and regular monitoring to continuously strengthen the management system.

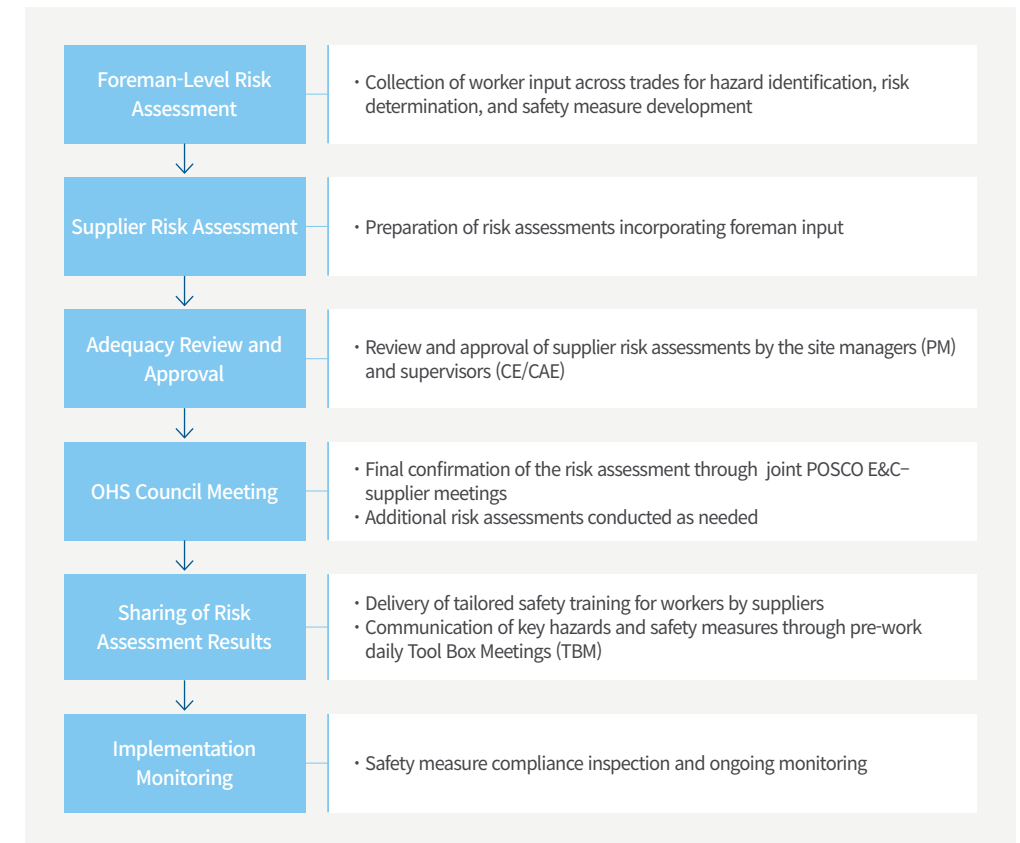
Occupational Health and Safety Management Index Assessment Process



Risk Assessment

To systematically manage hazards and risk factors across all sites, POSCO E&C operates a six-stage risk assessment process. Assessments are conducted at least monthly on a regular basis; when hazards or risks emerge that are not captured in a previously approved assessment, an ad hoc risk assessment is initiated. The assessment scope covers hazards and risk factors across all work processes, and the results are reported to the CSO on a semi-annual basis. Identified risk factors are addressed through corrective actions, with completion rates actively tracked.

Risk Assessment Process



Safety and Health

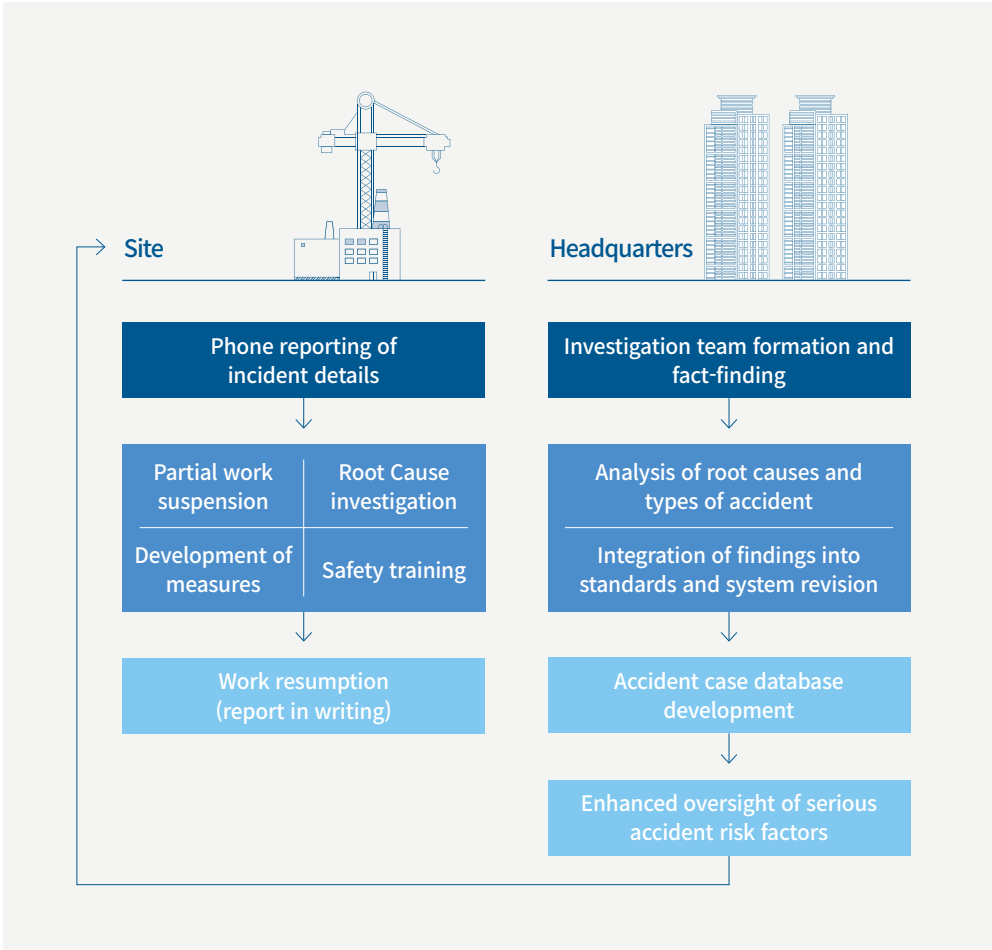
Risk Management

> Risk Management Process

Safety Accident Response

Upon occurrence of an accident, the on-site situation is immediately assessed and reported through phone and internal messaging channels within one hour. Where an accident is determined to be serious, a dedicated investigation team is promptly mobilized to conduct in-depth root cause analysis. Findings and corrective actions are shared across all worksites to strengthen accident prevention.

Safety Accident Response Process



Safety Assessments

POSCO E&C conducts safety assessments in partnership with external specialist institutions to objectively identify OHS risks across its operations and to derive effective improvement measures. In 2025, we engaged a leading global safety consulting firm through a safety management cooperation MOU, conducting a detailed diagnostic review of site-level risk factors and gaps in the management system. The assessment covered the OHS management system, evaluation framework, and training programs at POSCO E&C's headquarters and six project sites — comprising two plant, two infrastructure, and two building sites. Based on the findings, worksite-specific improvement measures are identified and systematically implemented through corrective and remedial actions to elevate OHS management performance.

Serious Accident Recurrence Prevention Measures

In 2025, a total of five serious accidents occurred at sites under POSCO E&C's management and supervision. In response, we conducted root cause analysis, established recurrence prevention measures, and declared a company-wide Safety Emergency Management framework. We are now directing our full efforts toward overcoming this safety crisis through three pillars: strengthening management-level safety leadership, expanding on-site safety management infrastructure, and embedding a safety culture across all levels of the organization.

Strengthening management-level safety leadership	- Strengthening safety communication between leadership and sites by conducting company-wide safety management meetings, all-level safety forums, and town halls at sites where serious accidents have occurred - Expanding executive and managerial safety activities to foster a culture of direct leadership involvement in site safety management
Expanding on-site safety management infrastructure	- Establishing a site-focused safety management system through a comprehensive reorganization of business division safety organizations - Strengthening real-time safety management capabilities for all sites through expansion of the headquarters integrated monitoring center - Strengthening safety management execution through expansion of on-site safety management personnel - Identifying the four major hazard-causing work categories through a three-year serious accident analysis and establishing an inspection system leveraging accident case studies
Embedding a safety culture across all levels	- Mandating pre-work safety inspections and improvement activities by site managers - Fostering worker participation in safety through foreman town halls and activation of work stoppage rights - Strengthening collaboration and alignment with suppliers through CSO-led safety partnership councils and safety management forums

Safety and Health

Metrics and Targets

> Metric

Occupational Health and Safety Management System

2025 ISO 45001 certification rate
(Occupational Health and Safety Management System)



100 %

Number and percentage of employees covered
by the OHS management system in 2025



5,795
persons (100%)

Industrial Accidents

Indicator	Unit	2023	2024	2025
Number of injured ¹⁾	Persons	57	56	53
Employee		0	0	1
Contractor		57	56	52
Number of fatalities		1	3	5
Employee		0	0	1
Contractor		1	3	4
Lost Time Injury Frequency Rate (LTIFR)	Persons/million hours	0.71	0.69	0.69
Employee		0.00	0.00	0.14
Contractor		0.87	0.84	0.80
Total Recordable Injury Frequency Rate (TRIFR)		1.98	2.46	1.95
Employee		0.00	0.07	0.14
Contractor		2.41	2.98	2.32

1) Excluding the number of fatalities

> Target

POSCO E&C has set zero serious accidents as its top safety priority, managing the number of serious accidents and the Lost Time Injury Frequency Rate (LTIFR) for both employees and suppliers as key performance indicators (KPIs). To strengthen the execution foundation for achieving these targets, we have established specific operational targets — including the number of CSO-chaired safety council meetings, risk assessments conducted, supplier safety management consulting sessions provided, and on-site safety activity diagnostics performed —and actively monitor progress against each target. Through this approach, we go beyond outcome tracking to monitor on-site execution and supply chain safety management activities, including those of suppliers.



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Governance

> Management

Role of Management

POSCO E&C established a governance system led by the Customer Satisfaction Group and the Quality Control Group to systematically realize customer-centric quality management. In 2026, we launched the Defect Zero Council, chaired by the Head of Customer Satisfaction Office, to strengthen decision-making and integrate company-wide quality risk management. By centralizing the formerly separated CS, quality, and technology functions, the council enables a rapid and consistent response system that fundamentally prevents defects across all stages, from customer feedback to the application of technological improvements. As the executive overseeing quality and defect management, the Head of Customer Satisfaction Office quantitatively manages performance by setting the construction quality improvement rate as a core management KPI.

Dedicated Organization

POSCO E&C operates dedicated organizations to enhance quality management and customer satisfaction. The Building Works Division and the Plant Engineering & Construction Division maintain specialized quality control teams to establish and apply product-specific standards and integrate customer needs. The R&D Center drives quality competitiveness through new technology and innovation initiatives. On-site quality management personnel proactively prevent quality risks by verifying regulatory compliance and conducting material quality inspection.

[Quality Management Policy](#)

Quality Management Policy

Through the Quality Management Policy, POSCO E&C establishes the creation of customer value and the provision of best-in-class products and services as core principles, setting the company's direction for protecting customer rights and interests. The policy applies to all worksites and employees across POSCO E&C and its subsidiaries, ensuring consistent implementation of the quality management system. The policy is established and revised upon CEO approval, and operates in conjunction with continuous improvement activities under the quality management system. The full text of the policy is publicly available on the company website, enabling all stakeholders — including customers — to access the management principles.

To support systematic implementation of quality management at the operational level, POSCO E&C maintains a set of detailed operational guidelines. The 'Customer Response Guidelines' and 'After-Sales Service Operations Manual,' among others, are designed to elevate service quality at customer touchpoints and standardize after-sales management processes, contributing to enhanced customer satisfaction.

Quality Management Governance



For information on the highest decision-making body for the customer satisfaction topic, please refer to ESG Management > Corporate Governance > Board of Directors.

Customer Satisfaction

Strategy

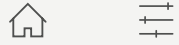
Risks and Opportunities

Customer-Related Risks and Opportunities



Customer Safety							
Risk/ opportunity	Value chain	Triggering factors	Financial impact	Time horizon ¹⁾			Detailed response strategy
				Short term	Medium term	Long term	
Risk	Downstream	Strengthening of building safety-related laws such as the Framework Act on the Construction Industry and the Building Act, and strengthened inspections by the Ministry of Land, Infrastructure and Transport to prevent poor construction and ensure quality	Occurrence of defect repair costs, compensation for damages, and reduced future pre-sale revenue due to a decline in brand trust when quality defects and safety risks (such as cracks, leaks, fire, and collapse) emerge during the use stage after building completion	●	●	●	- Operation of a quality management system based on global standard certifications - Operation of a six-stage quality diagnosis and coaching system from groundbreaking to completion - Advancement of AI-based quality control technology
Opportunity	Own operations	Reduction of customer inconvenience and strengthening of trust in the company through transparent information provision and rapid after-sales service response	Increase in revenue through enhanced customer trust by securing high quality, as well as a strengthened brand reputation and corporate image	●	●	●	- Enhancement of the convenience of customer defect reporting through the advancement of e-BLUET (customer IT system) technology - Reinforcement of BS inspections and CS training - Operation of resident participation programs

1) Short term: within one year (2026); medium term: more than one year and up to five years (2027–2030); long term: more than five years (2031 onward)



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Strategy

➤ Strategy and Response Measures

Quality Management System

POSCO E&C is building a systematic quality management system based on global standard certifications. We maintain ISO 9001 certification, the international standard for quality management systems, and operate a company-wide quality management system. In 2025, we obtained ISO 19443 (Nuclear Quality Management System) certification for the first time, an essential requirement for entering the overseas nuclear power business, strengthening our quality management capabilities. To secure quality competitiveness in the nuclear field, we established a nuclear quality assurance system and systematized construction quality control procedures, including on-site quality assurance manuals and quality assurance procedure documents. We also enacted standard processes for each stage of nuclear projects to secure consistency and reliability in our work execution system. In addition, we renewed our ASME Section I certification, which ensures the safety and quality of boilers used in power plants, in October 2025, reaffirming our quality management capabilities in the power facility field.

Quality Manager Training

POSCO E&C continuously promotes the capability-building of quality managers to achieve quality management that meets global standards. In 2025, we operated four training courses delivered by expert instructors with differentiated skills and experience to contribute to quality improvement across projects, and a total of 84 quality managers completed new, basic, and advanced training. In addition, in line with the latest trends, we produced short-form videos covering technical standards for 34 major trades, including tile installation, and used it for quality capability training. We distributed this content to 178 construction managers and 60 major suppliers to conduct training, and we strengthen quality control capabilities by regularly sending key summary training materials on technology and quality to share the latest technology trends and technical standards.



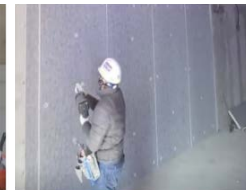
Tile: bathroom renovation spot bonding



Anwoollim inter-floor sound insulation structure



Art wall epoxy spot bonding



Insulation: fastener fixing method

Quality Control and Technology Development

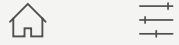
POSCO E&C operates systems such as a quality inspection system for each construction stage and a defect prevention system for quality control. We continuously invest in quality control innovation using digital technologies such as AI-based quality prediction, integrated data management, and on-site task automation. As a result of these technology development efforts, we have registered a cumulative total of 595 patents and filed six additional patent applications in 2025, enhancing our technological competitiveness.

AI-Based Ready-Mix Concrete Quality Prediction and Automation Technology Development | Ready-mix concrete is a core material forming the frame of a building, and poor quality directly affects structural safety. We developed an AI-driven system to predict and manage ready-mix concrete quality in advance and filed a patent application for the system. This system uses AI to predict the hardness (slump) and strength of ready-mix concrete to prevent quality defects in advance, and it determines strength early to prevent serious accidents. This technology's excellence was recognized with the Grand Innovation Award at the 2025 Smart Construction Challenge hosted by the Ministry of Land, Infrastructure and Transport.

Integrated Construction Quality Data Hub Management System | To establish a data-driven, objective quality management framework, we built Korea's first integrated system connecting public data from the Ministry of Land, Infrastructure and Transport with internal company data. The system collects 5.87 million public data records in real time, centralizing material quality, producer, and specification information across more than 20,000 construction sites nationwide. Utilizing an AI platform and dashboards, the system enables comparative analysis of materials and construction status against industry peers, while standardizing material quality testing.

On-Site Quality, Process, and Construction Management AI Automation Agent | To improve the work efficiency of on-site engineers, we introduced AI agent technology to automate quality control tasks that previously relied on manual work. This system has a structure in which multiple AIs that have learned specialized knowledge in each field, such as quality, process, and cost, collaborate, and it continuously accumulates on-site documents to use as the company's knowledge assets. By automating key tasks such as creating process schedules, reviewing construction periods, and analyzing quality, we have improved the work efficiency and accuracy of on-site engineers.

Commercialization of Ready-Mix Concrete Smart Quality Management Technology | We built a system that integrates and manages the entire process of ready-mix concrete in real time, from production to transportation, on-site delivery, and defect management, using digital technologies such as IoT, OCR, AI, and big data. Using OCR (optical character recognition) technology, it automatically digitizes quality test results to fundamentally prevent mistakes or data manipulation that may occur during manual recording. We have also established a system in which AI detects signs of quality abnormalities in advance to enable preemptive response. This technology is being piloted with SH Corporation, and we plan to expand its scope of application in the future.



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➤ Strategy and Response Measures

Operation of Customer Satisfaction Enhancement Programs

e-BLUET System | POSCO E&C has advanced its existing defect handling system, greatly improving customer convenience and work efficiency through e-BLUET (customer IT system). The integration of the system with a mobile application allows customers to conveniently report defects and track processing status in real time from anywhere. Simultaneously, this enables the company to immediately collect defect data and efficiently respond to VOCs. In 2026, we are advancing the system using AI to automatically analyze defect photos, recommend appropriate trades, and diagnose defect suitability. This system automatically classifies received defects by grade to manage them efficiently, and it identifies recurring patterns through real-time data analysis to support preventive management. Through this, the company establishes a proactive defect prevention system, and customers can improve satisfaction with the move-in experience through priority-based rapid defect handling.

CS Training and Expert Development Program | POSCO E&C operates customized CS training programs specialized for the characteristics of each organization, such as headquarters, sites, CS centers, and suppliers. We provide periodic training in line with the move-in cycle, and in 2025 we conducted 'BLUET Service Education that Builds Customer Trust' across 17 newly occupied residential complexes. This training covered the BLUET core action principles, our role in the customer experience (CX) era, and the CS mindset and importance of active communication for customer-facing personnel, and approximately 1,100 people, including managers, engineers, and on-site staff, completed the course. In addition, we operate 'BLUET CS Expert,' an in-house CS expert development program, to cultivate specialists for improving customer satisfaction. This program provides systematic education courses such as customized CS training, basic competency online education, and daily classes, and it also supports psychological support programs to help CS staff manage work-related stress.

Customer Satisfaction Management | POSCO E&C directly listens to the voice of customers through continuous customer satisfaction surveys and actively reflects customer needs in product development and quality control. To elevate the quality of our customer service, we introduced the IPCC (Internet Protocol Contact Center), a smart customer response system, in 2025. Upon receiving a call, the system automatically displays the caller's information and the household's maintenance history, enabling swift and accurate consultations that have significantly improved overall customer satisfaction. As a result, we won first place in the apartment category of the 2025 Korean Standard-Quality Excellence Index (KS-QEI), demonstrating the effectiveness of our customer-centric management.

Operation of Resident Participation Programs

POSCO E&C provides the BLUET service, which supports residents' ESG activities and enhances their satisfaction. Through resident participation environmental education programs such as upcycling one-day classes and Carbon Neutrality Challenge, we raise awareness of climate change response. Also, we reduce the generation of unnecessary waste through the provision of everyday services such as knife sharpening, phone care, and bicycle repair. In 2025, we provided the service to a total of 10,884 households in 15 complexes nationwide, including The Sharp Opocentriche, DEARELO, and Geoje DICLIVE.

Category	Details
BLUET Sharing	• Enhancement of grocery shopping convenience for residents through shared cart provision • Operation of knife sharpening and bicycle repair services • Operation of a cafeteria
BLUET Eco Challenge	• Implementation of a Carbon Neutrality Challenge for residents (PET bottle collection, tumbler verification, and others) • Provision of eco-bags and tumblers as part of carbon neutrality missions
BLUET Academy	• Operation of hands-on one-day upcycling classes to make items using waste materials • Operation of a cafeteria



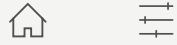
BLUET Sharing cart provision service



BLUET Eco Challenge Carbon Neutrality Challenge



BLUET Academy upcycling class



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Risk Management

➤ Risk Management Process

Quality Control Risk Assessment

POSCO E&C conducts systematic quality assessments across 6 stages, from groundbreaking to completion, led by the Quality Control Group. To accurately evaluate construction quality, we utilize customized checklists comprising 324 items tailored to the specific characteristics of each process phase. These diagnostic items are categorized by their level of importance, allowing us to closely monitor the implementation of corrective measures for critical findings. Furthermore, the group provides six-stage on-site coaching to systematically manage construction quality. During each assessment, we simultaneously offer preemptive training for the subsequent construction phase, ensuring that key quality control points are thoroughly understood beforehand. Field measurement data and nonconformity cases collected throughout this six-stage process are digitized and analyzed to identify recurring defect patterns and best practices for each trade. These insights are then incorporated into revisions of our technical guidelines and construction standards. By repurposing these updated standards as on-site training materials, we have established a virtuous cycle of quality knowledge. Ultimately, this comprehensive approach allows us to preemptively eliminate potential defects during the construction phase and minimize the occurrence of defects after completion.

Stage	Stage 1	Stage 2	Stage 3	Stage 4	Stage 5	Stage 6
Phase	Foundation rebar	Standard floor construction	Frame construction	Insulation construction	Frame completion	Furniture construction
Key Assessment Items	Installation of shear reinforcement, PIT level difference details, structural drawing consistency review, etc.	Rebar placement status of standard floor frames, parking lots, etc.	Slab thickness, rebar cover, condensation prevention material construction errors, and others	Early finishing work such as lightweight walls in residential units, insulation, and bathroom waterproofing	Mid-stage finishing work such as tiles, external waterproofing, and stone	Final finishing work in residential units, such as furniture, wallpapering, and flooring, as well as ancillary facilities
Preemptive Training for Subsequent Trades	Advance training on structural work, including rebar and concrete	Advance training on major finishing trades	Training on insulation, lightweight walls, ALC, and waterproofing	Training on tiles, common area finishing, and others	Training on wallpapering, flooring, furniture, and others	Completion preparation

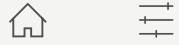
Establishment of an Integrated MOLIT Penalty Point Management System

POSCO E&C established an integrated MOLIT (the Ministry of Land, Infrastructure and Transport) penalty point management system to conduct real-time analysis of site-specific construction quality data and identify the core defect factors that trigger penalties. Utilizing the system's risk simulation feature, we forecast potential penalty issuances and facilitate preemptive corrective measures, thereby preventing penalties before they occur. Furthermore, we developed a real-time dashboard that visualizes external inspection trends. This provides management and on-site leaders with an intuitive overview of quality risks, streamlining quality management and enabling rapid, informed decision-making.

Customer Rights Risk Management System

Risk Monitoring and Prevention | POSCO E&C continuously monitors customer rights risks across key areas — including construction quality, defect remediation, move-in delays, after-sales services, and pre-sale contracts — through various VOC channels such as the BLUET Lounge, BLUET Customer Center, happy calls, and the website grievance channel. Upon identifying a customer rights risk, the company responds immediately through on-site diagnostic coaching by the Quality Technology Group, deployment of a dedicated defect remediation team, and intensive pre-move-in inspections. As a preventive measure, POSCO E&C mandates detailed explanations at the point of pre-sale contract execution and continues to expand resident communication channels.

Customer Protection and Damage Relief Procedures | For all defect cases submitted by customers, POSCO E&C conducts prompt on-site verification and after-sales service processing through a dedicated defect remediation team, followed by phone confirmation and satisfaction surveys to verify resolution outcomes. We strictly adhere to defect warranty periods as stipulated in the 'Enforcement Decree of the Multi-Family Housing Management Act,' and in the event of a dispute, ensure fair resolution through objective review and appropriate action via the Ministry of Land, Infrastructure and Transport's Defect Management Information System.



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Metrics and Targets

> Metric

Quality Management System Certification Rate

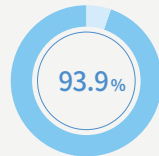
2025 ISO 9001 certification rate



100 %

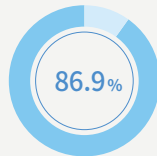
(Quality Management System)

Customer Feedback and Complaints Resolution Rate



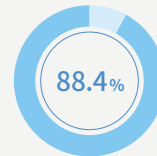
2023

Received 1,664,179 cases
Processed 1,562,520 cases



2024

Received 1,476,259 cases
Processed 1,282,398 cases



2025

Received 1,713,756 cases
Processed 1,514,447 cases

Customer Satisfaction Survey Score



71.7
points

2023

85.4
points

2024

85.9
points

2025

> Target

Quality Control Target

POSCO E&C operates a quality management system with the goal of achieving zero penalty points, serious defects, and construction defects to create customer value with the highest quality. The Plant Engineering & Construction Division manages the prevention of serious accidents and penalty points as its top priority and conducts cross-functional initiatives to strengthen technical capabilities and address areas requiring improvement. The Building Works Division proactively manages the risks of high-risk projects to prevent serious defects and standardizes quality through intensive management of key trades. We achieve our quality targets through field-oriented quality enhancement initiatives, such as strengthening preventive trial construction and worker quality training.

Customer Rights Protection Target

POSCO E&C aims to maintain first place in the apartment category of the Korean Standard-Quality Excellence Index (KS-QEI) in 2026. To manage customer satisfaction, we systematically manage key indicators such as the resolution rate of customer feedback and complaints and the customer satisfaction survey score. As a result, the customer satisfaction survey score has continued to rise since 2023, and we are achieving tangible results in customer-centered management, such as winning first place in the apartment category for the 16th time in history in 2025.



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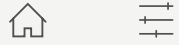
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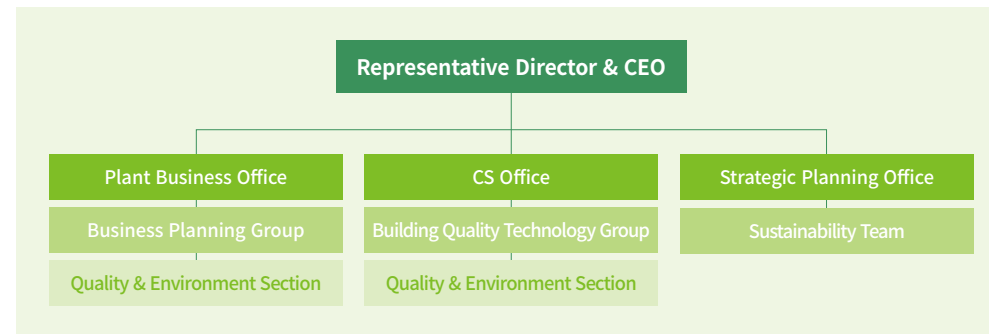
Management Framework

Organization

Dedicated Organization

POSCO E&C operates an environmental management system centered on the Strategic Planning Office and each business division. The Plant Engineering & Construction Division and the Building Works Division carry out environmental risk management and regulatory compliance activities tailored to their respective business characteristics. The Quality & Environment Section within each division is responsible for on-site environmental monitoring, environmental incident prevention and recurrence control measures, and environmental performance improvement. The Strategic Planning Office drives carbon neutrality initiatives, manages obligations under the Emissions Trading Scheme, and monitors trends in the enactment and revision of environmental laws and regulations. It also consolidates and manages company-wide environmental compliance violations. To strengthen information sharing and cross-divisional collaboration on environmental management, a working-level Environmental and Energy Management Council convenes monthly, addressing key agenda items including environmental compliance violations, GHG emissions, key environmental risks and improvements at divisions and sites, and time-sensitive environmental issues. Council outcomes are distributed to management and individual sites, strengthening environmental management execution. In addition, the Infrastructure Sector Environmental Management Council meets semi-annually to share group-level environmental policies and key issues; outcomes are shared with POSCO Holdings to reinforce the group-wide integrated environmental management framework.

Environmental Management Governance



KPI Management

To strengthen ESG execution, POSCO E&C incorporates ESG action items which include environmental management indicators into executive Key Performance Indicators (KPIs). Environmental regulatory compliance and GHG emissions are designated as KPIs for the dedicated responsible organization. Specifically, performance on GHG emissions reduction and the number of environmental regulation violations is reflected in the short-term monetary compensation of department heads.

Policy

Environmental and Energy Management Policy

POSCO E&C has established an Environmental and Energy Management Policy and operates an environmental and energy management system accordingly. The establishment and any subsequent revision of the policy require CEO approval and are disclosed to stakeholders via the company website.

Environmental and Energy Management Policy

POSCO E&C recognizes environment and energy as core elements of corporate management, and commits all employees and stakeholders to actively pursuing the following practices in support of a sustainable, low-carbon economy.



We establish an environmental and energy management system based on ISO 14001/50001 to comply with relevant laws and demonstrate environmental leadership.



We conserve resources and protect the environment by minimizing waste generation, increasing recycling, and using energy efficiently.



We establish environmental and energy targets and provide the resources necessary to achieve them, continuously improving our environmental and energy management system and performance.



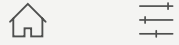
To create environmentally responsible construction sites, we apply optimal environmental damage prevention technologies and minimize pollutant emissions, providing a pleasant environment to local communities.



Through the introduction of environmentally responsible, low-carbon technologies and design and procurement that consider energy efficiency, we reduce GHG emissions and minimize the impact of climate change.



We periodically assess and improve environmental and energy operating performance, report it to management, and communicate with stakeholders.



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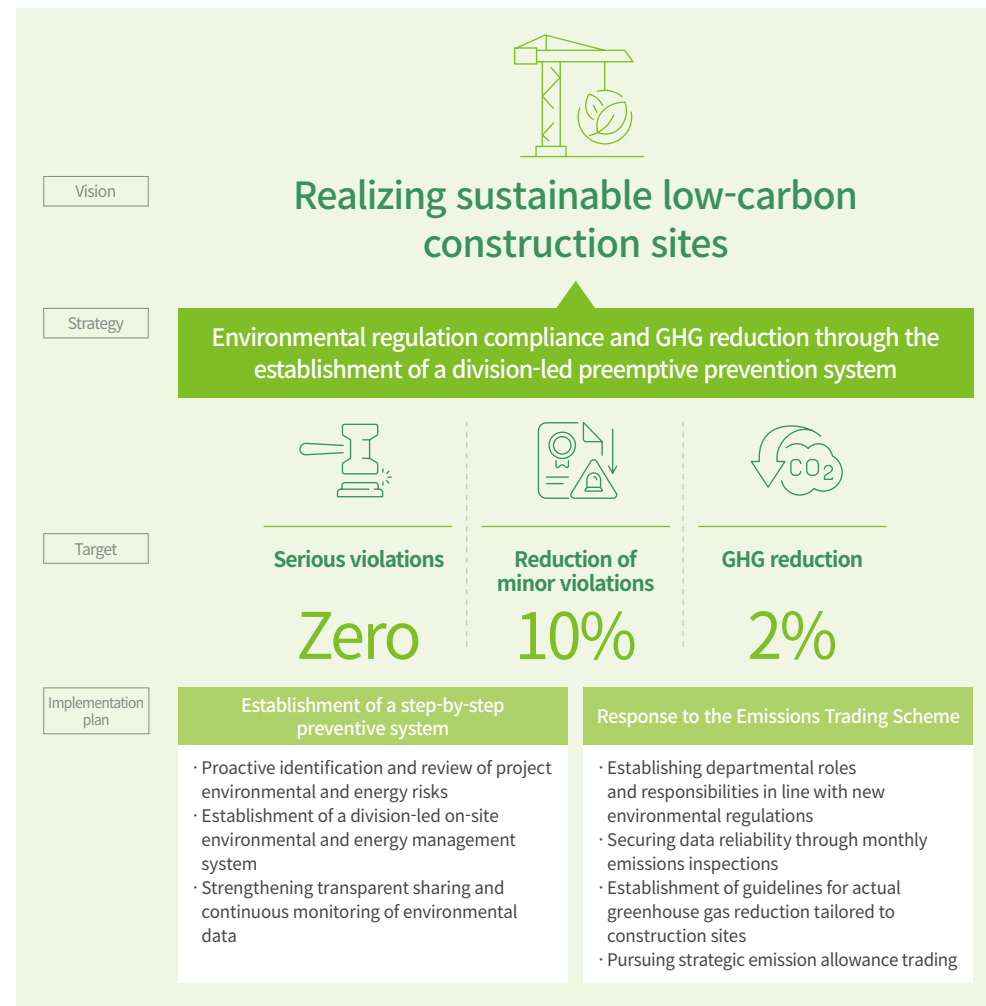
Management Activities

➤ Strategy and Response Measures

Environmental and Energy Management Strategy

To identify environmental and energy-related risks in advance and manage them systematically, POSCO E&C has established and operates a division-led environmental and energy management strategy.

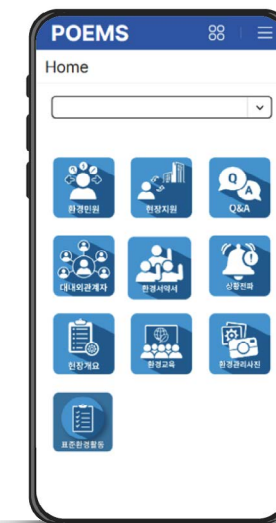
Environmental and Energy Management Strategy

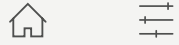


Advancing the Environmental Management System (POEMS)

POSCO E&C operates POEMS (POSCO E&C Environment Management System), our proprietary environmental management system, to ensure systematic management of company-wide environmental operations. Built in alignment with ISO 14001 and ISO 50001 certification requirements, POEMS integrates environmental data across multiple project sites, business divisions, and headquarters. In 2025, the system was redesigned to enhance usability for field operations. The redesigned POEMS expanded input and query functions for key environmental management items — including regulatory violation status and waste management — accessible anytime and anywhere, enabling proactive prevention of regulatory violations and rapid response when issues arise. The system also supports real-time information sharing across site, business division, and headquarters levels in the event of environmental incidents, enhancing company-wide response to environmental risks. Along with real-time updates of internal environmental standards, we have enabled the immediate confirmation of the latest environmental laws and their reflection in on-site work through linkage with information from external agencies such as the Ministry of Climate, Energy and Environment and the Ministry of Government Legislation. In addition, through real-time registration and inquiry of quantitative environmental indicators, we track progress toward environmental targets, while data accumulated by organizational unit and region supports ongoing environmental performance analysis and continuous improvement.

POEMS mobile screen composition





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Environmental Training

Tailored Environmental Training | POSCO E&C's dedicated environmental department delivers tailored Re-skilling (foundational competency) and Up-skilling (advanced competency) training programs to develop environmental professionals and strengthen on-site response capabilities. Re-skilling training serves as a foundational course for new personnel, designed to establish core environmental competencies among new environmental managers, newly deployed site personnel, and supplier workers. The curriculum covers environmental management fundamentals, environmental regulatory compliance, and supplier environmental management practices. Training is conducted upon initial deployment and at least once annually; in 2025, a total of 4,557 participants completed the program across 660 in-person and online sessions. Up-skilling training is an advanced program providing practice-oriented specialized instruction to strengthen the expertise of environmental practitioners and site managers. Topics include environmental incident response, dispute resolution, and the management of fugitive dust, noise and vibration, waste, and greenhouse gas emissions. Training is conducted at least once per quarter; in 2025, a total of 1,096 participants completed the program through expert-led lectures and discussion-based, hands-on workshops.

Mobile App Environmental Training | POSCO E&C has integrated the worker mobile app 'Pogeuni' into the environmental management system to strengthen the accessibility of environmental training for construction site workers and to systematically manage training records. To strengthen the effectiveness of environmental management, we have systematized the site deployment procedure so that only workers who have completed the required training and signed an environmental management pledge through

Pogeuni Environmental Training



Ep.1 Combustible/non-combustible separation



Ep.2 No mixing



Ep.3 Household waste Separation



Ep.4 Water spraying, covering



Ep.5 Wheel washing, entrances



Ep.6 Noise management



Ep.7 Water quality management



Ep.8 Organization and tidiness



Ep.9 Resources/energy



Ep.10 Other

the mobile app are permitted to access construction sites. The Pogeuni app also delivers video-based environmental training in seven languages, enabling foreign workers to complete training at any time and location on their own mobile devices, without language barriers. Additionally, by making these training videos publicly available on YouTube, we enable other companies and sites across the industry to access and utilize the content freely, contributing to broader environmental awareness throughout the construction sector.

Operation of a Compliance System

POSCO E&C systematically manages key legal risks related to the environment and climate change. We are designated as an allocation entity under the Emissions Trading Scheme pursuant to the Act on the Allocation and Trading of Greenhouse Gas Emission Allowances, and as a mandatory environmental information disclosure entity under the Environmental Technology and Industry Support Act. Accordingly, we comply with statutory requirements for GHG emissions reduction and public disclosure. To this end, we monitor legislative and regulatory developments — including amendments issued by the Ministry of Climate, Energy and Environment and relevant regulatory bodies — and incorporate these updates into our management strategy. We also continuously enhance our GHG management IT system (PGMS) in alignment with guidelines issued by the Greenhouse Gas Inventory and Research Center, strengthening the reliability of reported data.

In parallel, greenwashing risk — which may arise in the course of externally communicating climate-related performance — has been identified as a priority issue. To address the associated administrative risks under the Korea Fair Trade Commission's review guidelines on environmental labeling and advertising, we have established and operate a dedicated Greenwashing Review Committee. In 2025, we further strengthened our ESG verification process by enacting ESG information management and disclosure guidelines and introducing an accountability management framework.

Regulatory Violations and Measures

In 2025, POSCO E&C conducted a root-cause analysis of environmental regulatory violations identified at its construction sites and implemented corrective measures to prevent recurrence. For violations attributable to inadequate noise, vibration, and waste management, we applied site-specific remediation measures, including installation of additional noise barriers, deployment of noise-reduction equipment, direct communication with affected residents on noise and vibration mitigation measures, and reinforcement of segregated waste storage procedures using dedicated collection containers. We continue to refine our on-site environmental management procedures through systematic review of identified violations.



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Pollution

Pollutant Management System

POSCO E&C manages pollutant emissions through POEMS (POSCO E&C Environment Management System), an environmental management system that conforms to ISO 14001 criteria. We regularly analyze environmental management indicators by regional division to monitor the status of major pollutant generation, and manage environmental risks through real-time information sharing between sites and between sites and headquarters. In addition, we develop technologies to reduce environmental impact and continuously monitor regulatory compliance to minimize the adverse effects of pollutant emissions.

Fugitive Dust Reduction

To minimize the environmental impact of fugitive dust at construction sites and protect community health, POSCO E&C has established and operates on-site environmental management guidelines. Dust dispersion and vehicle-borne dust emissions are controlled through the installation of dustproof covers and screens, road watering (at least once daily), operation of wheel-washing and water-spraying facilities, and installation of dry wheel-washing pads and smart rapid sprinklers. Fine dust monitors are installed at sites to display real-time particulate concentrations on external electronic boards. In addition, we apply our proprietary dust suppressant technology — verified to outperform conventional covers — at construction sites. This technology received Green Technology Certification from the Ministry of Climate, Energy and Environment (2021) and was recognized with the Chair of the National Assembly Environment and Labor Committee Award at the 2024 Construction Environment Best Practice Competition. We have also signed a fine dust reduction agreement with the Ministry of Climate, Energy and Environment and the Seoul Metropolitan Government; as of 2025, 121 sites nationwide — including 17 in Seoul — participate in these programs, contributing to national particulate matter reduction efforts.

Water Resources and Water Pollutant Management

To reduce on-site water consumption and prevent wastewater discharge, POSCO E&C has established a water quality management process. Across all project phases, we develop and implement water quality management plans in accordance with our internal stage-specific standards, and prevent the uncontrolled release of wastewater through the operation of turbidity control nets, grit chambers, sedimentation tanks, and non-point source pollution reduction facilities. To further improve water resource efficiency, we have introduced wheel-washing water reuse, groundwater recycling during tunnel construction, and rainwater harvesting. At the Yongin Eco Town site, a turbid water treatment facility has been installed to settle suspended solids and discharge only clarified water, enabling efficient on-site wastewater management.

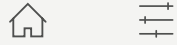
Worksite Noise/Vibration Management

Preventive Management and Monitoring | To minimize the adverse impact of construction-site noise and vibration on nearby residents, POSCO E&C implements systematic controls from the risk management stage through early construction, including the configuration of noise reduction measures based on noise prediction. Potential impacts are assessed in advance by comprehensively considering historical cases, site scale, and local characteristics, and a 3D construction noise simulation tool is used to visualize noise levels and evaluate mitigation options. We have also developed Korea's first construction-site vibration damage prediction tool, which supports decisions on the deployment of low-vibration equipment and, where necessary, adjustments to construction methods and sequencing; outputs from the tool also serve as evidentiary documentation for compensation claims in the event of damage. Fixed noise barriers are installed along site perimeters to prevent noise propagation beyond the boundary, and mobile air noise barriers are deployed near mobile noise sources such as heavy equipment. Noise monitors are installed at key locations inside and outside each site to ensure continuous compliance monitoring against regulatory thresholds.

Noise and Vibration Reduction Technology | To reduce noise and vibration, POSCO E&C strengthens on-site noise management through proprietary technology development and the adoption of new construction methods. For rock-breaking operations — which generate a disproportionately high volume of noise complaints — we developed a dual-layer noise reduction for breaker equipment, achieving an average noise reduction effect of 6.5 dB, and have filed a patent application. In addition, to reduce the noise and vibration during pile construction, we jointly developed and applied the 'Foundation Reinforcement Geo-P Pile Method' with a supplier.

Community Impact Management

POSCO E&C operates various channels such as resident briefing sessions to strengthen communication with residents near construction sites and strives to minimize the inconvenience and damage caused by construction. When there are facilities used by residents such as houses, schools, and hospitals near a site, we hold advance briefing sessions for local residents to share plans for operating environmental impact mitigation facilities, and we directly gather residents' requirements by listening to VOC. In addition, in accordance with construction environment-related laws, we establish training and management policies for each site to carry out prevention-focused environmental management, and we respond to environmental complaints and disputes through the Environmental Dispute Resolution Committee.



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Waste and Circular Economy

Waste Management System

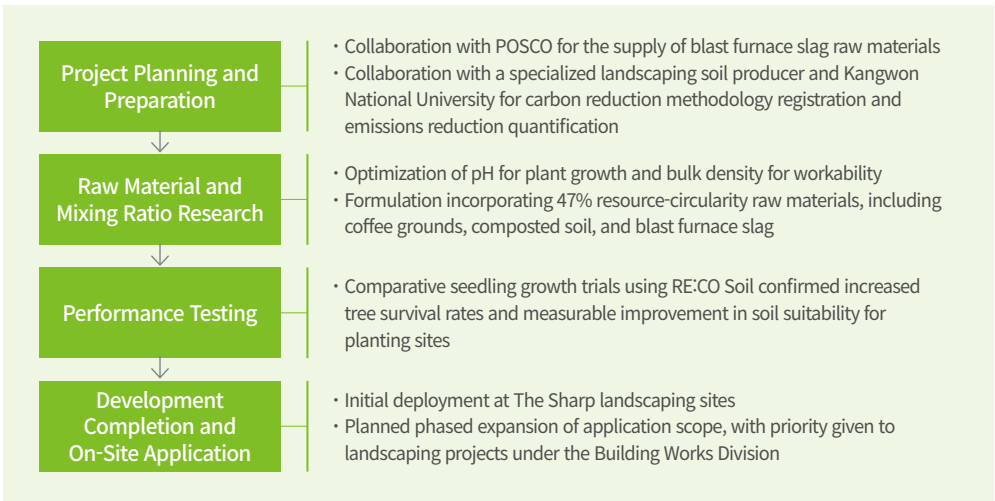
POSCO E&C operates a waste management system based on POEMS, an environmental management system that conforms to ISO 14001 criteria, and all waste generated at sites is managed in accordance with applicable regulations, including the Wastes Control Act and management standards. We reinforce our own internal waste management standards, disclose violation cases, and conduct training accordingly. To prevent regulatory violations, we conduct pre-inspection of waste treatment contractors and review required documentation, including permits, treatment capacity certificates, and treatment guarantee certificates covering waste collection, transportation, and disposal. A cross-functional review process is also in place to assess the adequacy of waste treatment service contracts prior to procurement.

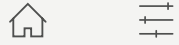
Waste Pre-Alert System | To proactively prevent regulatory violations during the waste management process, POSCO E&C has established a waste pre-alert system integrated with the government's environmental disclosure platform. By linking the Korea Environment Corporation's Allbaro system with the internal POEMS system, we detect data entry errors in waste records across all sites in real time, immediately notify the responsible personnel, and enable prompt corrective action and accurate record-keeping before any irregularity escalates into a formal regulatory violation.

Expansion of Blast Furnace Slag Recycling

POSCO E&C has developed RE:CO Soil, a landscaping soil conditioner incorporating blast furnace slag, which is an industrial by-product, and is deploying it across landscaping sites. RE:CO Soil is a carbon-reducing material that blends blast furnace slag, which captures atmospheric carbon, into landscaping soil. As a resource-circularity product, it recycles industrial by-products while contributing to GHG reduction. In July 2025, the carbon capture efficacy of blast furnace slag was officially recognized by the Carbon Reduction Certification Center of the Korea Chamber of Commerce and Industry, externally verifying its effect. At sites, RE:CO Soil is blended with conventional landscaping soil at a specified ratio, laid across landscaping areas, and followed by tree planting. Post-installation, we continuously monitor the amount of carbon captured in the soil and the growth condition of landscaping trees to measure the carbon reduction effect. In 2026, we plan to conduct measurement-based carbon reduction verification and certification based on the volume actually applied at the Cheongju multi-family housing site.

RE:CO Soil Development Process





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Development of Construction Waste Upcycling Materials

To expand the resource circularity of waste generated at construction sites, POSCO E&C is conducting research on upcycling construction material technologies. To address the longstanding issue of construction waste being disposed of without proper management, we have developed IMP Upcycling+ construction material technology, which reproduces construction waste such as waste concrete into asphalt, bricks, and cement, since 2024. Technologies for which development has been completed are now being applied to road paving and construction sites.

Carbon Footprint Tracking Management | The upcycled materials have obtained 6 Environmental Product Declaration (EPD) certifications, and a carbon footprint database has been established through carbon lifecycle tracking. Based on this, we have implemented a unified system that measures the carbon footprint of construction materials for the first time in Korea's construction industry.

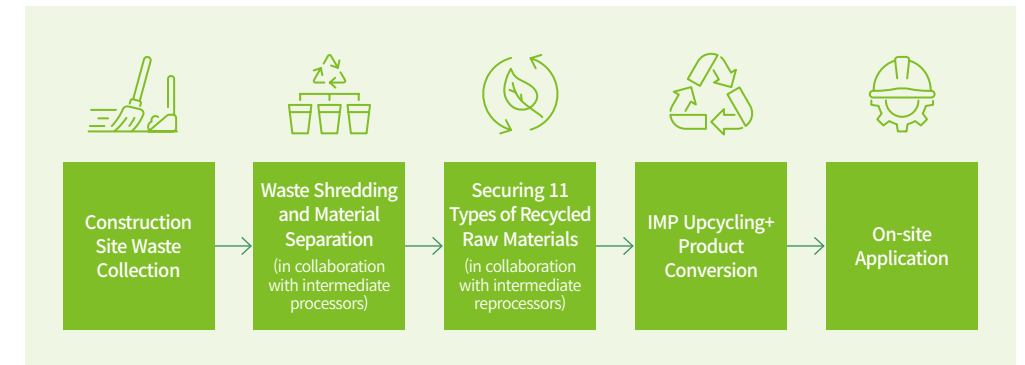
Win-Win Cooperation with SMEs | We are expanding cooperation with small and medium-sized enterprises in the process of developing upcycling materials. We cooperate with manufacturers of primary and secondary construction material products such as asphalt, bricks, and special concrete to validate commercialization potential and strengthen suppliers' technological competitiveness.

IMP Upcycling+ Technology Development Status

	Stage 1 Development Research Completed & Deployed at Sites	Stage 2 Development Research in Progress	Stage 3 Development Research Planned
Target Waste Resource	- Waste asphalt - Waste plastics and synthetic resins - Wood waste	- Waste concrete - Construction sludge - Waste soil and stone	- Waste tiles - Waste wood - Waste panels - Waste fibers
Upcycling+ Products	- Asphalt - Non-metallic formwork panels - Landscaping turf substitute	- Aggregate - Concrete structures - Solidifying agent for ground stabilization - Bricks	- Waste board - Mixed construction waste - Panels for building exterior and interior - Landscaping materials - Pellet material - Synthetic material

Expansion of Academic Research | In 2025, we signed a memorandum of understanding (MOU) with the Carbon Neutral Road Construction Technology Research Institute to advance the development of new upcycling construction material technology for road applications. By expanding technology development and presenting research results to relevant academic organizations, including the Korean Recycled Construction Resources Institute and the Korea Concrete Institute, we contribute to the technological advancement and broader industry adoption.

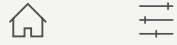
Construction Waste Upcycling Process



On-site Application Status



Upcycling Material Technology Cooperation MOU Signing Ceremony



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Biodiversity Policy

Biodiversity Policy

POSCO E&C has established and operates a biodiversity policy and accompanying practice guidelines, and systematically analyzes and manages environmental impacts based on an understanding of natural capital.

Biodiversity Management System

POSCO E&C applied the LEAP approach presented in the TNFD (Taskforce on Nature-related Financial Disclosures) framework, a global nature sustainability initiative, to analyze the dependencies, impacts, and risks related to natural capital. We will strive to contribute to Nature Positive by gradually advancing the process of identifying interactions with natural capital.

Natural Capital Management System



1) IBAT: Integrated Biodiversity Assessment Tool
2) ENCORE: Exploring Nature Capital Opportunities, Risk and Exposure
3) BRF: Biodiversity Risk Filter
4) SBTN: Science Based Targets Network
5) AR3T: Avoid, Reduce, Restore&Regenerate, Transform

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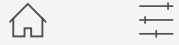
LOCATE Interface with Nature

In the Locate stage, to identify nature-related dependencies, impacts, and risks, POSCO E&C established criteria for selecting projects to be assessed. Of the 125 projects in progress in 2025, the top 30 worksites were identified as primary assessment candidates based on contract value and geographic distribution. Following an ecological sensitivity assessment that also considered regional diversity, a final 15 worksites were selected. The ecological sensitivity assessment was conducted based on the National Institute of Ecology's criteria for selecting ecologically sensitive areas, and we utilized IBAT, a global screening tool recommended by TNFD.

Ecological Sensitivity by Project

Site location	Key Biodiversity Areas ⁶⁾	Protected Areas ⁷⁾	Endangered Species	
			IUCN criteria ⁸⁾	Domestic criteria ⁹⁾
Seocho-gu, Seoul	10	6	43	24
Sasang-gu, Busan	2	1	57	54
Buk-gu, Daegu	2	1	12	17
Namdong-gu, Incheon	11	6	46	66
Seo-gu, Gwangju	3	5	45	28
Seo-gu, Daejeon	1	0	13	22
Jung-gu, Ulsan	1	1	50	28
Goyang-si, Gyeonggi-do	9	5	44	22
Sokcho-si, Gangwon-do	3	3	33	9
Cheongju-si, Chungcheongbuk-do	1	0	34	30
Dangjin-si, Chungcheongnam-do	7	3	42	31
Jeonju-si, Jeollabuk-do	5	2	51	15
Gwangyang-si, Jeollanam-do	1	3	55	22
Pohang-si, Gyeongsangbuk-do	0	0	41	22
Gimhae-si, Gyeongsangnam-do	2	1	57	17

6) Key Biodiversity Areas (KBAs): The number of areas selected by BirdLife International based on 11 criteria such as 'irreplaceability' and 'ecological integrity'
7) Protected Areas (PAs): The number of areas designated as 'World Natural Heritage,' 'Ramsar,' or by 'UNESCO's Man and the Biosphere Programme'
8) IUCN criteria: The number of endangered species within 50 km rated IUCN Red List Endangered or higher
9) Domestic criteria: The number of endangered species of Grade 1 or 2 or higher at the city level based on the 'Wildlife Protection and Management Act'



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EVALUATE Dependencies and Impacts

POSCO E&C analyzed nature-related impacts and ecosystem service dependencies across business operations in accordance with the International Standard Industrial Classification (ISIC), utilizing ENCORE — a global tool for assessing natural capital dependency and impact levels by industry. The analysis confirmed that the construction industry group to which POSCO E&C belongs exhibits high dependency on key ecosystem functions, including rainfall regulation and ground stabilization and erosion control. These factors are closely linked to water resources, the atmosphere, land, and marine topography; disruption to the underlying natural resources could affect overall business operations. The assessment of the construction industry's impacts on ecosystems further identified ecosystem disturbance as a very high-level impact, with GHG emissions and toxic pollutant discharge also recognized as significant environmental impacts. Building on these findings, we plan to strengthen conservation activities for key dependent ecosystems to secure business continuity, and to develop and implement management strategies to minimize adverse environmental impacts arising from business execution.

POSCO E&C's Major Businesses and Industry Classification

Business Division	Major Businesses	ISIC Industry Classification	Contract Amount (KRW billion) ¹⁾	Ratio (%)
Plant	Construction of industrial plants such as steel, power generation, petrochemicals, secondary batteries, and hydrogen, and infrastructure such as roads, railways, sites, and ports	• Construction of other civil engineering projects • Road and railway construction • Construction of public service projects	2,027	31.3
Building	Construction of buildings for various uses such as housing, offices, retail, and lodging facilities	• Building construction	4,446	68.7

1) Based on domestic contract amount

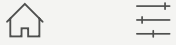
Dependency

			VERY LOW	LOW	MEDIUM	HIGH	VERY HIGH
Ecosystem service		Dependency Factor	Importance Grade				
Provisioning Services	Water supply		M				
	Animal-based energy		VL				
Regulating and Maintenance Services	Climate regulation (global)		M				
	Rainfall regulation		VH				
	Climate regulation (local)		L				
	Air filtration		VL				
	Ground stabilization and erosion control		H				
	Solid waste purification		VL				
	Water purification		M				
	Maintenance of water resource cycle		M				
	Flood damage prevention		M				
	Storm damage prevention		M				
	Noise pollution mitigation		VL				
	Pollution reduction by the atmosphere and ecosystems		L				
	Ecosystem disturbance mitigation		VL				

Impact

		VERY LOW	LOW	MEDIUM	HIGH	VERY HIGH
Impact Factor		Importance Grade				
Ecosystem disturbance (e.g., noise, light)		VH				
Freshwater use area		M				
Greenhouse gas emissions		H				
Seabed use area		M				
Non-greenhouse gas emissions		L				

Impact Factor		Importance Grade				
Solid waste generation and discharge		M				
Land use area		L				
Toxic pollutant discharge		H				
Water usage		L				
Introduction of invasive species		L				



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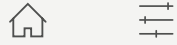
ASSESS Main Risk Factors

POSCO E&C assessed physical, regulatory deficiency, and reputational risks across the 15 selected priority projects using WWF's Biodiversity Risk Filter. The analysis identified two principal physical risk factors: self-purification capacity — driven by declining water resource availability and forest productivity — and disaster prevention — driven by deteriorating soil and air quality. In terms of reputational risk, the primary risk factors identified were the environmental dimension, linked to proximity to protected areas and Key Biodiversity Areas (KBAs), and the direct ecosystem degradation dimension, associated with forest loss and pollution.

Biodiversity Risk Assessment Results^{1) 2)} Very Low (1.0-1.8) Low (1.8-2.6) Medium (2.6-3.4) High (3.4-4.2) Very High (4.2-5.0)

Site Location	Physical Risk					Reputational Risk				Management Status or Plan
	Natural Resources	Self-Purification Capacity	Disaster Prevention	Scenic Value	Overall	Direct Ecosystem Destruction Aspect	Environmental Aspect	Socioeconomic Aspect	Overall	
Seocho-gu, Seoul (Defense Intelligence Command Site Business Complex)	3.76	3.75	3.69	1.00	3.75	4.10	3.88	3.00	3.99	• Implementation of environmental regulation reduction measures such as water pollution surveys of grit chamber sedimentation water
Sasang-gu, Busan (Eomgung District 3)	2.94	3.75	3.81	1.00	3.77	4.02	4.38	3.00	4.20	• Implementation of environmental management such as operating soundproof and dustproof walls
Buk-gu, Daegu (Nowon 2-dong Redevelopment Project)	2.94	3.83	3.88	1.00	3.84	4.06	2.97	3.00	3.53	• Installation of air soundproof walls and 12 m soundproof fences
Namdong-gu, Incheon (Sangincheon Elementary School Area Redevelopment)	3.73	3.75	3.69	1.00	3.73	3.88	3.50	3.00	3.69	• Conducting ecological surveys before demolition and water pollution surveys
Seo-gu, Gwangju (Yangdong 3 Housing Redevelopment)	3.35	3.81	3.88	1.00	3.83	4.06	3.88	2.81	3.97	• Installation of alternative habitats and fugitive dust prevention measures
Seo-gu, Daejeon (Doma-Byeondong District 3 Housing Redevelopment)	2.98	4.00	4.00	1.00	4.00	4.06	3.31	3.00	3.69	• Soil runoff prevention measures and fugitive dust prevention water spraying during demolition
Jung-gu, Ulsan (Hakseong-dong Regional Housing Association)	2.94	3.75	3.81	1.00	3.77	4.02	4.38	3.00	4.20	• Operation of fugitive dust cleaning vehicles and water spraying vehicles
Goyang-si, Gyeonggi-do (Wondang New Town District 1 Housing Redevelopment)	3.51	3.75	4.00	1.00	3.81	4.06	3.50	3.00	3.78	• Operation of a three-stage grit chamber to reduce suspended sediment
Sokcho-si, Gangwon-do (Yeongnang Park Multi-Family Housing)	2.94	3.75	3.81	1.00	3.77	4.02	4.38	3.00	4.20	• Low-illuminance night lighting design considering light pollution and application of low-noise blasting methods
Cheongju-si, Chungcheongbuk-do (Ochang Residential-Commercial Complex)	3.39	4.00	3.88	1.00	3.91	4.19	2.94	3.00	3.59	• Operation of water spraying vehicles, air soundproof walls, 6 m soundproof fences, and grit chambers
Dangjin-si, Chungcheongnam-do (Korea Gas Corporation Dangjin Base Phase 1)	3.35	4.00	3.50	1.00	3.62	4.02	3.50	3.00	3.76	• Plans for temporary transplanting of trees in the construction area and restoration to original state to preserve existing vegetation
Jeonju-si, Jeollabuk-do (Seosin-dong Gamnamugol Housing Redevelopment)	3.39	4.00	4.00	1.00	4.00	4.02	3.88	3.00	3.95	• Operation of fugitive dust prevention measures such as wheel washers and water spraying vehicles
Gwangyang-si, Jeollanam-do (Gwangyang 2 Terminal Units 7 and 8 Storage Tanks)	3.39	3.56	4.00	1.00	3.67	4.02	3.88	2.81	3.95	• Transplantation of trees around the tanks and creation and management of microhabitats
Pohang-si, Gyeongsangbuk-do (Yanghak Park Multi-Family Housing)	2.94	3.75	3.81	1.00	3.77	4.02	4.38	3.00	4.20	• Operation of 6m soundproof fences and sedimentation ponds
Gimhae-si, Gyeongsangnam-do (Sinmun District 1 A7-1BL)	3.20	3.75	3.94	1.00	3.80	3.65	3.88	3.00	3.76	• Planting of diverse tree species, creation of water landscape features, and use of low-carbon materials

1) We scored the level of risk that ecosystems pose to POSCO E&C's worksites, with higher assessment results indicating a higher level of risk related to natural capital
2) 'Regulatory Deficiency Risk,' newly introduced with the 2026 revision of the WWF BRF, is a national-level score that assesses the degree to which countries meet best practices for biodiversity-related laws and systems, and all 15 domestic site locations were confirmed to be at the Medium (3.25) level



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➤ Strategy and Response Measures

PREPARE Response and Disclosure

POSCO E&C systematically monitors the distribution of endangered wildlife around major business sites, and through this, we establish biodiversity protection measures prior to project execution. Looking ahead, we plan to set indicators and establish targets based on global standards, including SBTN's (Science Based Targets Network) target-setting methodology. In addition, we will annually disclose business activities related to biodiversity under the TNFD framework and progressively enhance the depth of our reporting.

Endangered Wildlife Distribution at Major Business Sites

Business Site	Distribution Status
Defense Intelligence Command Site (Seocho-gu, Seoul)	Class I: (Mammal) Otter / Class II: (Bird) Northern goshawk, Eurasian sparrowhawk, (Amphibian) Narrow-mouthed frog
Eomgung District 3 Redevelopment (Sasang-gu, Busan)	Class I: (Mammal) Otter / Class II: (Mammal) Leopard cat, Marten, (Bird) Bean goose, Whooper swan, Peregrine falcon, Eurasian sparrowhawk, Upland buzzard
Nowon 2-dong Redevelopment (Buk-gu, Daegu)	Class I: (Mammal) Otter / Class II: (Bird) Long-billed plover
Yangdong District 3 Redevelopment (Seo-gu, Gwangju)	Class I: (Mammal) Otter
Yeongnang Park Multi-Family Housing (Sokcho-si, Gangwon)	Class I: (Mammal) Otter / Class II: (Plant) Amsonia elliptica, (Mammal) Leopard cat, (Bird) Eurasian hobby, Eurasian sparrowhawk
Ochang Residential-Commercial Complex (Cheongju-si, Chungbuk)	Class I: (Mammal) Otter
Gimhae Sinmun District 1 (Gimhae-si, Gyeongnam)	Natural Monument: (Bird) Common kestrel
Wondang District 1 Redevelopment (Goyang-si, Gyeonggi)	Class II: (Bird) Northern goshawk, Oriental scops owl, (Amphibian) Narrow-mouthed frog / Natural Monument: (Bird) Common kestrel
Gwangyang 2 Terminal (Gwangyang-si, Jeonnam)	Class II: (Crustacean) Fiddler crab, Helice crab, (Shellfish) Heude's brackish snail, Ear-shaped snail

Special Case: Endangered Species Protection Activities | To protect the narrow-mouthed frog (Kaloula borealis) — an endangered wildlife species inhabiting urban development project sites — POSCO E&C operates a habitat relocation program. At the Goyang Pungdong District 2 and the Asan Tangeong District, we implemented preemptive protection measures in response to concerns over population decline and habitat loss, resulting in the creation of alternative habitats of sufficient scale and the successful relocation of approximately 2,400 individuals in total.

In collaboration with the National Institute of Ecology under the Ministry of Climate, Energy and Environment and local environmental experts, we devised measures to minimize the stress of narrow-mouthed frogs during capture and relocation. When selecting alternative habitats, we comprehensively reviewed environmental conditions such as ecological connectivity, food source security, and breeding environment, as well as social conditions such as community acceptance.

Following the establishment of alternative habitats, continuous monitoring was conducted to track settlement status, breeding success rates, and survival rates, with habitat improvement measures refined on a phased basis. As a result, at the Goyang Pungdong District 2, approximately 2,200 individuals were relocated to a newly established alternative habitat; through the fourth year of monitoring, the consistent presence of adults, vocalizations, and tadpoles confirmed stable population establishment. At the Asan Tangeong District, an alternative habitat of approximately 4,000 m² was established and 189 individuals were relocated; at the 12-month post-relocation point, breeding activity was confirmed with approximately 200 larvae and 100 eggs recorded, demonstrating a tangible contribution to endangered wildlife protection and biodiversity enhancement.

Alternative Habitat Creation

Approx.
51,175 m²

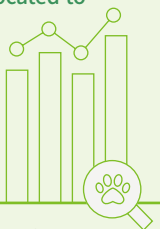
(Goyang Pungdong 47,175 m² / Asan Tangeong approx. 4,000 m²)

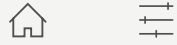


Number of Individuals Relocated to Alternative Habitats

2,394 individuals

(Goyang Pungdong 2,205 individuals / Asan Tangeong 189 individuals)





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Role of Management

The Board of Directors delegates responsibility for strategy execution and day-to-day management of human rights-related risks and opportunities to the CEO and the ESG Council. To strengthen human rights management execution, a dedicated human rights body — the Human Rights Subcommittee — operates under the ESG Council. The Human Rights Subcommittee is responsible for deliberating and resolving on the establishment of human rights management policies, human rights impact assessments, internalization activity plans, and related performance. In addition, key human rights agendas are reported to the Group Human Rights Management Council — comprising POSCO Holdings and eight business subsidiaries — to advance human rights management under a consistent group-wide direction.

Dedicated Organization

Human rights-related policies are implemented and managed primarily through the Human Rights Management Working Group and the Diversity Council. The Human Rights Management Working Group is responsible for conducting human rights impact assessments, identifying improvement actions and overseeing their implementation to establish a robust human rights management system. The Diversity Collaborative Group 'DIBE' — established to promote employee diversity — discusses key issues related to strengthening diversity, equity, and inclusion (DEI) within the organization and serves to identify and drive system improvements and related initiatives.

Human Rights Management Governance



POSCO Group Human Rights Management Council

To minimize disparities in human rights management standards across the holding company, business subsidiaries, and overseas subsidiaries, POSCO Group operates a Group Human Rights Management Council. The Council comprises POSCO Holdings and eight business subsidiaries, which convene semi-annual regular meetings to review domestic and international human rights issues that may arise across the Group's business activities and align on response strategies under a consistent group-wide direction.

Group Human Rights Management Council Organization Chart

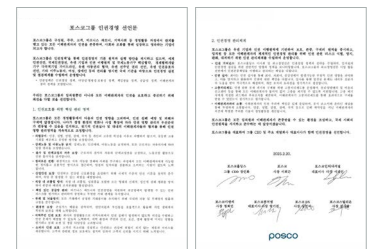


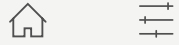
Policy

Human Rights Management Policy

[Group Human Rights Management Declaration](#)

POSCO E&C endorses the Ten Principles of the UN Global Compact across its four thematic areas. Alongside the POSCO Group Human Rights Management Declaration, we have established a human rights management policy to enable employees to uphold the principle of respect for human rights in their day-to-day work. The policy is grounded in international human rights norms, including the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights (UNGPs), and the OECD Guidelines for Multinational Enterprises. Applicable to all worksites and employees, the policy comprises 11 human rights principles — including the establishment of human rights management system, non-discrimination in employment, freedom of association and collective bargaining, and the prohibition of forced and child labor — together with provisions governing the human rights due diligence process and grievance mechanisms. The full text of the Group Human Rights Management Declaration and policy is available on the POSCO E&C website.





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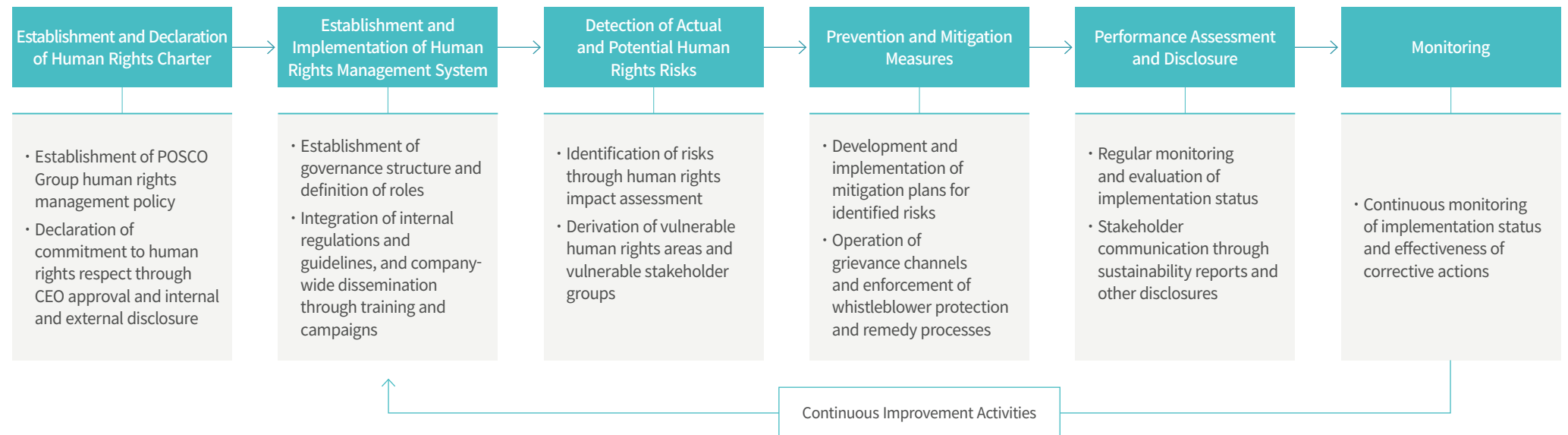
Management Activities

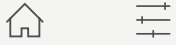
➤ Risk Management Activities

Human Rights Risk Management Process

By establishing a Human Rights Charter and a human rights management system, and conducting human rights risk identification and mitigation activities, POSCO E&C identifies and addresses potential human rights issues arising during business operations. In particular, POSCO E&C conducts an annual human rights impact assessment to identify human rights issues related to our business activities and evaluates actual and potential risks through analysis of internal and external cases. For further details, please refer to pages 61–62 of this report.

Human Rights Risk Management Process





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➤ Strategy and Response Measures

Human Rights

Human Rights Impact Assessment

In line with the POSCO Group Human Rights Due Diligence Implementation Guidelines, POSCO E&C has established a human rights impact assessment process and conducts annual assessments. This process verifies facts through on-site due diligence of human rights risks identified through the human rights management system assessment and employee awareness surveys.

Key issues identified in the assessments are reported to the Human Rights Subcommittee. Based on the risks’ significance and priority, we collaborate with relevant departments to develop and implement corrective measures. The assessment results are also shared through the POSCO Group Human Rights Management Council to explore group-level response measures. Furthermore, to verify the effectiveness of these measures, we annually compare and analyze human rights impact assessment results and report findings to internal executive management.

In addition, we provide training on human rights impact assessment methodology and support the assessments for our subsidiary POSCO A&C.

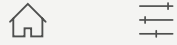
Human Rights Impact Assessment Method

Category	Details
Human Rights Management System Assessment	• Scope: Assessment of the company’s human rights management system, including policies and activities • Method: Assessment of 163 indicators across 11 areas - Establishment of human rights management system - Non-discrimination in employment - Freedom of association and collective bargaining - Prohibition of forced labor - Prohibition of child labor - Prohibition of workplace harassment/sexual harassment - Ensuring occupational health and safety - Responsible supply chain management - Protection of local residents’ human rights - Ensuring environmental rights - Protection of customer human rights - Open-ended questions
Human Rights Awareness Survey	• Scope: Assessment of employee awareness regarding the company’s human rights management activities, including identification of human rights-vulnerable job roles • Method: Assessment of 56 questions across 11 areas (52 multiple-choice, 4 open-ended)
On-site Due Diligence	• Detailed verification of human rights risks related to vulnerable job roles identified through the awareness survey • Method: Conducting one-on-one, in-person interviews with employees in vulnerable job roles at sites and headquarters

Human Rights Risk Assessment Results and Follow-Up Measures | The 2025 human rights impact assessment showed that the human rights management system and human rights awareness were generally at a satisfactory level. We identified groups with relatively low human rights awareness as vulnerable and conducted one-on-one in-depth interviews to assess human rights risks and gather ideas for improvement. Subsequently, in collaboration with the Human Rights Subcommittee, we prioritized risks and developed improvement measures through consultation with relevant departments. To address potential human rights risks, we conduct mandatory human rights management training and run human rights promotion campaigns. We are also implementing phased measures, including mandating bodycam use in medical offices to prevent workplace sexual harassment against on-site health personnel. In 2026, we plan to launch a group-wide human rights campaign aiming to raise awareness among all employees, including vulnerable groups.

Stakeholder Groups Vulnerable to Human Rights Risks

Gender	Women		
Age	20s	30s	
Job (site)	Construction	Project Administration	Site Management
Job (department)	Sales	CS	Procurement



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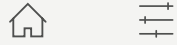
➤ Strategy and Response Measures

Human Rights

Human Rights Area-Specific Mitigation Activities

Human Rights Area	Area Details	Stakeholders	Risk Level ¹⁾	Human Rights Risk Mitigation Activities
Establishment of Human Rights Management System	Formulation of human rights policy, identification and management of human rights risks, operation of grievance mechanisms	Employees	P	- Establishment of human rights management policy and participation in the group-integrated human rights management declaration - Implementation of human rights impact assessment and operation of a grievance mechanism for general human rights issues - Mandatory completion of POSCO Group human rights management system training (e-learning)
Non-Discrimination in Employment	Prevention of discrimination based on race, religion, disability, gender, place of birth, employment status, and others	Employees	P	- Establishment of regulations ensuring respect, equality, and lawful, humane employment conditions through human rights management policy, employment rules, and ethical standards - Implementation of campaigns to raise awareness of human rights and diversity (including prevention of microaggressions)
Freedom of Association and Collective Bargaining	Ensuring the freedom to form and operate labor unions and labor-management councils	Employees	P	- Ensuring freedom of union activities - Operation of labor-management council and communication of its outcomes
Prohibition of Forced Labor	Ensuring the right to freely chosen employment, including prohibition of forced labor and human trafficking	Employees, suppliers	P	Establishment of regulations prohibiting forced labor and child labor through the human rights management policy
Prohibition of Child Labor	Prohibition of all forms of child labor and compliance with international law	Employees, suppliers	L	
Prohibition of Workplace Harassment/Sexual Harassment	Prevention of acts that cause sexual humiliation and physical/mental suffering at work	Employees, suppliers	P	- Operation of regulations to prevent workplace harassment and sexual harassment - Operation of reporting and counseling centers for violations of human dignity - Mandating the use of body cameras in medical offices
Ensuring Occupational Health and Safety	Implementation of measures ensuring occupational health and safety during work	Employees, suppliers	P	- Strengthening of company-wide occupational health and safety systems and standards - Expansion of safety/health managers at each site and operation of psychological counseling programs - Operation of a safety report channel and support for establishing suppliers' occupational health and safety management systems
Responsible Supply Chain Management	Efforts to build a sustainable supply chain that respects human rights	Employees, suppliers	L	- Operation of a Supplier Code of Conduct and establishment of sanctions for violations - Operation of special clauses ensuring compliance with ethical standards - Support for suppliers' ESG management improvement and monitoring of wage arrears through a worker app
Protection of Local Residents' Human Rights	Efforts to protect the human rights of residents near construction sites and to prevent environmental pollution arising during construction	Local community	L	- Implementation of environmental impact assessment - Development and application of technologies to reduce fugitive dust and noise, and prediction of environmental damage through noise simulation analysis
Ensuring Environmental Rights	Recognition of the severity of climate change and reduction of environmental pollutants such as greenhouse gases, noise, and wastewater, and development of environmental technologies	Employees, local community	L	- GHG reduction activities for climate change response - Biodiversity protection and habitat conservation activities
Protection of Customer Human Rights	Compliance with legal standards for providing products and services that do not harm customer safety and health	Customers	L	- Establishment of an AI and data-based quality management system - Provision of customer convenience and enhancing customer support services through the BLUET service

1) L: Low risk P: Potential risk



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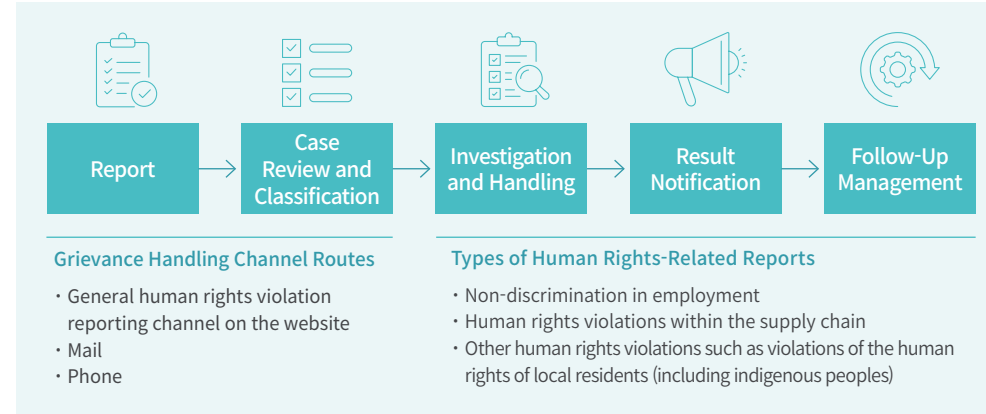
Human Rights

Operation of Human Rights Grievance Handling Channels



POSCO E&C operates grievance mechanisms to ensure that human rights issues raised by employees and stakeholders are promptly addressed and remedied. When a report is determined to involve a human rights issue, we conduct an investigation and follow the procedures set out in our human rights grievance handling guidelines. In cases of human rights violations, we develop specific remedies and take measures to protect victims and prevent recurrence. Even after resolution, we continuously monitor and analyze operations, and promptly address any identified issues in our human rights policy or grievance procedures. In line with these guidelines, we rigorously protect the identity of whistleblowers and the information they provide throughout the process, ensuring they face no discrimination or disadvantage.

Grievance Handling Process



Human Rights Training

Through the Learning Platform, an online training system, POSCO E&C provides all employees with training on POSCO Group's human rights management practices, global human rights regulation trends, and the relationship between corporate activities and human rights. In 2025, 5,501 employees — 94.9% of the workforce — completed the training. To further strengthen human rights standards at construction sites, we also introduced new training for the Project Management (PM) job group, covering domestic and international human rights trends, the company's human rights management initiatives, and key human rights issues to consider on-site. In 2026, we are rolling out a group-wide campaign to raise human rights awareness across POSCO Group.

Diversity and Inclusion

Diversity and Inclusion Activities

To promote diversity within the company, POSCO E&C utilized a diagnostic tool jointly developed by the Ministry of Culture, Sports and Tourism and the Korea University Diversity Research Center to assess our diversity index and identify improvement tasks, including the establishment of diversity policies and targets. These tasks are reported to the Human Rights Subcommittee and then addressed in collaboration with relevant departments. In addition, to enhance employee diversity awareness and expand participation, we have operated 'DIBE,' a voluntary employee council, through annual company-wide open call since 2023. In monthly meetings involving employees across various ranks, members develop and implement ideas on gender, generation, and culture, helping foster a culture of diversity throughout the organization. In 2025, we conducted eight campaigns to raise diversity awareness, including the prevention of microaggressions¹⁾, and new DIBE members will continue these campaigns in 2026.

1) Microaggression: subtle verbal or behavioral acts that convey prejudice or discrimination toward a particular group

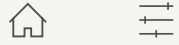
Operation of Women's Leadership Development Programs

In 2024, POSCO E&C joined 'Women in Innovation (WIN),' a women's leadership development initiative, and is advancing activities to strengthen women's leadership. In consultation with the Human Resources & Culture Office, we identify high-potential female talent and participate in WIN-led programs, including strategic thinking and leadership development training, internal and external women's leadership networking, and next-generation women's conferences for employees in leadership positions. Since 2024, we have also served as a founding member of the Korea Diversity Council, collaborating to develop female talent. Through this partnership, we benchmark best practices in diversity among member organizations and engage with public and educational institutions to advance the development of female talent.

Program	Timing	Main content	2025 performance
Saturday Matinee	Once a month	Capability-building training and networking program for deputy general manager and general manager-level women managers preparing to become next-generation women executives	4 participants
Next-Generation Women Leaders Conference	Once every half year	Leadership lectures and executive-level group mentoring program for developing the capabilities of women middle managers	16 participants
WIN Forum	Once a year	Invited lectures by external experts on expanding diversity	3 participants



Diversity Awareness Enhancement Campaign Materials



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Role of Management

For human resources management, POSCO E&C establishes an annual HR evaluation plan before each evaluation cycle. The plan is reported to the Head of the Human Resources & Culture Office and division heads, and management reviews and approves the evaluation direction and criteria in advance.

Dedicated Organization

POSCO E&C has dedicated working-level teams under the Human Resources & Culture Office to systematically manage its human resource systems. The Human Resources Group, the Labor Relation & Welfare Group, and the Administration Services Group handle HR system operation, stabilization of labor-management relations, and administrative support, respectively, strengthening the efficiency and execution of overall human resources management.

Human Resources Governance



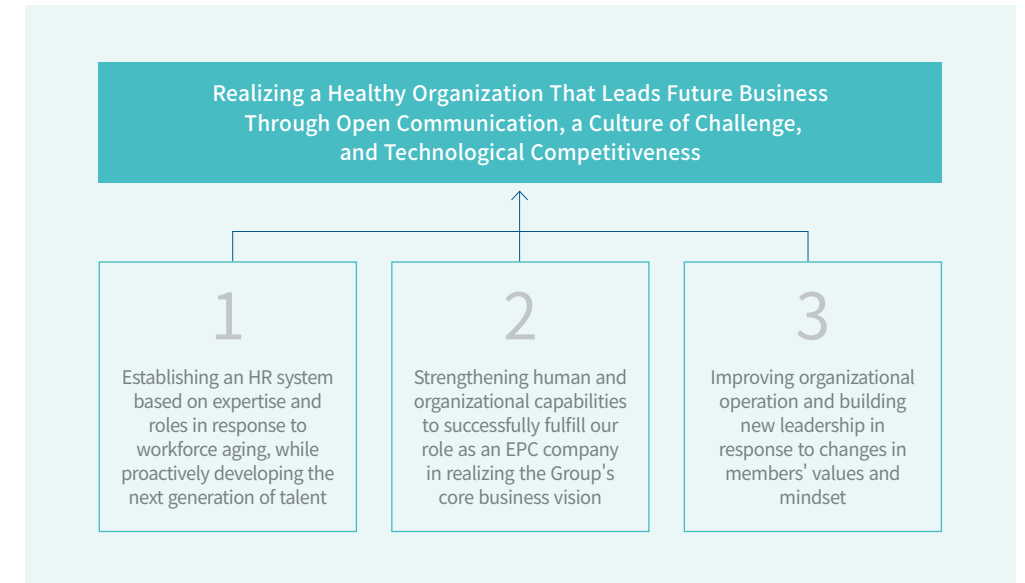
Management Activities

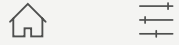
Strategy and Response Measures

Human Capital Management Strategy

To build a happy workplace, POSCO E&C operates an efficient HR system and focuses on cultivating talent capable of leading future business. To recruit self-directed individuals aligned with our ideal talent profile of "Challenge, Collaboration, and Responsibility," we have established a fair and transparent recruitment process. Through blind interviews, we evaluate candidates based on their competencies and job suitability rather than their education or background. After hiring, we provide self-development guidelines and systematic training programs that reflect the competencies, qualifications, and experience required for each role, continuously strengthening employees' expertise and job capabilities. We also operate a fair compensation system based on employees' performance, rank, and role, and our performance-linked salary system ensures that individual contributions and results are rewarded appropriately.

HR Management System





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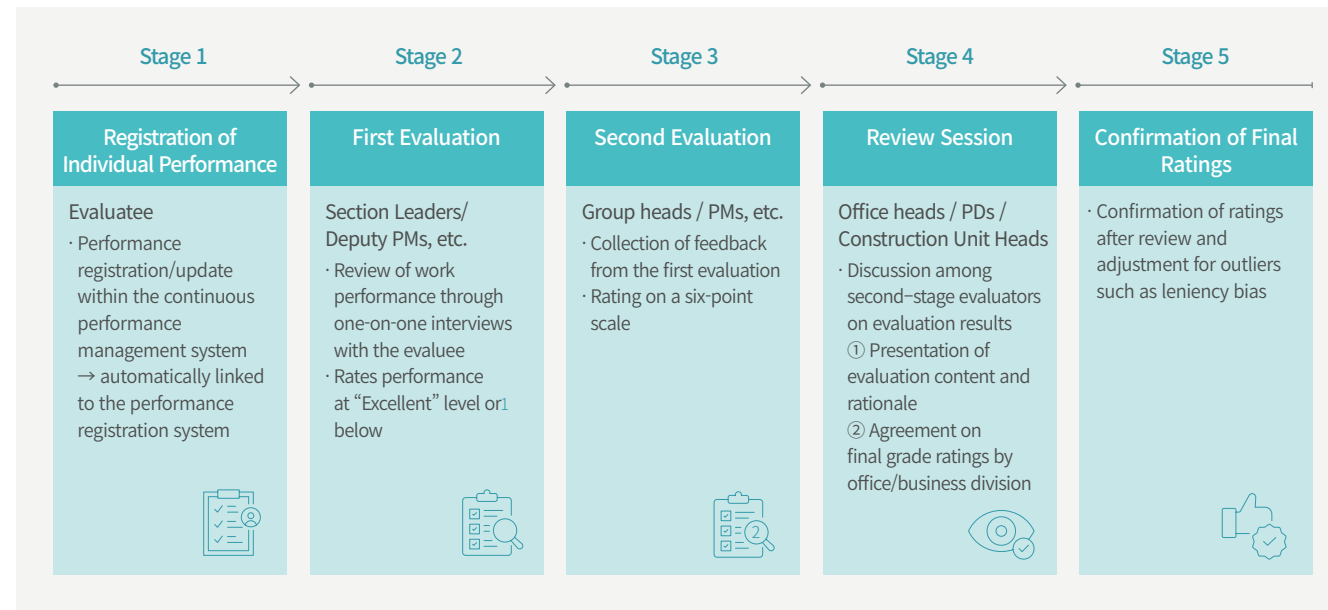
Management Activities

➤ Strategy and Response Measures

Continuous Performance Evaluation

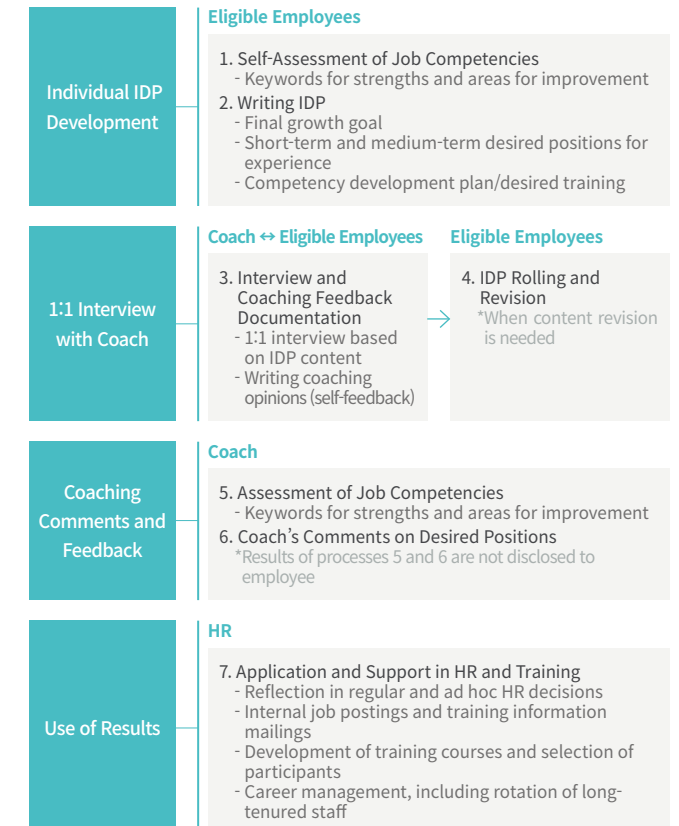
POSCO E&C evaluates employee performance and competencies fairly and transparently through a continuous performance management system. Based on evaluation results, we provide systematic feedback on individual performance and guidance on future work plans, supporting employees' ongoing growth and development. We also reward outstanding performance to enhance motivation. Performance evaluations use a six-level descriptive rating scale that reflects the characteristics of the construction industry, and we assess on-site and headquarters groups separately to account for the nature of field work. Regular evaluations are conducted annually, with managers and general employees assessed separately, and the HR department applies rigorous monitoring to prevent bias and strengthen fairness and acceptance. Evaluation results are reflected in compensation, including salary and performance-based pay, and serve as a key basis for overall HR decisions such as promotions.

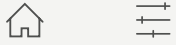
Performance Evaluation Process



Self-Directed Career Development Support

POSCO E&C operates an Individual Development Plan (IDP) for all employees, enabling them to design and pursue their own growth paths. Based on a self-assessment of job competencies, employees establish long-term growth goals, short- and medium-term target positions, and competency development plans, which are then reviewed and refined through one-on-one interviews with a coach. IDP results inform career management activities — including HR decisions, training program development, participant selection, and job rotation — linking individual growth goals with the organization's talent management.





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➤ Strategy and Response Measures

Operation of Talent Development Programs

Onboarding Training | POSCO E&C operates an onboarding program for new college graduate hires to help them adapt to the organization and build core competencies. The 2025 program, focused on understanding the company and its organizational culture, the role of on-site engineers, and foundational competencies for new employees, was completed by 7 new hires.

Job Competency Enhancement Training | POSCO E&C offers a range of training programs to cultivate core technical talent and strengthen employees' job competencies.

Course Title	Content
PM Development Course	- Customized training to strengthen the capabilities of Project Managers (PMs) — the core of every project — and support their growth into future business leaders - Field-focused learning, including hands-on operational practice at other sites and proposals for issue-response measures - Programs built around the five core PM competencies — order/sales management, project management, engineering & procurement management, construction management, and organizational & workforce management leadership — delivered through case-based discussion, case studies, and Problem-Based Learning (PBL) 2025 performance: 9 sessions conducted, 36 employees completed
Education for Remodeling Practitioners	- Capability-building training programs for working-level staff to strengthen product competitiveness based on core technologies and solutions - Sharing of remodeling project experience and related technology/method development cases 2025 performance: 2 sessions conducted, 38 employees completed the training
Certification Acquisition Support	- KRW 500,000 support upon acquiring a safety engineer certification (Industrial Safety Engineer/Construction Safety Engineer) 2025 performance: 57 employees obtained certification

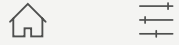
CASE Operation of the Core Specialist Program | To strengthen its core technological competitiveness, POSCO E&C operates a Core Specialist Program. This framework supports employees with outstanding technical expertise and performance in advancing into technical leadership roles, fostering the long-term cultivation of technical talent through a structured career path — Expert → Master → Chief Master. In 2025, we newly selected 7 specialists in fields including plant blast furnace/sintering, privately financed infrastructure O&M, and building integrated design, bringing the cumulative total to 80 specialists across 46 product and technology fields. We also operate Core Specialist Agile Teams that foster collaboration among employees from diverse departments to support cross-functional project execution. In 2025, these teams comprised 162 members across 19 teams, focused on strengthening EPC capabilities for Group businesses, driving productivity innovation, delivering customized services, and strengthening brand power. They delivered tangible results across multiple technical fields, including improved project profitability, the development of new technologies and products, and the identification of new business opportunities.

Transition Response Training | To preemptively address the industrial paradigm shift toward a low-carbon economy and develop future growth drivers, we operate transition response training programs.

Course Title	Content
Training Program for New Business EPC Practitioners	- Specialized theoretical training and advanced practical courses, developed in collaboration with external expert institutions, centered on priority business areas such as secondary batteries, low-carbon steel, and nuclear power - An advanced offshore wind course based on actual project experience, along with a Nuclear Academy established to support the future expansion of our nuclear business 2025 performance: 70 employees completed 2 courses (40 offshore wind, 30 nuclear power)
Re/Up Skilling Course	- Customized learning opportunities to effectively achieve job transition to new and core business areas (Reskilling) and the advancement of expertise in existing work (Upskilling) - Operation of 3 courses (LNG tank/terminal, road undergrounding, and remodeling) as part of the core product technology leader development course 2025 performance: 70 employees completed 3 courses

Fostering a Culture of Knowledge Sharing and Learning | Through learning clubs and in-house lectures driven by voluntary employee participation, we are establishing a culture that shares and spreads practical, work-related insights across the organization.

Course Title	Content
COP (Community of Practice)	- Learning clubs that draw on voluntary employee participation to identify and share innovative, work-related ideas and solutions - An organizational culture that empowers employees to learn and grow on their own initiative, supported through textbook purchases, external seminar attendance, guest lecturer sponsorship, and recognition of best practices 2025 performance: 740 members across 131 teams participated; 7 outstanding projects were recognized (including "Establishing structural guidelines to expand the application of PC construction methods in underground parking lots" (Grand Prize) and "Structural cost innovation through expanded use of POSCO steel" (Excellence Award)); KRW 26.5 billion in cost/investment savings; 4 patents filed
EIUM Special Lecture (E&C Insight Forum)	- Eco & Challenge: Cultivating a growth mindset that challenges the limits of our industry to build a sustainable future - DEI (Diversity, Equity, Inclusion): Building a fair organizational culture in which diverse employees can demonstrate their abilities with equal opportunities and a sense of belonging - Wellness (mental, physical, and financial health): Enhancing work engagement through training on a holistic approach to employee well-being 2026 plan: To be held once per quarter (4 sessions total) ※ Topics include mindfulness, humanities, personal finance, and psychological safety



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➤ Strategy and Response Measures

Operation of Welfare Programs

Through a range of welfare programs for employees and their families, POSCO E&C earned its fifth Family-Friendly Company recertification since its first certification in 2013 and continues to maintain this status. By operating flexible work arrangements and family-friendly benefit programs based on our employment regulations, we help all employees achieve work-life balance and realize their full potential.

Category	Program	Content
Flexible Work Arrangements	Selective Working Hours	• Daily and weekly working hours chosen autonomously within the total working-hour limit
	Flexible Working Hours	• Working hours adjusted flexibly over a set period to reflect fluctuations in workload
	Staggered Commuting	• Autonomous adjustment of start and end times
Refresh Programs	One Month Challenge	• Additional leave for employees in their 5th and 10th years to support recharging and growth (10 extra days granted when 10 days of annual leave are used)
	Long-service award leave	• Expanded award leave for long-tenured employees
	Family Day	• Every Friday designated as Family Day with 3 p.m. departure (4.5-day workweek)
Life-Cycle Support	Marriage Support	• Provision of wedding hall rental, KRW 2 million honeymoon subsidy, KRW 2 million wedding congratulatory money, and 7 days of special leave
	Pregnancy Support	• Reduced working hours during pregnancy • Prenatal checkup leave for expectant employees and their spouses • Fertility treatment cost support and fertility treatment leave (10 days per year, exceeding the statutory standard)
	Childbirth Support	• Maternity and spousal childbirth leave • Childbirth incentives of KRW 3 million for the first child, KRW 7 million for the second, and KRW 10 million for the third or more, plus a childbirth gift worth KRW 500,000
	Childcare Support	• Up to 2 years of parental leave • Full-time remote work available during the childcare period • In-house daycare center • Additional tuition-support points for multi-child families (2 or more children) • Congratulatory gifts for children entering elementary school and encouragement gifts for children taking the college entrance exam
	Health Support	• Employee health checkups/psychological counseling • Enrollment in group accident insurance • In-house fitness center and PT (Personal Training)
	Retirement Support	• Customized training for employees facing involuntary separation, including retirement (career planning, financial planning, retirement administration, and understanding and using ChatGPT)

Operation of the Labor-Management Council

To strengthen communication with employees and protect their rights and interests, POSCO E&C operates a Labor-Management Council in accordance with the Act Concerning the Promotion of Employees' Participation and Cooperation. Each year, matters spanning overall management — including key working conditions such as wages and benefits, as well as productivity improvement, occupational health and safety, and grievance handling — are addressed through constructive consultation within the Council. In line with legal requirements, the Council comprises seven employee representatives and seven company representatives. In addition to four regular meetings per year, it holds working-level meetings at least monthly to identify improvements to the work environment and implement agreed measures. In 2025, consultations on key agenda items, including the enhancement of employee benefits, contributed to tangible workplace improvements and the protection of employees' rights and interests.

Management Communication Activities

POSCO E&C operates a range of channels to facilitate communication between management and employees. The CEO personally led real-time online and offline forums and town-hall discussions with all employees, addressing the direction of improvements to our safety culture and management systems, and holding Q&A sessions on topics such as business performance, organizational culture, and ways of working. We also operate the Young Board program, composed of high-performing employees from each division, giving selected members regular opportunities to engage directly with the CEO. At the division-head level, town-hall meetings and small-group employee luncheons were held to connect with employees across a range of positions and team sizes. Through these activities, we incorporate employee input into management decision-making and strengthen mutual understanding and trust between management and employees.



Safety discussion



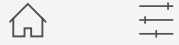
Lunch Talk with CEO



Homecoming Day



Homecoming Day



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Supply Chain

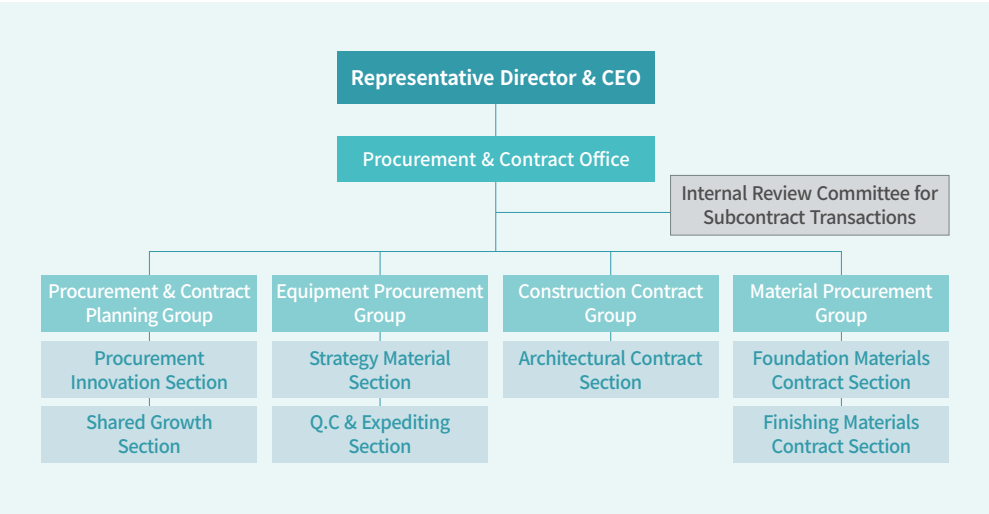
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POSCO E&C operates a governance system to strengthen sustainability across the supply chain. As the chief officer in charge of the supply chain, the Head of the Procurement & Contract Office oversees the company-wide supply chain strategy and operational direction, manages ESG risks based on the supplier selection, evaluation, and management system, and holds the authority to review and approve the establishment and amendment of related internal regulations. At the working level, 4 departments under the Procurement & Contract Office serve as dedicated units to establish and operate supply chain management policies and promote growth activities. In addition, through the Internal Review Committee for Subcontract Transactions, in which the heads of relevant departments participate, we deliberate on agenda items such as the appropriateness of supplier management standards and procedures, compliance with the model standards for selecting trading partners, and performance evaluation results, in accordance with the Four Major Guidelines for Fair Subcontracting Practices.

Supply Chain Governance

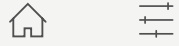


Policy

Supplier Code of Conduct

POSCO E&C has established a Supplier Code of Conduct to ensure suppliers fulfill their ethical responsibilities in their business operations. By signing the Supplier Code of Conduct at the time of contract, POSCO E&C's suppliers must create a safe work environment, ensure respect and dignity for workers, and operate their businesses in an environmentally responsible and ethical manner. This code was developed in alignment with the RBA (Responsible Business Alliance) Code of Conduct ver. 7.0, and it consists of provisions across the Environmental (E), Social (S: respect for human rights, shared growth and social contribution, safety and health, protection of trade secrets and intellectual property, and quality management), and Governance (G: ethics and fair trade) domains that suppliers are required to comply with.

1	Respect for Human Rights	Voluntary employment, no child labor, no discrimination, compliance with working hour requirements, compliance with wage laws, humane treatment
2	Safety and Health	Compliance with workplace safety and occupational safety standards
3	Environment	Hazardous substances management, management of wastewater, solid waste, and air pollution, pollution prevention, reduction of resource use
4	Ethics and Fair Trade	Business integrity, compliance with special terms and conditions of ethics practices, compliance with fair trade practices, trust-based culture
5	Protection of Trade Secrets and Intellectual Property	Management and protection of confidential information, protection of intellectual property
6	Quality Management	Quality management, change management, mutual quality management with suppliers
7	Mutual Growth and Social Contribution	Mutual growth, social contribution



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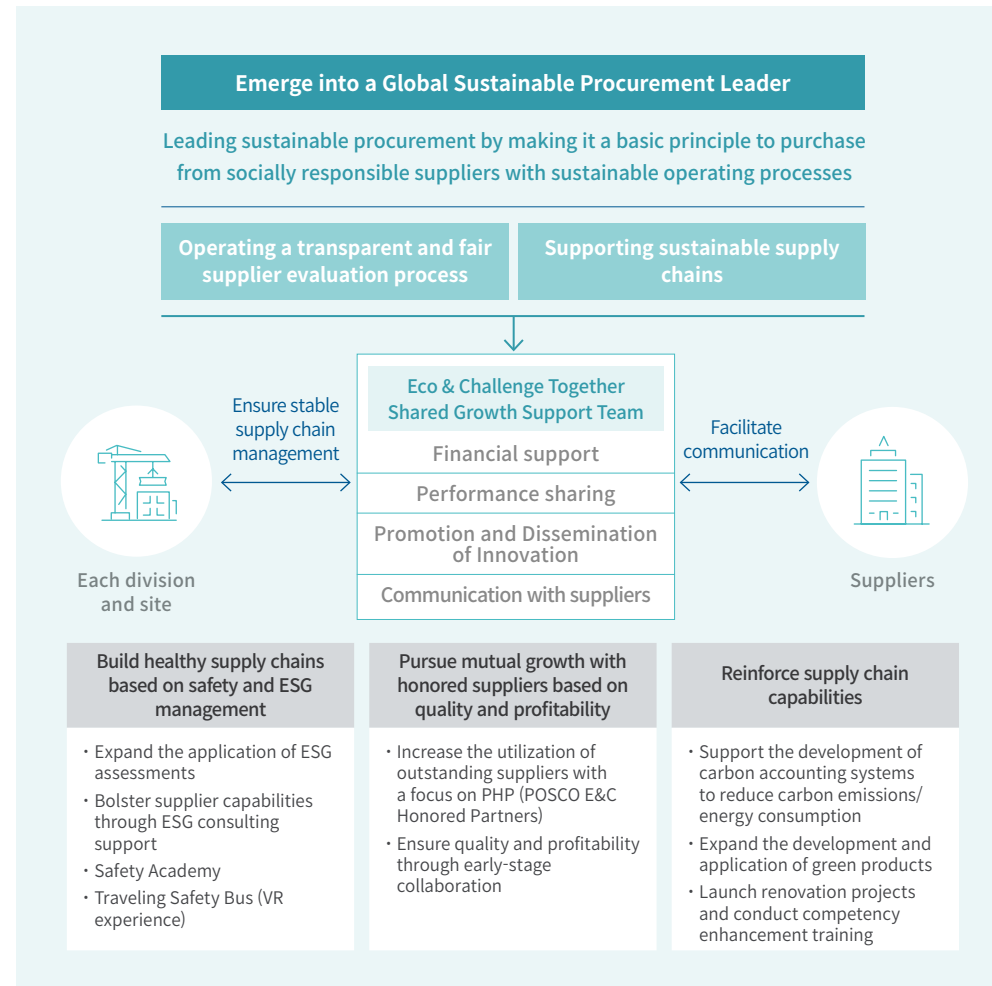
Supply Chain

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➤ Strategy and Response Measures

Supply Chain Management Strategy

As part of our corporate social responsibility, POSCO E&C has established a supply chain management system and is expanding sustainable procurement for mutual growth with suppliers. The Shared Growth Support Team facilitates the substantial capacity building of our small and medium-sized suppliers by providing support in areas such as technology development and training consulting.

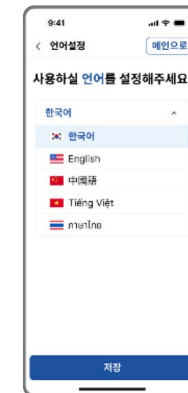


Operation of Supply Chain Report/Complaint Handling Process

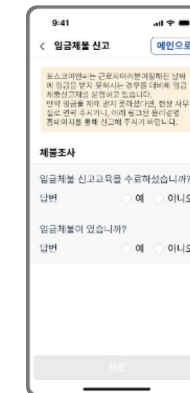
To gather suppliers' grievances and opinions, POSCO E&C operates a grievance handling center within the procurement portal and a mobile grievance-reporting app for on-site workers. All supplier employees and on-site workers can report complaints in the areas of quality management, on-site safety, working environment, and others using their real names or anonymously. Received reports are transferred to the responsible department and processed through a sequence of fact verification, detailed investigation, and action implementation, and the final processing results are communicated to the reporter. In 2025, 6 cases were received by the grievance handling and counseling center all of which were addressed. In addition, we conduct a meeting with dedicated shared growth personnel once a year to identify suppliers' requirements, listen to their feedback (Voice of Suppliers), and address the issues raised. In 2025, 44 companies with excellent performance participated in the meeting, fostering active communication.

Correction and Prevention Measures for Supply Chain Worker Human Rights Violations

POSCO E&C mandates a pledge of compliance with the Supplier Code of Conduct in all transactions with suppliers to prevent human rights violations by suppliers. Through this, we require adherence to human rights-related provisions such as the prohibition of forced and child labor, guaranteeing fair working conditions, ensuring industrial safety, and paying appropriate wages. In the event of a violation, we impose sanctions such as warnings, contract termination, and suspension of transactions depending on the severity of the violation. In addition, we carry out various supply chain human rights risk management activities, such as operating a worker-dedicated app to prevent the non-payment of wages to suppliers' on-site workers.



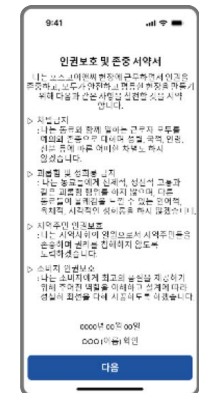
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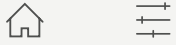
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[Protective Equipment Receipt Confirmation]



[Human Rights Protection and Respect Pledge]



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➤ Strategy and Response Measures

Mutual Growth Programs

Establishing Fair Trade | POSCO E&C operates a fair trade compliance program to protect the rights and interests of subcontractors and foster a fair trading environment. We operate a Subcontractor Shared Growth Cooperation Committee to strengthen communication with suppliers, and we have introduced an automated system to detect unfair contract clauses, preventing inequitable provisions before contracts are finalized.

Selection and Support of PHP (POSCO E&C Honored Partner) | POSCO E&C designates high-performing suppliers as PHP by awarding bonus points for shared growth activities within suppliers' annual comprehensive evaluation scores. PHP suppliers receive a range of benefits, including reduced contract performance bonds and expanded bidding opportunities. Each year, through our Shared Growth Partners Day event, we deepen communication with PHP suppliers and share the outcomes of our shared growth efforts. In 2025, we designated a total of 44 companies as PHP — 32 in construction, 6 in equipment, and 6 in materials — and expanded the scale of the associated rewards.

Financial/Shared Growth Support | POSCO E&C operates financial support programs to alleviate suppliers' financing burdens and ensure management stability. We have created a KRW 44 billion Shared Growth ESG Fund for registered suppliers to provide low-interest loans of up to KRW 500 million per supplier. In addition, we operate Together Shared Growth Loans for contracted suppliers, providing loans of up to 100% of the contract amount to enhance suppliers' liquidity and business stability.

Operation of the Shared Growth Support Team | The Shared Growth Support Team facilitates the substantial capacity building of our small and medium-sized suppliers by providing support in areas such as technology development and training consulting. We strengthen suppliers' competitiveness through a range of programs, including knowledge transfer via joint technology development, ESG consulting, statutory safety and job training, and meetings with dedicated shared growth personnel.

Shared Growth Support Team Programs

Category	Content	2025 Performance
Joint Technology Development Area	• New businesses: Technology development related to offshore wind, secondary batteries, hydrogen, and nuclear power businesses • Environment: Low-carbon construction technologies and PosMent application technologies • Quality: Technologies to improve constructability	• 17 joint technology developments completed; 16 benefit-sharing agreements signed; and 7 rewards granted (reward amount of KRW 15.7 billion)
Training	• Environment: Hydrogen industry training • Safety: Safety Academy, safety experience, smart construction training • Quality: Supplier-participatory quality improvement, remodeling execution capability enhancement, etc.	• 6 supplier training sessions held, with 475 participants
Consulting	• Safety: Safety diagnostic consulting for registered construction suppliers and support for obtaining occupational health and safety management system certification	• Safety consulting provided to 67 companies • Support for 10 companies in acquiring occupational health and safety management system certification

➤ Supply Chain Risk Management Activities

Supply Chain ESG Assessment

To proactively mitigate supply chain risks, POSCO E&C conducts ESG assessments of its suppliers. In 2025, we integrated our previously separate ESG and occupational health and safety assessments into a single process, completing evaluations for 787 construction suppliers. Assessments are conducted through written self-assessments and on-site audits, with results classified into three grades: Excellent, Satisfactory, and Needs Improvement. The 2025 results showed that 462 suppliers were rated Excellent (59%), 297 Satisfactory (38%), and 28 Needs Improvement (3%). Specifically regarding occupational health and safety, suppliers whose health and safety grade fall below the required standard are restricted from registration. We also provide safety consulting linked to our shared growth cooperation fund for small and medium-sized suppliers, to strengthen their safety management capabilities.

Supplier ESG Assessment Items

Environment



Non-compliance with environmental regulations, environmental organization/training, procurement of green products, energy saving, etc.

Social

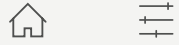


Overdue payments of the four major social insurance programs, safety accident prevention, compliance with working conditions, customer management, etc.

Governance



Management stability, ethics training, accounting transparency, overdue wages, etc.



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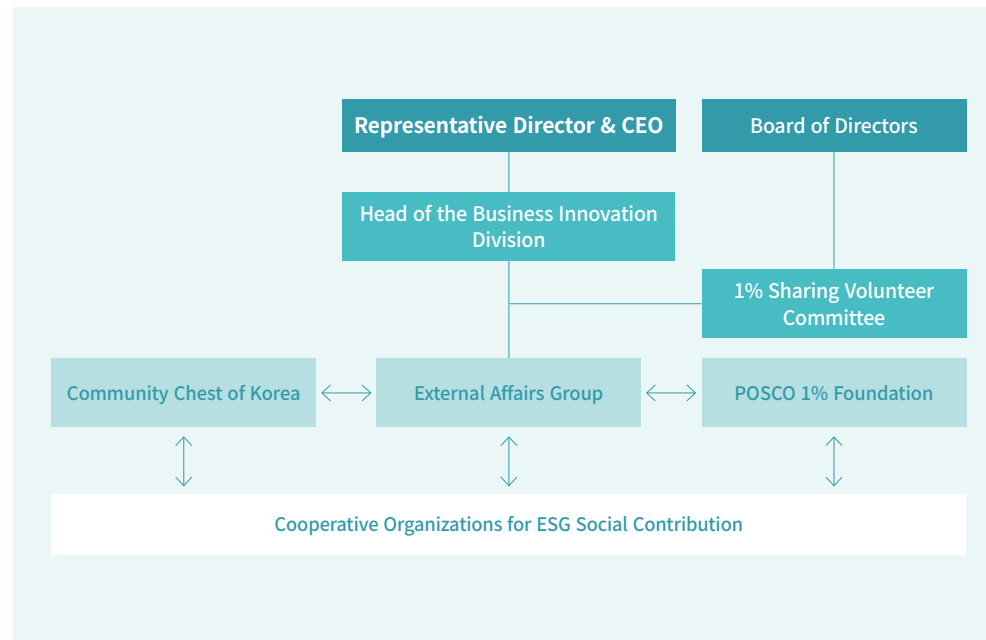
Role of Management

POSCO E&C has established a social contribution governance structure led by the Head of the Business Innovation Division, overseeing the development of social contribution strategy and its implementation. In accordance with related regulations, the Board of Directors deliberates on major donation decisions and, through the 1% Sharing Volunteer Committee, monitors the use of the 1% Sharing Fund, an employee-funded donation program.

Dedicated Organization

POSCO E&C implements social contribution programs for local communities through the External Affairs Group as its dedicated department. The External Affairs Group identifies and operates region-specific social contribution programs and delivers community contribution activities through partnerships with reputable organizations such as the Community Chest of Korea.

Social Contribution Governance



Management Activities

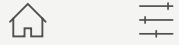
Strategy and Response Measures

Social Contribution Promotion Strategy

Under the vision of "Building Sustainable Happiness," POSCO E&C conducts its social contribution activities around three strategic directions, guided by the core values of sustainability and authenticity. First, we leverage our construction expertise to provide safe and comfortable living environments for vulnerable groups. Second, we support tailored programs that address social issues in the regions where we operate projects. Third, we enhance the effectiveness and synergy of our social contribution activities through collaboration with specialized partner organizations. In recognition of these efforts, we earned the highest grade for the seventh consecutive year in 2025 under the Community Social Contribution Recognition program — jointly organized by the Ministry of Health and Welfare and the Korea National Council on Social Welfare — based on our sustained volunteer and giving activities in key regions such as Incheon, Pohang, and Gwangyang, as well as at project sites nationwide.



1) Sustainable Development Goals



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➤ Strategy and Response Measures

Expertise-Based Social Contribution

Fire Prevention and Housing Environment Improvement, 'Safe House' | To create a safe living environment for households vulnerable to fire, POSCO E&C has continuously implemented fire-prevention programs encompassing housing improvements, safety-supply support, and safety education since 2013. The primary beneficiaries are vulnerable households in urgent need of housing environment improvement, such as elderly people living alone, and the support includes overall housing environment improvement such as replacing aging electrical facilities, installing fire-fighting facilities, wallpapering and waterproofing, and boiler repairs. In 2025, in cooperation with local firefighters, POSCO E&C on-site employees, the Comprehensive Support Center for the Elderly Living Alone, and Habitat for Humanity Korea, we improved the living environments of 74 households. In addition, we provided 12 types of residential fire safety goods to 203 households, strengthening the living safety net of vulnerable groups.



'Safe House' Safety Goods Support Activities

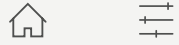


Naksujeong Trail Improvement

Creating Safe Environments for Children and Adolescents, 'Dream Space Guardian' | To create a safe environment where children and adolescents can live with peace of mind, POSCO E&C has been promoting the 'Dream Space Guardian' project since 2025, which renovates aging and hazardous facilities for children and adolescents and installs traffic safety facilities within child protection zones. In 2025, we installed traffic safety facilities at 2 locations near schools and supported the renovation of aging facilities at 17 child welfare facilities in the Incheon area, and in 2026, we plan to continue providing support for approximately 20 schools and children's facilities.



'Dream Space Guardian' Safety Fence Repair



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➤ Strategy and Response Measures

Region-Tailored Program Support

Donor-Led Program: 'Change My Town' | In partnership with the POSCO 1% Foundation, POSCO E&C operates 'Change My Town,' a program in which employees themselves propose and carry out initiatives. As donors, employees identify and propose the beneficiaries and activities in need of support, and undertake a range of activities — including repairing facilities at vulnerable households and local children's centers, delivering meals and meal kits to seniors living alone, and supporting cultural heritage field trips for special-education schools.

Employee Skill-Sharing: 'Talent Volunteer Teams' | POSCO E&C supports local communities through skill-sharing volunteer activities that draw on employees' talents, skills, and expertise. In 2025, a total of 21 volunteer teams and 673 employees took part across diverse fields — including baking, orchestra, housing improvement, and mural painting — carrying out 109 activities over the year. In total, they contributed 2,381 volunteer hours, delivering tailored support programs to 1,559 local residents.



'Change My Town' Housing Environment Improvement



Employee Talent Volunteer Teams Activities



Foreign Worker Care Service

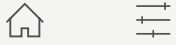


Healing Garden Creation

Joint Projects with Related Organizations

Foreign Worker Care Service | Since 2021, in cooperation with the Korean National Tuberculosis Association, POSCO E&C has supported health checkups for tuberculosis, latent tuberculosis, diabetes, and others, and specialist health counseling, for foreign construction workers who have limited access to healthcare and welfare services due to language barriers and financial difficulties. In 2026, we plan to contribute to creating a healthy living environment for workers by expanding the scope of treatment, such as autonomic nervous and vascular condition checks, along with supporting quarantine and housing environment improvement.

Goyang City Cooperation, 'Healing Garden Creation' | In 2025, POSCO E&C signed a business agreement with Goyang City and promoted a 'Healing Garden Creation' project that supports the creation of elementary school healing gardens and the operation of garden boxes at welfare and public facilities to support citizens' emotional stability. In particular, we supported approximately 160,000 L of RE:CO Soil, a resource-circulating soil conditioner made using coffee grounds, providing it to 97 community facilities including 11 schools, libraries, welfare centers, and cultural centers.



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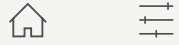
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Local Community Engagement Activities

Major Projects	Project Content	2025 Results and Performance	Impact
Safe House Living Environment Improvement / Safety Support	- Housing environment improvement and fire prevention facility installation - Fire safety and daily-life safety training for the elderly - Provision of supplies for fire and climate change response(heatwaves, heavy rain, cold waves)	- Housing environment improvement support for 74 households (cumulative: 454) - Safety supplies provided to 203 households (cumulative: 2,603)	Fire prevention and daily-life safety accident prevention for vulnerable groups
Sustainable Society	- Urban regeneration project in cooperation with local governments, universities, and residents - Establishment of a regular course and participation of 11 universities	50 university students identified 10 urban regeneration ideas - Realization of a resident-friendly walking trail in Naksujeong Village, Jeonju	Improving vulnerable urban areas, addressing local issues, and fostering talent
Blue carbon creation and marine environment conservation activities	- Marine waste collection and marine pollution prevention competition - Creation of halophyte colonies (Julpo Bay in Buan, Yeongjongdo in Incheon)	10 volunteer activities across 7 coastal sites, including Incheon and Pohang - Creation of 20,000 pyeong of halophyte colonies (Incheon: 10,000; Buan: 5,000; Gwangyang: 4,000) — cumulative: 40,000 pyeong * For details, please refer to page 30 of this report.	Marine environment conservation and expansion of carbon sinks
Talent Volunteer Teams	Community contribution leveraging employees' talents	Operation of 21 employee talent volunteer teams, with 673 volunteers participating and 1,559 beneficiaries supported	Resolution of local issues and strengthening of employee capabilities
Health Care Services for Foreign Workers	Health checkups and emotional support for foreign workers who lack access to medical care due to economic hardship and language barriers	815 people supported in 2025 (cumulative: 2,368)	Supporting foreign workers' adaptation to Korean society and contributing to safety accident prevention
Change My Town	A donor-led project proposed and implemented by employee donors	Approximately 2,029 people supported across 16 sites	Support for vulnerable and socially disadvantaged groups, and employee participation in resolving social issues
Employee 1% Sharing	Creation of a local community social contribution fund through employees donating 1% of their salary and the company contributing an equal amount	Raised KRW 570 million in 2025 * 2020: KRW 600 million → 2021: KRW 580 million → 2022: KRW 580 million → 2023: KRW 600 million → 2024: KRW 610 million → 2025: KRW 570 million (cumulative KRW 3.54 billion)	Support for vulnerable groups and environmental improvement across domestic and overseas regions
Dream Space Guardian	- Renovation of aging and dangerous facilities at children's and adolescents' facilities - Installation of traffic safety facilities within child protection zones near schools	- Traffic safety facilities installed at 2 school-adjacent locations - Renovation support for aging facilities at 17 child welfare institutions in the Incheon area	Creation of a safe growth environment for children and youth
Healing Garden Creation	- Creation of elementary school healing gardens in cooperation with Goyang City - Support for operating garden boxes at welfare and public facilities - Provision of RE:CO Soil, a resource-circulating soil conditioner	- Creation of therapeutic gardens at 11 schools - Provision of garden boxes to 97 community facilities, including libraries, welfare centers, and cultural centers - Provision of approximately 160,000 L of resource-circulating soil conditioner	Spreading urban agriculture and supporting emotional healing in local communities



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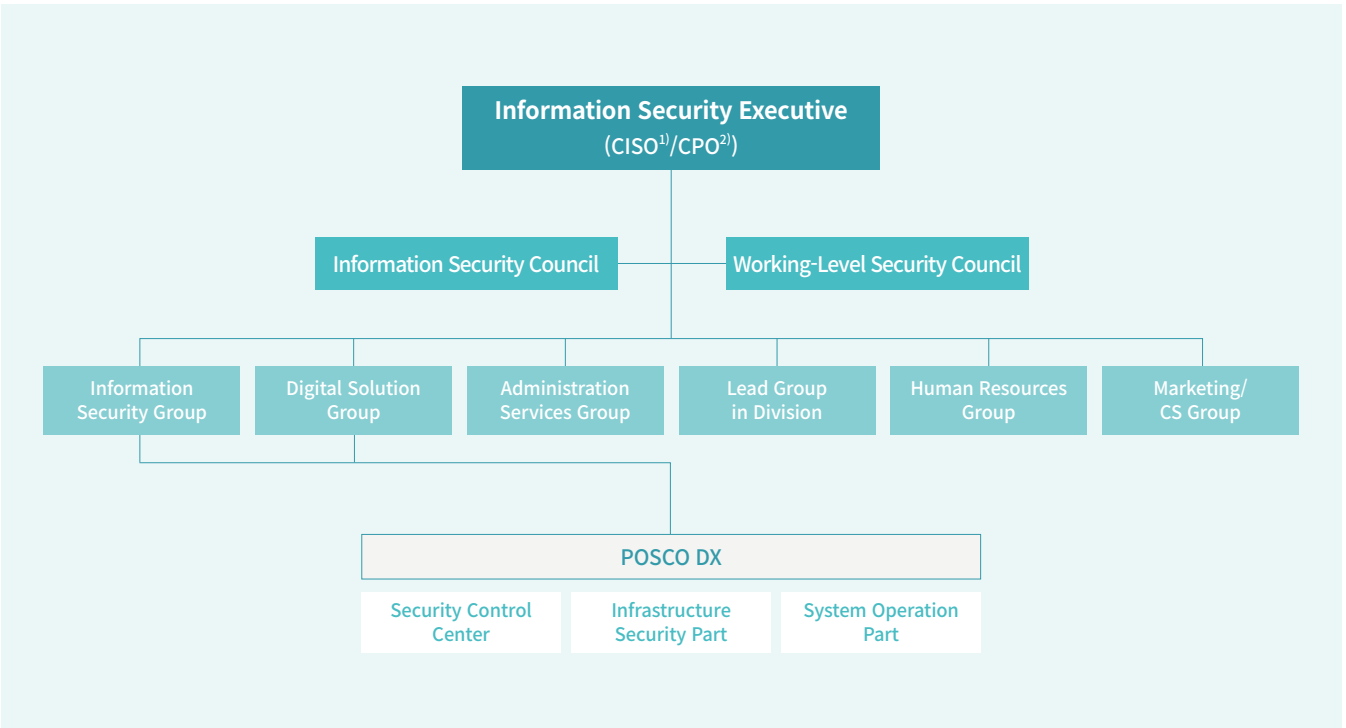
Role of Management

POSCO E&C has appointed the head of its dedicated Information Security Group as the Chief Information Security Officer (CISO) to oversee information security operations, in order to systematically manage information security risks. As information security consultative bodies, we operate the Information Security Council and the Information Security Working Group, through which it promotes company-wide information security initiatives and facilitates interdepartmental collaboration. The Information Security Council is convened once every half-year under the direction of the CISO to deliberate on major information security agenda items, while the Information Security Working Group is composed of security personnel from departments and projects to discuss practical information security matters.

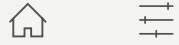
Dedicated Organization

POSCO E&C operates a dedicated information security organization to protect company-wide information assets and strengthen its response to cyber risks. The Information Security Group oversees overall information security and performs core functions such as establishing administrative and technical security systems, conducting security inspections and incident response, and operating the personal information protection system. In addition, we maintain an effective security management system by closely collaborating with relevant departments in each security area, and it links and applies group-level security policies and technical standards through cooperation with POSCO DX, which is dedicated to providing IT services for the POSCO Group.

Information Security Governance



1) CISO (Chief Information Security Officer)
2) CPO (Chief Privacy Officer)



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Policy

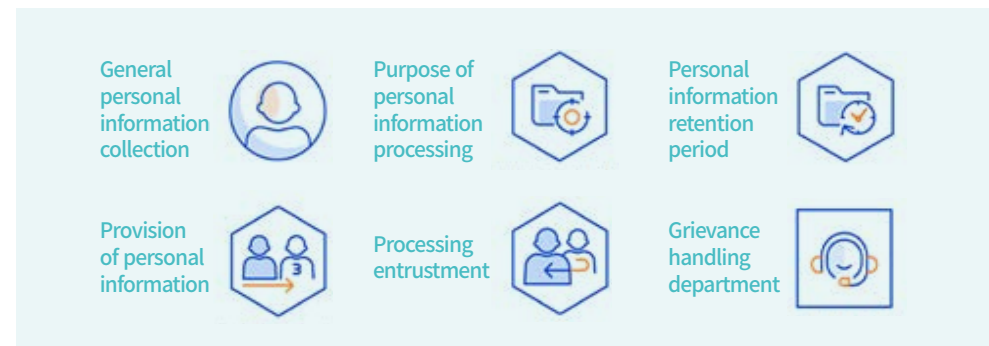
Information Security Policy

POSCO E&C has established the Information Security Guidelines, which apply to all employees across all worksites, including overseas subsidiaries, in order to systematically protect its information assets and personal information, thereby managing information security risks such as the leakage of customer personal information and information assets and external cyberattacks. The guidelines define the standards for major information security activities—such as information security policies and organization, incident response, and audit—and include the basic framework for the information security risk due diligence process. These guidelines are a company-wide policy approved by the CEO, and they are regularly reviewed and revised to continuously reflect the latest laws and regulations. In addition, we have established a Personal Information Protection Policy under the Information Security Guidelines to set management standards for the entire process of collecting, using, storing, and destroying personal information, and we safely manage personal information based on compliance with relevant laws and regulations.

Personal Information Processing Policy

POSCO E&C specifies the items and purposes of personal information collection and use through its Personal Information Processing Policy, transparently disclosing the status of personal information processing to data subjects. In addition, by introducing labeling images within the Personal Information Processing Policy, we enhance data subjects' understanding of the status of personal information processing. We have also established a rapid-response system for inquiries and grievances by clearly identifying the personal information protection officer and responsible department. We regularly review and update the Personal Information Processing Policy to reflect regulatory amendments and strengthen personal information protection.

Personal Information Processing Policy labeling image



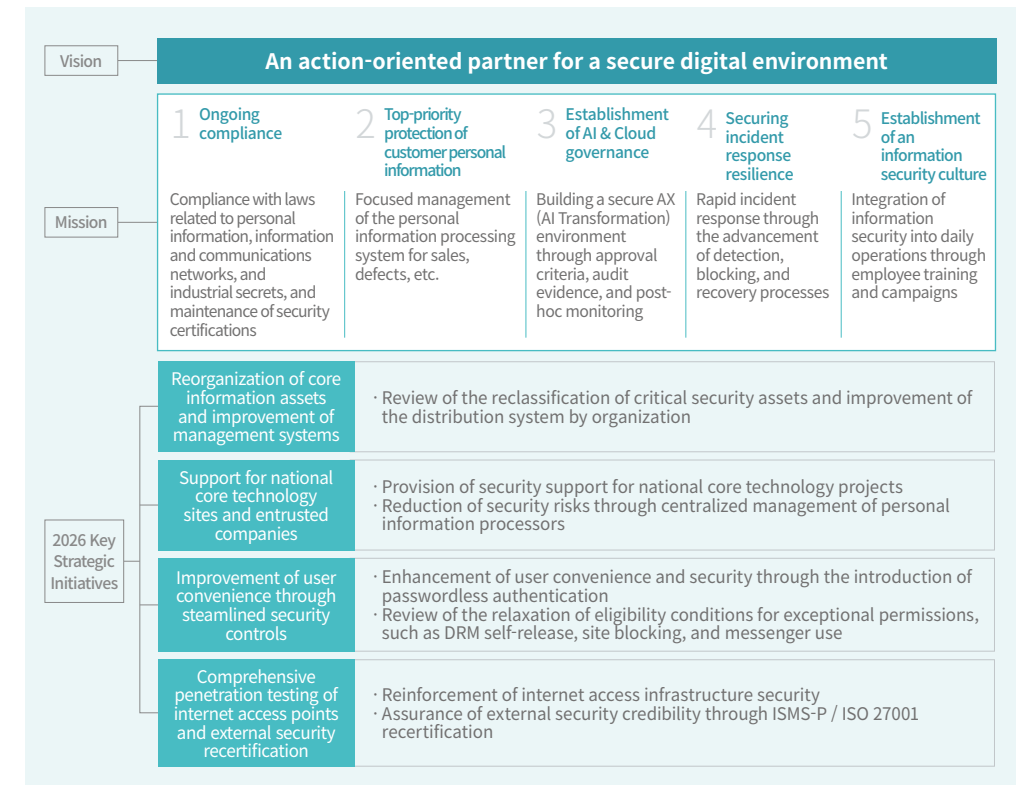
Management Activities

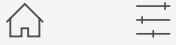
Strategy and Response Measures

Information Security Strategy

POSCO E&C has established an information security vision and mission. Our key strategic initiatives for 2026 include centralizing the management of personal information processing systems, strengthening internet access security and advancing our certification framework. To achieve these goals, we are pursuing initiatives such as conducting inspections of all personal information processors, carrying out penetration testing of all internet access points, and implementing a passwordless system by transitioning to a biometric authentication-based login framework. In addition, we aim to ensure the stability of our information security operations through continuous inspection and improvement of security vulnerabilities—for example, by establishing an on-site support system to protect national core technologies and by advancing our monitoring capabilities using network anomaly detection solutions.

Information Security Strategy Framework





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Information Security Certifications

ISO 27001 | POSCO E&C has maintained ISO 27001, the international standard information security management system certification, since 2014 to effectively operate an information security management system. ISO 27001 certification means that we have processes and control measures in place to protect our information from external security threats.

ISMS-P | In 2024, POSCO E&C acquired ISMS-P (Personal Information & Information Security Management System), the highest-level nationally accredited security certification, significantly strengthening the security level for The Sharp customers. Through this certification, which undergoes review by the Korea Internet & Security Agency, we have been officially recognized for our effective response capabilities against cyber breach threats and the safety of our security management system.

Employee Information Security Training

POSCO E&C conducts information security training for all employees and partner company staff to raise employees' awareness of information security. Training participants are selected based on their level of access authority to personal information and critical information assets, the frequency of information processing in the course of their work, and the level of impact in the event of a security incident, and customized training is provided accordingly for each group. To prevent information security incidents, POSCO E&C provides additional training for personnel in special roles, such as departmental security officers and personal information processors, and also conducts special training for employees who have received security penalty points. Going forward, POSCO E&C plans to continuously expand its training programs to further embed information security throughout the organization.

Information Security Training Programs

Target	Frequency	Program
All employees	Ongoing	Personal information protection awareness guidance
	Quarterly	Guidance and training on workplace security practices and phishing email checks
	Ongoing	Information security campaign
	Annual	Information Security Day (7/7) message
New Hires	Annual	Information security training for new and experienced employees
Personnel in Special Roles	Annual	Information security training for personnel in special roles (e.g., secretaries, system operators)

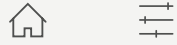
Target	Frequency	Program
Personal information handlers	Annual	Personal information handler training for ISMS-P certification targets
Personal information file custodians	Ongoing	Training on monitoring and change management of personal information files on PCs
Entrusted companies	Annual	Inspection and training for personal information processors (entrusted companies)
Business companies	Annual	Assessment and training on information security levels of business companies
On-site security facility personnel	Ongoing	On-site inspection and training on national core technologies

➤ Risk Management Activities

Information Security and Personal Information Protection Risk Assessment

Information Security Audit System | POSCO E&C regularly conducts internal and external audits to manage information security and personal information protection risks. External audits verify a security system at the international standard level through ISO 27001/ISMS-P certification reviews (once a year), POSCO Holdings phishing email inspections (once a quarter), and accounting firm internal control IT audits. Internal audits operate a real-time response system through professional outsourced penetration testing (once a year) and workplace security practices (once every half year).

Audit Result Actions | The main risk factors derived from the 2025 information security management system inspection include the antivirus operation of some servers, OS security patch management, security system administrator account management, and updating personal information consent and processing policies. Derived risks are immediately classified into immediate, short-term (1 month), medium-term (3 months), and long-term (6 months) tasks according to severity and addressed, and high-risk vulnerabilities are immediately improved. In addition, deficiencies identified in external agency reviews are handled in cooperation with related departments under the supervision of the Information Security Group, and all action statuses are reported to the Chief Information Security Officer. As of 2025, 100% of identified risk factors have been addressed.



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Ethics-Compliance

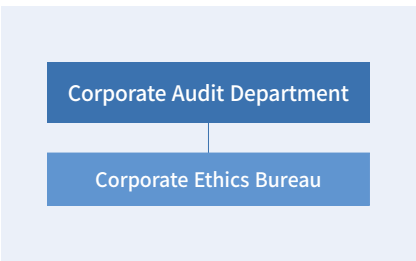
Management Framework

Organization

Governance (Ethics)

POSCO E&C operates the Corporate Audit Department as a dedicated ethics management organization. The Corporate Ethics Bureau receives reports, provides counseling, and conducts investigations into unethical conduct and grievances involving workplace harassment and sexual harassment. It also carries out preventive activities, including ethics training, campaigns, and ethics risk assessments.

Ethics Management Governance



Governance (Compliance Management)

The Head of the Legal Affairs Office, appointed as the Compliance Officer by a resolution of the Board of Directors, oversees company-wide compliance management based on independence and objectivity. In this role, the Compliance Officer monitors the risk of legal violations across key departments, verifies regulatory compliance, and provides up-to-date legal information. The Compliance Officer reports on compliance management status, major violation cases, and internal control improvements to the Audit Committee at least once a year. The Domestic and Overseas Legal Groups under the Legal Affairs Office are dedicated to compliance management and legal risk management, reporting key issues to management on both a regular and ad hoc basis.

Compliance Management Governance



Policy

Ethics Management Policy

[Ethics Management Policy](#)

POSCO E&C upholds the Ethics Charter and Ethics Principles as the highest-level norms, and has established the Code of Conduct and Practice Guidelines based on them to set specific standards of behavior that employees must observe in the workplace. Through the launch of our renewed ethics management framework, we established 'Integrity', 'Respect', and 'Mutual Empathy' as the three core values of ethics management, and defined 'conflict of interest', 'secondary victimization', 'disrespectful language and behavior', 'misuse of intangible assets', and 'discrimination against local people' as five priority misconduct practices to eliminate. We receive an annual pledge to comply with the Code of Ethics from both regular and contract employees, and disclose our Ethics Charter, Ethics Principles, behavioral principles, and behavioral guidelines to the public through our website. Furthermore, we have established anti-corruption compliance guidelines to ensure that our employees comply with relevant legal standards in the course of conducting business with all stakeholders, including affiliates, agents, and business partners.

3 Core Values of Ethics Management

Integrity

First, 'my' actions and decisions should always represent 'integrity'. We shall not seek personal interests at work and all decisions shall be made with the highest standard of justice and righteousness.

1

Respect

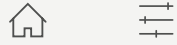
Second, we shall practice the value of respect for 'others'. We shall protect the human rights of our co-workers and everyone with whom we interact in our business activities, embrace diversity, and treat each other with fairness.

2

Mutual Empathy

Third, let us exercise 'mutual empathy' as a means to extend the boundaries that frame 'we/us'. We can develop and grow together through mutual trust by paying attention to the voices of our stakeholders and by respecting the perspectives and rights of diverse populations.

3



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➤ Strategy and Response Measures

Ethics

Ethics Risk Monitoring

POSCO E&C conducts monthly surveys of its employees through a mobile application to identify and prevent unethical risks in advance, determining whether they have experienced any violations of human dignity or unethical practices. For the leadership level responsible for organizational operations, we hold ethics sessions covering three areas: unethical business conduct, violations of human dignity, and activities to prevent and monitor unethical practices within the organization. In 2025, we assessed a total of 367 individuals, including executive-level position holders. For position holders identified through the assessment as having a low level of ethics management implementation, we require improvement through interviews with the responsible executive. For reported cases of unethical conduct, we take necessary measures such as additional investigations, counseling, and training to prevent recurrence. At the office (team) level, we operate a 'Workplace Self-Purification Checklist' that enables field departments to inspect ethical risks on their own, and items requiring intensive review are separately designated as tasks to be carried out. In addition, we conduct various unethical risk monitoring activities, including anonymous employee surveys to assess the level of ethical practice and identify vulnerable areas and opportunities for improvement.

Ethics Awareness Enhancement Activities

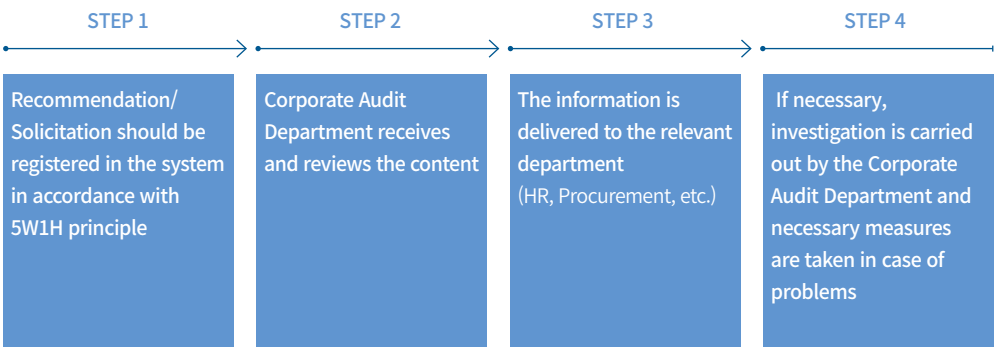
Employee Ethics Training and Campaigns | POSCO E&C performs ethics management awareness enhancement activities for employees to form a transparent organizational culture. We provide ethics management training through the learning platform every year, and conduct customized training by level according to the rank/job of the training target, such as including cases of internal unethical incidents in on-site ethics leader training materials. In addition, to internalize an ethical corporate culture, we promote sending Integrity Management Letters, broadcasting IPTV ethics campaign videos within the building, and posting ethics practice action guides. Furthermore, jointly with POSCO Group, we conduct monthly ethics campaigns for each type of unethical conduct. Through the company-wide bulletin board, we guide the concept, judgment criteria, dilemma situations, and correct handling standards for each type of unethical conduct in the form of infographics, supporting employees in easily understanding and applying ethics standards in daily work.

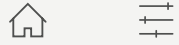
Supplier Ethics Training | POSCO E&C provides ethics training for new suppliers together with the procurement department. In 2025, we conducted training for suppliers that signed new contracts on the group-level ethics management practice philosophy and the ethical responsibilities required of both POSCO E&C and its suppliers.

Anti-Solicitation System

POSCO E&C operates the Clean POSCO System and records and manages all recommendations and solicitations in business relationships. The scope of reportable solicitations is expanded beyond the legal scope to include all expressions of intent that may undermine fairness. When an employee receives a solicitation, they register it in the system within 24 hours, after which the Corporate Audit Department immediately reviews the content and notifies the relevant department. In cases where an employee is involved in or aware of unethical conduct but fails to report it, strong measures are taken in accordance with the Code of Ethics to prevent recurrence.

Clean POSCO System Processing Procedure





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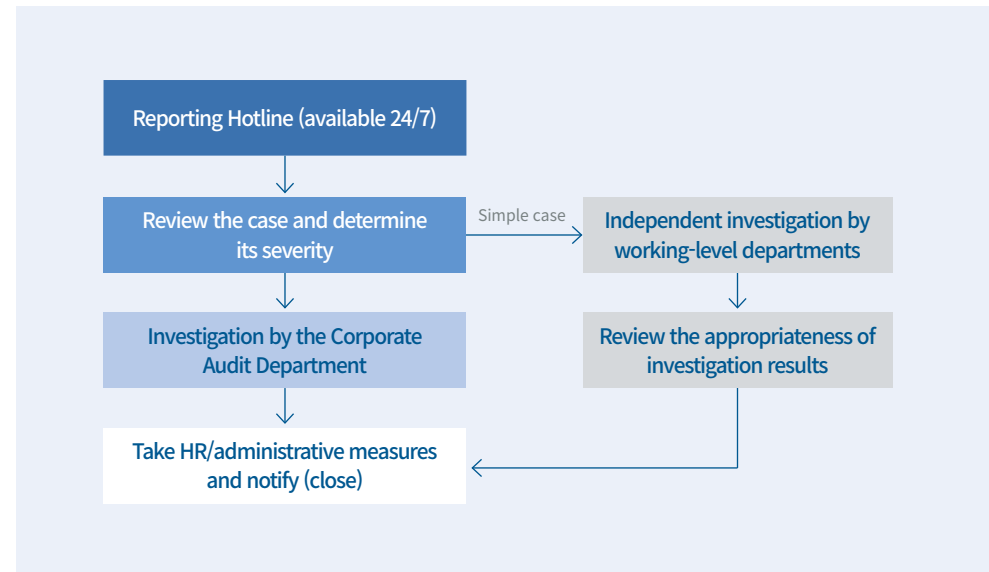
Ethics

Stakeholder Reporting and Grievance Handling System

POSCO E&C operates a Reporting Hotline where internal and external stakeholders can report unethical conduct, violations of unfair trade-related laws and the Subcontracting Act, and abuse of power. The Corporate Audit Department is the entity responsible for responding to received reports, and the ethics department reviews the appropriateness of the field department's fact verification results to ensure independence. Most cases are investigated within 2 weeks, and in 2025, a total of 91 cases¹⁾ of unethical conduct-related reports were received and all were processed. In addition, we operate English, Vietnamese, and Spanish report and counseling centers to enhance the accessibility of global stakeholders, and mitigate ethics risks early through a whistleblower reward and voluntary reporter immunity system. In accordance with whistleblower protection regulations, we protect the identity and information of reporters and strictly prohibit disadvantages due to reporting.

Operational Process of the Reporting Hotline

Report and Counseling Center



Compliance

Compliance Standards Monitoring

In 2025, the Compliance Officer conducted a total of 29 inspections on the risk of legal violations and control systems of key departments. As a result of focused inspections on compliance with fair trade-related laws—including the Fair Transactions in Subcontracting Act, the Monopoly Regulation and Fair Trade Act, and the Act on the Regulation of Terms and Conditions—it was confirmed that the overall level of legal compliance across departments was satisfactory. For matters requiring improvement, follow-up measures were completed, such as posting reports on the company-wide bulletin board and recommending voluntary corrective actions.

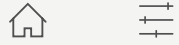
Compliance Management System (ISO 37301) Certification

In November 2025, POSCO E&C obtained the internationally recognized Compliance Management System (ISO 37301) certification from the Ethics & Compliance Management Certification Institute. ISO 37301 is an international standard that verifies whether an organization has established a management system to systematically manage various compliance obligations—such as laws, ethics, and internal regulations—and to prevent and control risks. Through this certification, POSCO E&C has been recognized for its company-wide compliance system capabilities in integrating and managing risks across all areas, including fair trade, anti-corruption, human rights, the environment, and the supply chain. As part of this effort, POSCO E&C has systematically identified and assessed corruption risks and established an action plan to prevent and manage them. This plan includes establishing criteria for risk identification and assessment, designing and operating control activities focused on high-risk areas, providing compliance training for employees, monitoring risks and reviewing results, and operating an improvement action process. In addition, we report the establishment and implementation status of our anti-corruption plan to the Board of Directors once a year, thereby strengthening the Board-level oversight function and enhancing the effectiveness of compliance management.



ISO 37301 certificate

¹⁾ Includes 1 case received in December 2025 and addressed in January 2026



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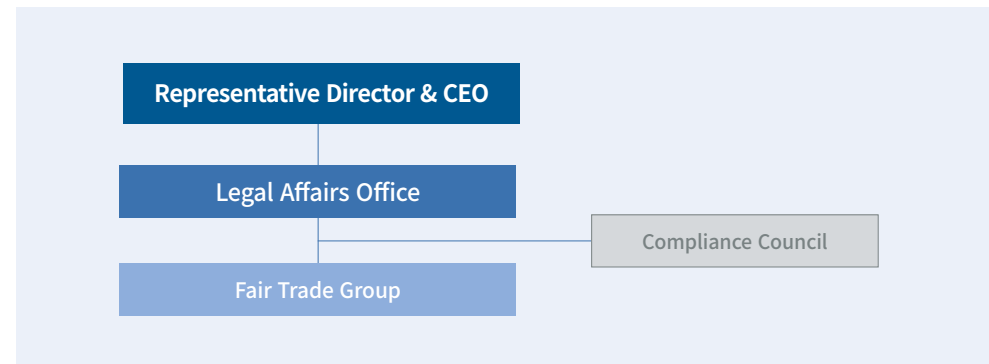
Organization

Governance

As the Compliance Manager, the Head of Legal Affairs Office establishes the company-wide fair trade direction and oversees related risk management work. The Compliance Manager is appointed by resolution of the Board of Directors, the highest decision-making body, thereby securing the independence and objectivity of the internal compliance function.

In accordance with Article 11, Paragraph 1 of the Fair Trade Compliance Program Operation Guidelines, the Head of Legal Affairs Office holds the Compliance Council on a half-yearly basis. The Council, in which major managers such as the Head of the Fair Trade Group and the Head of the Finance Group participate, deliberates on major agenda items related to the Fair Trade Compliance Program (CP) and performs an advisory function on the practical application process. In the first half of 2025, we discussed improving practical response processes to respond to the Korea Fair Trade Commission and strengthen compliance with the Fair Transactions in Subcontracting Act, and in the second half, we reported the 2025 CP activity performance and 2026 activity plan and discussed strict company-wide response measures against legal violations. In addition, the Fair Trade Group under the Legal Affairs Office, which is the practical execution organization, identifies and manages potential fair trade-related risks in advance through continuous monitoring and risk assessment.

Fair Trade Governance



Policy

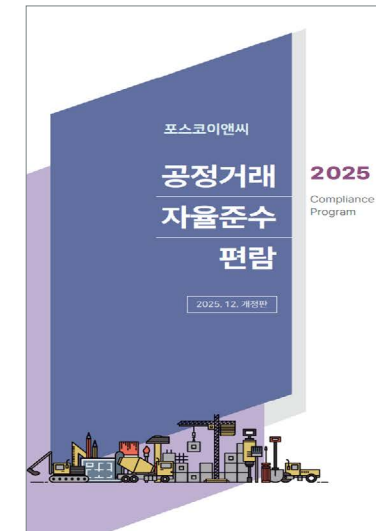
Fair Trade Policy

Fair Trade Compliance Program operation regulations and guidelines

Ethics Charter and Ethics Principles

Since introducing the Fair Trade Compliance Program (CP) in 2003, POSCO E&C has provided fair trade compliance program operation regulations and guidelines to support employees' voluntary compliance with laws. These regulations and guidelines, which apply to all employees, are policies that stipulate the procedures and standards to be followed for compliance with competition law (laws under the jurisdiction of the Korea Fair Trade Commission), and are regularly revised according to changes in laws.

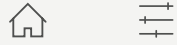
In addition, we have prepared provisions related to the prevention of unfair trade and unfair competition within the Ethics Charter and Ethics Principles established to prevent unethical conduct. At the business partner level, we stipulate that we must establish a fair trade order based on mutual trust and solidify a coexisting corporate ecosystem through shared growth with business partners.



Fair Trade Compliance Manual

Main Content

- Fair Transactions in Subcontracting Act
 - Definition of subcontracting transactions
 - Obligations of the principal contractor
 - Prohibitions for the principal contractor
- Monopoly Regulation and Fair Trade Act
 - Unfair collaborative acts (bid rigging)
 - Unfair support
 - General unfair trade practices
 - Disclosure system and business combinations
- Act on Fair Labeling and Advertising
- Act on the Regulation of Terms and Conditions
- Fair Trade Self-Assessment
 - Self-assessment checklist
 - CP regulations and guidelines



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➤ Strategy and Response Measures

Fair Trade Compliance Program (CP) Operation

POSCO E&C operates a systematic compliance program—including training and monitoring—to support employees' compliance with laws and regulations, centered on the Compliance Manager and the Compliance Council, in accordance with its fair trade compliance regulations, regularly assessing performance based on CP operations. In particular, through a prior work consultation system, we block the possibility of fair trade-related legal violations in advance. The Compliance Manager provides employees with advice on legal compliance and, through consultation with employees, prevents and controls in advance the legal violation risks that may arise in issues across fair trade, including subcontracting transactions.

CP System Improvement

POSCO E&C has analyzed fair trade risks and begun developing an automated system that enables voluntary correction of legal violation risks, in order to enhance its capacity to deter and respond to subcontracting disputes in advance. Instead of the existing method of recognizing and responding to risks after the fact, we have built a real-time, AI-based risk assessment system that identifies legal violation risks in advance and enables a preemptive response. This is the first system of its kind in the construction industry, and it is set to be applied to operations in early 2026.

CP Rating Assessment

In 2025, POSCO E&C achieved the highest AAA rating for three consecutive years in the Compliance Program assessment led by the Korea Fair Trade Commission (KFTC), as the first in the construction industry. The KFTC annually evaluates companies operating the CP based on indicators and performance. We have participated in the CP rating assessment since 2020 and continued to advance our compliance management system by incorporating the assessment results.

Fair Trade Education

POSCO E&C establishes and operates a company-wide fair trade training plan to support employees in practicing ethical management. In particular, we strengthen the expertise of employees responsible for fair trade matters through advanced, job-specific training and support them in obtaining the CCP (Certified Compliance Professional) qualification. In addition, to enhance employees' understanding, we distribute fair trade and legal reports company-wide and share trends in major laws and regulations—such as the Monopoly Regulation and Fair Trade Act, the Fair Transactions in Subcontracting Act and the Act on the Promotion of Mutually Beneficial Cooperation Between Large Enterprises and Small and Medium Enterprises—through our internal website.

Training	Content	Number of Sessions	Number of Participants
Fair Trade Basic Training	Online compliance training for all employees	Once a year	5,725 employees
Fair Transactions in Subcontracting Act Training for New Sites	Basic Subcontracting Act training for on-site practitioners	42 times a year	554 employees
CCP (Certified Compliance Professional course)	Compliance training for fair trade work personnel	Once a year	1 employee

Fair Trade

Risk Management

> Risk Management Activities

Unfair Trade or Unfair Competition Risk Management Activities

Fair Trade Risk Assessment

POSCO E&C conducts quarterly fair trade risk assessments to manage risks related to unfair trade and unfair competition. For risks derived through the risk assessment, we implement mitigation measures. In addition, through quarterly regular inspections of the fair trade compliance system and monthly on-site inspections, we enhance the internal fair trade monitoring system. By providing the fair trade compliance manual, which includes a self-inspection checklist, to all employees through the company website, we ensure that fair trade laws are complied with by each department.

Fair trade self-inspection checklist



Fair trade self-inspection checklist

CP Operation Effectiveness Evaluation

POSCO E&C conducts an annual CP operation effectiveness evaluation to check whether the Fair Trade Compliance Program for preventing legal violations is operating effectively. Based on the evaluation results, we improve deficiencies and advance the level of internal control.

Regular Inspection of the Subcontracting Transaction System

We conduct quarterly inspections of our fair trade system to identify and address areas with a high risk of violating subcontracting laws, thereby preventing potential non-compliance with fair trade laws and regulations. In addition, we review and assess subcontracting practices at project sites and provide customized coaching for identified risks to support substantial improvement. In 2025, we conducted 4 regular system inspections and 11 on-site coaching sessions, implementing mitigation measures for potential risks. Subsequently, we continuously check the level of risk mitigation by evaluating the effectiveness of these measures during regular inspections.

Metrics and Targets

> Target

Fair Trade Targets

POSCO E&C strives to prevent unfair trade by strengthening related education according to the CP operation effectiveness evaluation.

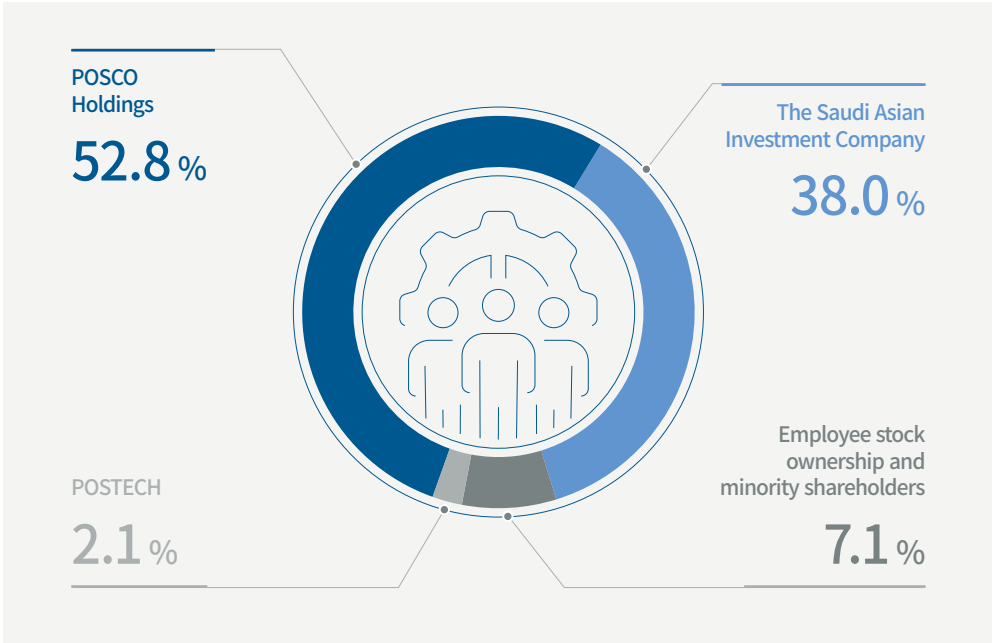
Fair trade indicator	Unit	2025	2026 (short-term target)	2030 (long-term target)
Cumulative training attendees	Persons	155,236	180,000	250,000
Cumulative training hours	Hours	69,983	75,000	100,000

Shareholder Rights

Shareholder Composition

POSCO E&C has introduced written and electronic voting since 2021 as part of our steadfast commitment to enhancing shareholder rights through proactive stakeholder engagement. As of December 31, 2025, the largest shareholder of POSCO E&C was POSCO Holdings with 52.8%, followed by the Saudi Asian Investment Company (38%), POSTECH (2.1%), and employee stockholders and minority shareholders (7.1%).

Composition of Shareholders



Tax Payment

Tax Strategy

POSCO E&C establishes its tax strategies in alignment with the annual revisions to tax laws and faithfully fulfills its tax obligations in accordance with country-specific pertinent laws both domestically and overseas. To build trust and strengthen relationships with stakeholders, we disclose our tax policy in detail through our business report. We do not pursue any undue gains through income shifting or tax avoidance by exploiting differences among international tax systems or national tax laws. When conducting overseas business, we maintain transparent relationships with the tax authorities of each country and faithfully fulfill our obligations in accordance with relevant laws and regulations. Our tax-related accounting is evaluated during financial audits, and we seek advice from external tax firms to ensure there are no omissions in tax reporting.

Tax Risk Management

POSCO E&C keeps close tabs on enactments and amendments in domestic and overseas tax laws to identify and manage risks that may arise across our business operations and ensures regulatory compliance. To minimize business-related tax risks, we consult with external tax experts and seek official interpretations from tax authorities to verify any potential non-compliance with tax laws domestically and overseas before making business decisions.

Tax Reporting

POSCO E&C responds to tax-related documentation requests promptly and accurately, maintaining transparent and sound relationships with tax authorities and fulfilling its tax responsibilities. We comply with tax filing and payment deadlines, and digitize all transaction-related supporting documents for submission upon request. To prevent tax avoidance, we apply fair and lawful prices to domestic transactions made with related parties while abiding by the OECD Transfer Pricing Guidelines and the arm's length principle as stipulated in country-specific laws for cross-border transactions.



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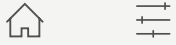
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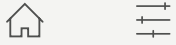
Greenhouse Gas

Category	Unit	2023	2024	2025
Direct/indirect emissions (Scope 1+2)	tCO ₂ e	62,150	67,666	45,319
Direct emissions (Scope 1)	tCO ₂ e	15,733	13,819	6,530
Domestic	tCO ₂ e	8,867	6,075	5,336
Overseas	tCO ₂ e	6,866	7,744	1,194
Indirect emissions (Scope 2)	tCO ₂ e	46,417	53,847	38,789
Domestic	tCO ₂ e	40,201	45,578	35,921
Overseas	tCO ₂ e	6,216	8,269	2,868
Other indirect emissions (Scope 3)	tCO ₂ e	3,255,792	2,865,043 ¹⁾	2,807,006
Purchased goods and services	tCO ₂ e	1,635,110	1,334,989	1,010,186
Capital goods	tCO ₂ e	26	4 ¹⁾	3
Upstream transportation and distribution	tCO ₂ e	23,797	19,279	14,915
Waste generated in operations	tCO ₂ e	10,281	19,496	7,451
Business travel	tCO ₂ e	2,725	3,307	3,008
Employee commuting	tCO ₂ e	557	442 ¹⁾	338
Use of sold products	tCO ₂ e	1,583,296	1,487,526	1,771,105
Investments	tCO ₂ e	0	0	0
Intensity of direct/indirect emissions (revenue basis, scope 1+2)	tCO ₂ e/100 million KRW	0.65	0.74	0.68

Energy

Category	Unit	2023	2024	2025
Energy consumption	GJ	975,691	1,050,072	838,718
Direct energy consumption	GJ	131,075	92,080	81,070
Natural gas	GJ	9,443	11,466	11,477
Renewable fuel	GJ	0	0	0
Kerosene	GJ	58,570	43,960	34,808
Gasoline	GJ	7,295	8,468	7,565
Diesel	GJ	55,643	27,525	26,864
LPG	GJ	124	200	173
Propane	GJ	0	461	183
Indirect energy consumption	GJ	844,616	957,992	757,648
Electricity	GJ	834,506	946,344	742,981
Steam	GJ	10,110	11,648	14,667
Energy intensity (revenue basis)	GJ/100 million KRW	10.24	11.46	12.52

1) Previously reported data has been restated due to changes in calculation methodology



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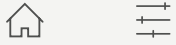
Environment

➤ Water

Category	Unit	2023	2024	2025
Total water withdrawal	ton	1,008,118	1,209,089	842,685
Municipal water	ton	474,406	575,856	405,624
Surface water	ton	94,614	76,325	65,071
Groundwater	ton	417,437	514,044	358,992
Other	ton	21,661	42,864	12,998
Total water consumption	ton	1,008,118	1,209,089	842,685
Total water discharge	ton	0	0	0
Recycled/reused water	ton	0	14,548	140
Water reuse rate	%	0	1.2	0.02

➤ Waste

Category	Unit	2023	2024	2025
Designated waste generated	ton	37	32	0.2
Recycled	ton	0	22	0
Incinerated	ton	12	0	0
Landfilled	ton	24	10	0.2
General waste generated	ton	6,893	24,436	9,362
Recycled	ton	6,628	13,020	2,377
Incinerated	ton	0	0	0
Landfilled	ton	265	11,416	6,985
Construction waste generated	ton	686,503	1,360,503	478,706
Recycled	ton	686,271	1,351,684	474,666
Incinerated	ton	57	81	201
Landfilled	ton	175	8,738	3,839
Total waste generated	ton	693,433	1,384,972	488,068
Recycled	ton	692,899	1,364,726	477,043
Recycling rate	%	99.9	98.5	97.7
Incinerated	ton	70	81	201
Landfilled	ton	465	20,164	10,824



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Sustainable Business and Green Procurement

Category		Unit	2023	2024	2025
Sales	Sales amount	KRW million	1,126,260	1,631,768	1,364,026
	Percentage of sales	%	11.8	17.8	20.4
Purchases	Purchases amount	KRW million	503,496	516,515	441,570
	Percentage of purchases	%	30.2	32.7	40.3

Raw Material Usage

Category		Unit	2023	2024	2025
Main raw material usage ¹⁾	Rebar	1,000 ton	342	261	213
	Cement	1,000 ton	75	80	73
	Asphalt concrete	1,000 ton	189	325	88
	Ready-mix concrete	1,000 m³	3,782	3,156	2,372
	Sand	1,000 m³	86	98	144
	Gravel	1,000 m³	256	300	294

Environmental Certifications

Category	Unit	2023	2024	2025
Environmental Management System (ISO 14001) certification rate	%	100	100	100
Number of sites covered	number	1	1	1
Number of acquired sites	number	1	1	1
Energy Management System (ISO 50001) certification rate	%	100	100	100
Number of sites covered	number	1	1	1
Number of acquired sites	number	1	1	1

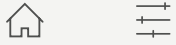
Environmental Law Violations

Category	Unit	2023	2024	2025
Non-compliance with environmental laws and regulations	Cases	32	88	47
Number of monetary sanctions	Cases	22	81	44
Penalty surcharges	Cases	0	0	0
Administrative fines	Cases	22	81	44
Fines	Cases	0	0	0
Number of non-monetary administrative dispositions (warnings, improvement orders, etc.)	Cases	10	7	3
Monetary sanction amount	KRW million	31	115	54

Environment-Friendly Vehicles

Category	Unit	2023	2024	2025
Percentage of environment-friendly vehicles owned	%	0	8.5	13.4

1) 2025 recycled raw material usage: recycled asphalt concrete 2,000tons, recycled aggregate 11,000m³



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Social

➤ Employee Status¹⁾

Category		Unit	2023	2024	2025
Total number of executives and employees		persons	6,279	5,922	5,795
Number of executives		persons	33	33	25
By gender	Male	persons	32	32	25
	Female	persons	1	1	0
	Female ratio	%	3.0	3.0	0
By age	Under 30	persons	0	0	0
	30 to 50	persons	1	1	1
	Over 50	persons	32	32	24
Number of employees		persons	6,246	5,889	5,770
By gender	Male	persons	5,499	5,189	5,125
	Female	persons	747	700	645
	Female ratio	%	12.0	11.9	11.2
By age	Under 30	persons	726	634	483
	30 to 50	persons	3,951	3,808	3,727
	Over 50	persons	1,569	1,447	1,560
By region	Korea	persons	5,948	5,700	5,630
	Asia except Korea	persons	112	64	46
	North America	persons	92	2	29
	South America	persons	66	97	35
	Europe	persons	26	26	30
	Other	persons	2	0	0
Number of managers		persons	483	457	398
By gender	Male	persons	474	447	391
	Female	persons	9	10	7
	Female ratio	%	1.9	2.2	1.8

➤ Employees by Contract Type¹⁾

Category		Unit	2023	2024	2025
Number of permanent employees		persons	3,641	3,560	3,453
By gender	Male	persons	3,388	3,293	3,191
	Female	persons	253	267	262
Number of fixed-term employees		persons	2,605	2,329	2,317
By gender	Male	persons	2,111	1,896	1,934
	Female	persons	494	433	383
Percentage of fixed-term employees		%	41.7	39.5	40.2

➤ Employee Diversity

Category		Unit	2023	2024	2025
Number of employees with disabilities		persons	198	155	147
Percentage of employees with disabilities		%	3.1	2.5	2.5
Number of veterans		persons	67	49	51
Number of foreign employees		persons	2	2	3

➤ Workers Who Are Not Employees¹⁾

Category		Unit	2023	2024	2025
Workers who are not employees		persons	28	23	28

1) Employee classification differs from the business report.



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➤ New Hires

Category		Unit	2023	2024	2025
Number of new hires		persons	1,764	1,651	1,462
By gender	Male	persons	1,486	1,424	1,274
	Female	persons	278	227	188
	Female ratio	%	15.8	13.8	12.9

➤ Turnover¹⁾

Category		Unit	2023	2024	2025
Number of voluntary turnover		persons	521	645	605
Voluntary turnover rate ²⁾		%	8.5	10.3	10.2
Number of involuntary turnover ³⁾		persons	927	1,151	1,116

1) Previously reported data has been restated to include fixed-term employees due to a change in calculation methodology.

2) Calculated using the previous year's number of employees as the denominator

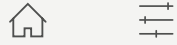
3) For fixed-term employees, this includes departures due to contract expiration. Cases with a gap period between contract expiration and renewal are also included in the calculation.

➤ Training

Category		Unit	2023	2024	2025
Training hours	Total training hours	hours	204,408	217,520	177,328
	Training hours per employee	hours/person	32.7	36.7	30.6
Training cost	Total training cost	KRW million	2,060	2,540	1,755
	Training cost per employee	KRW million/person	0.3	0.4	0.3

➤ Labor Relations

Category		Unit	2023	2024	2025
Percentage of employees covered by collective bargaining agreements		%	100	100	100



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➤ Safety and Health Certification

Category	Unit	2023	2024	2025
Percentage of sites covered by the safety and health management system	%	100	100	100
Number of sites covered	number	1	1	1
Number of acquired sites	number	1	1	1
Number of employees covered by the safety and health management system	persons	6,279	5,922	5,795
Percentage of employees covered by the safety and health management system	%	100	100	100

➤ Occupational Health and Safety Training

Category	Unit	2023	2024	2025
Total training sessions	cases	193	201	162
Total training hours	hours	48,923	55,106	50,986
Permanent employees	hours	19,411	20,135	21,346
Fixed-term employees	hours	24,773	30,543	26,719
Contractors	hours	4,739	4,428	2,921
Number of occupational health and safety training completers	persons	3,141	3,089	3,706
Permanent employees	persons	1,463	1,242	2,098
Fixed-term employees	persons	1,678	1,847	1,608

➤ Work-Related Injuries

Category	Unit	2023	2024	2025
Number of injured ¹⁾	persons	57	56	53
Employee	persons	0	0	1
Contractor	persons	57	56	52
Number of fatalities	persons	1	3	5
Employee	persons	0	0	1
Contractor	persons	1	3	4
Lost Time Injury Frequency Rate (LTIFR)	persons/ million hours	0.71	0.69	0.69
Employee	persons/ million hours	0.00	0.00	0.14
Contractor	persons/ million hours	0.87	0.84	0.80
Total Recordable Injury Frequency Rate (TRIFR)	persons/ million hours	1.98	2.46	1.95
Employee	persons/ million hours	0.00	0.07	0.14
Contractor	persons/ million hours	2.41	2.98	2.32
Occupational accident rate	%	0.16	0.17	0.17
Employee	%	0.00	0.00	0.03
Contractor	%	0.20	0.20	0.20
Fatality rate per 10,000 workers ²⁾	‰	0.28	0.90	1.47
Employee	‰	0.00	0.00	1.73
Contractor	‰	0.34	1.09	1.42

1) Fatalities not included

2) (Number of fatalities ÷ total number of employees and supplier workers) x 10,000, differs from the calculation methodology of data published by the Korea Occupational Safety and Health Agency



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➤ Social Investment

Category	Unit	2023	2024	2025
Social contribution cost	KRW million	7,597	8,506	3,504

➤ Customer Satisfaction

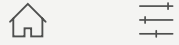
Category		Unit	2023	2024	2025
Customer feedback and complaints	Number of cases received	cases	1,664,179	1,476,259	1,713,756
	Number of cases processed	cases	1,562,520	1,282,398	1,514,447
	Resolution rate	%	93.9	86.9	88.4
Customer satisfaction survey score		scores	71.7	85.4	85.9

➤ Quality Management Certification

Category	Unit	2023	2024	2025
Quality management system (ISO 9001) certification rate	%	100	100	100
Number of sites covered	number	1	1	1
Number of acquired sites	number	1	1	1

➤ Information Security Certification

Category	Unit	2023	2024	2025
Information security certification (ISO 27001) certification rate	%	100	100	100
Number of sites covered	number	1	1	1
Number of acquired sites	number	1	1	1
Information security certification (ISMS-P) certification rate	%	0	100	100
Number of sites covered	number	0	1	1
Number of acquired sites	number	0	1	1



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Governance

Board of Directors Size and Independence

Category		Unit	2023	2024	2025
Number of board directors		persons	6	6	6
Composition	Number of executive directors	persons	3	3	3
	Number of non-executive directors	persons	3	3	3
Diversity	Number of male directors	persons	6	6	6
	Number of female directors	persons	0	0	0

Board of Directors Operations

Category		Unit	2023	2024	2025
Board attendance rate		%	100	97.2	98.0
Number of board meetings held		times	7	6	9
BOD deliberations by agenda item		cases	26	23	36

Compensation

Category		Unit	2023	2024	2025
Total annual compensation of the highest-paid individual ¹⁾		KRW million	1,346	990	844
Average annual compensation of employees (excluding the highest-paid individual)		KRW million	102	103 ²⁾	97
Compensation ratio between the highest-paid individual and employees		ratio	13.2	9.4	8.7
Ratio of the percentage increase in compensation for the highest-paid individual to that of employees		ratio	1.2	0.7	0.9

1) Due to a change in the Representative Director & CEO during 2025, the calculation is based on the annualized actual compensation received by the top-earner during their tenure, excluding severance pay.

2) Previously reported data has been restated due to a clerical error.

3) Calculated including registered executives

4) Includes human rights violation cases managed within the ethics violation reports

5) Includes 1 case received in December 2025 and resolved in January 2026

Fair Trade/Anti-Corruption

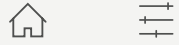
Category		Unit	2023	2024	2025
Fair trade training	Completion hours	hours	19,481	8,649	3,802
	Number of employees who completed	persons	5,632	4,638	5,725
Monetary sanctions imposed for competition-impeding acts and Fair Trade Act violation		KRW	0	9,062,400	0

Ethics Training

Category		Unit	2023	2024	2025
Total ethics training hours		hours	11,522	11,682	11,590
Mandatory ethics training completers		persons	5,761	5,841	5,795
Permanent employees ³⁾		persons	3,516	3,592	3,478
Fixed-term employees		persons	2,245	2,249	2,317

Ethics Violation Reporting and Response

Category		Unit	2023	2024	2025
Ethics violation reports ⁴⁾	Number of reports received	cases	51	66	91
	Number of reports resolved	cases	51	66	91 ⁵⁾
Employee grievance	Number of cases reported	cases	236	182	114
	Number of cases resolved	cases	236	182	114



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Financial Performance

Business Performance

Category	Unit	2023	2024	2025
Revenue	KRW million	10,165,708	9,468,701	6,903,145
Cost of sales	KRW million	(9,602,901)	(8,915,295)	(6,811,616)
Gross profit	KRW million	562,806	553,406	91,529
Administrative and selling expenses	KRW million	(361,393)	(491,560)	(542,989)
Operating profit	KRW million	201,413	61,846	(451,460)
Finance income and costs	KRW million	22,226	76,343	(135,234)
Other non-operating income or expenses	KRW million	39,866	(55,580)	(65,802)
Profit before income tax expense from continuing operations	KRW million	267,112	70,293	(645,701)
Income tax expense from continuing operations	KRW million	(90,494)	(19,308)	168,135
Net income	KRW million	176,617	50,986	(477,566)

Summary of Financial Statements

Category	Unit	2023	2024	2025
Total assets	KRW million	8,195,689	7,662,730	8,283,757
Current assets	KRW million	5,859,803	5,217,785	5,882,803
Non-current assets	KRW million	2,335,886	2,444,945	2,400,954
Total liabilities	KRW million	4,717,198	4,148,962	5,244,719
Current liabilities	KRW million	4,106,980	3,342,723	3,995,466
Non-current liabilities	KRW million	610,217	806,239	1,249,252
Total equity	KRW million	3,478,491	3,513,768	3,039,038

Sales by Division

Category	Unit	2023	2024	2025
Plant	KRW 100 million	32,854	26,009	24,130
Building works	KRW 100 million	50,447	55,192	45,053
Infrastructure	KRW 100 million	16,017	13,743	0 ¹⁾
Technical services	KRW 100 million	10.82	0	0
Real estate services & product sales	KRW 100 million	3,307	66	100

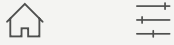
Cash Flow

Category	Unit	2023	2024	2025
Cash flow				
Cash flow from operation	KRW million	(294,877)	30,713	(950,239)
Cash flow from investment	KRW million	319,171	(93,683)	444,649
Cash flows from financing	KRW million	78,747	(360,621)	933,357
Cash and cash equivalents				
Cash and cash equivalents at the beginning of period	KRW million	1,005,528	1,110,015	701,303
Cash and cash equivalents at end of period	KRW million	1,110,015	701,303	1,117,412

Corporate Tax

Category	Unit	2023	2024	2025
Profit before tax	KRW 100 million	2,671	703	(6,457)
Income tax expense	KRW 100 million	905	193	(1,681)
Effective tax rate	%	33.9	27.5	26.0

1) In 2025, the Infra Business Division was merged into the Plant Engineering & Construction Division to strengthen business execution capabilities.



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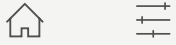
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Statement of Use	POSCO E&C has reported in accordance with the GRI Standards for the period from January 1, 2025 to December 31, 2025
GRI 1 Used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	As of June 2026, POSCO E&C has not applied sector standards because they are not applicable to the published sector standards.

Universal Standards

	Disclosure Items	ISO 26000	Page	Note
General Disclosure	2-1. Organizational details	7.3.3/7.6.2	6	
	2-2. Entities included in the organization's sustainability reporting		2, 6	
	2-3. Reporting period, frequency and contact point		2	
	2-4. Restatements of information		90	
	2-5. External assurance		102-106	
	2-6. Activities, value chain and other business relationships	6.4.3/6.4.4/6.8.5	7-10	
	2-7. Employees		89	
	2-8. Workers who are not employees		89	
	2-9. Governance structure and composition	6.2/7.4.3/7.7.5	12	
	2-10. Nomination and selection of the highest governance body		-	Undisclosed
	2-11. Chair of the highest governance body		12	
	2-12. Role of the highest governance body in overseeing the management of impacts		12, 13	
	2-13. Delegation of responsibility for managing impacts		14	
	2-14. Role of the highest governance body in sustainability reporting		-	Undisclosed
	2-15. Conflicts of interest		-	Business Report 154-161, 378-381
	2-16. Communication of critical concerns		13	
	2-17. Collective knowledge of the highest governance body		12	

	Disclosure Items	ISO 26000	Page	Note
General Disclosure	2-18. Evaluation of the performance of the highest governance body	6.2/7.4.3/7.7.5	-	
	2-19. Remuneration policies		13	
	2-20. Process to determine remuneration		-	Business Report 388-390
	2-21. Annual total compensation ratio		93	
	2-22. Statement on sustainable development strategy	4.7/5.2/6.4.1 /6.4.2/7.4.2 /7.8	5	
	2-23. Policy commitments		37, 42, 49, 55, 59, 68, 76, 78, 81	
	2-24. Embedding policy commitments		35-41, 42-47, 49-54, 55-58, 59-63, 68-70, 75-77, 78-80, 81-83	
	2-25. Processes to remediate negative impacts		40, 46, 61, 62, 69, 80	
	2-26. Mechanisms for seeking advice and raising concerns		40, 46, 61, 62, 69, 80	
	2-27. Compliance with laws and regulations		51, 88, 93	
	2-28. Membership associations		107	
	2-29. Approach to stakeholder engagement	5.3/6.3.10/ 6.4.5/7.5.3	23	
	2-30. Collective bargaining agreements		90	
Material Topics	3-1. Process to determine material topics	7.3.2/7.3.4	21, 23	
	3-2. List of material topics		22	



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Topic Specific Standards

Climate Change

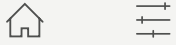
	Disclosure Items	ISO 26000	Page	Note
Material Topics	3-3. Management of material topics		25-34	
Energy	302-1. Energy consumption within the organization	6.5.5	86	
	302-2. Energy consumption outside of the organization		86	
	302-3. Energy intensity		86	
	302-4. Reduction of energy consumption		86	
Emissions	305-1. Direct (Scope 1) GHG emissions	6.5.3/6.5.5	34, 86	
	305-2. Energy indirect (Scope 2) GHG emissions		34, 86	
	305-3. Other indirect (Scope 3) GHG emissions		34, 86	
	305-4. GHG emissions intensity		34, 86	
	305-5. Reduction of GHG emissions		34, 86	

Occupational Health and Safety

	Disclosure Items	ISO 26000	Page	Note
Material Topics	3-3. Management of material topics		35-41	
Occupational Health and Safety	403-1. Occupational health and safety management system	6.4.6	37	
	403-2. Hazard identification, risk assessment, and incident investigation		36, 39-40	
	403-3. Occupational health services		38	
	403-4. Worker participation, consultation, and communication on occupational health and safety		38	
	403-5. Worker training on occupational health and safety		38	
	403-6. Promotion of worker health		38	
	403-7. Prevention and mitigation of occupational health and safety impacts directly linked by business relationships		38-40	
	403-8. Workers covered by an occupational health and safety management system		41, 91	
	403-9. Work-related injuries		41, 91	
	403-10. Work-related ill health		41, 91	

Customer Satisfaction

	Disclosure Items	ISO 26000	Page	Note
Material Topics	3-3. Management of material topics		42-47	



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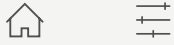
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Topic Specific Standards

Non-Material Topics

	Disclosure Items	ISO 26000	Page	Note
Economic Performance	201-1. Direct economic value generated and distributed	6.8.1/6.8.2	94	
	201-2. Financial implications and other risks and opportunities due to climate change	6.5.5	17, 32	
	201-3. Defined benefit plan obligations and other retirement plans	6.8.7	-	Business Report 124-125
Anti-Corruption	205-1. Operations assessed for risks related to corruption	6.6.3	80	
	205-2. Communication and training about anti-corruption policies and procedures		78, 93	
	205-3. Confirmed incidents of corruption and actions taken		93	
Anti-competitive Behavior	206-1. Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	6.6.1/6.6.2	93	
Tax	207-1. Approach to tax	6.2	84	
	207-2. Tax governance, control, and risk management		84	
Materials	301-1. Materials used by weight or volume	6.5.4	88	
	301-2. Recycled input materials used		88	
Water and Effluents	303-2. Management of water discharge-related impacts	6.5.3/6.5.4	52, 56	
	303-3. Water withdrawal		87	
	303-4. Water discharge		87	
	303-5. Water consumption		87	

	Disclosure Items	ISO 26000	Page	Note
Supplier Environmental Assessment	308-2. Negative environmental impacts in the supply chain and actions taken	6.5/6.6.6	70	
Employment	401-1. New employee hires and employee turnover	6.4.3/6.4.4	90	
	401-2. Benefits provided to full-time employees that are not provided to temporary or part-time employees		67	
	401-3. Parental leave		67	
Training and Education	404-1. Average hours of training per year per employee	6.4.7/6.8.5	90	
	404-2. Programs for upgrading employee skills and transition assistance programs		66	
Diversity and Equal Opportunity	405-1. Diversity of governance bodies and employees	6.2.3	89, 93	
Non-discrimination	406-1. Incidents of discrimination and corrective actions taken	6.3.7	62-63, 93	
Local Communities	413-1. Operations with local community engagement, impact assessments, and development programs	6.8	52, 71-74	
Supplier Social Assessment	414-2. Negative social impacts in the supply chain and actions taken	6.6.6	69, 70	



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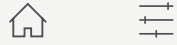
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Category	UNGC 10 Principles	Page
Human Rights	1. Businesses should support and respect the protection of internationally proclaimed human rights; and	59-63
	2. make sure that they are not complicit in human rights abuses	
Labor	3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;	59-63, 64-67
	4. the elimination of all forms of forced and compulsory labour;	
	5. the effective abolition of child labour; and	
	6. the elimination of discrimination in respect of employment and occupation.	
Environment	7. Businesses should support a precautionary approach to environmental challenges;	25-34, 49-54, 55-58
	8. undertake initiatives to promote greater environmental responsibility; and	
	9. encourage the development and diffusion of environmentally friendly technologies.	
Anti-corruption	10. Businesses should work against corruption in all its forms, including extortion and bribery.	78-83



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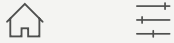
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UN SDGs



Key SDGs	Detailed objectives	POSCO E&C's contribution
	3.7 ensure universal access to sexual and reproductive health-care services, including for family planning, information and education, and the integration of reproductive health into national strategies and programmes.	• Maternity leave / parental leave • Fertility treatment and fertility leave for pregnancy support • Childbirth incentives and provision of childbirth gifts • Operation of in-house daycare center
	4.3 ensure equal access for all women and men to affordable and quality technical, vocational and tertiary education 4.5 eliminate gender disparities in education and ensure equal access to all levels of education and vocational training for the unprivileged	• Re/Up Skilling program (Job Skill Training) • PM development program • Agile team led by core technical experts • Urban Sustainability Society (formerly Urban Innovation School) • Support for children and youth's growth environment 'Kkumteo Jikimi'
	6.4 substantially increase water-use efficiency across all sectors	• Water resource recycling system • Installation of silt protectors while operating grit chambers, settling tanks, and nonpoint source pollution reduction facilities
	7.1 ensure universal access to affordable, reliable and modern energy services 7.2 increase substantially the share of renewable energy in the global energy mix 7.3 double the global rate of improvement in energy efficiency	• Strengthening low-carbon transition businesses (offshore wind power, LNG, etc.) • Development of real-time power monitoring systems for each site • Installation of rooftop solar panels on employee housing
	8.2 achieve higher levels of economic productivity through technological upgrading and innovation 8.3 promote development-oriented policies that encourage the formalization and growth of micro-, small- and medium-sized enterprises 8.7 eradicate forced labour and child labour 8.8 protect labour rights and promote safe and secure working environments for all workers 8.b develop and operationalize a global strategy for employment of the unprivileged	• Operation of the Shared Growth Support Team • Prohibition of forced labor and child labor in the Human Rights Charter • Field application of Smart Safety technology • Priority medical services for vulnerable workers such as the elderly and foreign workers • Implementation of Traveling Safety Bus training • Strengthening site-based occupational health and safety capabilities • Safety support for contractors • Operation of Eco & Rest: Mobile solar-powered rest area for workers

Key SDGs	Detailed objectives	POSCO E&C's contribution
	9.4 increased resource-use efficiency and greater adoption of clean and environmentally sound technologies 9.5 enhance scientific research, upgrade the technological capabilities of industrial sectors in all countries, encouraging innovation and substantially increasing the number of research and development workers	• Smart Building Safety Solutions • Operation of the Nuclear Power Business Division • Development of hybrid offshore wind floaters and automated optimal-design technologies for substructures • Expansion of the remodeling business • Securing HyREX core facility EPC capabilities
	10.3 ensure equal opportunity and reduce inequalities of outcome	• Implementing human rights impact assessment • Operation of human rights reporting and complaint handling channels
	11.1 ensure access for all to adequate, safe and affordable housing and upgrade slums 11.6 paying special attention to air quality and municipal and other waste management 11.b increase the number of cities and human settlements through resource efficiency	• Fire prevention, improvement of living environment and safety support • Housing support for the vulnerable 'Change My Town' • 'Healing Garden Creation' in partnership with Goyang City
	13.1 strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries 13.2 integrate climate change measures into national policies, strategies and planning 13.3 improve policies and institutional capacity on climate change mitigation, adaptation, impact reduction	• SBTi 2030 short-term carbon reduction target approved • Declaration of carbon neutrality by 2050 • Expansion of green procurement
	14.1 prevent and significantly reduce marine pollution, including marine debris and nutrient pollution	• Public-private cooperation 'Activities to create salt-tolerant plant communities' • Clean Ocean Volunteer Group
	15.5 take urgent and significant action to halt the loss of biodiversity and protect and prevent the extinction of threatened species	• Promotion of activities to protect legally protected species in each field
	16.5 substantially reduce corruption and bribery in all their forms	• Establishment of an ethical management promotion system • Clean POSCO System • Unethical behavior reporting system



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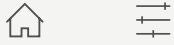
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Metric	SASB Code	Detailed indicators	Unit	POSCO E&C Response Status
Environmental Impacts of Project Development	IF-EN-160a.1	Number of incidents of non-compliance with environmental permits, standards and regulations	number	0 criminally punishable offences
	IF-EN-160a.2	Discussion of processes to assess and manage environmental risks associated with project design, siting and construction	N/A	In order to understand the impact on the surrounding environment before the start of a project, we conduct, predict and evaluate an environmental impact assessment according to the type and scope of the target business and obtain approval from the approval agency before carrying out construction. Before starting construction, we establish an environmental management plan for dust, noise and vibration, waste, etc. And prevent environmental damage in advance through periodic monitoring after starting construction. We are conducting thorough on-site environmental management through environmental management training, environmental incident response, community briefing sessions, etc.
Structural Integrity & Safety	IF-EN-250a.1	Amount of defect- and safety-related rework costs	presentation currency	KRW 48.9 billion
	IF-EN-250a.2	Total amount of monetary losses as a result of legal proceedings associated with defect- and safety-related Incidents	presentation currency	KRW 17.89 billion
Workplace Health & Safety	IF-EN-320a.1	(1) Total recordable incident rate(TRIR) and (2) fatality rate for (a) direct employees and (b) contract employees	%	Total Recordable Incident Rate (TRIR): 0.39(persons/200,000 working hours)
Lifecycle Impacts of Buildings & Infrastructure	IF-EN-410a.1	Number of (1) commissioned projects certified to a third-party multi-attribute sustainability standard and (2) active projects seeking such certification	number	• 17 total LEED certifications (2010-2018) • ZEB 5 Grade 1 completed (2017), ZEB 1 Grade 1 completed (2024), ZEB PLUS Grade 1 (2025) • 12 G-SEED certified buildings as of 2025 completion
	IF-EN-410a.2	Discussion of process to incorporate operational-phase energy and water efficiency considerations into project planning and design	N/A	To fundamentally reduce building energy loads, we are strengthening our passive design strategies. In alignment with green building certification standards for energy and environmental pollution, we are minimizing energy consumption by deploying highly insulated, airtight windows alongside advanced airtightness techniques. Furthermore, we are comprehensively expanding the use of green materials that hold Environmental Product Declarations (EPD) and low-carbon certifications. This approach allows us to effectively reduce carbon emissions and maximize resource circulation efficiency from a Life Cycle Assessment (LCA) perspective, encompassing everything from initial production and construction to final disposal. We seamlessly integrate active technologies to drive efficient energy production and consumption. We optimize equipment performance through high-efficiency LED lighting and advanced HVAC systems, while simultaneously improving our Energy Performance Index (EPI) scores by expanding the deployment of renewable energy sources such as photovoltaics (PV), building-integrated photovoltaics (BIPV), and geothermal systems. In terms of water stewardship, we are significantly increasing our water reuse rates by installing water-saving fixtures alongside rainwater harvesting and greywater recycling systems, thereby fulfilling rigorous green building criteria for water management and resource conservation. To ensure these systems maintain optimal performance, we are continually advancing our operational management frameworks. During the post-construction operational phase, we systematically analyze energy consumption through real-time monitoring and fine-tune system operations based on Zero Energy Building (ZEB) optimization guidelines. In parallel, we secure high ecological area ratios within our complexes and establish natural water circulation systems. Together, these efforts realize a highly sustainable maintenance model designed to minimize the environmental footprint throughout the entire lifecycle of our buildings.



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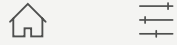
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Metric	SASB Code	Detailed indicators	Unit	POSCO E&C Response Status
Climate Impacts of Business Mix	IF-EN-410b.1	Amount of backlog for (1) hydrocarbon-related projects and (2) renewable energy projects	presentation currency	• Hydrocarbon-related project order backlog : KRW 88.4 billion (including coal, oil, etc., excluding gas power generation) • Backlog of orders for renewable energy projects : KRW 638.7 billion (including hydropower, water treatment, and renewable energy)
	IF-EN-410b.2	Amount of backlog cancellations associated with hydrocarbon-related projects	presentation currency	KRW 0 (no cancellation in 2025)
	IF-EN-410b.3	Amount of backlog for non-energy projects associated with climate change mitigation	presentation currency	KRW 2,861 billion (related to public transportation such as general railways, light rail, subways, and vehicle depots)
Business Ethics	IF-EN-510a.1	(1) Number of active projects and (2) backlog in countries that have the 20 lowest rankings in Transparency International’s Corruption Perception Index	number, presentation currency	KRW 2.4 billion (Venezuela)
	IF-EN-510a.2	Total amount of monetary losses as a result of legal proceedings associated with charges of (1) bribery or corruption and (2) anti-competitive practices	presentation currency	KRW 0 (no fines or settlements related to anti-corruption, bid-rigging, and bribery)
	IF-EN-510a.3	Description of policies and practices for prevention of (1) bribery and corruption, and (2) anti-competitive behaviour in the project bidding processes	N/A	1. Ethics charter 2. Code of ethics 3. Code of Ethics Implementation Guidelines 4. Conflict of Interest Prevention Code of Conduct 5. Fair Trade Voluntary Compliance Program Operation Regulations 6. Fair Trade Voluntary Compliance Program Operation Guidelines 7. Anti-corruption compliance guidelines 8. OECD Anti-Bribery Compliance Guidelines
Activity Metric	IF-EN-000.A	Number of active projects	number	150 (domestic 142, overseas 8)
	IF-EN-000.B	Number of commissioned projects	number	17 completed
	IF-EN-000.C	Total backlog	presentation currency	KRW 48,007.2 billion



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Assurance Statement

This Assurance Statement has been prepared for POSCO Eco & Challenge Co., Ltd.

Terms of Engagement

LRQA was commissioned by POSCO Eco & Challenge Co., Ltd. POSCO E&C) to provide independent assurance on its Greenhouse Gas (GHG) Inventory Report for the calendar year 2025 (the report) against the guidelines for target management” using “the verification guidelines for GHG emissions trading system”.

The report relates to direct GHG emissions and energy indirect GHG emissions.

Management Responsibility

LRQA’s responsibility is only to POSCO E&C. LRQA disclaims any liability or responsibility to others as explained in the end footnote. The management of POSCO E&C is responsible for preparing the report and for maintaining effective internal controls over all the data and information within the report. Ultimately, the report has been approved by, and remains the responsibility of POSCO E&C.

LRQA’s approach

LRQA’s assurance engagement has been carried out in accordance with our verification procedure using “the verification guidelines for GHG emissions trading system” to reasonable level of assurance. The following tasks were undertaken as part of the evidence gathering process for this assurance engagement:

- Visiting sites and auditing management system to control the data and records regarding GHG emissions and energy uses
- Interviewing the relevant persons responsible for managing and maintaining data and associated records
- Reviewing the historical data and information back to source for the calendar year 2025

Level of Assurance & Materiality

The opinion expressed in this Assurance Statement has been formed on the basis of a reasonable level of assurance, and at the materiality of the professional judgement of the verifier and at the materiality level of 5%.

LRQA’s Opinion

Based on LRQA’s approach, we believe that the report is prepared in accordance with the guidelines for target management” using the verification guidelines for GHG emissions trading system” and the GHG emissions data in the Table 1 is materially correct.

Dated: 20 Feb. 2026

IL-HYOUNG LEE

LRQA

2F T Tower, 30, Sowol-ro 2-gil, Jung-gu, Seoul, 04637, Korea

LRQA Reference: SEO6037695

Table1. Summary of GHG emissions

Unit: tCO₂eq

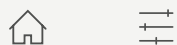
Scope of GHG emissions	2025
Direct GHG Emissions	5,336.287
Energy Indirect GHG Emissions	35,921.595
Total GHG Emissions	41,255

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LRQA Independent Assurance Statement

Relating to POSCO Eco & Challenge Co., Ltd.’s Report for the calendar year 2025

This Assurance Statement has been prepared for POSCO Eco & Challenge Co., Ltd. in accordance with our contract.

Terms of engagement

LRQA was commissioned by POSCO Eco & Challenge Co., Ltd. (hereinafter referred to as “POSCO E&C”) to provide independent assurance on its GHG emissions inventory for the calendar year 2025 (hereinafter referred to as “the report”) against the assurance criteria below to a limited level of assurance and materiality of 5% using ISAE 3000 and ISAE 3410.

Our assurance engagement covered POSCO E&C’s domestic and overseas operations and activities, and specifically the following requirements:

- Evaluating conformance with World Resources Institute / World Business Council for Sustainable Development Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard, revised edition¹
- Evaluating the accuracy and reliability of data and information for direct GHG emissions (Scope 1) and energy indirect GHG emissions (Scope 2) for overseas construction sites
- Evaluating the accuracy and reliability of data and information for other indirect GHG emissions (Scope 3) for domestic sites².

The main activities of POSCO E&C include construction and the GHG emissions have been consolidated using an operational control approach.

LRQA’s responsibility is only to POSCO E&C. LRQA disclaims any liability or responsibility to others as explained in the end footnote. POSCO E&C’s responsibility is for collecting, aggregating, analysing and presenting all the data and information within the report and for maintaining effective internal controls over the systems from which the report is derived. Ultimately, the report has been approved by, and remains the responsibility of POSCO E&C.

LRQA’s Opinion

Based on LRQA’s approach nothing has come to our attention that would cause us to believe that POSCO E&C has not, in all material respects:

- Met the requirements above; and
- Disclosed accurate and reliable data and information as summarized in Table 1 and Table 2 below.

The opinion expressed is formed on the basis of a limited level of assurance and at the materiality of 5%.

Note: The extent of evidence-gathering for a limited assurance engagement is less than for a reasonable assurance engagement. Limited assurance engagements focus on aggregated data rather than physically checking source data at sites. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

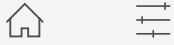
LRQA’s approach

LRQA’s assurance engagements are carried out in accordance with our verification procedure. The following tasks though were undertaken as part of the evidence gathering process for this assurance engagement:

- Interviewing key people of the organization responsible for managing GHG emissions data and records;
- Reviewing whether GHG emissions have been calculated with parameters from recognized sources;
- Verifying historical GHG emissions data and records at an aggregated level for the calendar year 2025; and
- Visiting POSCO E&C’s office in Incheon and reviewing additional evidence made available by POSCO E&C.

¹ <https://www.ghgprotocol.org>

² This engagement excludes verification of Scope 1 and 2 GHG emissions for domestic operations in accordance with our contract with POSCO E&C. The Scope 1 and 2 GHG emissions for domestic operations of POSCO E&C have been verified for the same reporting period by LRQA in accordance with the GHG Emissions Trading System of Korea.



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LRQA’s standards, competence and independence

LRQA implements and maintains a comprehensive management system that meets accreditation requirements for ISO 14065 Greenhouse gases – Requirements for greenhouse gas validation and verification bodies for use in accreditation or other forms of recognition and ISO/IEC 17021 Conformity assessment – Requirements for bodies providing audit and certification of management systems that are at least as demanding as the requirements of the International Standard on Quality Control 1 and comply with the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants.

LRQA ensures the selection of appropriately qualified individuals based on their qualifications, training and experience. The outcome of all verification and certification assessments is then internally reviewed by senior management to ensure that the approach applied is rigorous and transparent.

LRQA is POSCO E&C’s certification body for ISO 9001, ISO 14001, ISO 45001, ISO 50001, ISO 27001 and ISO 19443, and verification body for its greenhouse gas emissions. We also provide POSCO E&C with a range of training services related to management systems. The verification and certification assessments, together with the training, are the only work undertaken by LRQA for POSCO E&C and as such does not compromise our independence or impartiality.

Dated: 28 May, 2026

Tae-Kyoung Kim

LRQA Lead Verifier

On behalf of LRQA

2nd Floor, T Tower, 30, Sowol-ro 2-gil, Jung-gu, Seoul, Republic of Korea

LRQA reference: SEO00001257

Table 1. Summary of POSCO E&C’s Overseas Construction Sites, Scope 1 and Scope 2 GHG Emissions Inventory 2025

Scope of GHG emissions	Tonnes CO ₂ e
Direct GHG emissions (Scope 1)	1,194
Energy indirect GHG emissions (Scope 2, Location-based)	2,868

Note 1: Scope 2, Location-based is defined in the GHG Protocol Scope 2 Guidance, 2015

Table 2. Summary of POSCO E&C’s Domestic Sites, Scope 3 GHG Emissions Inventory 2025

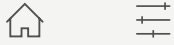
Scope of GHG emissions	Tonnes CO ₂ e
Other indirect GHG emissions (Scope 3)	2,807,006
Purchased goods & services – operation of construction equipment by subcontractors and production of ready-mix concrete, rebar, steel, cement, mortar, asphalt and PHC pile	1,010,186
Capital goods – laptop, desktop, monitors and tablets	3
Upstream transportation and distribution – transportation of ready-mix concrete	14,915
Waste generated in operations – treatment of wastes generated in construction sites	7,451
Business travel – personal cars, rental cars, buses, high-speed trains and domestic/ international flights	3,008
Employee commuting – commuter buses	338
Use of sold products – operation of apartment and office buildings	1,771,105

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Independent Practitioners’ Limited Assurance Report

To the management of POSCO Eco & Challenge Co., Ltd.

June 19, 2026

Conclusion

We have performed a limited assurance engagement on whether the below Sustainability Information in the Sustainability Report (“Report”) of POSCO Eco & Challenge Co., Ltd. (the “Company”) as of and for the year ended December 31, 2025 has been prepared in accordance with Criteria.

Subject Matter Information(“SMI”)	Period	Sustainability Report	Criteria
Global Reporting Initiative (GRI) Standards Index within the Report	As of and for the year ended 31 December, 2025	95p - 97p	GRI Standards (Global Reporting Initiative)
Sustainability Accounting Standards Board (SASB) Index within the Report	As of and for the year ended 31 December, 2025	100p - 101p	SASB Standards (Sustainability Accounting Standards Board)
ESG Data within the ESG Factbook	As of and for the year ended 31 December, 2025	86p - 94p	POSCO Group Index

causes us to believe that the Company has not complied as of and for the year ended December 31, 2025, in all material respects, with Criteria.

Our conclusion on the SMI does not extend to any other information that accompanies or contains the SMI and our report.

Basis for conclusion

We conducted our engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised) ‘Assurance Engagements Other Than Audits or Reviews of Historical Financial Information’, issued by the International Auditing and Assurance Standards Board (IAASB). Our responsibilities under this standard are further described in the “Our responsibilities” section of our report.

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA).

Our firm applies International Standard on Quality Management (ISQM) 1 ‘Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements’, issued by the IAASB. This standard requires the firm to design, implement and operate a system of quality management, including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

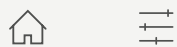
Responsibilities for the SMI

Management of the `Company is responsible for:

- designing, implementing and maintaining internal control relevant to the preparation of the SMI such that they are free from material misstatement, whether due to fraud or error;
- selecting or developing suitable criteria for preparing the SMI and appropriately referring to or describing the criteria used; and
- preparing the SMI in accordance with the Criteria.

Inherent limitations

The preparation of sustainability information requires management to establish or interpret the applicable criteria, determine the relevance of information to be included, and develop estimates and assumptions that affect the reported information. Entities may apply different but acceptable interpretations, judgments, and estimations. Sustainability information includes details about the company’s environmental, social, and governance (ESG) initiatives and goals, the anticipated future impact of events that have occurred or are expected to occur, and information regarding commitments and uncertainties. Actual results may differ significantly from management’s current assessments, as events and circumstances often do not unfold as expected.



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Our responsibilities

We are responsible for:

- planning and performing the engagement to obtain limited assurance about whether the SMI are free from material misstatement, whether due to fraud or error;
- forming an independent conclusion, based on the procedures we have performed and the evidence we have obtained; and
- reporting our conclusion to the management.

Summary of the work we performed as the basis for our conclusion

We exercised professional judgment and maintained professional skepticism throughout the engagement. We designed and performed our procedures to obtain evidence about the SMI that is sufficient and appropriate to provide a basis for our conclusion. Our procedures selected depended on our understanding of the SMI and other engagement circumstances, and our consideration of areas where material misstatements are likely to arise. In carrying out our engagement, the procedures we performed primarily consisted of:

- Understand the systems and processes for managing and reporting the identified sustainability information
- Review of documentation and interview with the personnel regarding the risk assessment process and materiality assessment
- Interview with the person in charge of managing and reporting the identified sustainability information related to material issues
- Review of the underlying data for sustainability information related to material issues
- Perform inquiries and analytical reviews on the SMI
- Perform limited verification on the data related to the SMI

- Verify that the financial information presented in the report is consistent with the audited financial statements of the Company
- Assess whether the information presented in the report is consistent with our overall knowledge and experience of the Company's sustainability performance

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Seoul, Korea
June 19, 2026

KPMG Samjong Accounting Corp.

This report is effective as of June 19, 2026, the assurance report date. Certain subsequent events or circumstances, which may occur between the assurance report date and the time of reading this report, could have a material impact on the Company's Sustainability Report. Accordingly, the readers of the assurance report should understand that the above assurance report has not been updated to reflect the impact of such subsequent events or circumstances, if any.

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Member Associations

As of June 2026



Construction Association of Korea



International Contractors Association of Korea



Korea Plant Industries Association



The Federation of Korean Industries



Korea Federation of Construction Contractors



Korea Electrical Contractors Association



Korea Construction Engineers Association



Korea Housing Association



Korea Atomic Industrial Forum



UN Global Compact Network Korea



Korea Fire Facility Association



Women in Innovation



Korea Society of Waste Management

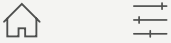


Korea Remodeling Association



Korea Wind Energy Industry Association

Total 92 Associations



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List of Certifications

(As of December 31, 2025)

Certification Name
ISO 14001 Environmental Management System Certification
ISO 50001 Energy Management System Certification
ISO 45001 Occupational Health and Safety Management System Certification
ISO 9001 Quality Management System Certification

Certification Name
ISO 27001 Information Security Management System Certification
Health-Friendly Workplace Certification (Ministry of Health and Welfare)
ASME Certification for Thermal and Nuclear Power Manufacturing and Construction
ISMS-P Certification (KISA)

Certification Name
Family-Friendly Corporate Certification (Ministry of Gender Equality and Family)
KEPIC Certification for Nuclear Power Construction and Design

List of Awards

Year	Event Name	Award Details	Organization
2025	CES 2025	Robot Innovation Award (Robot for creating roughness in concrete construction joints)	Consumer Technology Association
	The 21st Construction Environment Best Practice Competition	Minister of Land, Infrastructure and Transport Award (Carbon-reducing landscaping soil RE:CO Soil using domestic resources)	Korea Environment Construction Association
	Smart Construction Challenge	Best Innovation Award: Minister of Land, Infrastructure and Transport Award (AI-based ready-mix concrete quality prediction and production automation technology)	Minister of Land, Infrastructure and Transport
	The 15th Korea Landscape Architecture Awards	Minister of Environment Award, Minister of Culture, Sports and Tourism Award (The Sharp Jinju Pier, Park 1538)	Minister of Land, Infrastructure and Transport, Environment and Landscape Architecture Foundation
	2025 Korean Standard-Quality Excellence Index (KS-QEI)	Ranked 16th in the apartment category	Korean Standards Association
2024	2024 CDP KOREA Awards	Carbon Management Sector Honors	CDP Korea
	2024 Consumer Well-being Environment Satisfaction Index (KSWEI)	1st place for 5 years in a row	Korean Standards Association
	2024 Call Center Quality Index (KS-CQI)	Best Company and Apartment for 4 years in a row	Korean Standards Association
	IFLA AAPME(Africa Asia Pacific Middle East) Awards 2024	Grand Prize (The Sharp Gallery Rooftop Garden)	International Federation of Landscape Architects
	2024 Republic of Korea Landscape Award	Minister of Land, Infrastructure and Transport Award, Minister of Environment Award (POSCO Square Garden , The Sharp Gallery)	Minister of Land, Infrastructure and Transport, Environment and Landscape Architecture Foundation
	2024 Seoul Metropolitan City Landscape Award	Excellence Award (POSCO Square Garden, The Sharp Gallery)	Seoul Metropolitan Government
	2024 Gangnam-gu Beautiful Building	Special Award (POSCO Square Garden)	Gangnam-gu Office, Seoul
	Korea Concrete Institute Technology Award	Technology Award (Concrete Integrated Quality Management Intelligence Platform, POS-ICON)	Korea Concrete Institute
	2024 Good Design Product Selection	Excellence Product Selection and Bronze Award (Eco Lighting Leaf)	Ministry of Trade, Industry and Resources, Korea Institute of Design Promotion
	2024 Smart Construction Challenge	Infrastructure and Transport Minister’s Award (Songdo Korean American Town Phase 2 Development Project Site)	Minister of Land, Infrastructure and Transport
	Construction Environment Best Practice Competition	Minister of Environment Award (2 cases), National Assembly Member Award	Korea Environment Construction Association

