
THINKWARE

Human Rights Management Implementation Guidelines
Version 1.0.0

Human Rights Management Implementation Guidelines	Version: 1.0.0
	Date: 2019.07.01.

Revision History

Date	Version	Description	Written by
2019. 07. 01.	1.0.0	First Draft	Yoonhan Kim

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Chapter 1 General Provisions

Article 1 (Purpose)

This guideline is aimed at establishing and implementing policies on the protection and promotion of human rights of Thinkware Inc. (hereinafter referred to as the “company”) employees and stakeholders, and other necessary matters.

Article 2 (Scope of application)

This guideline applies to all employees and stakeholders of the company.

Article 3 (Definition)

The meaning of the terms used in this guideline is as follows.

1. “Human rights” refers to the dignity, values, freedoms and rights as a human being recognized in the international human rights treaties and customary international laws guaranteed by the Korean Constitution and laws, or acceded to and ratified by the Republic of Korea.
2. “Human rights management” means preventing the occurrence of human rights violations by the company and carrying out human rights–friendly management activities. The company promotes human rights management, fulfills its obligations to practice and inspection, and provides relief procedures for victims of human rights violations. Say what to offer.
3. “Employees” means executives and employees working for the company.
4. “Stakeholders” refers to employees, local residents, customers, etc. belonging to a partner company as a person related to the company's management activities.
5. “Partners” means subsidiaries and business partners that have business relationships with the company.

Chapter 2 General Principles of Human Rights Management

Article 4 (Basic Principles)

The company supports and complies with international standards and norms, including the UN Framework Charter on Human Rights.

Article 5 (non–discrimination in employment)

In employment, the company shall not discriminate on the basis of gender, age, race, religion, disability, education, geography, political orientation, etc.

Article 6 (Guarantee of freedom of association and collective bargaining)

- ① The company guarantees that employees can freely form a trade union, and should not impose any disadvantages for joining or working with a trade union.
- ② The company shall guarantee the right to collective bargaining through employee representatives, and provide information and resources necessary for the performance of labor union activities.

Article 7 (Prohibition of forced labor and child labor)

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- ① The company prohibits forced labor that is contrary to the employees' free will.
- ② The company prohibits the employment of persons under the age of 15, and in case of hiring persons under the age of 18, separate consideration should be given to the safety and guarantee of educational opportunities.

Article 8 (Occupational Safety Guarantee)

- ① The company provides a safe and hygienic work environment to its employees, guarantees the right to safety, and takes measures in accordance with relevant laws such as the 「Occupational Safety and Health Act」 for accidents or diseases that occur during work.
- ② The company must establish a system and environment that guarantees the safety of all stakeholders in carrying out the prescribed business.

Article 9 (Responsible Supplier Management)

- ① The company guarantees equal opportunities to all partners and conducts transparent and fair transactions.
- ② The company shall take care not to infringe on human rights, including business partners, in areas where business activities occur.
- ③ The company supports suppliers to practice human rights management, and can check whether suppliers have implemented human rights management through surveys or site visits.

Article 10 (Protection of local residents' human rights)

The company should take care not to infringe on the human rights of local residents in areas where business activities occur.

Article 11 (Environmental Right Guarantee)

- ① The company shall establish and maintain an environmental management system, and disclose environmental information internally and externally.
- ② The company adheres to the principle of a preventive approach to prevent local residents from experiencing various grievances, including harmful substances and noise, in areas where business activities occur.

Article 12 (Protection of Human Rights of Stakeholders)

- ① The company creates a system and environment so that there is no risk to the safety of all stakeholders in conducting business.
- ② The company strives to protect the human rights and personal information of all stakeholders.

Article 13 (Remedies)

The company provides prompt and appropriate remedies for human rights violations arising in the course of business promotion.

Chapter 3 Human Rights Management System

Article 14 (Human Rights Management Charter)

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The company proclaims the Charter of Human Rights Management in order to guarantee the dignity and value of human beings in all business activities, and the executives and employees use the Charter as the standard of conduct and value judgment of human rights management.

Article 15 (Establishment of Human Rights Management Plan)

The company establishes a regular plan to effectively promote human rights management, and includes the following items.

1. Goals and basic directions of human rights management
2. Human Rights Management Promotion Task and Implementation Strategy
3. Matters concerning human rights practice and inspection obligations such as human rights impact assessment
4. Other matters necessary for the protection and promotion of human rights

Article 16 (Department in charge of human rights management))

The company operates a human rights management department in charge of the following tasks to practice human rights management.

1. Matters concerning the establishment and implementation of the basic human rights management plan
2. Matters concerning the implementation of human rights education
3. Matters concerning the implementation of human rights impact assessment
4. Matters concerning human rights violation cases
5. Other matters deemed necessary by the president or the chairman of the Human Rights Management Committee

Article 17 (Human Rights Education)

- ① The company can regularly conduct human rights education to foster employees' awareness of human rights and to spread a culture of respect for human rights.
- ② The company can conduct human rights education for stakeholders and suppliers to foster human rights awareness and spread a culture of respect for human rights.
- ③ The education in Paragraphs 1 to 2 can be conducted in an appropriate manner, such as group education and cyber education, taking into account the company's annual curriculum and timing.

Article 18 (Support for Human Rights Implementation Activities)

In order to promote human rights protection and value enhancement, the company can provide support if necessary so that suppliers can practice human rights management.

Chapter 4 Human Rights Management Committee

Article 19 (Installation and Function)

- ① The company may establish a human rights management committee (hereinafter referred to as the "committee") for the efficient promotion and establishment of human rights management.
- ② The committee deliberates on the following matters to protect and promote the human rights of stakeholders including employees.

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1. Matters concerning the establishment of the basic plan for human rights management
 2. Conducting human rights impact assessment and recommending measures to be taken for the results
 3. Matters concerning remedy measures for cases of human rights violations
 4. Matters concerning systems and policies related to human rights management
 5. Other matters deemed necessary by the chairperson or president for the protection and promotion of human rights.
- ③ The committee may recommend necessary measures to the president after deliberation and resolution on the matters under paragraph (2).
- ④ The president shall take necessary measures, such as improvement, with respect to the recommendations of the committee pursuant to Paragraph 3, and if he/she does not take necessary measures, he/she shall report the reason to the committee.

Article 20 (Composition)

- ① The committee consists of no more than 5 members, including 1 chairman and 2 ex officio members, and is appointed by the president.
- ② The internal committee consists of a total of 3 members, and the head of the business management department and the head of the HR department are taken for granted.
- ③ External members are appointed as experts in legal, academic, and civil society organizations who represent stakeholders or have extensive experience in human rights, and consist of the same number of internal members, and the term of office is two years, but can be reappointed only once.
- ④ The president shall appoint one representative of the company's workers as a member of the committee, and the representative of the workers shall be the one recommended by the labor-management council.
- ⑤ The chairperson of the committee is elected and elected from among external members, and the secretary is the head of the personnel team.

Article 21 (Convocation and Meeting)

- ① Meetings of the committee are divided into regular meetings and extraordinary meetings.
- ② The chairperson convenes a regular meeting once a year, and when the president or chairman deems it necessary, or when there is a request of more than a third of the enrolled members, a temporary meeting is called.
- ③ The meeting of the committee is decided by the attendance of a majority of the enrolled members and the approval of a majority of the attending members. In the case of an equal number of members, the chairman has the right to decide.
- ④ The chairperson may make a written decision on matters that are insignificant or urgently needed.

Article 22 (Attendance Allowance)

Participation allowance and travel expenses can be paid to external members who attend the committee within the budget.

Article 23 (Listening of Opinions)

If necessary, the chairperson may listen to opinions by having the parties or related persons present in the meeting agenda.

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Article 24 (avoidance of conflict of interest)

The chairperson should exclude members who have an interest in a specific agenda from discussing the agenda.

Article 25 (prohibition of confidential leakage)

Members and related persons present at the meeting of the committee shall not divulge any secrets learned about the committee.

Article 26 (Cancellation of Members)

When a member falls under any of the following subparagraphs, the president may propose to the chairman to cancel the member. In this case, the chairperson shall convene the committee to deliberate and decide on a case concerning the dismissal of the member.

1. When the mission is not faithfully performed
2. When you disclose secrets, etc. learned on the job
3. When it is difficult to perform a job due to illness, etc.
4. If you are involved in human rights violations
5. When there is a change in the position of an external member at the time of appointment
6. When it is judged that the performance of the job is inappropriate due to other damage to dignity

Chapter 5 Human Rights Impact Assessment

Article 27 (Human Rights Impact Assessment)

- ① The company may conduct a human rights impact assessment for issues that affect the human rights of employees and stakeholders, such as organization management and major projects.
- ② Human rights impact assessment is supervised by the HR team, and relevant data for assessment can be requested from each department.
- ③ Human rights impact assessment can be conducted by entrusting it to an external specialized agency if it is deemed necessary.
- ④ The Committee deliberates and adopts the results of the human rights impact assessment.
- ⑤ Detailed procedures and methods for human rights impact assessment shall be implemented by establishing a separate plan according to the case.

Article 28 (Disclosure of Human Rights Management Information)

The company shall disclose information on human rights management, such as the results of human rights impact assessment, through the website.

Chapter 6 Remedies for Human Rights

Article 29 (Report and Reception of Human Rights Violation)

- ① A person who has been infringed on human rights (hereinafter referred to as “victim”) or a person who knows the fact may report it to the HR team leader through the following methods.
 1. Online report: SNS human rights report center, phone, email, etc. In this case, the person in

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charge of reception must write the details confirmed by the reporter in the report form in Attachment No. 1.

2. Offline reporting: human rights complaints, visit submissions, etc. In this case, the reporter must fill out and submit a report on human rights violations in the form of Attachment No. 1.
- ② The head of the HR team must submit a report on human rights violations or discrimination (hereinafter referred to as “human rights violations”) (in the attached form No. 2) and initiate an investigation for relief of the violations. However, this is not the case if it falls under any of the following subparagraphs.
 1. If the content of the report is clearly false or it is recognized that there is no reason
 2. When it is clear that the human rights victim does not want an investigation
 3. In the case of reporting more than one year after the fact that caused the report occurred. However, this is not the case if the committee decides to investigate the facts that caused the report to be investigated in cases where the statute of limitations or civil prescriptions have not been completed.
 4. When a trial, investigation by an investigative agency, audit or other rights remedy procedure is in progress or has been terminated with respect to the fact that caused the case at the time the case is reported
 5. The report was submitted anonymously or under a pseudonym. However, cases where it is not necessary to specify the reporter, such as suggestions for improving the human rights management system, are excluded.
 6. When it is deemed inappropriate to investigate the report by the committee
 7. When the reporter withdraws the report
 8. In the case of re-reporting the case for which the committee canceled the submission of the same fact
 9. Where the purpose of the report is contrary to the final judgment of the court or the decision of the Constitutional Court on the fact that caused the report.
- ③ In the event of a human rights violation, the head of the HR team must faithfully inform the victim about the remedy procedures of external organizations (National Human Rights Commission, prosecutors, police, etc.) separately from the company's human rights violation case handling procedure. You can apply.

Article 30 (handling of human rights infringement cases)

- ① If the case reported as a human rights violation does not fall under the subparagraphs of Article 29, Paragraph 2, the head of the HR team shall investigate and confirm whether there is a violation of human rights. If it is judged that there is a violation of human rights, the chairman and the president And the chairman or president shall decide to convene the committee.
- ② In principle, human rights violations are handled within 3 months from the date of receipt. However, if the deadline is extended due to unavoidable circumstances, the reason must be explained in writing to the victim.
- ③ However, if it is determined that the proposed human rights violations are not under the jurisdiction of the company or are not related to the human rights violations occurring in the port industry, the relevant information may be transferred to the relevant agencies (National Human Rights Commission, etc.).

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Article 31 (Investigation Method)

- ① Investigations under Article 30, Paragraph 1 are as follows.
 1. The head of the HR team may request the person in charge of the case related to the case to submit the data necessary for the investigation, and the person in charge of the relevant business shall respond to the request unless there is a special reason.
 2. The head of the HR team should listen to the opinions of the stakeholders related to the case of human rights violations, such as victims and respondents.
 3. When the investigation is completed, the HR team leader must prepare a report of the investigation result (attached sheet 3) and report it to the chairman and president.
- ② The chairman or the president decides to convene the committee after reviewing the results of the investigation, and the chairman can listen to the statement by having the parties or interested parties attend the committee if necessary.

Article 32 (Decision)

- ① After deliberating on the proposed case, the Committee shall make a decision to cite or dismiss the violation of human rights, and prepare a Deliberation and Resolution Form (Appendix No. 4).
- ② As a result of deliberating the proposed case, the committee decides to dismiss it if the contents of the case fall under any of the following subparagraphs, and the head of the personnel team shall notify the reporter of the decision of the committee in writing.
 1. When it is clear that the content of the case is not true or there is no objective evidence to admit that it is true
 2. In case the investigation does not correspond to violation of human rights or discrimination
 3. When it is recognized that no separate remedy is necessary, such as damage recovery has already been made.
- ③ The committee shall make a decision to cite human rights violations when it is determined that human rights violations are evident, such as those not falling under the subparagraphs of Paragraph 2 as a result of deliberating the proposed case.
- ④ When the committee makes a decision pursuant to Paragraph 3, the head of the HR team must notify the victim of the committee's decision in writing.

Article 33 (Follow-up measures)

- ① The president shall correct the violation of human rights violations and guidelines according to the decision of the committee, and take necessary measures for improvement, such as providing personnel measures and training to prevent recurrence for executives and employees who have committed human rights violations.
- ② If requested by the victim, the president can support the victim's psychological counseling by using legal advice using an in-house lawyer and the worker's psychological counseling program.
- ③ After the committee's decision, the HR team leader should strengthen monitoring to prevent retaliation for reporting or recurring human rights violations.

Article 34 (Guarantee of Reporter's Status)

- ① 위원회는 신고인과 신고내용에 대하여 비밀을 보장하여야 하며, 신고인 신고에 따른 불이익을 받지 아니하도록 필요한 조치를 취하여야 한다.
- ② 직무상 또는 우연히 신고자의 신분을 인지한 임직원은 신고자의 신분을 공개하여서는 아니 된다.

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- ③ 신고자의 신분이 공개된 때에는 회사는 그 경위를 조사하여야 하며, 조사 결과 신분 공개에 책임이 있는 자에 대하여 필요한 조치를 취하여야 한다.
- ④ 제1항에도 불구하고 불이익을 받은 신고인은 국가인권위원회에 보호조치 및 불이익의 구제 등을 요청할 수 있으며, 이 경우 회사는 적극 협조하여야 한다.
- ① The Committee shall ensure the confidentiality of the reporter and the contents of the report, and shall take necessary measures to prevent disadvantages from the reporter report.
- ② Employees who have recognized the reporter's identity on the job or accidentally shall not disclose the reporter's identity.
- ③ When the identity of the reporter is disclosed, the company shall investigate the circumstances and take necessary measures against the person responsible for the disclosure of the identity as a result of the investigation.
- ④ Notwithstanding Paragraph 1, the reporter who has suffered disadvantages may request protection measures and relief from disadvantages to the National Human Rights Commission of Korea, and in this case, the company must actively cooperate.

Article 35 (Consultation on Human Rights Violation)

- ① When it is unclear whether or not the guidelines are violated while performing a job, executives and employees can take care of it after consulting with the HR team leader.
- ② The president may take necessary measures, such as communication channels, so that the consultation pursuant to Paragraph 1 can be smoothly performed.

Addendum

These guidelines will be effective from July 01, 2019.

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【Appendix No. 1 Format】

Human Rights Violation Report			
1. Reporter			
Name*	D.O.B* . . .	Gender*	Nationality*
Address*			
Contact (phone, mobile phone or email)*			
2-1. Victim (Please write if the reporter and the victim are different.)			
Name*	D.O.B* . . .	Gender*	Nationality*
Address*			
Contact (phone, mobile phone or email)*			
Relationship with reporter *		Others	
2-2. If the reporter and the victim are different, did the victim know they are consulting?			
<input type="radio"/> ① I know and want to investigate () <input type="radio"/> ② I know but do not want to investigate () <input type="radio"/> ③ I don't know () <input type="radio"/> ④ I know, but I don't know if you want to investigate ()			
3. Who has violated the victim's human rights or committed discrimination?			
Name		Department	
Contact			
4. About human rights violations or discrimination against victims			
<input type="radio"/> ① Have you filed a complaint, complaint, or complaint with an investigation agency? <input type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="radio"/> ② Have you ever filed a remedy procedure by a rights remedy agency such as the court or the Constitutional Court? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, when and in whose name? <input type="checkbox"/> When () <input type="checkbox"/> Agency and case number ()			

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③ Have you ever filed a complaint with the National Human Rights Commission on the same matter?
 Yes No

If yes, when and in whose name?
 When () Who ()

5. What content of human rights violations or discrimination did the victim have?

Name	Department
------	------------

Content (If there is not enough space to write, please keep writing on the attached sheet)

If you have any evidence or data to help prove or see someone who has seen or is familiar with human rights abuses or discrimination that the victim has suffered, please write.

7. Attached documents: Yes (document name:) No

Reporter (signature or seal)

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【Appendix No. 2 Format】

Receipt and handling of human rights violation cases

Receipt No	Received on	Reporter		Contents	Processing result	Reply date	Department head check
		Dept.	Name				

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【Appendix No. 3 Format】

Investigation and results of human rights violations

Receipt No.			Received in		
			Investigation period		
Reporter	Dept.		Respondent	Dept.	
	Name			Name	
Content					
Result of Investigation					
Opinion of department in charge					

Date:

Human Resources Team Leader, THINKWARE Corporation (Signature)

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【Appendix No. 4 Format】

Human Rights Management Committee deliberation resolution

Regarding the (draft) submitted to the 0st THINKWARE Corporation's Human Rights Management Committee, the committee deliberates and decides as follows.

Case Name	
Decision	

Date:

Chairman, Human Rights Management Committee, THINKWARE Corporation (Signature)
 Commissioner (Signature)
 Commissioner (Signature)
 Commissioner (Signature)
 Commissioner (Signature)