Dear Special Rapporteurs Pesce, Bennoune, de Varennes, Shaheed, Obokata, Melzer and Mullally,

I am writing on behalf of LG Display Co., Ltd. (“LG Display”) in relation to your letter dated 12 March 2021 (Reference: AL OTH 127/2021).

First of all, thank you for your letter and providing LG Display with an opportunity to address the issues that you raise. LG Display takes its obligations and responsibilities to ensure respect for human rights very seriously, and we have considered carefully the matters set out in your letter in order to ensure that we can provide you with a comprehensive response to your questions.

LG Display has investigated its suppliers’ potential involvement in the human rights abuses described in your letter

In March 2020, LG Display learned from the Policy Brief Report No. 26/2020 of Australia Strategic Policy Institute1 (the “Report”) that it had been alleged that LG Display had potentially benefitted, either directly or indirectly, from the use of Uyghur workers in forced labor programs and that some of our business partners may have consequently been connected to purported human rights abuses, as described in your letter.

As soon as we learned of these allegations, we immediately started investigating the issue and identified two companies with whom we had had dealings as potentially implicated in the issues described in the Report.

The first company was a supplier with whom we had contemplated entering into a business relationship in early 2016. In said event, we decided not to proceed and consequently have never been in a business relationship with this entity.

The second company was a supplier with whom we had been in a business relationship since 2015. We contacted the supplier in order to raise our concerns about the alleged human rights abuses referred to in the Report, following which the supplier affirmed to us that no forced labour was used in connection with our business relationship. Nonetheless, we undertook our own due diligence process in order to investigate the allegations described in the Report. As part of this process, we reminded the supplier of LG Display’s Supplier Responsibility Code of Conduct2 (“SR Code”), which prohibits forced labor and discrimination against minorities, and subsequently conducted an on-site investigation with a third-party auditor qualified by the Responsible Business Alliance (“RBA”). Through the third-party auditor, we performed individual interviews of the supplier’s employees. The results of these interviews did not present any indications of forced labour, discrimination or other kinds of human rights abuses. As our investigations did not identify any evidence of the alleged forced labor or discrimination against minorities, we did not report the matter to the relevant authorities. We did, however, formally terminate the supply contract and ended the business relationship with that supplier in 2020.

Accordingly, we do not have any outstanding business relationships with any entity identified in the March 2020 Report, or otherwise implicated in the forced labor programs and human rights abuses described in your letter.

2 http://www.lgdisplay.com/fileDownload?familySeq=dFSqSYXSnNm0DB2og8GHCLB7gFOqK2mhAVzaXr0cA%3D
LG Display’s internal policies and procedures

LG Display has adopted its own SR Code based on global standards in relation to the protection of human rights in the areas of safety, environment, health, labor and others, and implemented the SR Code for personnel of LG Display and its business partners throughout our supply chain. Through strict adherence to and implementation of the SR Code, LGD seeks to respect employees’ rights, establish a safe working environment, implement environmentally friendly policies and maintain an ethical corporate culture.

In order to ensure that our business partners comply with the SR Code, we perform on-site audits. If we identify any violations of the SR Code, we require our business partners to supplement, improve or cure such violation within a defined period, which will be monitored through follow-up field inspections. The SR Code also requires our business partners to communicate with sub-suppliers to ensure their compliance with their own code of conduct. In turn, we, as a supplier to global IT companies, are contractually required to comply with our customers’ supplier responsibilities and are periodically audited for our own compliance. As such, we have tried to establish and actively participate in an integrated evaluation and monitoring mechanism throughout the entire supply chain from top to bottom.

Shortly after the allegations set out in your letter came to our attention, we reviewed the matter with our compliance department in order to set up a process by which we would utilize the leverage in our business relationships with our partners to prevent and mitigate against possible human rights abuses. In April 2020, we reminded our business partners of the prohibition of any kind of forced labor as well as discrimination against minorities by sending official letters in which we underscored the need for compliance with LGD’s SR Code. We also provided online training on forced labor and other human rights issues addressed in the SR Code to both our employees in manufacturing sites outside Korea as well as employees of our principal suppliers. Through this training, we sought to enhance their awareness and knowledge of these issues and provide them with the tools to identify and report human rights abuses they may encounter while conducting business. We plan to continue providing appropriate training for those who have a need to be familiar with such issues in order to prevent, mitigate or remedy human rights abuses. We also implemented a requirement that our major suppliers be contractually obliged to comply with and be regularly assessed on their compliance with the SR Code. In addition, we ensured that a failure to remedy any violation of the SR Code will be considered a material breach of our contract and impact any future business we may have with them.

Further, in order to enhance our ability to directly receive any grievances from employees of LG Display or our business partners, we operate an online grievance system, including LG Group Jung-Do Management (corporate social responsibility) which is accessible on our website and an employee grievance report system on LG Display’s intranet. The online grievance systems are open to LG Group personnel and employees of our suppliers and other business partners, who can anonymously make a direct report on any human rights abuses they may experience. Upon receiving such reports, we provide the complainant with feedback in accordance with our internal procedures and take measures to protect him or her until the reported case is resolved. We regularly review our grievance mechanism in order to ensure that it is compliant with international standards, such as the codes and guidelines of the International Labor Organization, RBA and United Nations Global Compact as well as local laws and regulations. Its effectiveness is also periodically evaluated by a third party auditor.

3 https://ethics.lg.co.kr/main/en.do
The fact that we have these procedures in place underscores the seriousness with which LG Display takes the issue of human rights and we reaffirm our commitment to ensure continuous compliance with our human rights related obligations and responsibilities, both internally and externally. In this regard, we recently joined the RBA as a part of our efforts to strengthen our responsibility throughout the supply chain and are also in the process of expanding the scope of due diligence on our business partners. LG Display will continuously comply with international human rights standards and reinforce our due diligence procedures to monitor, identify and prevent any human rights abuses within our business practice and supply chain.

We thank you for the opportunity to respond to your letter. Please let us know if we can be of any further assistance.

Yours sincerely,

JaeHoon Yang
Executive Vice President
LG Display Co., Ltd.