Revision History	No.	Date of Establishment/ Revision	Enforcement Date	Description
	0	2024.12.02	2024.12.02	Initial Establishment
	1	2026.01.02	2026.01.02	First revision

Hyundai Polytech
The Code of Conduct
for Business Partners

Approval	Prepared by	Reviewed by	Approved by	Authorized by	CEO
					

Table of contents

1. Overview

A. Purpose of the Code of Conduct

B. Scope and Applicability of the Code of Conduct

C. Roles and Responsibilities of Business Partners

2. Ethics

A. Transparent Management and Anti-Corruption

B. Prevention of Conflicts of Interest

C. Prevention of Unfair Trading Practices

D. Prevention of Counterfeit Parts

E. Compliance with Export Controls and Economic Sanctions

F. Protection of Information

G. Protection of Intellectual Property

H. Responsible Sourcing of Materials

3. Environment

A. Establishment of Environmental Management System

B. Management of Energy Use and Greenhouse Gas Emissions

C. Management of Water Resources

D. Management of Air Pollutants

E. Management of Ozone-Depleting Substances (ODS)

F. Management of Resource Circulation and Waste

G. Management of Chemicals

H. Noise Management

I. Animal Welfare

J. Protection of Biodiversity and Prohibition of Deforestation

4. Labor and Human Rights

A. Prohibition of Child Labor

B. Prohibition of Forced Labor

C. Prevention of Discrimination and Harassment

D. Compensation and Employee Welfare

E. Management of Working Hours

F. Humane Treatment

G. Freedom of Association and Collective Bargaining

H. Ethical Recruitment

5. Safety and Health

A. Establishment of Safety and Health Management System

B. Safety Management of Machinery, Equipment, and Facilities

C. Emergency Preparedness and Response

D. Management of Safety-Related Incidents

E. Safety Risk Assessment

F. Health Care Management

G. Safety and Health of Contractors

H. Prohibition of Hazardous Work for Vulnerable Workers

6. Management System

A. Establishment of the Code of Conduct and Disclosure of Corporate Commitment

B. Appointment of Responsible Personnel

C. Risk Identification and Assessment

D. Education and Communication

E. Information Management

F. Operation of Grievance Mechanism

G. Preparation of Remediation Measures

H. Management of Suppliers and Sub-suppliers

I. Compliance with the Code of Conduct

7. Supply Chain Due Diligence

1. Overview

A. Purpose of the Code of Conduct

Hyundai Polytech recognizes ethical and responsible management as a core principle of sustainable management and pursues sustainable growth together with its customers, business partners, and local communities through the establishment of a fair and transparent supply chain.
This Supplier Code of Conduct sets forth the fundamental principles and standards that business partners are expected to consider and follow in the areas of ethics, environment, labor and human rights, occupational health and safety, and management systems. It has been established to support the development of a sustainable supply chain and to enable a systematic response to applicable ESG-related laws and regulations, as well as global supply chain requirements.
This Code of Conduct has been developed with reference to applicable domestic and international laws, internationally recognized standards, and global supply chain due diligence frameworks. Where any provision of this Code conflicts with applicable local laws or regulations, the applicable laws and regulations of the relevant jurisdiction shall prevail.

B. Scope and Applicability of the Code of Conduct

This Code of Conduct applies to all domestic and overseas business partners and their employees that provide goods or services to Hyundai Polytech or maintain other business relationships with Hyundai Polytech.
Hyundai Polytech supports its business partners in understanding and implementing the principles and requirements of this Code of Conduct. Business partners are encouraged, where appropriate, to communicate the key principles of this Code to their suppliers and sub-suppliers and to promote responsible supply chain management throughout their value chain.

C. Roles and Responsibilities of Business Partners

Business partners shall consider this Code of Conduct in their managerial decision-making and business operations and are responsible for complying with all applicable laws, regulations, and contractual obligations.
Business partners shall endeavor to manage risks related to ethics, the environment, labor and

human rights, occupational health and safety, and other sustainability-related matters, and actively participate in the establishment of a responsible supply chain.
Hyundai Polytech may establish and operate policies, procedures, and management systems necessary to support the enhancement of business partners' sustainability performance and the management of supply chain ESG risks.
Material violations of this Code of Conduct or a demonstrated lack of commitment to improvement may affect business partner selection and the continuation of business relationships.
This Code of Conduct is not intended to cover every detailed implementation requirement. Hyundai Polytech may review and revise this Code periodically to reflect changes in supply chain conditions, applicable laws and regulations, and evolving global ESG expectations.
Hyundai Polytech provides business partners with relevant documents, guidance materials, and other appropriate resources to support their understanding and implementation of this Code of Conduct. Business partners are encouraged to communicate the principles and key requirements of this Code to their suppliers and other supply chain participants, where appropriate.

2. Ethics

A. Transparent Management and Anti-Corruption

① Hyundai Polytech business partners shall comply with all applicable anti-corruption laws and regulations in the countries and regions where they operate.
② Business partners shall prohibit their directors, officers, and employees from directly or indirectly offering, promising, giving, requesting, or accepting bribes, improper payments, gifts, entertainment, hospitality, kickbacks, or any other undue benefits by taking advantage of their position or authority.
③ Business partners shall not engage in any promise, proposal, provision, acceptance, or arrangement intended to obtain improper business advantages or to improperly influence contract awards, pricing, supplier selection, evaluation, procurement, or other business decisions.
④ Business partners shall endeavor to establish and operate appropriate internal controls, procedures, education programs, and reporting mechanisms to prevent corruption and unethical conduct.

B. Prevention of Conflicts of Interest

① Business partners shall prevent situations where personal interests of directors, officers, or employees could influence, or appear to influence, business decisions involving Hyundai Polytech or the business partner.
② A conflict of interest refers to any situation in which personal interests, family relationships, financial interests, or other private relationships may impair, or appear to impair, objective and impartial business judgment.
③ Business partners shall not pursue personal gain or provide, promise, request, or accept improper benefits that may cause damage to the company or any third party. All business activities shall be conducted responsibly in accordance with established authority and procedures.

C. Fair Competition

① Business partners shall comply with applicable competition and antitrust laws and regulations in the countries where they operate.
② Business partners shall not abuse market dominance or superior bargaining position, nor engage in price fixing, bid rigging, unfair trade practices, or any conduct that may restrict fair competition.
③ Business partners shall make payments to suppliers and sub-suppliers in accordance with agreed contractual terms and shall not unreasonably delay, withhold, or arbitrarily adjust such payments.

D. Prevention of Counterfeit Parts

① Business partners shall not manufacture, procure, distribute, or use unauthorized, counterfeit, or altered materials or parts.
② Business partners shall endeavor to operate management procedures to verify that raw materials and components used throughout production and supply processes comply with contractual requirements, technical specifications, and applicable laws.
③ Where counterfeit or non-conforming parts are identified or suspected, business partners shall promptly notify Hyundai Polytech and cooperate in implementing appropriate corrective measures.

E. Compliance with Export Controls and Economic Sanctions

① Business partners shall comply with applicable export control, trade compliance, economic

sanctions, and international trade regulations.

② Business partners shall not conduct transactions with countries, regions, organizations, entities, or individuals subject to applicable export controls or economic sanctions and shall endeavor to establish appropriate internal procedures to ensure compliance.

③ Upon request by Hyundai Polytech, business partners shall cooperate in providing information necessary to confirm compliance with export control and economic sanctions requirements.

F. Protection of Information

① Business partners shall protect all confidential information obtained through business relationships with Hyundai Polytech, including trade secrets, technical information, and personal data of Hyundai Polytech, customers, suppliers, and other business partners.

② Business partners shall comply with applicable laws governing the collection, use, storage, transfer, and disposal of information and shall not use or disclose confidential information without proper authorization.

G. Protection of Intellectual Property

① Business partners shall respect intellectual property rights owned by Hyundai Polytech and other business partners, including patents, trademarks, copyrights, designs, technical documents, and proprietary technologies.

② Business partners shall establish appropriate measures to prevent infringement of intellectual property rights and shall endeavor to take prompt corrective actions where potential infringement is identified.

H. Responsible Sourcing of Materials

① Business partners shall endeavor to source conflict minerals and other responsible minerals in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains and applicable laws and regulations and may refer to the Responsible Minerals Assurance Process (RMAP) or equivalent internationally recognized verification programs where appropriate.

② Business partners shall endeavor to establish and operate management processes capable of identifying the countries and regions of origin of raw materials, components, and parts directly or indirectly used in products supplied to Hyundai Polytech.

③ Business partners shall not directly or indirectly procure or use raw materials, components, or products manufactured using forced labor at any stage of the supply chain.
④ Business partners shall endeavor to establish processes to identify the origin and smelters of conflict minerals, responsible minerals, and other major raw materials used in products.
⑤ Through such processes, business partners shall endeavor to identify significant social and environmental risks, including human rights violations, unethical practices, and adverse environmental impacts associated with countries of origin or smelters, and shall review appropriate corrective actions where necessary.
⑥ Where business partners primarily handle minerals or major raw materials, they shall endeavor to verify whether mining and processing activities are associated with human rights violations, unethical conduct, or adverse environmental impacts and may utilize relevant supporting information or appropriate verification processes where necessary.

3. Environment

A. Establishment of Environmental Management System

① Hyundai Polytech business partners shall comply with all applicable environmental laws and regulations in the countries and regions where they operate and shall obtain and maintain all required environmental permits, licenses, and approvals necessary for business operations.
② Business partners shall endeavor to establish and operate an environmental management system that includes organizational structure, planning, implementation, monitoring, and performance evaluation in order to systematically manage and mitigate environmental impacts arising from business activities.
The management system may reflect internationally recognized environmental management standards such as ISO 14001.

B. Management of Energy Use and Greenhouse Gas Emissions

① Business partners shall endeavor to establish systems capable of measuring and recording energy consumption and greenhouse gas (GHG) emissions at the company-wide or site level.
② Business partners shall continuously promote activities to improve energy efficiency and minimize greenhouse gas emissions arising from their operations.
③ In accordance with internationally recognized standards such as the GHG Protocol, business

partners shall endeavor to annually quantify and document Scope 1 (Direct Emissions), Scope 2 (Indirect Emissions from Purchased Energy), and, where applicable, Scope 3 Category 1 (Purchased Goods and Services), and transparently manage reduction targets or related management activities.

C. Management of Water Resources

① Business partners shall measure and manage water consumption, wastewater discharge, and water pollutants in accordance with applicable laws and shall endeavor to establish management systems to ensure the proper operation of pollution prevention facilities.
② Business partners shall endeavor to reduce water consumption, promote water reuse and recycling, and manage wastewater in compliance with applicable legal standards.
③ Business partners shall establish and operate appropriate procedures to prevent stormwater contamination and the discharge of contaminated stormwater or hazardous substances into stormwater drainage systems.

D. Management of Air Pollutants

① Business partners shall monitor and manage air emissions in accordance with applicable environmental regulations and shall endeavor to establish management systems for the proper operation of air pollution control facilities.
② Business partners shall endeavor to minimize air emissions through appropriate process controls and pollution reduction measures and shall comply with applicable emission standards.

E. Management of Ozone-Depleting Substances (ODS)

① Business partners shall periodically identify and record the use of ozone-depleting substances and shall endeavor to consider environmentally preferable alternatives wherever practicable.
② Where the use of such substances is unavoidable, business partners shall conduct appropriate risk assessments and establish suitable control measures to minimize impacts on human health and the environment.
③ Business partners shall endeavor to reduce the use of ozone-depleting substances, promote their gradual replacement, and provide related information upon Hyundai Polytech's request where appropriate.

F. Management of Resource Circulation and Waste

① Business partners shall operate waste management systems in accordance with applicable laws for the proper segregation, storage, transportation, treatment, and disposal of waste.
② Business partners shall endeavor to reduce landfill and incineration waste through reuse, recycling, recovery of raw materials, and resource circulation activities.
③ Business partners shall endeavor to minimize adverse environmental impacts throughout the entire life cycle of products and services.

G. Management of Chemicals

① Business partners shall endeavor to ensure the safe transportation, storage, handling, use, and disposal of chemicals and shall identify, label, or disclose hazard information in accordance with applicable regulations.
② Business partners shall operate appropriate management procedures to comply with legal and customer requirements concerning hazardous substances contained in products and shall maintain relevant information where necessary.

H. Noise Management

① Business partners shall endeavor to manage workplace and community noise in compliance with applicable legal standards and to minimize potential impacts on employees and surrounding communities.

I. Animal Welfare

① Where animal testing is unavoidable, business partners shall comply with applicable animal welfare laws and regulations.
② Business partners shall respect internationally recognized principles of animal welfare, including the Five Freedoms promoted by the World Organisation for Animal Health (WOAH), where applicable.

J. Protection of Biodiversity and Prohibition of Deforestation

① Business partners shall endeavor to recognize the impacts and dependencies of their business activities on biodiversity and establish appropriate measures to prevent, reduce, and mitigate adverse impacts.
② Business partners shall endeavor to establish procedures to identify risks associated with deforestation within their business activities and supply chains and take appropriate actions where significant risks are identified.

4. Labor and Human Rights

A. Prohibition of Child Labor

① Business partners shall not employ children below the minimum working age prescribed by applicable laws, the compulsory education age, or the age of 15, whichever is higher, at any stage of production.
② Business partners shall apply a zero-tolerance approach to child labor and shall verify the age of employees through legally acceptable documentation such as government-issued identification.
③ Where young workers are employed, business partners shall not assign them to hazardous work and shall ensure that their education opportunities are not restricted.
④ Business partners shall endeavor to avoid conducting business with suppliers or sub-suppliers that employ child labor and shall take appropriate corrective actions where such practices are identified.

B. Prohibition of Forced Labor

① Business partners shall prohibit all forms of forced labor and shall not engage in physical or psychological coercion, including violence, threats, confinement, debt bondage, or human trafficking.
② Business partners shall endeavor to recognize and manage risks associated with forced labor in high-risk regions, operations, or business relationships.
③ Business partners shall endeavor to provide employees with education or awareness programs regarding the prohibition of forced labor and the requirements of this Code of Conduct.
④ Where forced labor is identified, business partners shall promptly implement corrective actions and cooperate with Hyundai Polytech by providing relevant information regarding the issue and corrective measures.

C. Prevention of Discrimination and Harassment

① Business partners shall prohibit discrimination in recruitment, promotion, compensation, training, and other employment practices on the basis of gender, nationality, race, religion, disability, age, marital status, pregnancy, or any other status protected by applicable laws.
② Business partners shall prohibit sexual harassment, workplace harassment, verbal abuse, intimidation, and all forms of inhumane treatment and shall implement appropriate preventive and management measures in accordance with applicable laws and internal policies.

D. Compensation and Employee Welfare

① Business partners shall pay wages in accordance with applicable laws and employment agreements within the prescribed payment period and shall provide employees with understandable wage statements.
② Business partners shall endeavor to operate employee welfare programs that contribute to improving employees' well-being and quality of life.

E. Management of Working Hours

① Business partners shall comply with applicable laws governing working hours and shall manage total working hours, including overtime, within legal limits.
② Business partners shall respect employees' rights to adequate rest and shall provide appropriate compensation for overtime work in accordance with applicable laws.

F. Humane Treatment

① Business partners shall respect employees' privacy and dignity and shall prohibit workplace harassment and any form of inhumane treatment.
② Business partners shall comply with applicable personal data protection laws and safeguard employees' personal information.

G. Freedom of Association and Collective Bargaining

① Business partners shall respect employees' rights to freedom of association and collective

bargaining in accordance with applicable laws and regulations.

H. Ethical Recruitment

① Except where required by applicable laws, business partners shall not retain, confiscate, conceal, destroy, or otherwise restrict employees' access to personal identity documents, including identification cards, passports, or driver's licenses.
② Business partners shall not require employees to pay recruitment fees or other charges as a condition of employment.
③ Business partners shall ensure that all employees receive written employment terms and conditions, or that such terms are explained in a language that employees understand before commencing employment.

5. Safety and Health

A. Establishment of Safety and Health Management System

① Hyundai Polytech business partners shall comply with all applicable occupational health and safety laws and regulations in the countries where they operate and shall obtain and maintain all permits, licenses, and approvals required for their business operations.
② Business partners shall endeavor to establish and operate an occupational health and safety management system consisting of planning, implementation, operation, monitoring, and continual improvement activities to prevent occupational accidents and work-related illnesses.
The management system may reflect internationally recognized occupational health and safety management standards such as ISO 45001.

B. Safety Management of Machinery, Equipment, and Facilities

① Business partners shall periodically inspect and assess the safety of hazardous machinery, equipment, and facilities used in their operations.
② Business partners shall install and properly maintain safety devices, machine guards, emergency stop devices, and other protective measures necessary to prevent occupational accidents.
③ Business partners shall provide employees with appropriate personal protective equipment (PPE).

Such equipment shall be suitable for the work environment, readily available, properly maintained, and effectively used.

C. Emergency Preparedness and Response

① Business partners shall establish emergency preparedness and response plans covering natural disasters, infectious disease outbreaks, fires, and occupational accidents. Appropriate procedures for reporting, emergency response, and follow-up actions shall also be maintained.
② Business partners shall endeavor to conduct emergency response education or drills in consideration of applicable legal requirements and the nature of their business operations.
③ Business partners shall ensure that evacuation routes, emergency lighting, fire detection and alarm systems, and firefighting equipment are appropriately installed and regularly inspected to ensure proper operation.

D. Management of Safety-Related Incidents

① Business partners shall endeavor to maintain procedures for recording and managing occupational accidents, near misses, work-related illnesses, and other safety-related incidents.
② Where safety-related incidents occur, business partners shall investigate the root causes and endeavor to establish and implement appropriate corrective and preventive measures.
③ In the event of a serious occupational accident or work-related illness, business partners shall immediately take appropriate actions, including suspension of hazardous work where necessary and protection of affected employees.

E. Safety Risk Assessment

① Business partners shall conduct workplace risk assessments or equivalent safety inspections in accordance with applicable laws to identify accident risks and hazardous factors.
② Business partners shall provide employees with information regarding workplace hazards and safety risks identified through such assessments. Such information shall be communicated in a language understood by employees and made readily accessible.
③ Business partners shall not assign pregnant employees or young workers to high-risk tasks and shall endeavor to provide an appropriate working environment for socially vulnerable employees, including persons with disabilities and migrant workers.

F. Health Care Management

① Business partners may provide rest areas, restrooms, and dining facilities for employees and shall endeavor to maintain cleanliness when such facilities are provided.
② Business partners may provide dormitories for employees and, when provided, shall ensure adequate safety signage, lighting, heating and cooling, and appropriate access control to restrict unauthorized entry.
③ Business partners shall conduct regular general or special health examinations for employees in accordance with applicable health screening laws in the countries where they operate. Where necessary based on examination results, business partners shall implement measures such as changes to work assignments, job transfers, or reductions in working hours.

G. Safety and Health of Contractors

① Business partners shall endeavor to ensure that contractors performing work on behalf of the company are provided with an appropriate level of occupational health and safety protection while carrying out such work.

H. Prohibition of Hazardous Work for Vulnerable Workers

① Business partners shall not assign overtime work, night work, or hazardous duties to young workers and shall not assign work that may pose risks to the health or safety of pregnant or postpartum employees.

6. Management System

A. Establishment of the Code of Conduct and Disclosure of Corporate Commitment

① Business partners shall endeavor to establish a Code of Conduct or equivalent internal standards appropriate for compliance and ESG management.
② Business partners shall endeavor to communicate their commitment to sustainable management and the principles of this Code of Conduct to their employees.
③ Where appropriate, business partners may communicate their commitment to sustainable management internally through management messages, internal guidelines, or company bulletin

boards and externally through corporate websites, sustainability reports, or other communication channels.

B. Appointment of Responsible Personnel

① Business partners shall endeavor to designate personnel or management representatives responsible for compliance and sustainability-related activities.
② Business partners shall endeavor to assign appropriate responsibilities for planning, implementing, and monitoring sustainability-related activities.

C. Risk Identification and Assessmen

① Business partners shall endeavor to identify risks related to ethics, the environment, labor and human rights, occupational health and safety, and other compliance areas that may arise during business operations.
② Where significant risks are identified, business partners shall endeavor to establish and implement appropriate mitigation measures.
③ Business partners shall endeavor to record and manage significant risks and related improvement actions.

D. Education and Communication

① Business partners shall endeavor to provide employees with education or awareness programs regarding this Code of Conduct and applicable laws and regulations.
② Business partners may communicate implementation plans and performance related to this Code of Conduct to employees where appropriate.

E. Information Management

① Business partners shall endeavor to accurately record and maintain information relating to ethics, environmental management, labor and human rights, occupational health and safety, and other compliance matters based on actual business operations.
② Where disclosure of such information is requested by applicable laws, industry associations, or major customers, business partners shall endeavor to provide such information transparently to the

extent permitted by applicable laws.

F. Operation of Grievance Mechanism

① Business partners shall endeavor to operate a grievance mechanism or equivalent procedures through which employees may report violations related to ethics, the environment, labor and human rights, occupational health and safety, or other compliance matters, or raise concerns regarding infringement of their rights or interests.
② Business partners shall protect the confidentiality of reporters and reported information and shall endeavor to prevent any form of retaliation, discrimination, dismissal, intimidation, or other unfair treatment resulting from good-faith reporting.

G. Remediation

① Where business activities result in adverse sustainability impacts, business partners shall endeavor to establish appropriate corrective or remedial measures considering the nature and significance of such impacts.
② Where appropriate, business partners may consider the views of affected stakeholders when determining corrective or remedial measures.

H. Management of Suppliers and Sub-suppliers

① Business partners shall endeavor to communicate the importance of ethics, environmental management, labor and human rights, occupational health and safety, and other compliance requirements to major suppliers and sub-suppliers involved in the planning, design, manufacture, sale, or delivery of products and services, and to share the principles of Hyundai Polytech's Supplier Code of Conduct where appropriate.
② Where business partners become aware of legal violations or significant ESG risks involving suppliers, sub-suppliers, or other supply chain participants, they shall endeavor to encourage or recommend appropriate corrective actions.

I. Compliance with the Code of Conduct

① Within the scope permitted by applicable laws, business partners shall cooperate with ESG

self-assessments (SAQ), document reviews, or on-site assessments conducted by Hyundai Polytech or third parties designated by Hyundai Polytech.

② Business partners shall prepare and maintain documentation and records necessary to demonstrate compliance with this Code of Conduct, and such records shall be based on actual business operations.

③ Where improvement opportunities are identified through ESG self-assessments (SAQ), document reviews, or on-site assessments, business partners shall establish and implement appropriate corrective action plans.

④ Hyundai Polytech may review the implementation status of corrective actions and, where material non-compliance or failure to improve is identified, may consider appropriate measures such as additional assessments, review of business conditions, or reconsideration of the business relationship.

⑤ Upon request by Hyundai Polytech, business partners may submit an ESG Compliance Commitment and Hyundai Polytech may incorporate key ESG requirements into new or renewed business agreements where appropriate.

7. Supply Chain Due Diligence

(Hyundai Polytech Supplier Code of Conduct)

① Within the scope of applicable laws and regulations, business partners shall endeavor to identify and manage risks related to human rights, labor, the environment, occupational health and safety, ethics, and other sustainability matters that may arise throughout their supply chains.

② Business partners shall endeavor to establish supply chain risk management processes appropriate to the size and nature of their business, taking into consideration the six-step due diligence framework set forth in the OECD Due Diligence Guidance for Responsible Business Conduct.

• Establish policies for responsible business conduct and integrate them into management systems.

• Identify and assess actual and potential adverse impacts on stakeholders arising from business activities and supply chain operations.

• Cease, prevent, or mitigate adverse impacts and implement appropriate action plans.

• Monitor the implementation and effectiveness of measures taken to address identified

risks.

• Communicate due diligence policies, procedures, and implementation activities to relevant stakeholders, where appropriate.

• Provide or cooperate in appropriate remediation where adverse impacts have occurred.

③ Business partners shall endeavor, where appropriate, to communicate the principles and key requirements of this Code of Conduct to their major suppliers and sub-suppliers.

④ Where business partners become aware of significant ESG risks or potential legal non-compliance within their supply chains, they shall endeavor to take reasonable measures to prevent, mitigate, or address such risks.