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Hyundai Polytech Anti-Corruption & Bribery Policy

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Approval					

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1. General Provisions

1.1 Purpose

Hyundai Polytech establishes this Anti-Corruption & Bribery Policy to prevent corruption, bribery, conflicts of interest, anti-competitive practices, and unfair transactions, and to ensure that all employees perform their duties in a fair, transparent, and ethical manner in compliance with applicable laws and ethical standards

1.2 Scope of Application

This Policy applies to all employees of Hyundai Polytech at its headquarters, domestic and overseas business sites, and research and sales organizations. It also applies, where relevant, to business partners such as suppliers, vendors, agents, distributors, and other third parties acting on behalf of Hyundai Polytech.

1.3 Applicable Laws and Standards

Hyundai Polytech complies with the applicable laws and regulations of the Republic of Korea, including [The Act on the Prohibition of Improper Solicitation and Receipt of Money and Valuables](commonly known as the “Improper Solicitation and Graft Act”), [The Criminal Act], and [The Monopoly Regulation and Fair Trade Act], andwhere necessary in connection with international business activitiesand transactions, refers to international anti-corruption standards, including the U.S. Foreign Corrupt Practices Act(FCPA) and the U.K. Bribery Act.

2. Principles of Anti-Corruption and Anti-Bribery

2.1 Fundamental Principles

Hyundai Polytech adopts a zero-tolerance approach to corruption and bribery. All employees shall conduct business with integrity, transparency, and fairness at all times.

2.2 Definition of Corruption and Bribery

Corruption and bribery refer to any act of offering, promising, giving, requesting, or receiving money, gifts, hospitality, favors, donations, sponsorships, or any other tangible or intangible benefits for the purpose of obtaining improper business advantages.

2.3 Prohibition of Bribery and Improper Benefits

Employees of Hyundai Polytech shall not offer, provide, request, or accept any improper benefits that exceed socially accepted norms in relation to their duties.

2.4 Prevention of Improper Solicitation and Conflicts of Interest

Employees shall not engage in improper solicitation or accept such solicitation. Any situation in which personal interests may conflict with the interests of Hyundai Polytech must be promptly disclosed and appropriately managed.

2.5 Gifts, Entertainment, and Hospitality

Gifts, entertainment, and hospitality shall be limited to modest and customary levels permitted by applicable laws and internal guidelines, and shall be subject to prior approval or post-reporting as required by Hyundai Polytech.

2.6 Transactions with Government and Public Officials

All transactions involving government entities or public officials shall strictly comply with applicable laws and regulations, and no actions that may be perceived as improper influence or solicitation shall be permitted.

2.7 Prohibition of Facilitation Payments

Facilitation payments intended to expedite routine governmental actions are strictly prohibited, except in exceptional circumstances involving immediate threats to life, health, or safety.

2.8 Donations and Sponsorships

All donations and sponsorships shall be conducted transparently in accordance with internal procedures. Political donations and sponsorships are strictly prohibited.

3. Policy Implementation and Control

3.1 Training and Awareness

Hyundai Polytech provides regular training and awareness programs to ensure that employees understand and comply with this Policy.

3.2 Internal Control and Monitoring

Hyundai Polytech monitors corruption and bribery risks in key business areas, including accounting, procurement, and contracting, and operates appropriate internal control measures.

3.3 Disciplinary Measures

Any violation of this Policy may result in disciplinary action in accordance with Hyundai Polytech's internal regulations.

4. Ethics Reporting and Protection System

4.1 Operation of Ethics Reporting Channels

Hyundai Polytech operates ethics reporting channels that allow employees and stakeholders to report suspected corruption, bribery, conflicts of interest, or unfair practices.[www.hdsr.co.kr/contact/contact.php]

4.2 Protection of Whistleblowers

Hyundai Polytech ensures confidentiality and protects whistleblowers from retaliation or any form of disadvantage.

4.3 Reporting and Investigation Procedures

All reports shall be investigated in accordance with established procedures, and appropriate corrective or disciplinary measures shall be taken based on the investigation results.