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# Hyundai Polytech
# Code of Conduct

| Approval | Prepared by | Reviewed by | Approved by | Authorized by | CEO |
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# Chapter 1. General Provisions

## Article 1 (Purpose)

This Code of Conduct establishes the ethical standards and responsibilities to be observed by all employees of Hyundai Polytech in order to ensure compliance with applicable laws and regulations, promote ethical management, respect human rights, protect occupational health and safety, preserve the environment, and achieve sustainable management.

The purpose of this Code is to strengthen trust with customers, employees, business partners, shareholders, local communities, and other stakeholders by promoting integrity, transparency, and responsible business conduct throughout all business activities.

## Article 2 (Scope of Application)

This Code of Conduct applies to all employees and executives of Hyundai Polytech.

Hyundai Polytech may encourage temporary employees, dispatched personnel, contractors, and other individuals performing work on behalf of the Company to observe the principles and intent of this Code of Conduct.

The Company also endeavors to communicate the principles of this Code of Conduct to business partners, supply chain participants, and other stakeholders in order to promote a culture of sustainable and responsible business conduct.

## Article 3 (Status of the Code of Conduct and Responsibilities)

① This Code of Conduct serves as the fundamental standard governing all business activities, policies, and internal regulations of Hyundai Polytech.

② All employees shall understand, comply with, and uphold the principles of this Code of Conduct and shall report any violations in accordance with applicable internal procedures.

③ In operating this Code of Conduct, Hyundai Polytech may refer to internationally recognized standards, including the United Nations Global Compact (UNGC), the OECD Guidelines for Multinational Enterprises, the ILO Core Conventions, the UN Guiding Principles on Business and Human Rights (UNGPs), the Responsible Business Alliance (RBA) Code of Conduct, and the Drive Sustainability Guiding Principles.

# Chapter 2. Ethics and Compliance

### Article 4 (Compliance with Laws and Regulations)

① Employees shall comply with all applicable domestic and international laws, regulations, international standards, and Company policies in performing their duties.

② Employees shall faithfully fulfill legal obligations related to fair competition, customs, rules of origin, import and export controls, personal data protection, and other regulatory requirements applicable to the Company's business activities.

### Article 5 (Anti-Corruption and Prohibition of Improper Conduct)

① Employees shall not offer, promise, provide, request, or accept bribes, improper payments, gifts, entertainment, hospitality, or any other undue benefits in connection with business activities.

② Employees shall not engage in corruption, improper solicitation, embezzlement, breach of trust, fraud, money laundering, or any other unethical or unlawful conduct.

③ Employees shall perform all duties with integrity, transparency, and fairness, and shall avoid any conduct that may undermine the Company's ethical standards.

### Article 6 (Prevention of Conflicts of Interest)

Employees shall avoid situations in which personal interests conflict, or may reasonably appear to conflict, with the interests of Hyundai Polytech.

Employees shall promptly disclose any actual or potential conflict of interest in accordance with the Company's internal procedures and shall not use their position, authority, or confidential information to obtain improper personal benefits or benefits for any third party.

## Chapter 3. Human Rights and Labor

### Article 7 (Respect for Human Rights)

① Hyundai Polytech respects internationally recognized human rights and does not tolerate any act that infringes upon the dignity or fundamental rights of individuals.

② The Company prohibits workplace harassment, sexual harassment, verbal abuse, violence, intimidation, and any other form of inhumane treatment.

③ The Company prohibits retaliation against employees or stakeholders who report human rights concerns or violations in good faith.

### Article 8 (Prohibition of Discrimination and Forced or Child Labor)

① The Company prohibits discrimination in employment and the workplace on the basis of gender, age, nationality, race, religion, disability, educational background, marital status, political opinion, or any other characteristic protected by applicable laws.
② The Company prohibits all forms of forced labor, debt bondage, human trafficking, and any other form of involuntary labor.
③ The Company does not employ child labor in violation of applicable laws and regulations.
④ The Company respects the rights of foreign workers and shall provide a fair and non-discriminatory working environment.

### Article 9 (Working Conditions and Freedom of Association)

① Hyundai Polytech complies with applicable labor laws and regulations and endeavors to ensure fair working conditions, including wages, working hours, holidays, leave, and statutory employee benefits.
② The Company respects employees' rights to freedom of association and collective bargaining in accordance with applicable laws and regulations.
③ The Company operates grievance handling procedures through which employees may freely raise concerns, report grievances, or provide suggestions without fear of retaliation.

## Chapter 4. Safety and Health

### Article 10 (Establishment of a Safe Working Environment)

① Hyundai Polytech places the safety and health of employees as a key priority in its business operations and endeavors to provide a safe and healthy working environment.
② The Company conducts risk assessments, safety training, and accident prevention activities to identify and reduce workplace hazards.
③ Employees shall comply with safety rules and promptly report any hazards, unsafe conditions, or potential risks identified in the workplace.

### Article 11 (Compliance with Occupational Safety and Health Laws)

Hyundai Polytech complies with applicable occupational health and safety laws and regulations and continuously improves its occupational health and safety management system to prevent accidents and protect employees' health.

## Chapter 5. Environmental Responsibility

### Article 12 (Compliance with Environmental Laws and Regulations)

① Hyundai Polytech complies with all applicable environmental laws, regulations, permits, and other environmental requirements in the countries and regions where it operates.

② The Company endeavors to prevent environmental pollution, minimize adverse environmental impacts, and promote environmentally responsible business practices.

③ The Company endeavors to measure, manage, and reduce greenhouse gas emissions and energy consumption through continuous environmental improvement activities.

### Article 13 (Environmental Protection and Climate Change Response)

① Hyundai Polytech recognizes its responsibility to protect the environment and endeavors to minimize environmental impacts arising from its business activities.

② The Company endeavors to respond proactively to climate change by promoting greenhouse gas reduction, energy efficiency improvement, and sustainable resource management.

③ The Company endeavors to improve resource efficiency, reduce waste generation, and promote reuse and recycling wherever practicable.

④ The Company endeavors to conserve biodiversity and prevent deforestation by considering environmental impacts throughout its business activities and supply chain, where appropriate.

## Chapter 6. Fair Trade and Information Protection

### Article 14 (Fair Competition)

Hyundai Polytech is committed to fair, transparent, and responsible business practices and complies with all applicable competition and antitrust laws and regulations.

The Company does not engage in unfair trade practices, abuse of market position, collusion, bid rigging, price fixing, or any conduct that may restrict fair competition.

### Article 15 (Protection of Information and Intellectual Property)

① Employees shall protect confidential information, trade secrets, technical information, personal data, and other proprietary information belonging to Hyundai Polytech, its customers, suppliers, and other business partners.

② Employees shall respect intellectual property rights, including patents, trademarks, copyrights, industrial designs, technical documentation, and proprietary technologies, and shall not improperly use or infringe upon the intellectual property rights of others.
③ Employees shall comply with the Company's information security and cybersecurity policies and shall appropriately manage information assets to prevent unauthorized access, disclosure, alteration, loss, or misuse.

## Chapter 7. Responsible Supply Chain

### Article 16 (Internal Responsibility for a Responsible Supply Chain)

① Hyundai Polytech endeavors to identify, assess, and manage ESG-related risks throughout its supply chain in order to establish a sustainable and responsible supply chain.
② The Company may conduct ESG assessments, document reviews, on-site assessments, and other appropriate activities for business partners and suppliers to evaluate ESG performance and promote continuous improvement.
③ The Company manages its supply chain by considering applicable laws and regulations, customer requirements, and internationally recognized standards related to responsible business conduct and supply chain due diligence.

### Article 17 (Alignment with the Supplier Code of Conduct)

① Hyundai Polytech operates and maintains a Supplier Code of Conduct and may request its business partners to comply with the principles and requirements set forth therein.
② The Company may conduct ESG Self-Assessments (SAQ), document reviews, on-site assessments, and corrective action activities for business partners where appropriate.
③ Hyundai Polytech may request business partners to submit an ESG Compliance Commitment and other relevant information necessary for responsible supply chain management.
④ The Company endeavors to strengthen supply chain ESG management through communication, education, and cooperation with its business partners.

## Chapter 8. Reporting and Protection

### Article 18 (Reporting of Violations)

Employees who become aware of any violation of this Code of Conduct, applicable laws, or the Company's internal regulations may report such matters through the Company's established reporting procedures.

Hyundai Polytech may operate appropriate reporting channels, including anonymous reporting channels where permitted by applicable laws.

### Article 19 (Protection of Whistleblowers)

① Hyundai Polytech protects the identity and confidentiality of individuals who report concerns or violations in good faith.

② The Company strictly prohibits retaliation, discrimination, intimidation, or any other disadvantage against whistleblowers.

③ Reported matters shall be reviewed objectively, fairly, and confidentially in accordance with the Company's internal procedures and applicable laws.

## Chapter 9. Supplementary Provisions

### Article 20 (Enforcement and Revision)

This Code of Conduct shall become effective upon approval by the Chief Executive Officer.

The Company may review and revise this Code of Conduct from time to time to reflect changes in applicable laws and regulations, international standards, business operations, and stakeholder expectations.