

# **HD Hyundai Infracore Code of Conduct for Partner Companies**

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## Preface

HD Hyundai Infracore created this internal Code of Conduct to strengthen compliance management and build our sustainable supply chain.

This Code of Conduct stipulates basic matters that a partner company shall comply as a supplier/ vendor of products and services to HD Hyundai Infracore or enters into an agreement with us for other dealings. In addition, the relevant partner company may recommend its subcontractors in the downstream supply chain to be in compliance therewith.

This Code of Conduct defines the requirements for labor and human rights, safety and health, environment, ethics and management system based on global standards such as the UN Guiding Principles on Business and Human Rights (UNGPs), the OECD Guidelines for Multinational Enterprises and the ILO Fundamental Conventions.

A partner company shall perform self-evaluation regularly, formulate a plan to reduce and mitigate risks with regard to any violations confirmed through an inspection and due diligence, as well as implement it.

In the case where this Code of Conduct conflicts with local laws, the stricter one shall take precedence.

HD Hyundai Infracore intends that this Code of Conduct will create an opportunity for a partner company to duly fulfill their social responsibility and further strengthen win-win partnerships.

## **1. Labor and Human Rights**

### **1.1 Prohibition of Discrimination (Recognition of Diversity)**

In the employment practices such as employment and promotion, reward, provision of educational and training opportunities, a partner company shall not discriminate against its employees, recruits, or candidates on the grounds of race, skin color, age, gender, sexual orientation, ethnicity, disability, health status, pregnancy, religion, political bias, union affiliation, nationality, and marital status. Other than exceptional cases attributable to local laws or workplace safety, medical examinations shall not be mandated as it may be unfairly used as grounds for discrimination against employees, recruits, or candidates.

### **1.2 Protection of Basic Human Rights**

A partner company shall respect each and every employee, shall not treat an employee severely or inhumanely, including but not limited to sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, verbal abuse, and unreasonable restrictions in the workplace, as well as ensure that there are no threats as to such treatment. A partner company shall prepare regulations and procedures for the humane treatment of employees and protection of basic human rights, and then sufficiently explain them to employees.

### **1.3 Prohibition against Employment of Minors**

A partner company shall not employ minors in any manufacturing process. A partner company shall comply with the ILO Minimum Age Convention and not employ those who are under the minimum employable age according to local laws. Employees under the age of 18 shall not perform work in high-risk tasks/processes (including overtime/overnight work) with due care for safety and health. In the case where a trainee program is implemented, management action shall be taken for trainees separate from general employees in compliance with local laws.

#### **1.4 Protection of Employee Treatment**

A partner company shall ensure that each employee's working days and hours do not exceed the maximum numbers stipulated in local laws. At least one day off shall be given every seven (7) days and any overtime work shall be performed voluntarily with the employee's consent. A partner company shall comply with local laws and protect the basic treatment of employees such as wage and welfare benefits and the details of an employee's wage and deduction shall be provided using a payslip created in the language that foreign employees can understand.

#### **1.5 Prohibition of Forced Labor**

A partner company shall not force labor against an employee's free will through assault, threat, confinement, and any other methods of unlawfully restraining mental or physical freedom. A partner company shall not demand that an employee transfer his/her ID card, passport or work permit as a condition for employment, nor demand a commission in exchange for employment from him/her.

#### **1.6 Freedom of Association/ Assembly**

A partner company shall ensure that employees have the right to organize and join an association of employees or a labor union, the right to associate with other employees for collective bargaining and peaceful assembly, and the right not to participate therein pursuant to local laws.

In addition, there shall be no discrimination, retaliation, threat, and bullying against a labor union, so that employees and their representatives shall be able to share opinions freely with senior management with regard to working conditions and management policies.

## **2. Safety and Health**

### **2.1 Industrial Safety Management**

A partner company shall remove physical risk factors in advance and take preventive measures through proper design, engineering, administrative control, preventive maintenance, and safe work procedures. In addition, management is duly required to protect employees from exposure to potential risk factors such as chemicals, electrical shocks, other energy sources, fire, vehicular accidents, and danger of falls. If such measures are deemed to be incapable of controlling risk factors sufficiently, proper personal protective equipment shall be provided to employees.

### **2.2 Preparation for Emergency**

A partner company shall identify potential emergencies and accidents in advance, and prepare an emergency response plan and response procedures including escape facilities for exiting in the event of an emergency, firefighting facilities, and recovery plan. In addition, it is required to have capabilities to respond to an emergency through regular education and training sessions based on plans and manuals.

### **2.3 Industrial Accidents and Disease Control**

A partner company shall be equipped with the procedures and system to prevent, control, trace, and report industrial accidents and illnesses/ diseases. Herein, included are the regulations that encourage employees to report any abnormalities, classify, and record industrial accidents and illnesses/ diseases, provide necessary medical care, and take corrective measures on detecting root causes, thereby facilitating employees to return to work safely.

## **2.4 Management of Exposure to Harmful Factors**

A partner company shall identify chemically, biologically, and physically hazardous factors likely to be exposed to in the workplace, remove or replace any such risk factors, or reduce risk exposure below the safe limit by taking technical and administrative measures. In the case where the risk factors are not controlled sufficiently, proper personal protective equipment shall be provided to employees.

## **2.5 Equipment Safety Management**

A partner company shall regularly conduct safety inspections on machinery, work tools, and equipment in the workplace. Safety equipment and a protective wall shall be installed to protect employees from safety accidents while using machinery, tools, and equipment, all of which shall be maintained and managed to perform their function safely and as intended.

## **2.6 Hygiene and Facility Management**

A partner company shall provide a resting place, toilet, restaurant, drinking water, etc. to employees, and maintain such facilities cleanly and safely. In the case where a dormitory is provided to employees, it shall be hygienic and clean, and provide a proper exit, airconditioning & heating, firefighting facilities, ventilation, personal locker or room, and an environment granting reasonable access rights.

## **2.7 Safety and Health Education**

A partner company shall provide safety and health education in a language foreign employees can understand. Safety and health education shall be provided regularly, including work assignment and transfer, while information related to safety and health shall be posted in a conspicuous and visible location in the workplace.

### **3. Environment**

#### **3.1 Acquisition of Environment Permission**

A partner company shall acquire and manage environmental permission necessary for the operation management of the workplace, and reflect the latest amendments of laws at all times. In addition, it is required to conform to the requirements such as operations and reports that are necessary in the process of acquiring permission.

#### **3.2 Management of Hazardous Substances**

A partner company shall identify any and all chemicals and other substances hazardous to human health and likely to pollute the environment, and manage the historical records of safe handling and the movement of such substances, safe storage, use and discarding thereof. In addition, it is required to comply with local laws that prohibit or regulate the use and handling of specific substances.

#### **3.3 Management of Environmental Pollutants**

In treating waste water, waste, air pollutants, and ozone layer-depleting substances generated from equipment, work process and hygiene facilities in the workplace, a partner company shall establish and operate the safety management system with regard to the comprehensive steps for pollutants, as well as comply with control, treatment methods, and the maximum permissible limit stipulated in local laws.

#### **3.4 Prevention of Pollution and Reduction of Resource Use**

A partner company shall reduce pollution sources such as waste water and waste by using methods such as efficiency of production and maintenance process and facilities, substitution of raw material, and recycling & reuse of raw material, as well as improve efficiency in using resources and water.

### **3.5 Response to Regulations of Product Environment**

A partner company shall comply with local laws and regulations on prohibition or restriction of the use of specific substances, including recycling and treatment labeling related to products.

### **3.6 Management of Energy Consumption and Greenhouse Gas Emissions**

A partner company shall identify energy consumption and direct and indirect greenhouse gas emissions (Scopes 1&2) at the enterprise and worksite levels according to stages. In addition, it is mandated to find a cost effective way to minimize energy consumption and greenhouse gas emissions while simultaneously improving energy efficiency.

## **4. Ethics and Fair Trade**

A partner company shall comply with the Code of Ethics for Partner Companies of Hyundai Heavy Industries Group.

### **4.1 Compliance with Business Ethics**

A partner company shall comply with local laws and regulations and abide by the ethical standards of the highest level in all and any business relationships. Unethical conduct in any form, such as corruption, extortion, embezzlement, bribery, and business-related entertainment shall be strictly prohibited. A partner company shall implement monitoring and clampdown procedures against such conduct and thus warrant autonomous ethics compliance from employees.

### **4.2 Compliance with Fair Trade**

A partner company shall not offer nor accept any means of taking profits through unfair or improper dealings in business. Local laws and regulations related to fair trade shall be complied with and the standards for fair advertising and competition shall be observed.



### **4.3 Transparent Information Disclosure**

A partner company shall accurately record information related to the actual condition of labor, safety, and, health & environment management; management activities; corporate governance; and financial structure, and openly disclose information pursuant to relevant local laws & regulations and general industrial practices.

### **4.4 Protection of Intellectual Property**

A partner company shall not infringe nor unlawfully use other people's intellectual property such as patents, software, designs and trademarks. Any technical material, information, and intellectual property acquired in the course of business dealings shall be protected proactively, while transfer of technology and know-how shall be implemented in a way to protect such rights.

### **4.5 Protection of Personal Information**

A partner company shall take systematic measures to protect personal information of all and any stakeholders related to corporate management, and prepare and manage overall procedures for handling and using personal information according to local laws.

### **4.6 Responsible Management of Raw Materials**

If it is reasonably suspicious that raw materials in use are unlawful or raw materials have an adverse effect on the environment or have been procured through unethical methods, a partner company shall establish policies to avoid the use thereof.

In accordance with the OECD Due Diligence Guidance for Responsible Supply Chain of Minerals and Conflict-Affected, High Risk Areas (CAHRA), raw materials and minerals such as tin, tantalum, tungsten, and gold from a specific country of origin shall not be used in the supply chain of the Company without any exceptions.

To this end, a partner company shall trace whether such materials are used in all and any supply chains including a country of origin of relevant materials and customer company, and make efforts in earnest not to use conflict minerals in production process.

In addition, relevant evidence materials including a certificate of the country of origin shall be submitted upon request from HD Hyundai Infracore.

## **5. Management System**

### **5.1 Establishment of Management System**

A partner company shall construct a business management system to comply with this Code of Conduct, the laws related to the promotion of business and customer requirements, while the competent representative shall regularly inspect the current operation status of the business management system, including the pursuit of continued improvement. A partner company shall express its commitment to fulfill its social responsibility in an official written form, and post it internally and externally.

### **5.2 Response to Laws and External Requirements**

A partner company shall identify the latest laws and regulations related to the promotion of business and customer requirements, and establish and operate a process to reflect them to management activities.

### **5.3 Risk Management**

A partner company shall identify potential risks in labor & human rights, ethics, environment, safety, and health related to business operations, formulate measures to reduce the risks, and then implement them.

### **5.4 Goal Setting and Management**

A partner company shall set performance goals and an execution plan to improve social and environmental performance, and carry out regular inspections and evaluations.

### **5.5 Receipt of Employee Opinion & Improvement and Grievance Settlement**

A partner company shall collect employees' opinions on standards and conditions applicable to this Code of Conduct, and establish a process to undertake improvement activities. In addition, employees shall be protected so that they can provide grievances and opinions without fear of disadvantageous measures such as dismissal, threats, and retaliation.

### **5.6 Corporate Training and Communication**

A partner company shall operate a training program for employees to comply with this Code of Conduct and laws, and communicate accurate and precise information on the partner company's policies, goals, and performance to employees, subcontractors, and customers.

### **5.7 Supply Chain Management**

A partner company shall recommend its subcontractors (customer company) to comply with law and regulations in the areas of labor & human rights, ethics, environment, safety, and health, as well as make efforts to incentivize them to undertake improvement activities.