

 <b>HYUNDAI</b>	<b>HMMA Business Partner Code of Conduct</b>	
	<b>HR-AL-LG-S-00021</b>	
Revision Date : 11/2/2023	Owner : Kyu Young Lee	Revision Level : 5


Hyundai Motor Manufacturing Alabama, LLC (“HMMA”) prides itself on its relationships with its suppliers, vendors, customers, contractors, and business associates (hereinafter collectively referred to as “HMMA Business Partners”). HMMA strives to promote a mutually beneficial business relationship with each HMMA Business Partner based upon the highest standards of conduct. This document sets forth minimum workplace standards and business practices that are expected of every current or potential HMMA Business Partner. These standards were established to ensure that all HMMA Business Partners are aware of HMMA’s expectations of them to conduct business with integrity and respect and in full compliance with applicable law.

**1. Business Ethics**

HMMA Business Partners are expected to adhere to the highest standards of ethical conduct when dealing with their employees, suppliers, vendors, customers, contractors, business associates, governmental entities, and the public.

HMMA Business Partners are also expected to be familiar with and strictly follow HMMA’s Business Ethics Policy (HR-AL-TR-S-00054) when interacting with HMMA Team Members. Among other things, HMMA’s Business Ethics Policy prohibits HMMA Team Members from soliciting and/or accepting (and HMMA Business Partners from offering and/or providing):

- Gifts given to HMMA Team Members on a single occasion that have a value in excess of \$50.00, or gifts given to a Team Member on multiple occasions throughout the calendar year that have an aggregate value in excess of \$100.00.
- Entertainment (*e.g.*, tickets to sporting events, plays, or charity events, golf outings, receptions, conference / convention expenses) provided to Team Members on a single occasion that have a value in excess of \$100.00, or entertainment provided to Team Members on multiple occasions throughout the calendar year that has an aggregate value in excess of \$200.00. The entertainment provided must have a clear business purpose or objective, and there must be an expectation of reciprocity (*i.e.*, HMMA Team Member paying for the next similar entertainment event) within a reasonable time period.
- Meals provided to HMMA Team Members on a single occasion that have a value in excess of \$75.00, or meals provided to a Team Member on multiple occasions throughout the calendar year that have an aggregate value in excess of \$150.00.

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The meal provided must have a clear business purpose or objective, and there must be an expectation of reciprocity (*i.e.*, HMMA Team Member paying for the next meal) within a reasonable time period.

- Airfare, hotels, transportation, or lodging of any kind. However, Team Members are allowed to travel by automobile or taxi with a Business Partner if the travel is related to official HMMA business and if the travel costs associated with the shared automobile or taxi ride do not exceed \$50.00.
- Personal discounts for goods or services that are not offered generally to all HMMA Team Members (*e.g.*, HMMA’s approved H-List).
- Future benefits to HMMA Team Members or their relatives.
- Any personal or financial benefit that may improperly influence an HMMA Team Member’s judgement in the conduct of official HMMA business.

HMMA Business Partners should immediately contact HMMA’s General Counsel if they have any questions about HMMA’s Business Ethics Policy or Business Partner Code of Conduct, or if they become aware of any HMMA Team Member violating or potentially violating HMMA’s Business Ethics Policy or Business Partner Code of Conduct. Reports of potential violations of HMMA’s Business Ethics Policy or Business Partner Code of Conduct may also be made anonymously by leaving a voicemail message on HMMA’s Compliance Hotline at 1-844-LGL-CPLY (1-844-545-2759), or by email at [compliance@hmmausa.com](mailto:compliance@hmmausa.com).

## **2. Anti-Corruption**

HMMA Business Partners are expected to take all action necessary to prevent any and all forms of corruption, extortion, and embezzlement by their employees, officers, directors, or agents.

HMMA Business Partners are expected to strictly comply with all applicable anti-corruption laws while conducting business with or on behalf of HMMA. HMMA Business Partners are further expected to be familiar with and strictly follow HMMA’s Anti-Corruption Guidelines (HR-AL-LG-S-00022).

HMMA Business Partners are expected to prohibit the offering, paying, promising, authorizing, soliciting, or accepting of any bribe or other improper payment directly or indirectly through any

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third party, to or from any person or organization, including government agencies or officials, private companies or employees of those private companies.

HMMA Business Partners should make political contributions and donations only in compliance with all applicable laws.

**3. Antitrust**

HMMA Business Partners are expected to adhere to the highest standards of fair business practices, advertising, and competition. Suppliers should not engage in any practice that constitutes a private monopoly, improper restraint of trade (including cartel or bid rigging), unfair business practice, or abuse of a dominant market position.

HMMA Business Partners should develop transparent and fair relationships with their own suppliers, vendors, customers, contractors, and business associates.

**4. Business Records**

HMMA Business Partners are expected to accurately record and disclose information regarding their business activities, business structure, financial situation, and performance in accordance with applicable laws and regulations as well as prevailing industry business practices.

**5. Intellectual Property and Confidential Information**

HMMA Business Partners are expected to respect all intellectual property rights. HMMA Business Partners should implement appropriate procedures to manage the import and export of technologies, goods, and materials in accordance with applicable laws and regulations. Transfers of technology and expertise should be done in a manner that protects intellectual property rights.

HMMA Business Partners should take any and all reasonable steps to safeguard HMMA’s confidential information.

HMMA Business Partners should only obtain confidential and/or personal information about their employees, customers, and third parties through proper methods. HMMA Business Partners are

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expected to rigorously control and protect this information and only use it appropriately and in accordance with all applicable laws and regulations.

## **6. Equal Employment Opportunity**

HMMA recognizes that its Business Partners are independent businesses and are the exclusive employers for their employees. However, HMMA expects its Business Partners to strictly comply with all applicable labor and employment laws and to treat all of their employees with dignity and respect.

HMMA Business Partners should prohibit discrimination, harassment, and retaliation against any of its employees, job applicants, or other individuals based on race, color, religion, sex, pregnancy, marital status, age, national origin, disability, genetic/family medical history, service in the uniformed services, filing for bankruptcy, engaging in protected activity, filing a workers' compensation claim, exercising rights under the Family and Medical Leave Act of 1983 ("FMLA") and/or the Occupational Safety and Health Act of 1970 ("OSHA Act") or other legally protected characteristics or activities.

HMMA Business Partners are expected to maintain a work environment that is positive and free of unlawful discrimination, harassment, and retaliation.

HMMA Business Partners should set wages (including overtime pay, wage deductions, performance-based pay and other remuneration) in compliance with all applicable laws.

HMMA Business Partners should recognize employee diversity and seek to promote diversity in all facets of its operations.

## **7. Forced Labor**

HMMA expects Business Partners to support HMMA's commitment to ensuring that no products entering its supply chain are mined, produced, or manufactured, in whole or in part, with forced, imprisoned, indentured, or indentured child labor (collectively, "forced labor"), by preventing the use of forced labor within their own operations and undertaking measures to ensure that forced labor is not used within their supply chains. These measures include, as appropriate, assessment

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of forced labor risk in Business Partners’ supply chains and implementation of supply chain due diligence processes, including mapping high risk supply chains and, where appropriate, collecting transaction-specific documentation to verify mapping. Business Partners are expected to require their sub-suppliers to implement similar measures to assess their forced labor risks. In addition, HMMA Business Partners must comply with all applicable anti-forced labor laws and regulations and should reference these commitments in their Codes of Conduct.

Business Partners are expected to cooperate with HMMA’s anti-forced labor compliance inquiries into the Business Partners’ supply chains, and with HMMA’s due diligence efforts to understand its supply chains and assess forced labor risks. This includes cooperating with HMMA’s requests for supply chain mapping information and transaction-specific documentation tracing Business Partners’ supply chains down to the raw material. HMMA expects its Business Partners to attend any forced labor trainings that HMMA provides.

Business Partners must notify HMMA immediately upon becoming aware of any credible allegations or evidence of forced labor within their supply chains, or any evidence that products they supply to HMMA may otherwise be non-compliant with applicable forced labor laws. Upon identifying forced labor within their supply chains, Business Partners must immediately work to stop the use of forced labor within their supply chains. Business Partners should likewise require their sub-suppliers to undertake measures to identify their forced labor risks and remediate any instances of forced labor within their supply chains.

**8. Health & Safety**

HMMA Business Partners should make the health and safety of their employees a top priority. HMMA Business Partners are expected to provide a safe work environment and minimize physical and chemical hazards through proper design, engineering and administrative controls, preventative maintenance, safe work procedures, and ongoing safety training. HMMA Business Partners are further expected to be familiar with and strictly follow HMMA’s Contractor Handbook (HR-AL-SF-S-00035) while working onsite at HMMA’s facilities.

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HMMA Business Partners should comply with all regulations set forth by the Occupational Safety and Health Administration (“OSHA”) and all other federal, state, and local laws related to workplace safety.

HMMA Business Partners should provide employees with appropriate personal protective equipment (“PPE”) where hazards cannot be adequately controlled by other means.

HMMA Business Partners should provide and properly maintain physical guards, interlocks, and barriers where machinery presents an injury hazard to employees.

HMMA Business Partners should minimize the impact of emergency situations by developing appropriate emergency response plans and procedures.

**9. Environmental**

HMMA Business Partners are expected to comply with all applicable environmental laws and regulations, including those administered by the U.S. Environmental Protection Agency (“EPA”) and the Alabama Department of Environmental Management (“ADEM”).

HMMA Business Partners are expected to maintain all required environmental permits and registrations and strictly follow the operational and reporting standards required to keep such permits.

HMMA Business Partners are expected to comply with regulated substance specifications and with any applicable laws and regulations prohibiting or restricting the use or handling of specific substances.

**10. Compliance Monitoring**

HMMA Business Partners are expected to operate in full compliance with the laws, rules, and regulations of the United States, the State of Alabama, and any foreign country or political subdivision having jurisdiction over any HMMA Business Partners’ activities that relate to manufacture, transportation, importation, exportation, and licensing. Additional laws, rules, and regulations HMMA Business Partners are expected to follow include (but are not limited to) those

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relating to immigration, conflict minerals, conditions of employment, and subcontractor selection. HMMA Business Partners are further expected to prohibit the use of materials from embargoed countries and/or from slave or child labor.

HMMA Business Partners should hold their supply chain, including all of their suppliers, vendors, customers, contractors, and business associates to the same standards contained in this Code of Conduct.

HMMA Business Partners are expected to establish and implement processes, procedures, codes of conduct, reporting systems, training and other appropriate mechanisms to ensure thorough, company-wide compliance with the HMMA Business Partner Code of Conduct.

HMMA Business Partners should promptly report to HMMA’s General Counsel notice of every known breach of this Code of Conduct and immediately implement a corrective action plan to cure the non-compliance within a specified time period.

If any HMMA Business Partner fails to meet the corrective action plan commitment, HMMA may suspend or terminate the business relationship. This suspension may include suspending placement of future orders and potentially terminating current production. HMMA reserves the right to hold each of its Business Partners responsible for reasonable costs incurred by HMMA in investigating non-compliance.