

 HYUNDAI	HMMA Business Partner Code of Conduct	HR-AL-LG-S-00021
Revision Date : 1/25/2019	Owner : Chris Smith	Revision Level : 4

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-HR-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. 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 does 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.

 HYUNDAI	HMMA Business Partner Code of Conduct	HR-AL-LG-S-00021
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- 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 if they become aware of any HMMA Team Member violating or potentially violating HMMA's Business Ethics Policy. Reports of potential violations of HMMA's Business Ethics Policy 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.

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 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 such practices as private monopolies, improper restraint of trade (including cartels or bid rigging), unfair business practices, 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.

 HYUNDAI	HMMA Business Partner Code of Conduct	HR-AL-LG-S-00021
Revision Date : 1/25/2019	Owner : Chris Smith	Revision Level : 4

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 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 1993 (“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. 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

 HYUNDAI	HMMA Business Partner Code of Conduct	HR-AL-LG-S-00021
Revision Date : 1/25/2019	Owner : Chris Smith	Revision Level : 4

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.

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.

8. 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.

9. Compliance Monitoring

HMMA Business Partners should hold their supply chain, including all of its 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 Vice President of Purchasing and/or 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.

 HYUNDAI	HMMA Business Partner Code of Conduct	HR-AL-LG-S-00021
Revision Date : 1/25/2019	Owner : Chris Smith	Revision Level : 4

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.

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 the 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 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.

10. Existing Contract Provisions

Nothing in this document shall be construed or interpreted as a cancellation, amendment, or modification of the existing contractual obligations between HMMA and any HMMA Business Partner. Likewise, this document does not create any third-party beneficiary rights or benefits for HMMA Business Partners, or its suppliers, vendors, customers, contractors, business associates, employees or any other party.