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## Kia Supplier Code of Conduct

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## 1. Overview

### a. Purpose

Kia recognises that its operations and supply chain activities may contribute to potential or actual adverse impacts on people and the environment. As such, Kia acknowledges its responsibility to set clear standards, assess performance within its supply chains, and communicate transparently with relevant stakeholders and the public.

Kia is committed to ethical business conduct in its operations and supply chain. This commitment includes ensuring that raw materials linked to human rights violations, environmental pollution and degradation, and illegal governance practices are not used. Kia also monitors and addresses the social and environmental risks associated with the sourcing and procurement of raw materials.

Kia is committed to responsible business conduct in line with internationally recognized standards, including the "OECD Guidelines for Multinational Enterprises on Responsible Business Conduct", the "UN Guiding Principles on Business and Human Rights", the "International Labour Organization (ILO) Conventions", and the "Universal Declaration on Human Rights".

In addition, where relevant, Kia conducts supply chain due diligence focusing on raw materials such as rubber, palm oil, wood, leather, cotton, PVC, polysilicon, and those used in batteries and electronics. This is carried out in accordance with the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas", the "EU Corporate Sustainability Due Diligence Directive", the "EU Battery Regulation", the "EU Deforestation Regulation", the "EU Prohibition of Products Made by Forced Labour Regulation", the "United States Uyghur Forced Labor Prevention Act", as well as environmental, social, and governance (ESG) related guidelines and applicable regulatory requirements.

Kia adopts a risk-based, ongoing, proactive and reactive due diligence process to identify, assess, prevent, mitigate and remediate risks of adverse impacts across the raw material supply chain.

### b. Scope of Application

This Supplier Code of Conduct (the "Code") reflects Kia's responsible sourcing

commitments, principles and the standards Kia strives to meet.

This Code applies to all suppliers engaged in business with Kia, including but not limited to direct and indirect suppliers, consultants, agents, advisors, value-chain partners, service providers, manufacturers, distributors, sales representatives, channel partners, intermediaries, and business partners (referred to individually as "Supplier" or collectively as "Suppliers") who provide products or services to Kia or act on its behalf.

All Suppliers that provide goods or services to Kia, or enter into a contract for any other transactions, are expected to uphold ethical business conduct and comply with the standards set forth in this Code. These expectations apply broadly to all Suppliers.

### **c. Reference Documents**

The Code should be read in conjunction with Kia's broader responsible sourcing commitments and related governance documents, as amended from time to time. These include, but are not limited to, Kia's "Supply Chain Sustainability Management Policy", "Responsible Raw Materials Procurement Policy", "Responsible Minerals Sourcing Policy", and "Human Rights Policy". Together, these policies and procedures establish the expectations, principles, and standards that guide responsible business conduct across Kia's supply chain. Publicly available documents can be accessed through Kia's official website and should be interpreted collectively, alongside all other applicable Kia policies that support ethical, sustainable, and legally compliant business practices.

### **d. Suppliers' Roles and Responsibilities**

In management decision-making and operational business processes, all Suppliers should align to the provisions of this Code. Kia, either directly or through third-party entities commissioned by Kia, reserves the right to request relevant data, documentation, and evidence, and to audit or inspect Suppliers, within the scope permitted by law, to verify compliance with the provisions contained herein. Based on inspection and investigation outcomes, Kia may recommend that Suppliers respond to any identified risks, and if so, Suppliers should establish plans and implement countermeasures to mitigate these risks. Compliance with this Code may be considered an important criterion in the selection of suppliers, and the lack of meaningful improvement efforts by a Supplier in violation of this Code may result in the suspension of business or the

termination of the contract with the Kia.

This Code is not an exhaustive list of all obligations with which Suppliers should comply, and may be regularly reviewed, supplemented and amended to establish a sustainable supply chain based on the principle of continuous improvement. This Code can be found on Kia's corporate website, where readers can make further inquiries if necessary.

Furthermore, Kia will strive to provide appropriate channels and methods to allow Suppliers and their employees to easily access information related to this Code, ensuring sufficient understanding and compliance. In this regard, Kia is also committed to supporting its Suppliers in building their capacity to meet these standards by providing access to relevant resources, engagement opportunities, and training. In turn, Suppliers are also expected to actively communicate the contents of this Code, and to ensure that their own suppliers, subcontractors, and upstream partners adhere to these standards and are able to disclose data and documented evidence to verify the information upon request.

## **2. Responsible Sourcing Principles**

Kia conducts supply chain due diligence based on the key principles for responsible sourcing outlined below, and abides by these principles to ensure effective implementation. Kia adhere to these principles in Kia's operations and expect Suppliers to conduct appropriate, risk-based due diligence in their own operations and supply chains in line with Kia's core principles. Kia also expects Suppliers to provide relevant stakeholders with clear and accurate information demonstrating their alignment with these principles.

### **a. Ethical Business Conduct**

#### Compliance with Laws and Regulations

- ① Suppliers shall always maintain the highest standards of ethical conduct and is expected to comply with all the applicable local, national, and multi-jurisdictional laws and regulations related to the conduct of its business.
- ② In case the standards mentioned in this Code differ from any legal requirements provided by such laws and regulations, the stricter of the standards prescribed in

the Code or the law shall apply.

### Transparency and Anti-Corruption

- ① The executives and employees of Suppliers should uphold with the highest standards of integrity and comply with all applicable laws and regulations in the countries where they operate.
- ② The executives and employees of Suppliers must not engage in bribery, money laundering, extortion, embezzlement, fraud, collusion, or any form of corruption, including exploiting their position for personal gain or obtaining unfair advantages by leveraging systemic weaknesses.
- ③ Suppliers should establish internal mechanisms for reporting and investigating suspicious transactions, and must ensure that whistleblowers are protected from retaliation and unfair treatment.
- ④ Suppliers must not charge recruitment fees or any other costs relating to securing employment opportunities.

### Conflicts of Interest

- ① Suppliers should make responsible and impartial decisions based on clearly defined operational rules.
- ② Executives and employees of Suppliers should not promise, offer, authorize, or provide anything that could result in undue or improper benefits. This prohibition includes causing harm to Kia for personal gain, or promising individual benefits through third parties.

### Fair Trade and Competition

- ① Suppliers should comply with all applicable anti-corruption laws and standards in the countries where they operate.
- ② Suppliers should not engage in practices that would undermine fair competition, such as abusing market thought dominance or unfairly leveraging their trading position.
- ③ Suppliers should make payments to their suppliers in a timely manner and should



not arbitrarily alter agreed payment amounts.

- ④ Suppliers should not engage in actions or enter into agreements with other parties that unfairly restrict market competition, including fixing prices, limiting supply volumes, or manipulating trade terms related to specific areas or goods/services.
- ⑤ Suppliers should not improperly obtain or use information from competitors, business partners (subcontractors), or other entities, nor disclose information acquired through illicit means by themselves or third parties.

#### Prevention of Unauthorized Parts

- ① Suppliers should not manufacture, use or distribute unauthorized or counterfeit raw materials or parts.
- ② Suppliers should conduct regular inspections to ensure unauthorized or counterfeit raw materials or parts are not used or manufactured at their facilities, and must promptly report any such occurrences to relevant authorities or customers including Kia.
- ③ Suppliers should make every effort to ensure that raw materials and parts they produce are used and distributed strictly in accordance with intended business purposes and contractual obligations.
- ④ Suppliers must regularly verify whether counterfeit raw materials or parts are being used or produced within their workplaces, and if such instances are identified, they must immediately notify the government or the client.

#### Compliance with Export Controls/Sanctions

- ① Suppliers should comply with all applicable laws, regulations, and international treaties related to export controls and economic sanctions.
- ② Suppliers must not conduct business with countries, territories, entities, groups, or individuals that are subject to export controls or economic sanctions.
- ③ Suppliers should perform internal audits to ensure compliance with all applicable laws, regulations and international treaties related to export controls and economic sanctions, and should cooperate with Kia's due diligence processes as necessary.

### Information Protection

- ① Suppliers should not disclose, store or use trade secrets or confidential business information related to their clients or business partners (subcontractors) without appropriate consent, except where required by applicable laws and regulations or necessary for Kia to comply with its legal obligations (including but not limited to supply chain regulatory compliance requirements, such as the EUBR and similar due diligence requirements).
- ② Suppliers should collect and use personal information solely for its originally intended purpose and in accordance with data retention period. Prior consent or other appropriate legal measures in accordance with applicable laws and regulations should be obtained before making changes to either the purpose or the retention period.

### Intellectual Property Protection

- ① Suppliers should respect the intellectual property rights of their clients and business partners (subcontractors), establish appropriate measures to protect intellectual property rights, and regularly verify that these protections are in place.

### Responsible Procurement Activities

- ① Suppliers shall comply with the principles of responsible sourcing for all parts and components delivered to Kia. The detailed provisions of these principles are set forth in Kia's "Responsible Sourcing Policy" and "Responsible Raw Minerals Sourcing Policy" and include, but are not limited to, the following:
  - Traceability and origin tracking of sensitive raw materials, parts, and components
  - Prohibition of forced labor and child labor throughout the entire production and procurement process of raw materials, parts, and components
  - Application and implementation of Kia's policy on conflict minerals such as Tungsten, Tin, Tantalum, and Gold, as well as responsible minerals including Cobalt and Mica
  - Fulfillment of battery-related due diligence and procurement requirements in accordance with the EUBR

- Fulfillment of requirements and due diligence obligations related to the prevention of deforestation in the supply chain of raw materials and components pursuant to the EU Deforestation Regulation (EUDR)

- ② Suppliers shall familiarize themselves with the requirements set forth in Kia's "Responsible Raw Material Sourcing Policy" and "Responsible Minerals Policy," which include the above matters, and shall self-assess and verify their compliance with these requirements.
- ③ For suppliers that are directly or indirectly involved in the sourcing, trading, processing, or supply of minerals covered under the EUBR or the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, such as tin, tungsten, tantalum, gold (3TGs), cobalt, lithium, natural graphite, nickel, or their chemical compounds, the following additional requirements apply.
- ④ Suppliers should establish robust procedures to verify the origin of these minerals and raw materials, including the identification of associated smelters or refiners. These procedures should be used to thoroughly assess whether any human rights abuses, unethical conduct, or environmental damage are present at the extraction, processing, or smelter level.
- ⑤ Suppliers primarily engaged in the trade or transformation of these materials must make every effort to independently verify—through due diligence systems or recognised external certification schemes—that such minerals are free from human rights abuses, unethical conduct, or environmental damage at the mining and processing stages.

## **b. Environment**

### Establishment of Environmental Management System

- ① Suppliers should comply with all applicable environmental laws and regulations in the countries and regions where their business operates, and must timely obtain and maintain all required environmental permits and licenses in valid status.
- ② Suppliers should identify and assess the environmental impacts of their business activities and establish and operate an Environmental Management System to reduce or mitigate such impacts. This system should include the following elements:
  - i. A clear organizational structure and accountability system

- ii. Establishment of environmental objectives and implementation plans
  - iii. Operational procedures and work manuals
  - iv. Performance monitoring, internal audits, and evaluation systems
  - v. International standards for Environmental Management Systems, such as ISO 14001 developed by the International Organization for Standardization (ISO), are global benchmarks designed to continuously improve corporate environmental performance. The adoption of international standards like ISO 14001 and obtaining external certification can serve as evidence of a supplier's responsible environmental management level.
- ③ Suppliers shall establish an Environmental Policy considering their Material Environmental Aspects, which may include key environmental factors such as:
- i. Management and reduction of energy use and greenhouse gas (GHG) emissions
  - ii. Efficient use and protection of water resources
  - iii. Control and reduction of water and air pollutants emissions
  - iv. Waste management and utilization of circular resources (including persistent organic pollutants, mercury, etc.)
  - v. Safe handling and management of chemicals

#### Management of Energy Use and Greenhouse Gas Emissions

- ① Suppliers should establish a system to measure, monitor, and report their energy consumption and greenhouse gas emissions accurately and consistently. Where relevant, Suppliers are encouraged to align with internationally recognized frameworks such as the GHG Protocol.
- ② Suppliers should make every effort to reduce energy usage and greenhouse gas emissions through efficient management practices and the adoption of cleaner technologies and renewable energy sources.

#### Water Resources Management

- ① Suppliers should establish a system to measure, monitor, and manage their water

usage and wastewater discharge.

- ② Suppliers should strive to reduce water consumption and enhance the treatment and recycling of wastewater. Discharged water must meet or exceed applicable legal standards, or adhere to more stringent internal benchmarks for water quality and contaminants.

#### Air Pollutant Management

- ① Suppliers should establish a system to measure and monitor their air pollutant emissions.
- ② Suppliers should apply appropriate methods to reduce air pollutant emissions and ensure that discharged levels meet applicable legal standards or a more rigorous internal threshold.

#### Management of Reusable Resources and Waste

- ① Suppliers should establish a system to measure, monitor, and manage waste generation and disposal.
- ② Suppliers should use appropriate methods to minimize the disposal of waste subject to landfill or incineration. Suppliers should strive to increase reuse, recycling, and material recovery, including the recovery of raw materials and components.
- ③ Suppliers should work to minimize environmentally harmful residues resulting from landfill or incineration, taking into account the full lifecycle impacts of their products and processes.

#### Chemical Substances Management

- ① Suppliers should ensure that all chemical substances used in their operations are safely managed throughout the transportation, storage, handling, use, and disposal. Furthermore, Suppliers should clearly label all containers and provide appropriate safety information to communicate potential hazards.
- ② Suppliers should make every effort to identify whether raw materials, parts, or products they procure, produce, sell, or distribute contain substances that may pose

risks to human health or the environment, and manage such substances in accordance to applicable regulations.

#### Protection of Biodiversity and No Deforestation

- ① Suppliers should assess the impact and dependence of their operations on biodiversity, and develop and implement strategic plans to prevent, minimize, and offset negative effects. These efforts should aim to preserve, restore, or enhance biodiversity within their operational areas and surrounding communities.
- ② Suppliers should establish procedures to assess deforestation risks associated with their business operations and proactively implement response measures to address actual or potential impacts. These actions should support the protection of local forest ecosystems and, where possible, align with globally recognized no-deforestation commitments.

#### Management of Noise and Vibration

- ① Suppliers should assess the potential impacts of their operations related to noise and vibration and establish and implement strategic plans to prevent, minimize, and control such pollution, thereby protecting the health and comfort of workers and local communities.
- ② Suppliers should establish procedures to regularly monitor noise and vibration levels, identify potential sources of excessive emissions, and make every effort to implement effective mitigation measures when actual or potential risks to people or the environment are identified.

#### Prevention of Soil Pollution and Sustainable Land Use

- ① Suppliers should evaluate the potential impacts of their business activities on soil quality and land use, and develop and execute strategic plans to prevent, reduce, and remediate soil pollution, soil erosion and land degradation. These plans should support sustainable land management and the protection of local ecosystems.
- ② Suppliers should establish procedures to detect risks of soil contamination and improper land use resulting from their operations, and must make every effort to establish and apply timely response systems to address any actual or potential soil

pollution, soil erosion or land degradation.

#### Environmental Risk Prevention (Plant Safety)

- ① We are committed to minimizing environmental risks linked to raw materials sourcing and expect Suppliers to manage environmental related operational disturbances responsibly. Suppliers are expected to identify and mitigate potential environmental hazards that could affect surrounding communities or ecosystems. Kia supports proactive risk management and continuous monitoring and improvement in environmental performance.

#### **c. Labor/Human Rights**

##### Prohibition of Child Labor

- ① Suppliers must prohibit all forms of child labor within their operation and ensure that the minimum age for employment complies with the applicable national law and is at least 15 years (ILO Convention No. 138). Suppliers should verify the age of all employees and applicants using legitimate documents such as government-issued identification cards or birth certificates. If any instance of risk of child labor is identified, Suppliers must immediately terminate such employment, notify Kia without delay and implement appropriate remedial measures, including corrective actions and educational programs.
- ② When employing young workers, Suppliers must not assign them to high-risk tasks as defined by applicable occupational safety and health standards, and must ensure they are provided with access to educational opportunities.
- ③ Suppliers should not procure goods or services from business partners (subcontractors) known to engage in child labor or violate applicable labor laws and regulations. Appropriate corrective action must be taken if such violations are confirmed.

##### Prohibition of Forced Labor

- ① Suppliers must comply with all applicable labor laws and regulations in the countries where they operate, and must prohibit all forms of forced or compulsory labor that violate the free will of workers. "Forced Labor," as defined by ILO Convention No. 29,

refers to any work or service exacted from a person under the threat of penalty that the person has not voluntarily offered. This includes, but is not limited to, debt bondage, human trafficking, slavery, prison labor, and any act that restricts a worker's freedom to leave employment, as prohibited under Article 2 of ILO Convention No. 29.

- ② Suppliers cannot require employees to surrender personal documents such as identification cards or visas as a condition of employment or to restrict their freedom. Coercive acts such as assault, threats, or confinement are also strictly prohibited. Furthermore, workers' freedom of movement must be guaranteed, and all workers, including contract employees, must be able to voluntarily terminate their employment relationship without fear of penalty. Employment contracts must be provided in a language understood by the worker and made available for review before employment begins under fair terms.
- ③ Suppliers shall not produce all or any part of the products supplied to Kia through forced labor, nor shall they directly or indirectly source, incorporate, install, utilize, or otherwise use any components or products produced or distributed in violation of forced labor regulations by regulated entities or persons. Forced labor regulations refer to laws and measures enforced by organizations such as the United Nations (UN), U.S. Customs and Border Protection, the European Union (EU), the Government of the Republic of Korea, and other governmental bodies that impose import bans, sanctions, and regulations related to forced labor from time to time.
- ④ Suppliers shall conduct risk-based due diligence in compliance with the requirements under Chapter 3. Supply Chain Due Diligence, as set forth hereafter. They must identify supply chain risks across their entire upstream suppliers and map out the locations of their business and operations, while prioritizing the screening of their own Tier 1 and Tier 2 suppliers. This process is intended to proactively identify and eliminate high-risk factors related to Forced Labor, and the due diligence results shall be regularly updated.
- ⑤ Suppliers shall establish a Supplier Code of Conduct that explicitly prohibits forced labor throughout entire production process and supply chain, which shall include the following procedures:
  - i. Procedures to identify the origin of raw materials, parts, and components and ensure their traceability



- ii. Systems designed to prevent the use of forced labor in the product manufacturing process
  - iii. Application of these procedures to both direct and indirect supply chains
- ⑥ Suppliers shall conduct regular training for their employees and their own Tier-1 suppliers on the prohibition of forced labor and the related Code of Conduct.
  - ⑦ Suppliers shall also require their own suppliers to adopt an equivalent code of conduct and to implement associated procedures. Compliance must be verified through monitoring and/or auditing.
  - ⑧ If any risk of forced labor are identified within the supply chain, suppliers must establish and implement a Corrective Action Plan (CAP) and promptly report the matter to Kia. In particular, if a supplier becomes aware that forced labor products or components are being directly or indirectly supplied to Kia through subcontractors or other indirect suppliers, the supplier must immediately cease dealings with the relevant party and swiftly notify Kia.

#### Non-Discrimination and No Harassment

- ① Suppliers shall prohibit any direct or indirect unreasonable discrimination based on the following personal characteristics such as gender, race, ethnicity, nationality, religion, disability, age, marital and family status, social status, political opinions, and others throughout all employment processes, including recruitment, promotion, assignment, education, and training.
- ② All workers have the right to equal opportunity and fair treatment. Accordingly, suppliers must establish preventive measures to ensure that discrimination, harassment, or adverse treatment based on these characteristics does not occur in any aspect of employment.
- ③ Suppliers must not allow any unreasonable form of discrimination in the overall compensation system, including wages, bonuses, allowances, and benefits. Fair and consistent standards should be applied to work of equal value.
- ④ Suppliers shall not include discriminatory requirements unrelated to job performance (e.g., appearance, specific physical conditions) in recruitment advertisements or candidate selection processes. Job descriptions should be based on essential skills, qualifications, and experience necessary to perform the job.

## Wages and Benefits

- ① Suppliers shall pay workers fair wages in accordance with all applicable labor and wage laws in the countries where they operate, providing accurate and timely compensation on the designated payday. Suppliers must also provide clear pay slips written in a language understandable to the workers, ensuring transparency of wage components and deductions.
- ② Suppliers shall continuously strive to provide all workers with favorable working conditions and benefits that contribute to improving their quality of life.
- ③ Suppliers shall conduct mandatory training on workers' rights, wage systems, and welfare programs, and while complying with relevant laws and regulations, shall endeavor to offer all workers opportunities to enhance their skills and develop long-term careers.
- ④ Suppliers are obligated to pay wages that meet or exceed the legal minimum wage. Where possible, suppliers should analyze the gap between the living wage level, considering essential living costs such as housing, meals, healthcare, education, and transportation in the region where the workplace is located, and their current wage levels. For workers earning below a living wage, suppliers must develop and implement long-term strategies and action plans to close this wage gap.

## Working Hours

- ① Suppliers should comply with all applicable laws and regulations related to working hours and rest periods in the countries where they operate.
- ② Suppliers should ensure that any work performed beyond normal hours are voluntary and provide lawful compensation for overtime if employees work overtime under exceptional circumstances.
- ③ Suppliers should ensure that all employees are granted at least one rest day per week on average.

### Humane Treatment

- ① Suppliers should respect the privacy of all employees and refrain from assigning unnecessary overtime work.
- ② Suppliers should notify employees in advance and obtain their informed consent when collecting their personal information.
- ③ Suppliers should prohibit workplace harassment, which includes any act that may cause physical or mental distress, or that aggravates the working environment for other employees beyond the normal scope of their work. Appropriate changes and measures should be taken to address such harassment, such as disciplinary action against the offender or changing the work location, or assignment upon request.

### Freedom of Association

- ① Suppliers should respect the labor relations laws of the countries where this Code is applied to, and provides sufficient opportunity for communication to all officers and employees. In cases where mass termination or workforce changes are unavoidable due to management reasons such as large-scale relocations or layoffs, suppliers shall engage in negotiations with employee representatives within the minimum consultation or notice periods stipulated by local laws.

### Ethical Recruitment

- ① Unless specifically permitted by applicable laws and regulations, Suppliers should not store, dispose of, confiscate or otherwise restrict employees' access to their personal documents (such as identification cards, passports, driver's licenses, etc.).
- ② Suppliers should not require any fees or payments of any kind in exchange for employment. This includes ensuring that recruitment is conducted ethically and that no worker is charged fees by recruitment or labor agencies.
- ③ Suppliers should provide written documents or verbal explanations about working conditions in a language each employee can understand.
- ④ Where Suppliers engage labor agencies, they must conduct appropriate due diligence to ensure that such agencies operate lawfully and ethically. Suppliers must ensure that workers are not hired through deceptive, coercive, or fraudulent

practices by labor agencies, and that all employment terms are fully disclosed to workers prior to hiring.

#### Indigenous Peoples' Rights and Local Communities

- ① Suppliers should strive to recognize and respect the rights, cultures, and traditions of Indigenous Peoples and local communities affected by their business operations. This includes alignment with the principles of the United Nations Declaration on the Rights of Indigenous Peoples (“UNDRIP”). Suppliers should establish and implement plans to support their well-being and protect their cultural heritage.
- ② Suppliers should establish procedures to engage with Indigenous Peoples and local communities in a meaningful and respectful manner, identifying potential impacts on their rights and livelihoods, and make every effort to minimize negative impacts while supporting inclusive and sustainable development.

#### Right to Dispose of Land including FPIC and Prohibition of Unlawful Eviction

- ① Suppliers should strive to ensure that any land acquisition or use respects the legal and customary rights of affected persons and communities, avoid unlawful eviction and dispossession, and promote fair and transparent processes, in line with UNDRIP and other relevant international standards.
- ② Suppliers should establish procedures to obtain Free, Prior and Informed Consent (“FPIC”) from affected Indigenous Peoples and local communities before initiating any project or activity that may affect their land or resources. The outcomes of these consultations must be honored in good faith and consistent with the commitments outlined in UNDRIP.

#### Protection of Human Rights Defenders

- ① Suppliers should strive to recognize and support the vital role of human rights defenders linked to their operations, ensuring they can act freely and safely without fear or intimidation or harm.
- ② Suppliers should establish procedures to identify risks faced by human rights defenders in their areas of operation and strive to prevent, address, and remediate any harassment, threats, or violence against them.

## d. Health and Safety

### Establishment of Health and Safety Management System

- ① Suppliers should comply with applicable workplace health and safety laws and regulations in the countries where they operate, and fully obtain and maintain all required health and safety-related permits and licenses necessary for their business operations.
- ② Suppliers should establish and operate a Health and Safety Management System designed to prevent workplace hazards and accidents. This system should include clear organizational structures, planning and implementation procedures, and performance evaluation mechanisms.

### Safety Management of Machinery, Equipment, and Facilities

- ① Suppliers should regularly inspect and assess the safety conditions of all potentially hazardous machinery, equipment, and facilities used in the workplace.
- ② Suppliers should install and maintain appropriate safety devices, protective barriers, and emergency systems to prevent accidents involving such machinery, equipment, and facilities.
- ③ Suppliers should provide appropriate personal protective equipment (PPE) to ensure worker safety. PPE must be readily accessible, properly maintained, and in good working condition.

### Emergency Preparedness

- ① Suppliers should establish and maintain plans to respond to emergencies, including natural disasters, disease outbreaks, fire, and other occupational accidents. These plans should clearly define reporting procedures, response actions, and follow-up measures.
- ② Suppliers should implement employee training and emergency drills in accordance with internal plans or guidelines and in compliance with the laws and regulations of the countries where they operate.
- ③ Suppliers should ensure the presence and proper functioning of exit routes and

signs, fire detection and warning systems, and fire prevention equipment to support safe evacuation in the event of an emergency.

### Accident Management

- ① Suppliers should have programs to monitor, record, and evaluate industrial accidents and occupational illnesses.
- ② Suppliers should immediately cease operations in affected areas if an industrial accident or serious disease outbreak occurs, and implement necessary safety measures, including the evacuation of employees.
- ③ Suppliers should investigate the causes of industrial accidents or illnesses and develop appropriate corrective actions to mitigate risks and prevent recurrence.

### Safety Evaluation

- ① Suppliers should regularly conduct safety risk assessments to ensure that employees are not exposed to accidents or hazardous conditions. Assessment results should be communicated to employees, and necessary improvements to machinery, equipment, or facilities should be made accordingly.
- ② Suppliers should provide employees with information on workplace hazards and risks based on safety risk assessment results. This information must be written in a language employees understand and displayed in a clearly visible and accessible location.
- ③ Suppliers should not require pregnant women or young workers to perform tasks involving significant safety or health risks, and should strive to create an inclusive work environment for vulnerable groups, including persons with disabilities and migrant workers.

### Health Management

- ① Suppliers should provide employees with rest areas, toilet facilities, dining areas, and should strive to maintain hygiene and cleanliness in such spaces.
- ② Suppliers that provide boarding facilities should ensure they are equipped with

adequate safety signage, lighting, and heating and cooling systems. These facilities must also include appropriate measures to prevent unauthorized access.

- ③ Suppliers should provide general or specialized medical examinations in compliance with relevant health regulations in the countries where they operate. Based on the medical results, suppliers should implement appropriate actions such as job reassignment, work location reassignment or adjustments to working hours.
- ④ If suppliers provide housing facilities such as dormitories to employees, they must ensure a safe and hygienic living environment including the following:
  - i. Emergency escape facilities (e.g., evacuation devices on each floor)
  - ii. Fire detection and alarm systems
  - iii. Regular facility maintenance
  - iv. Drinking water, ventilation, and heating systems
  - v. Sanitary amenities (showers, restrooms, laundry rooms, etc.)
- ⑤ If suppliers operate food and beverage facilities such as cafeterias for employees, they must ensure food safety and hygiene through hygienic food storage, regular inventory checks and regular cleaning and hygiene management of facilities.

#### Health and Safety of Contractors

- ① Suppliers should ensure that health and safety of contractors are effectively managed during the provision of their services. This includes verifying that contractors are trained on relevant safety protocols, comply with site-specific health and safety requirements, and use appropriate protective equipment. Suppliers should monitor contractor activities and ensure that any incidents involving contractors are reported and addressed promptly.

### **3. Supply Chain Due Diligence**

- ① All Suppliers are expected to establish and implement due diligence procedures in line with the OECD Due Diligence Guidance for Responsible Business Conduct ("OECD Guidance for Responsible Business"). This framework applies to businesses

across sectors and aims to help enterprises identify, prevent, mitigate, and account for how they address actual and potential adverse impacts in their operations, supply chains, and business relationships.

② Suppliers should follow the six-step process outlined in the OECD Guidance for Responsible Business:

- Step 1 - Embed Responsible Business Conduct into Policies and Management Systems:  
Establish policies on responsible business conduct, integrate them into management systems, and ensure commitment from senior leadership. This includes establishing internal accountability mechanisms and assigning clear responsibilities.
- Step 2 - Identify and Assess Adverse Impacts in Operations, Supply Chains, and Business Relationships:  
Conduct risk-based due diligence to identify and assess actual or potential negative impacts on human rights, labor rights, environmental protection, and ethics across the supply chain.
- Step 3 - Cease, Prevent, or Mitigate Adverse Impacts:  
Develop and implement strategies to prevent or respond to identified risks, including remediation measures where required. Engage with affected stakeholders and take steps that are proportional to the severity and likelihood of harm.
- Step 4 - Track Implementation and Results:  
Monitor the effectiveness of due diligence actions, using qualitative and quantitative indicators and feedback from stakeholders. Adjust strategies as needed to improve performance.
- Step 5 - Communicate How Impacts Are Addressed:  
Publicly communicate due diligence efforts, including policies, actions taken, outcomes, and lessons learned. This may take the form of sustainability or compliance reporting.
- Step 6 — Provision of Remediation and Cooperation  
In cases where an actual negative impact has been caused or contributed to, companies should provide for or cooperate in remediation when appropriate.



- ③ Suppliers should promote these practices across their own supply chains and support upstream business partners in adopting similar standards. Risk assessments and responses should be proportionate to the size, sector, and context of the enterprise and the severity of the risks involved.
- ④ In addition to the general due diligence obligations stated above, suppliers involved in the procurement, handling, processing, or trading of specific raw materials defined in Kia's "Responsible Raw Materials Sourcing Policy" and "Responsible Minerals Sourcing Policy" must fully comply with the requirements set forth in those policies.

## **4. Management Systems and Compliance**

### **a. Company Statement Disclosure**

- ① Suppliers should disclose this Code, or their commitment to sustainable business practices, both internally and externally. This may include public statements that reflect alignment with the principles set out herein.
- ② Suppliers should share this Code, or their sustainability commitments through internal channels, such as the New Year's address by executives, internal guidelines, company policies, or internal bulletins. They are also encouraged to disclose these commitments externally via company websites, sustainability or management reports, and other relevant publications.

### **b. Appointment of Social and Environmental Sustainability Management**

- ① Suppliers should appoint a senior-level individual responsible for overseeing corporate social and environmental sustainability activities, including performance monitoring and compliance.
- ② Suppliers should also designate a person or team responsible for the day-to-day planning, coordination, and implementation of corporate social and environmental sustainability initiatives.

### **c. Risk Assessment**

- ① Suppliers should strive to identify and evaluate ethical, environmental, labor and human rights, and health and safety risks associated with their business operations, including those within their supply chains. This process should consider both actual and potential adverse impacts.
- ② If significant risks are identified, Suppliers should develop and implement appropriate mitigation measures. These measures may include revising internal policies, enhancing controls, engaging at-risk suppliers, or establishing grievance or remediation procedures. Risk assessments should be reviewed periodically and updated as necessary.

#### **d. Training and Communication**

- ① Suppliers should provide regular training to employees on the provisions of this Code, as well as on relevant laws, regulations, internal policies, and procedures. Training should be tailored to employee roles and responsibilities and delivered in a format and language they understand.
- ② Suppliers should share implementation plans and updates regarding compliance with this Code. This includes internal communication to employees and, where appropriate, external communication to stakeholders or customers.

#### **e. Data Management**

- ① Suppliers should accurately record and manage data related to ethical, environmental, labor and human rights, and safety and health risks. Data should be kept up to date, securely stored, and accessible for review as needed.
- ② Suppliers should strive to disclose such data in a transparent manner when requested by applicable laws and regulations, local authorities, industry associations, or major clients, unless prohibited by law. Disclosure should be timely, accurate, and supported by relevant documentation.

#### **f. Grievance Mechanisms**

- ① Suppliers should operate a grievance mechanism that allows employees and other stakeholders to seek advice and report concerns or violations related to ethics, environmental issues, labor and human rights, and health and safety. The mechanism should also enable reports concerning infringements of individual rights or legitimate interests, and it must be accessible, confidential, and responsive. The mechanism should be designed and operated in line with the effectiveness criteria set out in the UN Guiding Principles on Business and Human Rights (UNGPs).
- ② Suppliers should protect whistleblowers from retaliation, such as dismissal, threats or harassment. The identities of individuals who raise concerns must be protected, and all reports should be handled promptly, impartially, and in accordance with due process.

### Kia Grievance Channels

- [KOR/Global] Supply Chain Sustainability Management Team - Grievances (Win-Win Cooperation Center → Supply Chain ESG Center → Grievances) (<https://winwin23.hyundai.com>)
- [KOR] Procurement Planning Team - Transparent Procurement Report Center (<http://winwin.hyundai.com/coportal/system/clean.html>)
- [KOR/Global] Audit Planning Team - Cyber Audit Office (<https://audit.hyundai.com/>)

### g. Remediation

- ① If Suppliers' operations negatively affect supply chain sustainability, Suppliers should provide appropriate remedies to affected parties, taking into account the extent of harm, the rights of those affected, and the importance of fair and effective redress.
- ② Suppliers should establish remediation procedures in line with internationally recognized good practices and engage in meaningful consultation with affected individuals or their legitimate representatives when determining appropriate remedies.

### h. Management of Business Partners (Subcontractors)

- ① Suppliers should encourage their business partners (subcontractors) and other supply chain participants to manage ethical, environmental, labor and human rights, and safety and health risks in the planning, designing, sale and manufacture of goods and services.
- ② Suppliers should also encourage their business partners (subcontractors) and other supply chain participants to identify and remedy violations or risks related to ethics, environmental impact, labor and human rights, and health and safety that are recognized under applicable laws and regulations in the countries where they operate.

## i. Compliance with this Supplier Code of Conduct

- ① Where permitted by law, Suppliers should provide evidence of compliance with this Code during regular assessments or on-site audits conducted by Kia or designated third parties.
- ② Suppliers should maintain accurate, complete, and verifiable documentation<sup>1</sup> that demonstrates compliance with this Code. Such documentation must be fact-based and accurately reflect business practices.
- ③ Suppliers should promptly develop and implement corrective action plans to address any deficiencies or violations identified during assessments or on-site audits. Progress on corrective actions should be monitored and documented.
- ④ This Code forms part of the contractual agreement between Kia and the Supplier. It shall be read in conjunction with, and incorporated into, any applicable supply contracts, unless expressly stated otherwise.
- ⑤ Suppliers must promptly report any actual or potential breach of this Code, or any circumstances likely to lead to such a breach, to Kia. They are also expected to cooperate fully with any related investigation.
- ⑥ If Kia reasonably determines that a Supplier has breached this Code, whether (i) intentionally, (ii) repeatedly, (iii) in a serious or irremediable manner, or (iv) without willingness or capacity to take corrective action, Kia may suspend or terminate the commercial relationship by written notice, without prejudice to any other rights or remedies.

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<sup>1</sup> Appropriate documents may include workplace safety and health management rules prepared under Article 25 of the Korean Occupational Safety and Health Act, industrial accident and disease occurrence records prepared under Article 10 of the Korean Occupational Safety and Health Act, employment rules prepared under Article 93 of the Korean Labor Standards Act, a wages register prepared under Article 48 of the Korean Labor Standards Act, etc. and other materials relevant to the requirements of this Code or that may provide supporting evidence for the assessment of compliance status, such as signed consent form confirming compliance with the Ethics Charter, emergency manual, a working hours log, work environment monitoring results, etc.