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Hyundai Motor Company Responsible Minerals Policy

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1. General Provisions

a. Declaration and Purpose

Hyundai Motor Company recognizes that its operations and supply chain activities may have potential or actual adverse impacts on human rights and the environment. Accordingly, Hyundai Motor Company has a responsibility to set clear standards, review the level of implementation across its supply chain, and transparently disclose relevant information to stakeholders and the public.

Hyundai Motor Company is committed to conducting ethical business activities throughout its operations and its entire supply chain. This commitment includes conducting due diligence to prevent the use of raw materials linked to human rights violations, environmental pollution and degradation, or illegal governance practices. Hyundai Motor Company also continuously monitors and manages the social and environmental risks that may arise in the sourcing and procurement of raw materials.

Hyundai Motor Company commits to conducting appropriate due diligence of raw materials, in particular battery raw materials, in compliance with relevant laws and international standards, including the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" (the "OECD Guidance"), the "OECD Guidelines for Multinational Enterprises," the "UN Guiding Principles on Business and Human Rights," the "ILO Core Conventions," the international human rights instruments including the "Universal Declaration of Human Rights," the "International Covenant on Civil and Political Rights," and the "International Covenant on Economic, Social and Cultural Rights," and the "EU Battery Regulation (EUBR)."

Hyundai Motor Company establishes and implements a risk-based, ongoing, proactive, and reactive due diligence process to identify, assess, prevent, mitigate, and remediate the risk of adverse impacts that may arise across the raw material supply chain, including battery raw materials. Hyundai Motor Company is a member of the Responsible Minerals Initiative (RMI), through which it actively strengthens responsible mineral sourcing practices and enhances the transparency and integrity of its supply chain management.

b. Scope of Application

The Hyundai Motor Company Responsible Minerals Policy (the "Policy") sets out Hyundai Motor Company's commitments and principles regarding responsible mineral sourcing, as well as the standards it strives to meet. Hyundai Motor Company expects all suppliers and sub-suppliers to comply with and implement the commitments and principles of this Policy across their operations and their entire supply chains.

This Policy was developed through cross-functional collaboration among relevant departments, including the Supply Chain Sustainability Management Team, and reflects the advice of external experts.

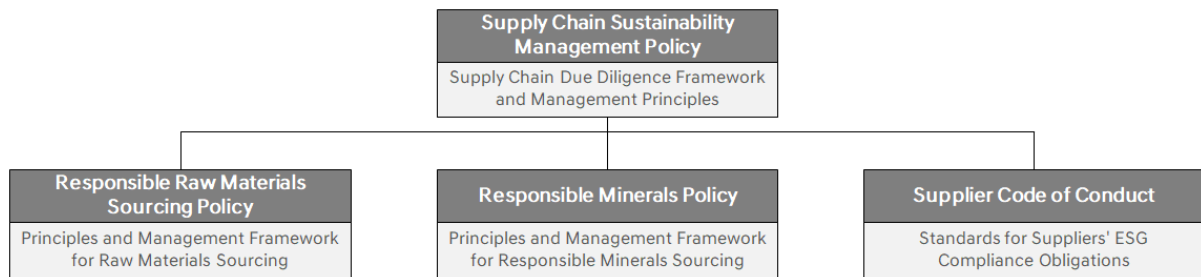
This Policy is established by Hyundai Motor Company together with its affiliates and subsidiaries (collectively, the "Company") and applies across the entire Company.

The raw materials within the scope of this Policy include responsible minerals such as, but not limited to, conflict minerals (tin, tantalum, tungsten, and gold) and battery minerals (cobalt, lithium, nickel, and natural graphite).

c. Related Policies

The Company's commitment to responsible sourcing set out in this Policy is supported by the "Supplier Code of Conduct." The "Supplier Code of Conduct" sets forth the standards and expectations for suppliers engaged in business with Hyundai Motor Company to uphold their social, environmental, and ethical responsibilities across their operations and entire supply chains. To ensure responsible mineral sourcing across the value chain, the Company has also established and implements operational policies and processes, including the "Responsible Raw Materials Sourcing Policy," the "Human Rights Charter," and the "Supply Chain Sustainability Management Policy." In particular, the "Supply Chain Sustainability Management Policy" supports engagement and capacity-building activities and the implementation of responsible sourcing due diligence carried out not only at Hyundai Motor Company's operating sites but also across the entire supply chain in order to build long-term partnerships. Hyundai Motor Company's policies are available on its official website and should be interpreted comprehensively together with all other internal policies for ethical and sustainable business operations.

Common sourcing principles, due diligence processes, governance, and grievance handling standards not otherwise specified in this Policy shall be governed by the "Hyundai Motor Company Supply Chain Sustainability Management Policy."



[Supply Chain Management Policy Hierarchy]

2. Principles for Responsible Sourcing of Minerals

To support the implementation of due diligence, Hyundai Motor Company establishes and commits to adhering to the core principles for responsible sourcing set out below. These principles apply to all of Hyundai Motor Company's operations, and the Company expects suppliers and sub-suppliers that supply the raw materials within the scope of this Policy to also conduct appropriate, risk-based due diligence in their own operations and across their entire supply chains. Suppliers and sub-suppliers must also provide stakeholders with clear and accurate information demonstrating that they implement measures consistent with these principles within the scope of relevant laws and standards. Furthermore, in line with the Company's core principles, if a supplier is found to transact with, or be involved with, smelters or refiners associated with serious human rights violations such as forced labor or child labor, the Company reserves the right to suspend or terminate its business relationship with that supplier, within the scope of relevant laws, in order to uphold its commitment to responsible sourcing. In addition, to ensure the effective implementation of the core principles of this Policy, the Company incorporates this Policy into the contracts and agreements it concludes with suppliers, to the extent applicable.

Common sustainability management principles not otherwise specified in this Section shall be governed by the "Hyundai Motor Company Supply Chain Sustainability Management Policy" and the "Supplier Code of Conduct."

a. Social Responsibility

① Serious Human Rights Abuses

The Company does not tolerate any form of serious human rights abuse in its supply chain. Within the scope of relevant laws, the Company may suspend, cancel, or terminate its business relationship with any supplier involved in such practices. In particular, the Company actively works to prevent human rights violations that may occur in the sourcing of raw minerals and throughout the value chain, and to mitigate the associated risks. This commitment includes the following:

- i. All forms of forced labor and child labor;
- ii. All forms of abuse, including torture and cruel, inhuman, or degrading treatment;
- iii. Other serious human rights violations, such as discrimination, sexual harassment, and sexual violence;
- iv. Inhumane criminal acts contrary to international human rights law, such as war and genocide.

② Armed Groups

The Company does not tolerate any form of "Direct or Indirect Support" for public or private security forces, non-state armed groups, or their affiliates that illegally control mine sites or transport routes, or that engage in extortion or illegal taxation in connection with the supply chain. This includes, but is not limited to, purchasing minerals from, making payments to, or providing logistical support or equipment to such entities. Where armed group personnel are deployed, the Company requires compliance with the "Voluntary Principles on Security and Human Rights" and requires suppliers to operate screening procedures to ensure that individuals or organizations known to have been involved in serious human rights abuses are not hired. The Company also collaborates with relevant stakeholders to enhance the transparency, proportionality, and accountability of payments to public security institutions, and implements protective measures so that vulnerable groups, in particular artisanal miners, do not suffer human rights abuses at the hands of armed groups. Where a serious human rights risk related to armed groups has been identified but appropriate remedial measures are not taken within six months following the establishment of a risk management plan, the Company may suspend or terminate its business relationship with the relevant supplier.

③ Rights of Local Communities and Indigenous Peoples

The Company is committed to respecting and protecting the rights of all individuals, including those of vulnerable groups such as women and minorities, in the communities where it operates. The Company does not tolerate, support, or contribute to any act that violates or abuses the rights of Indigenous Peoples or other marginalized communities.

In accordance with the "United Nations Declaration on the Rights of Indigenous Peoples," the Company respects the rights of local communities and Indigenous Peoples, and requires suppliers involved in resource development or extraction that may have a material impact on the lands, territories, or resources of Indigenous Peoples to establish FPIC procedures aligned with applicable laws and international standards.

The Company considers the health, safety, and livelihoods of local communities and Indigenous Peoples in all its business activities. The Company takes proactive measures to prevent adverse impacts arising from air, water, and soil pollution, deforestation, improper waste disposal, and water use in sensitive areas. It also strongly opposes acts such as land grabbing, unlawful eviction, and the destruction of cultural or ritual sites. The Company minimizes its impact on local communities through environmentally responsible and socially respectful operations at all its sites, and requires suppliers to implement similar measures.

Other general social responsibility principles, such as non-discrimination and anti-harassment, freedom of association, diversity in employment, working hours and wages, occupational health and safety, and human rights defenders, shall be governed by the "Hyundai Motor Company Supply Chain Sustainability Management Policy" and the "Supplier Code of Conduct."

b. Environmental Responsibility

Hyundai Motor Company continuously strives to reduce the direct, indirect, induced, and cumulative environmental impacts that may arise in the sourcing and use of raw materials. It also makes every effort to use resources efficiently, reduce greenhouse gas and pollutant emissions, and prevent and mitigate environmental degradation throughout its operations and supply chain. Where environmental harm cannot be fully avoided or remedied, the Company pursues appropriate compensation and restoration measures.

① Water Pollution and Usage

The Company is committed to responsible water stewardship and expects its suppliers to use water efficiently and prevent water pollution. Water use in water-stressed areas and the proper treatment of wastewater are managed with particular importance. The scope of water resource management covers all water resources, including the seabed and marine environments, and encompasses matters related to water pollution, water use, water quantity (such as floods and droughts), and water accessibility. The Company does not tolerate any act that threatens local water resources or harms the water accessibility of nearby communities, ecosystems, or the seabed and marine environments.

② Soil Pollution, Land Use and Deforestation

The Company supports the preservation of healthy soil and responsible land use across its supply chain. The Company strives to prevent any act that contributes to land degradation, illegal land acquisition, or deforestation. Suppliers must avoid sourcing practices that harm ecosystems or the livelihoods of local communities, and must manage land in a sustainable manner.

③ Biodiversity

The Company is committed to protecting biodiversity and may require suppliers to assess and mitigate impacts on critical habitats and endangered species in advance. The Company does not tolerate any act that causes irreversible damage to ecosystems or threatens biodiversity conservation areas. It also encourages responsible sourcing practices that respect ecological balance and conserve natural resources for future generations.

Other general environmental responsibility principles, such as climate action and energy, air pollution and greenhouse gases, waste, hazardous substances and circular resources, and noise and vibration, shall be governed by the "Hyundai Motor Company Supply Chain Sustainability Management Policy."

c. Ethical Responsibility

① Ethical Conduct and Business Integrity

The Company is committed to maintaining ethical business conduct aligned with international standards throughout its operations and supply chain. In particular, it prohibits fraudulent acts that misrepresent the origin of minerals and actively cooperates to ensure traceability and responsible sourcing across the supply chain.

All suppliers must foster a culture grounded in ethics and integrity. Other general ethical responsibility principles, such as anti-corruption and anti-bribery, transparency in transactions, fair trade, political engagement, protection of personal information and intellectual property, and honest disclosure of information, shall be governed by the "Hyundai Motor Company Supply Chain Sustainability Management Policy" and the "Supplier Code of Conduct."

3. Responsible Sourcing Management System

In accordance with the "OECD Guidance," Hyundai Motor Company has established a comprehensive Responsible Sourcing Management System (the "RSMS") and a Supply Chain Due Diligence Procedure to identify, assess, and manage risks. This system is designed to address the risks defined in OECD Annex II, meet stakeholder expectations, and align with international frameworks, including the "EU Battery Regulation," and with leading industry best practices.

a. Establishment of the Responsible Sourcing Management System

The Company's RSMS is built on the foundation of this Policy and the "Supplier Code of Conduct," which set out the Company's commitment to responsible sourcing and the clear standards required of all suppliers. To reinforce these principles, the Company requires new suppliers to submit a signed agreement confirming compliance with this Policy prior to registration and contract execution. In addition, the Company obtains from its Tier 1 suppliers a "Letter of Commitment to Use RMAP-Conformant Smelters," and requires Tier 1 suppliers to apply the same RMAP-use principle to their own lower-tier supply chains (including Tier 2 and below) and to monitor this on a regular basis. Where the origin of a mineral is identified as a Conflict-Affected and High-Risk Area (CAHRA), suppliers are, in principle, required to conduct third-party due diligence or to source through smelters certified under the Responsible Minerals Assurance Process (RMAP); the detailed standards for this are set out in the "Addressing Identified Risks" subsection of this Section.

The RSMS includes an internal governance structure that supports the effective conduct of due diligence activities and facilitates the smooth sharing of key information among internal teams and external stakeholders, as set out in the Supply Chain Due Diligence Procedure.

The Company requires all business partners to maintain a responsible supply chain management system for the raw materials specified in this Policy, and, in accordance with the "OECD Guidance," the "UN Guiding Principles on Business and Human Rights," and Section 5 of this Policy, encourages stakeholders to anonymously raise concerns regarding the extraction, trade, handling, and export of minerals. As part of the RSMS, the Company establishes and operates systems to manage its supply chain and ensure transparency, including a chain of custody and traceability system that identifies and traces upstream suppliers and business partners.

b. Identification and Assessment of OECD Annex II Risks and EUBR Annex X.2 Risk Categories

The Company actively maps its raw material supply chain and continuously pursues improvement activities to enhance transparency and traceability, particularly for high-risk raw materials. The Company conducts ongoing assessments of environmental and social risks, including the identification of red flags related to the origin of raw materials.

The Company comprehensively assesses various factors, including whether suppliers source raw materials from Conflict-Affected and High-Risk Areas (CAHRA), whether they intentionally submit false information, and their level of awareness of responsible minerals. Suppliers for which red flags are identified through such assessments are managed in accordance with the Company's risk response mechanism.

In addition, the Company evaluates key suppliers for sustainability-related risks, including human rights, using tools such as Supplier Assessment Questionnaires (SAQs). The selection and monitoring of suppliers subject to assessment are conducted in accordance with the Company's internal procurement policies and procedures, and all suppliers must comply with the "Supplier Code of Conduct."

The Company annually reviews priority minerals by comprehensively considering global regulatory trends, the distribution of high-risk areas, impacts on human rights and the environment, strategic sourcing approaches, stakeholder concerns, and global certification status. For newly designated priority minerals, the Company performs supply chain mapping and on-site due diligence to identify and mitigate risks.

The Company regularly conducts due diligence of its lower-tier supply chain and applies enhanced due diligence where sourcing takes place in Conflict-Affected and High-Risk Areas (CAHRA). Enhanced due

diligence includes expanded desktop research, on-site visits, third-party verification, and alignment with recognized industry standards.

To trace the origin of minerals from Conflict-Affected and High-Risk Areas, the Company utilizes RMI reporting templates for all suppliers, including the "Conflict Minerals Reporting Template (CMRT)," the "Extended Minerals Reporting Template (EMRT)," and the "Additional Minerals Reporting Template (AMRT)."

Upon the Company's request, suppliers must transparently disclose the origin of raw materials within the scope of relevant laws, and must actively cooperate with the Company in conducting due diligence and implementing corrective actions and, where necessary, remediation.

c. Addressing Identified Risks

The Company establishes and implements risk mitigation measures to address risks identified within its supply chain. The key measures are as follows:

- i. Establishing measurable risk mitigation plans in consultation with relevant stakeholders;
- ii. Assigning internal departments responsible for implementation and managing implementation progress by setting performance objectives and indicators;
- iii. Prioritizing response measures based on the severity and urgency of risks;
- iv. Monitoring the effectiveness of mitigation measures; and
- v. Reporting the results of risk assessments to top management.

For responsible minerals for which RMAP (Responsible Minerals Assurance Process)-certified smelters exist, the Company sources, in principle, through certified smelters, and for minerals sourced from Conflict-Affected and High-Risk Areas (CAHRA) in particular, it applies enhanced due diligence to give priority to sourcing through RMAP-certified smelters. Where a supplier sources minerals from a smelter or refiner (SOR) that is not RMAP-certified, the Company requires the supplier to take the following measures:

- i. Re-verify whether the raw materials actually supplied originated from the smelter concerned;
- ii. Encourage uncertified smelters within the supply chain to participate in the RMAP assessment and require them to obtain an RMAP "Conformant" determination within a reasonable period; and
- iii. Exclude from the Company's supply chain any smelter that fails to obtain certification within a

reasonable period or refuses to participate in the RMAP assessment.

However, where a serious risk under Annex II of the "OECD Guidance" is identified, the Company may immediately suspend or terminate the transaction concerned without granting an improvement period.

For minerals for which no responsible minerals certification scheme, such as the RMAP, exists, the best-efforts obligation under the "OECD Guidance" applies. Accordingly, suppliers must ensure transparency for the responsible sourcing of such minerals, comply with relevant international industry standards and guidelines, and actively seek alternative verification methods.

Where a supplier does not sufficiently provide essential information related to conflict minerals or responsible minerals, or where supply chain risks are identified but appropriate corrective actions are not implemented, the Company pursues improvement activities to strengthen supply chain capacity through means such as training and due diligence. However, where a supplier intentionally provides false information or fails to demonstrate any improvement efforts despite repeated requests, the Company reserves the right to suspend or terminate its business relationship with that supplier within the scope of relevant laws. Before making a final decision to suspend or terminate a transaction, the Company assesses in advance the potential adverse impacts of such action on stakeholders, including workers and local communities, and, avoiding irresponsible disengagement, implements a phased termination of the transaction in a responsible manner.

d. Conduct of Third-Party Audits

The Company conducts risk-based due diligence of its supply chain and engages independent third-party verification bodies to assess suppliers' compliance with relevant standards, including the "OECD Guidance" and the "EU Battery Regulation." Based on the results of such due diligence, time-bound corrective action plans are established, and their implementation and effectiveness are continuously monitored. In addition to third-party verification, the Company may conduct its own due diligence and assessments, and expects suppliers to cooperate voluntarily and fully throughout the process.

For identified red flag suppliers, the Company takes measures according to the level of risk, such as revising the "Supplier Code of Conduct," providing training support, and conducting direct on-site audits. Where recurring problems or a lack of improvement are identified among high-risk suppliers, the Company recommends that they undergo due diligence by an independent third-party organization to ensure compliance with the required standards.

The Company further encourages suppliers to actively participate in credible industry initiatives and third-party certification programs, such as Copper Mark, IRMA, and RMI's RMAP. Participation in such programs is an indicator of a supplier's commitment to responsible sourcing and contributes to

identifying and mitigating upstream supply chain risks. To strengthen the integrity and sustainability of its supply chain, the Company continues to expand the proportion of its sourcing from certified smelters and refiners, such as those certified under the RMAP.

e. Public Disclosure on Responsible Sourcing

The Company regards transparency as a core value and discloses information on its responsible sourcing activities on a regular basis, at least once a year. Such disclosures are made through a variety of accessible channels, including the Company's website, sustainability reports, and separate communications with stakeholders. The disclosures include specific information on the sourcing and management of sustainable raw materials, as well as performance data related to the implementation of this Policy.

The items disclosed may include responsible sourcing policies and procedures, the results of supply chain risk assessments (including any critical risks identified), the results of grievances received and how they were addressed, and the progress of risk mitigation and continuous improvement activities. In alignment with relevant regulations, such as the "EU Battery Regulation," the Company gathers feedback from external stakeholders on its disclosures and reporting to enhance transparency. The Company also provides relevant information in a clear and accessible manner so that stakeholders, including employees, suppliers, and the general public, can clearly and easily understand and engage with its content.

4. Governance and Capacity Building

a. Roles of the Management Committee, the Board of Directors, and Executives

Risks related to responsible mineral sourcing are managed under the oversight of appropriate governance bodies, including executives and the Board of Directors, while the Supply Chain Sustainability Management Team under the Purchasing Division is responsible for the related operational work. Detailed matters concerning the governance structure and roles shall be governed by the "Hyundai Motor Company Supply Chain Sustainability Management Policy."

b. Training and Support

The Company provides tailored, objective-specific training programs to employees involved in raw material sourcing in order to strengthen their understanding of the sustainability principles set out in this Policy. The training covers key environmental, social, and governance (ESG) risks associated with raw material sourcing, as well as the Company's expectations for ethical and responsible supply chain operations.

As part of this training program, employees receive practical guidance on how to apply the RSMS in their daily work. This includes identifying and assessing supply chain risks, recognizing red flags, communicating with suppliers on due diligence requirements, and implementing appropriate follow-up actions. Through this training, the Company ensures that responsible sourcing principles are embedded into procurement practices and strengthens employees' capacity to comply with and put into practice the Company's sustainability management principles in the field.

In addition, the Company conducts awareness-raising activities and training on conflict minerals management for its Tier 1 and Tier 2 suppliers, electric vehicle battery suppliers, and purchasing personnel. The training covers the background of conflict minerals management, key regulatory trends, the Company's conflict minerals policy, an introduction to reporting templates such as the CMRT and EMRT, related survey plans, and how to use RMAP-certified smelters.

The Company also carries out activities to strengthen supply chain due diligence capabilities through joint training, workshops, and resource sharing with suppliers and sub-suppliers. These efforts not only help suppliers accurately understand the Company's requirements but also aim to promote continuous improvement and a shared sense of responsibility across the value chain.

5. Grievance Mechanisms

Hyundai Motor Company is committed to fostering an environment in which concerns related to raw material sourcing can be raised freely, transparently, and safely. All employees, suppliers, contractors, community members, and other stakeholders are encouraged to actively report any violations of this Policy, as well as any issues that may undermine the sustainability, legality, or ethical integrity of the sourcing process.

a. Grievance Submission and Handling

The Company operates a variety of accessible channels through which grievances related to raw material sourcing and procurement can be raised. These channels are open to all stakeholders, including employees, suppliers, civil society organizations, and affected communities. In addition, the Company recognizes officially acknowledged external non-judicial grievance mechanisms—such as RMI's Online Grievance Mechanism, RBA's Grievance Mechanism, and the OECD National Contact Points (NCPs)—as valid reporting avenues, ensuring that grievances related to human rights violations, environmental violations, and responsible mineral sourcing can be raised and resolved comprehensively and transparently throughout the supply chain.

The Company handles grievances raised in the course of responsible mineral sourcing in a transparent and fair manner, and protects reporting parties in accordance with its non-retaliation principle. Detailed matters concerning grievance handling procedures and the remediation of victims shall be governed by the "Hyundai Motor Company Supply Chain Sustainability Management Policy."

b. Representative Grievance Channels

Representative 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 (Win-Win Growth → Fostering a Win-Win Growth Culture → Transparent Procurement Report Center) (<http://winwin.hyundai.com/coportal/system/clean.html>)
- [KOR/Global] Audit Planning Team - Cyber Audit Office (<https://audit.hyundai.com>)

6. Policy and RSMS Review

Hyundai Motor Company will regularly monitor the performance and effectiveness of its Responsible Sourcing Management System (RSMS) to ensure alignment with this Policy and evolving international standards. The RSMS is reviewed and updated on a regular basis at least once every two years, and may

be reviewed earlier where there are changes in circumstances, revisions to relevant regulations, or significant changes in supply chain risks.

Policy revisions are carried out through internal consultation with relevant departments, and the Company will continuously improve its RSMS to meet global best practices and stakeholder expectations.

This Policy applies from the date on which it officially takes effect.

Annex - Reference Frameworks for Suppliers

To support its approach to responsible sourcing and due diligence, Hyundai Motor Company draws upon a range of international standards, principles, and conventions. Suppliers are also encouraged to review and use the following resources to align with applicable legal requirements and the Company's standards for ethical sourcing:

- International Bill of Human Rights
- Optional Protocol to the International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy
- OECD Due Diligence Guidance for Responsible Business Conduct
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- Ten Principles of the United Nations Global Compact
- UNEP Guidelines for Social Life Cycle Assessment of Products
- Convention on Biological Diversity (notably Decision COP VIII/28 - Voluntary Guidelines on Biodiversity-Inclusive Impact Assessment)
- Paris Agreement