



**Hyundai Motor  
Europe GmbH**

**July 2020**

## **CODE OF CONDUCT**

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## MESSAGE FROM TOP MANAGEMENT

We are pleased to introduce the Hyundai Motor Europe Code of Conduct (the “**Code**”). The Code is an essential part of our pan-European compliance program (the “**Compliance Program**”), which has been created to promote and embed a culture of ethics and integrity within our organization across Europe.

Conducting business in a legal and ethical manner is crucial for the success of our company in Europe. Through the Compliance Program we want to prevent, detect and react to illegal behaviors or to conducts that are not in line with our ethical standards. As a result, we will minimize our exposure to legal, reputational and financial risks while improving our credibility and competitiveness.

We consider that being compliant is a matter of making the right choices, but with an increasingly complex regulatory environment, this is not always an easy task. For that reason, the Code is designed to summarize and reflect our key legal obligations and to formalize our standards for an ethical conduct. It also aims to give you practical guidance on how to behave in compliance with those legal obligations and standards. We want to help you make the right decision.

Read carefully and understand the Code and follow the guidelines and policies set in it. Use the Code to identify the risks that are relevant to you in the performance of your work.

Ultimately, each and every one of us is responsible for having an effective Compliance Program within the Hyundai group. So, please do your part by fostering ethical and legal business operations at all times.

A handwritten signature in blue ink, appearing to read 'M. Cole', is positioned above the typed name and title.

Mr. Michael Cole  
**President & CEO**  
**Hyundai Motor Europe GmbH**

## **1.**

### **Introduction and General Principles**

- 1.1 Definitions and Icons
- 1.2 What is the Code of Conduct?
- 1.3 Who is the Code of Conduct for?
- 1.4 How can you use the Code of Conduct?
- 1.5 What are your individual responsibilities?
- 1.6 How to ask questions and report violations?
- 1.7 Whistleblowing Line
- 1.8 Corporate Core Values

# 1 INTRODUCTION AND GENERAL PRINCIPLES

## 1.1 Definitions and Icons

- **“Code”** as defined in section MESSAGE FROM TOP MANAGEMENT.
- **“Company” or “we”** means Hyundai Motor Europe GmbH and the European subsidiaries listed below:
  - Hyundai Motor Deutschland GmbH
  - Hyundai Motor Company Italy S.r.l.
  - Hyundai Motor Espana S.L.U.
  - Hyundai Motor France SAS
  - Hyundai Motor Poland Sp.z.o.o.
  - Hyundai Motor Czech s.r.o.
  - Hyundai Motor Netherlands B.V.
  - Hyundai Motor UK Limited
  - Hyundai Motor Norway AS
  - Hyundai Motor Czech s.r.o., organizačná zložka Slovakia
  - Hyundai Motorsports GmbH
  - Hyundai Motor Manufacturing Czech s.r.o.
  - Hyundai Assan Otomotiv San. ve Tic. A.Ş
- **“Compliance Program”** as defined in section MESSAGE FROM TOP MANAGEMENT.
- **“Compliance Team”** means the person, team or department that is in charge of compliance within your organization.
- **“Employee(s)” or “you”** means employees and executives of the Company, as well as consultants, contractors and/or sub-contractors that act on behalf of the Company.
- **“Line Manager”** means those Employees that manage a team within your organization.
- **“HR Team”** means the person, team or department that is in charge of Human Resources and General Affairs within your organization.
- **“Hyundai”** means Hyundai Motor Company as the global organization duly organized and existing under the laws of the Republic of Korea, having its head office at 231, Yangjae-dong, Seocho-gu, Seoul, South-Korea.
- **“Third Parties”** means suppliers, authorized dealers and repairers who have a business relationship with the Company.
- **“Whistleblowing Platform”** means the Company’s channel available for the Employees to report known or suspected violations of the Code.
- **“Your Organization”** means the relevant entity listed within the Company definition of which you are an Employee.



→ Applicable local policy or policies which are regulating in more detail the behaviour or conduct described in the section at issue.



→ Indications to be followed.

## **1.2 What is the Code of Conduct?**

The Code brings together the rules, principles and values of the Company that must at all times inspire and be used as a reference for internal management and in the relations between the Company and the different stakeholders involved.

In particular, the Code is intended to assist Employees in making good, ethical and lawful decisions with regard to their conduct and the conduct of others. It helps by highlighting different scenarios in which a compliance risk exists and gives guidance on how to react to and/or handle such situations.

The Code of Conduct is an essential part of the Company's Compliance Program, which ultimately aims to set the ethical standards that must guide the actions of Company's Employees and to establish effective measures to enable prevention, detection and reaction of/to infringements of applicable laws and internal policies.

## **1.3 Who is the Code of Conduct for?**

The Code applies to each and every Employee. For the avoidance of doubt, at no time and under no circumstances an Employee is exempted or released from the scope and application of the Code.

## **1.4 How can you use the Code of Conduct?**

The Code gives you guidance and practical advice on how you should conduct yourself in different situations you may face/are exposed to in your daily activities in order to be compliant. We recognize that taking the right decision is not always an easy concept, and the most "compliant" course of action in a given situation is not always clear. Therefore, the Code should be considered and used as a guide and reference rather than as a definitive rulebook.

Please note that the Code is split into multiple sections, each of which deals with a specific topic of relevance for our organization.

In relation to each topic we will explain to you:

- Why is that topic important under our Compliance program?
- What is the key compliance rule in relation to that topic?
- What behavior we expect from you in order to protect our Company in connection to that topic? We will provide you with some illustrative "Do's" and "Don'ts".
- Which are the relevant local policies that apply within your organization? These policies will provide you with further details on that topic.
- What to do if you have a question or a violation to report?

Even though you might think that some of the sections are not directly applicable to you in connection to your day to day job, it is still important to have an awareness of these issues, particularly because every Employee has a responsibility to support the success of the Compliance Program.

## 1.5 What are your individual responsibilities?

You must:

- Read the Code making sure that you understand it. Complete any compliance training that is assigned to you.
- Follow it. You have to conduct business in line with the rules set in the Code and in the applicable local policies implemented within Your Organization.
- Ask for guidance and assistance, if you have any doubt or are unsure about the most appropriate course of action to take.

You will find the relevant contact point under the “Indication” section of each of the Code’s topics. In any case, you can always raise your questions to your Line Manager or to the Compliance Team, who will be happy to assist you.

- Report if you know or suspect that a violation of the Code may be occurring.

Please follow the reporting procedures set out in the section 1.7 below.

Moreover, if you are managing a team within the Company you have to:

- Promote a culture of ethics and should at all times.
- Ensure that the Employees you supervise understand their responsibilities under the Code.
- Create an environment where Employees feel comfortable raising concerns without fear of retaliation.
- Never encourage or direct employees to achieve business results at the expense of ethical conduct or compliance with the Code or applicable law.

## 1.6 What are the consequences of violations of the Code?

This Code sets out exemplary behaviors setting the standard of ethics and integrity to be observed by Employees. Anyone who violates the Code will be subject to the application of disciplinary measures. Such measures will be defined in accordance to the seriousness and/or recurrence of the offense committed and in line with the applicable labor laws. They may be: disciplinary orientation, verbal warning, written warning, suspension and even lawful termination of the employment contract.

## 1.7 Whistleblowing Platform

**Speak Up:** Open and honest reporting of known or suspected violations of the Code is crucial for ensuring the Company’s reputation and protecting our business. Therefore, if you know or suspect a violation of the Code and/or applicable laws may be occurring, you have the duty to report it through the Company’s Whistleblowing Platform<sup>1</sup>. This is an online communication platform where you can enjoy full anonymity if you wish.

To access it, please visit <https://hyundai.gan-compliance.com/caseReport>

**Non-Retaliation:** Please note that the Company will not tolerate any form of retaliation against Employees who raise concerns or report misconduct in good faith or who cooperate with an internal investigation. We want to foster an open and honest culture that encourages Employees to come forward without fear.

**Internal Investigation of reports:** We will analyze the reports received through the Company’s Whistleblowing Platform and carry out an internal investigation when necessary. During this

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<sup>1</sup> Alternatively, you can also reach us by sending an email to [legal-compliance@hyundai-europe.com](mailto:legal-compliance@hyundai-europe.com).

investigation, we will maintain the confidentiality of the reports made to the extent possible whilst allowing a full and fair investigation to be completed and ensuring we comply with our legal obligations.

Employees must provide full, frank and honest answers to any question asked to them by any investigation team from the Company and should comply with any requests to maintain confidentiality in respect to the investigation process.

### 1.8 Corporate Core Values

Hyundai identifies five core values as part of our corporate philosophy and as principles that have existed in the Company throughout our history, and all Employees shall follow and encourage the application of them in our organization.

Knowledge and adherence to these values is the first step for you to better understand and apply more easily this Code.



- We promote a customer-driven corporate culture by providing the best quality and impeccable service with all values centered on our customers.



- We refuse to be complacent, embrace every opportunity for greater challenge, and are confident in achieving our goals with unwavering passion and ingenious thinking.



- We create synergy through a sense of “togetherness” that is fostered by mutual communication and cooperation within the company and with our business partners.



- We believe the future of our organization lies in the hearts and capabilities of individual members, and will help them develop their potential by creating a corporate culture that respects talent.



- We respect the diversity of cultures and customs, aspire to be the world’s best at what we do, and strive to become a respected global corporate citizen.



## **2.**

### **How to behave in the workplace?**

- 2.1 Respect for Human and Labour rights
- 2.2 No harassment and No discrimination
- 2.3 No use of drugs and alcohol in the workplace
- 2.4 Conflict of interests

## 2 HOW TO BEHAVE IN THE WORKPLACE?

We want to be a great place to work where Employees can carry out their activities in a harmonious work environment. We do not tolerate disrespectful conducts that could interfere improperly with the individual performance of our Employees or that create a hostile and offensive environment.

This section sets out the standards of good behavior that we expect from you – and that you may expect from all your colleagues.

### 2.1 Respect for Human and Labor Rights

**WHY?** Hyundai recognizes that the relationship between business and human and labour rights has become increasingly important and as a sign of its commitment, joined in 2008 the UN Global Compact. In this context, the Company considers essential to observe a policy of respect of human rights and fair labour standards within our region.

**WHAT?** The Company will not tolerate any conduct of the Employees that directly or indirectly encourage, promote or lead to violation and/or abuses of human rights or that undermine basic labour rights and standards.

#### HOW?

<b>Do's</b>	<ul style="list-style-type: none"><li>• Be aware of your rights as worker.</li><li>• Seek to work with Third Parties who respect human and labor rights.</li><li>• Take reasonable steps to ensure adherence to human rights within our supply chain.</li></ul>	<b>Don'ts</b>	<ul style="list-style-type: none"><li>• Do not allow the use of child labor.</li><li>• Do not use forced labor. Individuals must not be coerced to work by violence or intimidation.</li><li>• Do not turn a blind eye any abuses you suspect may be occurring.</li></ul>
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#### ➤ Employment Regulation



- Report any violations you know or suspect may be occurring through the Company's Whistleblowing Platform (<https://hyundai.gan-compliance.com/caseReport>).
- If you have any question related to this topic, seek guidance and advice either from your Line Manager, the HR Team or the Compliance Team.


## 2.2 No harassment and no discrimination

**WHY?** We have as primary value the respect for the individual and will always try our utmost to ensure that Employees and third parties are treated with dignity and respect. Moreover, please note that harassing and discriminatory behaviors may lead to the sanctions imposed not only to the Company but also to Employees, in accordance to applicable local laws.


**WHAT?** You shall not have any behavior towards other Employees or when dealing with third parties that may be humiliating, offensive, intimidating or that includes unwelcome sexual advances. The Company is committed to provide a workplace free from harassment, unlawful discrimination, intimidation, bias bullying and any other offensive conduct.

### HOW?

<b>Do's</b>	<ul style="list-style-type: none"> <li>• Treat all Employees and third parties with respect at all times.</li> <li>• Be aware of cultural differences and sensitivities, what is acceptable in one culture may not be in another.</li> </ul>	<b>Don'ts</b>	<ul style="list-style-type: none"> <li>• Do not display offensive or disrespectful material.</li> <li>• Do not abuse authority or create an intimidating or offensive atmosphere. Do not yell nor speak loud at employees.</li> <li>• Do not discriminate for reasons of race, color, nationality, social class, age, gender, marital status, sexual orientation, ideology, public opinion, religion or any other condition.</li> <li>• Do not turn a blind eye to actions which constitute harassment or discrimination.</li> </ul>
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- Employment Regulation
- Policy on Prevention of Sexual Harassment

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  - Report any violations you know or suspect may be occurring through the Company's Whistleblowing Platform (<https://hyundai.gan-compliance.com/caseReport>).
  - If you have any question related to this topic, seek guidance and advice either from your Line Manager, the HR Team or the Compliance Team.

**2.3 No use of drugs and alcohol in the workplace**


**WHY?** We maintain a zero-tolerance policy regarding intoxication at work since this could impair your ability to perform your duties in a correct and safe manner and to exercise sound business management on behalf of the Company. Furthermore, you could damage our image and reputation.

**WHAT?** You shall not come to work under the influence of alcohol and/or illegal drugs or use them during the workday. Exceptionally, alcohol may be consumed on the Company’s premises only at the events approved in advance by top management. In those cases, you should ensure that you do not drink to excess and are still able to carry out your job safely and competently and behave in accordance with the Code.

**HOW?**

<b>Do's</b>	<ul style="list-style-type: none"> <li>• Ensure that you only consume alcohol on the Company premises during events approved in advance by top management (e.g. organized Company events).</li> </ul>	<b>Don'ts</b>	<ul style="list-style-type: none"> <li>• Do not come back after lunch or an event outside the Company slurring words and/or smelling of alcohol.</li> <li>• Do not come to work under the influence of intoxicating substances or illegal drugs.</li> <li>• Do not take or encourage others to take intoxicating substances or illegal drugs at work.</li> <li>• Do not turn a blind eye to any suspected intoxication on the part of your colleagues.</li> </ul>
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➤ Employment Regulation

-  ➤ Report any instance of intoxication you know or suspect through the Company’s Whistleblowing Platform (<https://hyundai.gan-compliance.com/caseReport>).
- If you have any question related to this topic, seek guidance and advice either from your Line Manager, the HR Team or the Compliance Team.

## 2.4 Conflict of interests

**WHY?** The Company respects the rights of the Employees to manage their personal affairs in any way they choose. But it is important that those interests are lawful and do not conflict with the interests of the Company, since such conflicts have the potential to bring legal liability to the Company and yourself.

Cases of conflict of interest may arise when your personal relationships, participation in external activities or an interest in another venture, could influence or be perceived by others to influence your business decisions for the Company. Some examples:


- Contracting with related companies, family or friends or being involved in recruitment decisions relating to family or friends.
- Taking advantage of business opportunities that would otherwise fall to the Company.
- Having a financial interest in any company which is a competitor of the Company.
- Personal relationships between Employees who are part of the same reporting line.


Even the mere appearance of a conflict can be damaging to our business, jeopardizing the Company's and your reputation. It is therefore important to be vigilant in this regard.

**WHAT?** Do not let your personal interests (of those of a related person) conflict either directly or indirectly with those of the Company. In case you believe there is an actual or potential conflict of interest, you must inform your Line Manager as well as the HR Team and/or the Compliance Team. We will work with you to mitigate or resolve the conflict wherever possible, but you must refrain from proceeding with the course of action until we provide you with the relevant approval or adequate measures to implement.

### HOW?

<b>Do's</b>	<ul style="list-style-type: none"> <li>• Be transparent. Inform us in any case where you believe there is an actual or potential conflict of interest.</li> <li>• If you are aware that the Company is considering contracting with a company in which you or your family or friends hold an interest, please report it to avoid the appearance of you having influenced improperly the decision.</li> </ul>	<b>Don'ts</b>	<ul style="list-style-type: none"> <li>• Do not be involved in procurement relating to companies in which you or your family or friends hold an interest, or in recruitment decisions relating to family or friends.</li> <li>• Do not provide services or hold a financial interest under any circumstances for companies that are in any way competitors of the Company.</li> <li>• Do not enter into a personal relationship with someone who is part of your same reporting line.</li> </ul>
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➤ Business Ethics Policy

-  Report any conflict of interest you know or suspect may be occurring through the Company's Whistleblowing Platform (<https://hyundai.gan-compliance.com/caseReport>).
- If you are not sure whether a conflict of interest exists or you have a question on this topic, seek guidance and advice either from your Line Manager, the HR Team or the Compliance Team.

### **3.**

#### **How to conduct business with Third Parties?**

- 3.1 Anti-Bribery and Corruption
- 3.2 Gifts and Hospitality
- 3.3 Anti-Money Laundering
- 3.4 Respect of Competition Laws
- 3.5 International trade

### 3 HOW TO CONDUCT BUSINESS WITH THIRD PARTIES?

We select our suppliers impartially and in a transparent manner and that selection is based on objective criteria, such as technical ability, economic aspects, legal compliance and ethical behavior.

Relationships with customers and dealer network are managed by the Company according to principles of collaboration, availability, professionalism and transparency in order to found the basis for a solid and lasting relationship of mutual trust.

In this section we provide you some guidelines on how to conduct business with third parties in a safe manner for you and for the Company pursuant also to the applicable laws.


#### 3.1 Anti-Bribery and Corruption


**WHY?** The Company totally condemns all forms of corruption and bribery in both the public and private sector and observes a policy of zero tolerance of all corrupt practices. These behaviors entail a lack of integrity and dishonest business conduct and may attract high fines and prosecution leading to possible imprisonment of the individuals involved.

**WHAT?** You shall not promise, offer, provide or grant an unjustified benefit or advantage of any kind either personally or to a third party in exchange of an undue favor to the Company. Likewise, you may not receive, request or accept an unjustified benefit or advantage of any kind for yourself or a third party in exchange for unduly benefitting a third party.

#### HOW?

<b>Do's</b>	<ul style="list-style-type: none"><li>• Remain alert to the risk of bribery and corruption. Know well who you are doing business with.</li><li>• Take particular care when dealing with public servants and authorities.</li><li>• Inform the Compliance Team if you face a request for a kickback or facilitation payment.</li><li>• Follow the rules set in the Gifts and Hospitality Section, since this will minimize the risks of entering into bribery or corruption.</li></ul>	<b>Don'ts</b>	<ul style="list-style-type: none"><li>• Do not make facilitation payments to authorities in order to secure or expedite the performance of certain action.</li><li>• Do not conceal bribery or corruption through legal practices such as gifts, invitations, sponsorships or donations.</li><li>• Do not turn a blind eye to corrupt behavior.</li></ul>
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	<ul style="list-style-type: none"><li>➤ Anti-bribery and corruption Compliance Guidelines - Manual</li><li>➤ Anti-bribery and corruption Compliance Guidelines – Do's and Don'ts</li></ul>
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-  Report any violations you know or suspect may be occurring through the Company's Whistleblowing Platform (<https://hyundai.gan-compliance.com/caseReport>).
- If you have any question related to this topic, seek guidance and advice either from your Line Manager or the Compliance Team.

### 3.2 Gifts and Hospitality

**WHY?** Offering and/or accepting gifts, hospitality, entertainment or any other benefit from current or potential business partners may influence or raise questions about the recipient’s impartiality and compromise the Company’s reputation because of unfair treatment. Moreover, giving and/or receiving improper gifts, hospitality or entertainment might result in a bribe or in a corrupt practice, with the consequences described in the previous section. Therefore, it is very important that Employees respect the Company’s rules regarding gifts and hospitality.


**WHAT?** As a general rule, you must never use gifts, hospitality and entertainment to influence the business decision-making processes, gain an improper business advantage or cause others to perceive an improper influence. These conducts are in most cases illegal.

Notwithstanding this, the offer or reception of gifts, hospitality or entertainment is permitted by the Company when:


- (i) The offer is the result of usual and legitimate business practices.
- (ii) The offer is in line with the criteria set by the relevant local policy applicable within your organization.

**HOW?**

<b>Do's</b>	<ul style="list-style-type: none"> <li>• When giving or receiving gifts, hospitality or entertainment, check its actual or potential intent and purpose.</li> <li>• You can accept gifts or souvenirs of inexpressive values, such as notebooks, pens, key chains, cups or caps with the supplier's logo.</li> <li>• Decline gifts or benefits exceeding permissible limits when they are offered, If gifts are received without an opportunity to decline, they should be returned.</li> </ul>	<b>Don'ts</b>	<ul style="list-style-type: none"> <li>• Do not accept and/or offer gifts of insignificant value that can be construed as a bribe.</li> <li>• Avoid situations where gifts, hospitality and entertainment may affect your business judgment or objectivity, or the business judgment and objectivity of another person, or that they coincide (for a time) with business decisions.</li> <li>• Never offer anything of value to public servants.</li> </ul>
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- Anti-bribery and corruption Compliance Guidelines - Manual
- Anti-bribery and corruption Compliance Guidelines – Do's and Don'ts
- Business Ethics Policy

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  - In case of doubt as to the legitimacy or legality of any gift, hospitality or entertainment to be offered and/or received, you must consult your Line Manager, HR Team and/or the Compliance Team and get their approval before the gift, entertainment or hospitality is offered and/or accepted.
  - Report any violations you know or suspect may be occurring through the Company’s Whistleblowing Platform (<https://hyundai.gan-compliance.com/caseReport>).



### 3.3 Anti-Money Laundering

**WHY?** Money laundering is the process by which criminals turn ‘dirty’ money resulting from illegal activities, into ‘clean’ money which appears to come from a legitimate source, or when legitimate funds are used to support the activities of criminal and terrorist groups. All companies can be target of these illegal organizations to clean up their money. Therefore, it is of utmost importance that the Company is on guard in order to avoid being exploited this way. Being involved in money laundering can result in criminal prosecution, substantial fines and great reputational damage.

**WHAT?** You must be vigilant against the risk of assisting any criminal or terrorist organization in any stage of the money laundering process. Therefore, you must be alert and react to the following warning signs that could indicate money laundering:

- Orders that are inconsistent with customer’s or supplier’s usual practices.
- Requests for cash payment.
- Requests to make a payment to or accept a payment from a third party.
- Requests for making a payment on an account located in a country different to the one where the business partner is located.

#### HOW?

<b>Do's</b>	<ul style="list-style-type: none"> <li>• Take extreme care when being asked to make payments in cash or to a bank account in a country where services were not performed and the recipient is not located (“off-shore” payments).</li> <li>• Confirm the source of any funds received whenever you are concerned they might not be from a legitimate source.</li> </ul>	<b>Don'ts</b>	<ul style="list-style-type: none"> <li>• Do not make payments to unfamiliar companies/individuals or bank accounts without first confirming and validating the reason for making such payments.</li> <li>• Do not accept payments from unknown sources or persons without confirming why they are making the payment and, if possible, confirming the source of the funds.</li> </ul>
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- If you observe any of the warning signs listed above or you have any question related to this topic, you must contact your Line Manager or the Compliance Team.
- Report any violations you know or suspect may be occurring through the Company’s Whistleblowing Platform (<https://hyundai.gan-compliance.com/caseReport>).

### 3.4 Respect of Competition Laws


**WHY?** In a truly competitive market, consumers benefit from the availability of a wide range of high quality products and competitively priced goods and services. The Company believes that any anti-competitive behavior is bad for customers, bad for business and ultimately an unacceptable conduct. Therefore, we are firmly committed to do business in strict compliance with applicable competition laws. Moreover, an infringement of competition laws can have extremely serious consequences, such as serious damage to the Company's reputation and fines which can reach 10% of the Company's annual turnover.

**WHAT?** You shall be vigilant and not enter into any actual or potential infringement of competition law that you identify during the course of business, such as:


- Creation or participation in a cartel with competitors (e.g. by fixing prices, dividing target markets or customers, collusive tendering, boycotting common customers or suppliers).
- Exchange of commercially sensitive information with competitors (e.g. price-related information, cost-related information, business plans and strategy).
- Establishing resale prices for distributors and/or dealers.
- Restrictions of cross-border sales.
- Restriction on independent repairers to access spare parts or technical information.
- Abusing the position of dominance of the Company in a certain market or situation.

#### HOW?

<b>Do's</b>	<ul style="list-style-type: none"> <li>• Obtain your Compliance Department's clearance before cooperating with or disclosing commercially sensitive information to a competitor (directly or indirectly).</li> <li>• Leave a meeting or any event if a competitor starts discussing an issue that is sensitive.</li> <li>• Bear in mind that our independent distributors and our dealers are competitors to each other. Do not facilitate an exchange of commercially sensitive information between them.</li> </ul>	<b>Don'ts</b>	<ul style="list-style-type: none"> <li>• Do not agree or even informally discuss with competitors any issue that is commercially sensitive.</li> <li>• Do not think that exchanging commercially sensitive information through a third party (e.g. an agency) is any safer. Indirect exchanges of sensitive information are also prohibited.</li> <li>• Do not think of creative ways for ultimately setting the resale price or the minimum price our distributors/dealers shall sell our products, or for stopping cross-border sales. Indirect restrictions are also prohibited.</li> </ul>
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- EU Competition Law Compliance Manual
- EU Competition Law Compliance Manual –Do's and Don'ts

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  - If you identify a conduct that might present an actual or potential risk under competition law, you must seek the guidance and advice from the Compliance Team.
  - Report any violations you know or suspect may be occurring through the Company's Whistleblowing Platform (<https://hyundai.gan-compliance.com/caseReport>).

**3.5 International trade**

**WHY?** Most countries regulate trade for economic, political and security reasons and the Company is subject to international trade and import/export laws and regulations around the world. Failure to comply with applicable laws exposes the Company, and in some instances individual Employees, to strict civil and criminal penalties including unlimited fines and imprisonment and to reputational risk.

**WHAT?** When it is relevant for the scope of your work, you must follow the applicable trade laws and regulations, which include:

- **Sanctions regulations** that prohibit the Company from conducting business in certain countries, with certain individuals or companies and with certain products;
- **Export Control regulations** that restrict the export of specific products of the Company to certain countries or to certain end users;
- **Import/Customs regulations** that control the way the Company imports products into countries around the world and what import duties have to pay on those products.

**HOW?**

<b>Do's</b>	<ul style="list-style-type: none"> <li>• Before starting a cooperation check if the jurisdiction subject has been under restrictive and or sanctions measures (e.g. embargo).</li> <li>• Ensure that the items involved in a transaction are not prohibited or restricted for supply to certain destinations.</li> </ul>	<b>Don'ts</b>	<ul style="list-style-type: none"> <li>• Do not do business with persons and entities target by the sanctions measures.</li> <li>• Do not export any product that is subjects to Export Control regulations without considering whether an export license is required.</li> </ul>
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- Report any violations you know or suspect may be occurring through the Company's Whistleblowing Platform (<https://hyundai.gan-compliance.com/caseReport>).
- If you have any question related to this topic, seek guidance and advice either from your Line Manager or the Compliance Team.

## **4.**

### **How to manage Company's assets, information and communications?**

- 4.1 Company Assets and Resources
- 4.2 Confidential Information
- 4.3 Personal Data Protection
- 4.4 Intellectual Property
- 4.5 Social network, blogs and other social media
- 4.6 Economic-financial information

## 4 HOW TO MANAGE COMPANY'S ASSETS, INFORMATION AND COMMUNICATIONS?

In this section we want to provide you with some guidelines on how you should use the Company's assets, how to handle the information and data of sensitive nature (e.g. confidential information, personal data or economic-financial information) to which you have access in the execution of your tasks, how to manage ours or others' intellectual property in the context of your work, and how to properly use the social networks in connection to our brand.

### 4.1 Company Assets and Resources

**WHY?** The Company provides Employees with all necessary assets and resources to perform their daily work in the best way and to ensure a safe and pleasant workplace. Naturally it is important that Employees use these assets and resources with responsibility and professionalism.

Company's assets and resources are office supplies, computers, phones, mobile phones, tablets, vehicles, real estate, tools, software and any other items made available by the Company in the workplace to perform the daily work.

**WHAT?** You are responsible for managing properly and safeguarding the Company's assets and resources, including the information systems and other electronic devices made available to you.

#### HOW?

<b>Do's</b>	<ul style="list-style-type: none"><li>• Use the Company's assets and resources (vehicles, mobile phones, tablets, computers, etc.) in strict compliance with the Company's internal policies and applicable laws.</li><li>• Only use authorized software and devices.</li><li>• Take care of the Company's assets avoiding undue, inadequate, illegal or harmful use, avoiding to the extent possible loss or theft.</li></ul>	<b>Don'ts</b>	<ul style="list-style-type: none"><li>• Do not damage or destroy the Company's assets and resources.</li><li>• Do not use unauthorized devices or software (such as your private computer or unauthorized public clouds) to perform your work.</li><li>• Do not use any materials, equipment, tools, vehicles and other assets and resources of the Company for private purposes or facilitate use by Third Parties, unless otherwise authorized in specific internal policies.</li></ul>
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	<ul style="list-style-type: none"><li>➤ Employment Regulation</li><li>➤ Security Regulation</li></ul>	<ul style="list-style-type: none"><li>➤ Data Security Policy</li><li>➤ Mobile Phone Policy</li></ul>
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- Report any violations you know or suspect may be occurring through the Company's Whistleblowing Platform (<https://hyundai.gan-compliance.com/caseReport>).
- If you have any question related to this topic, seek guidance and advice either from your Line Manager, the HR Team or the Compliance Team.

**4.2 Confidential Information**

**WHY?** The Company’s confidential information is a very important proprietary asset. What constitutes confidential information may vary depending on the context, but in general we give this consideration to any non-public information owned by the Company which is normally deemed for internal use (the “**Confidential Information**”).

Confidential Information typically relates to our ideas and concepts, new products and designs, marketing and commercial plans, financial results, business development opportunities, changes to internal management or relationships with our business partners, manufacturing techniques and pricing data. Some of this information may even constitute a trade secret and/or be protected by other intellectual property rights.


Treating Confidential Information with a particular degree of care is essential for its adequate protection and supports our competitive advantage in the market.

**WHAT?** You have to exercise a high level of care to ensure that the Company’s confidential information is at all times protected.

**HOW?**

<b>Do’s</b>	<ul style="list-style-type: none"> <li>• Be vigilant and careful when using authorized electronic means of storing and sending Confidential Information.</li> <li>• Secure all Confidential Information while working in an “open space” environment.</li> <li>• Ensure secure storage when you step away from your workspace (e.g. lock cabinets and desktops) and make sure no Confidential Information is left on printers or in meeting rooms.</li> <li>• Ensure that the necessary confidentiality agreements and clauses are in place and complied with before you disclose Confidential Information to any Third Party.</li> </ul>	<b>Don’ts</b>	<ul style="list-style-type: none"> <li>• Do not disclose Confidential Information without the prior express authorization of the Company, not even to close relatives or friends.</li> <li>• Do not discuss Confidential Information in places where you can be overheard.</li> <li>• Do not disclose Confidential Information to Third Parties without having adequate measures in place (e.g. confidentiality agreements).</li> <li>• Do not initiate and manage paper or electronic back-up files outside of the Company’s system, such as personal file management systems or public clouds, unless you have received prior IT and HR approval.</li> </ul>
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➤ Security Regulation

-  Report any violations you know or suspect may be occurring through the Company’s Whistleblowing Platform (<https://hyundai.gan-compliance.com/caseReport>).
- Seek the advice of your Legal Team any time you need to disclose Confidential Information to Third Parties, so they can ensure beforehand that all adequate measures are in place.

**4.3 Personal Data Protection**


**WHY?** The Company is very committed to guarantee the proper, clear and adequate processing of personal data, which shall always be done in accordance with the applicable data protection laws (e.g. GDPR). It is therefore important that we duly protect the personal data collected from our Employees, customers and Third Parties and we take all security and any other measures which are required by the laws currently in force.

**WHAT?** All Employees and Third Parties are obliged to treat personal data acquired and processed in the context of the employment relationship or collaboration with the Company in line with the applicable data protection laws.


Moreover, you shall guarantee a diligent selection procedure of Third Party service providers that leads to an appropriate level of security in the application and utilization of our IT systems which are used for the processing of personal data.

**HOW?**

<b>Do's</b>	<ul style="list-style-type: none"> <li>• Be extremely aware of and take appropriate action when collecting, processing, using, disclosing, storing and transferring personal data. Notify the Compliance Team timely in case of new/changing projects that involve the processing of personal data.</li> <li>• Secure the processing of personal data by Third Party service providers of the Company by involving the Compliance Team during the selection procedure.</li> <li>• Notify the Compliance Team immediately in case of a (potential) data breach.</li> </ul>	<b>Don'ts</b>	<ul style="list-style-type: none"> <li>• Do not collect, process, use, disclose or store personal data without being sure we have a legal basis for it (e.g. the consent of the data subject).</li> <li>• Do not access personal data if it is not strictly required for the performance of your work.</li> <li>• Do not transfer personal data to Third Parties, in particular when they are located outside the EU without checking if the transfer is allowed.</li> </ul>
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- General Data Protection Policy
- Data Security Policy
- Data Subject's Right Policy
- Employee Privacy Notice
- Data Breach Policy
- Security Regulation
- Data Retention and Deletion Policy

-  Report any violations you know or suspect may be occurring through the Company's Whistleblowing Platform (<https://hyundai.gan-compliance.com/caseReport>).
- If you have any question related to this topic, seek guidance and advice either from your Line Manager or the Compliance Team.

**4.4 Intellectual Property**


**WHY?** The Company’s intellectual property rights, such as patents, trademarks, copyrights, design rights, know-how and trade secrets (together the “**IP Rights**”), are key to our business and need to be protected. Likewise, it is also very important that we respect and avoid infringing the IP rights of others. Not doing so can damage our operations and reputation and may result in severe consequences for the Company and for you, such as civil, criminal and administrative liability.

**WHAT?** You shall protect the Company’s IP Rights by following all the rules set by the Company in this regard, in this Code and in any other applicable local policy. Likewise, you shall respect the IP Rights of others. Please note that the Company does not tolerate any unauthorized use, theft or misappropriation of any third party’s IP Rights.

**HOW?**

<b>Do’s</b>	<ul style="list-style-type: none"> <li>• If you notice that a third party is infringing or misusing Hyundai’s IP Rights you must report it to your Legal Team.</li> <li>• Be vigilant and ensure that third-party materials are used only in accordance to the terms of the relevant license.</li> </ul>	<b>Don’ts</b>	<ul style="list-style-type: none"> <li>• Do not use any third-party material protected by an IP Right without the authorization of the right-holder.</li> <li>• Do not do business with suppliers and subcontractors who do not respect the Company’s IP Rights.</li> </ul>
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➤
Intellectual Property Rights Manual

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Report any known or suspected misuse of any Company’s or third party’s intellectual property to your Legal Team or through the Company’s Whistleblowing Platform (<https://hyundai.gan-compliance.com/caseReport>).
- Seek the advice of your Legal Team when you want to license the use of Hyundai IP Rights to a third party or to introduce a new brand/trademark in your market.
- Seek the advice of your Legal Team when you want to receive the license for the use of a third party material.




**4.5 Social networks, blogs and other social media**


**WHY?** The Company’s social networks are an institutional communication tool that may contribute to strengthening our identity and corporate culture and also have an impact on the business and image of the Company. Moreover, as Hyundai Employee, everything you write or say reflects on Hyundai’s reputation. Therefore, we need you to use the social networks and social media in a way that ensures the protection of the reputation of the Company.

**WHAT?** You shall not use the Company’s or your own social networks and media to divulge information, make comments or show images that may be improper, inadequate, inappropriate, offensive, discriminatory, humiliating or defamatory, in breach of a duty of confidentiality or business secret or that may in any way affect the prestige and reputation of the Company or of its professionals.

**HOW?**

<b>Do’s</b>	<ul style="list-style-type: none"> <li>• At all times respect the Company’s reputation in social networks and social media.</li> <li>• Use the social networks and social media pursuant to the guidelines provided by the Company.</li> <li>• Raise any comments which may have a negative effect on Hyundai’s brand reputation in Europe to the attention of the Company’s social media team.</li> </ul>	<b>Don’ts</b>	<ul style="list-style-type: none"> <li>• Do not disclose information about Hyundai’s operations unless you have received authorization to do so.</li> <li>• Do not use Hyundai official social media channels if you are not an approved user.</li> <li>• Do not enter into discussions with other people online about the Company’s brand / product neither on your own channels nor on the official channels.</li> </ul>
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➤ Social Media Guidelines and Policy

-  Report any violations you know or suspect may be occurring through the Company’s Whistleblowing Platform (<https://hyundai.gan-compliance.com/caseReport>).
- If you have any question related to this topic, seek guidance and advice either from your Line Manager, the PR Team or the Social Media Team.

**4.6 Economic-financial information**

**WHY?** The Company strictly respects the principles of truthfulness and correctness with regard to any document in which our economic, patrimonial and financial values are indicated. Books and records which are incomplete mean that the Company’s management is taking decisions based on incorrect information.


Likewise, a failure to maintain accurate and complete books and records can place the Company and its Employees at risk of high fines. In addition of the financial impact of such penalties, significant reputational damage would be incurred if prosecution is brought against the Company in any of the countries in which we do business.

**WHAT?** You must never have any behavior which aims to alter the correctness and truthfulness of the data and information contained in the Company’s financial statements, reports or other corporate communications required by law.

**HOW?**

<b>Do's</b>	<ul style="list-style-type: none"> <li>• Ensure that all books and records you maintain are truthful and accurate.</li> <li>• Question any items on any records which appear unusual, suspicious or incomplete.</li> <li>• Ensure that you maintain a file of supporting documents to show that payments have been legitimately made (e.g. receipts for any expenses claimed).</li> <li>• If you are in charge of handling economic-financial information, you have to verify diligently the correctness of the data and information given. Frequently review books and records to double check for any previous errors.</li> <li>• Respond truthfully to all appropriate questions from auditors.</li> </ul>	<b>Don'ts</b>	<ul style="list-style-type: none"> <li>• Do not falsify, conceal or destroy a document or omit relevant information.</li> <li>• Do not establish any kind of “off the record” account or any other undisclosed or unrecorded fund.</li> </ul>
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➤ Security Regulation

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➤ Report any violations you know or suspect may be occurring through the Company’s Whistleblowing Platform (<https://hyundai.gan-compliance.com/caseReport>).
- If you have any question related to this topic, seek guidance and advice either from your Line Manager or the Compliance Team.

## **5.**

### **Ensuring Safety, Quality and Environmentally Friendly Workplace**

5.1 Health & Safety

5.2 Product quality and safety

5.3 Environment

## 5 ENSURING SAFETY, QUALITY AND ENVIRONMENTALLY FRIENDLY WORKPLACE

The Company recognizes that good health and safety form an essential part of its business operations. Therefore, it is committed of doing its utmost to ensure the health and safety of all of its Employees, to ensure the quality and safety of its products and to preserve the natural environment by contributing to reduce the impact that its business operations have upon it.

### 5.1 Health and Safety

**WHY?** The Company is committed to ensuring a healthy and safe work environment. The consequences of getting health and safety wrong can be severe and the Company wishes to do all it can to protect its Employees and members of the public that it comes in contact with.

**WHAT?** We have the duty to put all suitable arrangements in place to assess and manage the risks posed to health and safety of Employees in the workplace. For that purpose, the Company has set up a management structure in relation to health and safety. Moreover, we provide you with training on how to manage dangerous situations (e.g. fire prevention) and if relevant, how to carry out your role safely.

You have the duty to respect and follow the instructions provided to you by the Company in this area.

#### HOW?

<b>Do's</b>	<ul style="list-style-type: none"><li>• Make sure you are familiar with the Company's emergency and evacuation procedures in your location.</li><li>• Ensure that you use any protective equipment you have been provided with at all times.</li><li>• Make sure your work environment (office area, desk area) is free of hazards.</li><li>• Attend trainings related to health and safety delivered by the Company.</li></ul>	<b>Don'ts</b>	<ul style="list-style-type: none"><li>• Do not neglect or break the work safety rules. Do not take risks just to get a job done more quickly. You owe a duty to yourself and your colleagues to work in a safe manner.</li><li>• Do not attempt to use machinery or equipment which you may have not trained to use.</li><li>• Do not attempt to undertake any task which may present a risk to your safety or that of others unless you have received the correct safety training.</li></ul>
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- Report any violations you know or suspect may be occurring through the Company's Whistleblowing Platform (<https://hyundai.gan-compliance.com/caseReport>).
- If you have any question related to this topic, seek guidance and advice either from your Line Manager, the HR Team or the Compliance Team.

**5.2 Product quality and safety**

**WHY?** Supplying quality and safe vehicles and other products is a core requirement for our business and must be treated with the utmost importance. Therefore, Hyundai has a firm commitment and implements all necessary measures to ensure that its products are safe to consumers. Moreover, breaches of product safety and quality legislation may result in damages to our customers, high fines and great reputational damage.


**WHAT?** Hyundai has implemented a system of checks and quality control inspections to test and monitor the quality of Hyundai’s products and their fitness for purpose.

Moreover, in the event that a defect is identified with a particular Hyundai product, the Company has traceability and recall procedures in place to ensure that the defect is identified and rectified as quickly as possible.

You must ensure that you follow all relevant Company policies, procedures and quality standards in that are relevant in connection to your work. Be vigilant and react in case you identify our products are not matching the required levels of quality and safety.

**HOW?**

<b>Do’s</b>	<ul style="list-style-type: none"> <li>• Where appropriate, make sure you are familiar with the Company’s quality standards and the technical specifications of the Company’s products.</li> <li>• Do raise any concerns you have about potential or actual changes in the quality of a product.</li> </ul>	<b>Don’ts</b>	<ul style="list-style-type: none"> <li>• Do not ignore any potential issues you identify regarding product safety or quality.</li> <li>• When appropriate, do not forget to check that all documentation relating to quality compliance and all quality checks have been completed.</li> </ul>
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-  ➤ Report any violations you know or suspect may be occurring through the Company’s Whistleblowing Platform (<https://hyundai.gan-compliance.com/caseReport>).
- If you have any question related to this topic or any concern regarding potential or actual changes in the quality of a product, seek guidance and advice either from your Line Manager or the Compliance Team.

### 5.3 Environment

**WHY?** The Company recognizes the importance of preserving the natural environment and is dedicated to reducing the impact its business operations have on it. Therefore, we work on constantly improving the environmental management and publicly reporting our performance. It is important to work together to ensure compliance to applicable laws in all circumstance since breaches of environmental regulations may result in criminal and/or civil proceeding and/or other sanctions.

**WHAT?** Hyundai's green technologies are created to benefit both the current and future generations. Our automobiles are designed to minimize environmental impact from the product planning stage to the disposal/recycling. We strive to apply the most innovative green technologies available and are committed to ensuring that our workplaces are operating in an environmentally friendly way.

We expect you to contribute to our commitment by abiding to the policies and procedures that may be implemented in your workplace in relation to the protection of the environment and the promotion of environmentally friendly working practices.

#### HOW?

<b>Do's</b>	<ul style="list-style-type: none"><li>• Consume raw materials, energy, fuel and other resources always in an economic and efficient manner.</li><li>• Make sure you are familiar with the applicable laws that are relevant for you in connection to your work (e.g. regulations in relation to carbon and other greenhouse emissions, energy use, clean air, use, storage and disposal of industrial and chemical waste, logistics, recycling or product development).</li></ul>	<b>Don'ts</b>	<ul style="list-style-type: none"><li>• Do not neglect and/or disobey the environmental rules.</li><li>• Do not ignore actual or potential issues you identify regarding the impact working practices may have on the environment.</li><li>• Do not avoid complying with an environmental-friendly practice to save time.</li></ul>
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- Report any violations you know or suspect may be occurring through the Company's Whistleblowing Platform (<https://hyundai.gan-compliance.com/caseReport>).
- If you have any question related to this topic, seek guidance and advice either from your Line Manager, the HR Team or the Compliance Team.

**6.**

**Resources**

## 6 RESOURCES

The Code and the other applicable local policies and guidelines listed in the Code are available on the HR Portal and on the compliance portal at the following address <https://hyundai.gan-compliance.com> in the “Policy Library” section.

If you do not have access to the above channels or you have questions or concerns, ask to your Line Manager, HR Team or Compliance Team or contact the following address [legal-compliance@hyundai-europe.com](mailto:legal-compliance@hyundai-europe.com).

For your reference, below are listed all the policies and guidelines applied within your organization:

- Anti-bribery and Corruption Compliance Guidelines – Manual and Do's and Don'ts
- Business Ethics Policy
- Data Breach Policy
- Data Retention and Deletion Policy
- Data Security Policy
- Data Subject's Right Policy
- Employee Privacy Notice
- Employment Regulation
- EU Competition Law Compliance - Manual and Do's and Don'ts
- General Data Protection Policy
- Intellectual Property Rights Manual
- Mobile Phone Policy
- Policy on Prevention of Sexual Harassment
- Security Regulation
- Social Media Guidelines and Policy