



HME Human Rights Policy
March 2026

TABLE OF CONTENTS

1	Introduction and eligibility	3
2	Purpose and definitions.....	4
3	Scope and obligations	5
4	Human rights and employee working conditions	5
5	Human rights in our business operations	7
6	Implementing Human Rights in Our Operations	9
7	Implementation & Final Provisions	10
8	Responsibilities	10
9	Policy Review and Controls.....	10
10	Non-Compliance with the Policy	11
11	Related Policies and Guidelines.....	11
12	Appendix I - R&Rs	12
13	Appendix II – Policy References	12
14	Appendix III- Hyundai Motor Company Human Rights Key Principles.....	13
15	Appendix IV: Policy’s Implementation Checklist	15

1 INTRODUCTION AND ELIGIBILITY

INTRODUCTION

Welcome to our Human Rights policy. At our Company, we recognize that respect for human rights is fundamental to responsible business conduct and sustainable growth. The Human Rights policy establishes our commitment to uphold internationally recognized human rights principles in all aspects of our operations. It serves as a framework for identifying, preventing, and mitigating potential human rights risks across our workforce, supply chain, and communities where we operate.

ELIGIBILITY

This Human Rights policy is applied to the following entities, referred to as “Company” or “Organization”, with no prejudice to other entities that may be incorporated in Europe during the period:

- Hyundai Motor Europe GmbH
- Hyundai Connected Mobility GmbH
- Hyundai Motorsports GmbH
- Hyundai Motor Group Racing SAS
- Hyundai Motor Deutschland GmbH
- Hyundai Motor UK Limited
- Hyundai Motor Company Italy s.r.l.
- Hyundai Motor Espana S.L.U.
- Hyundai Motor France SAS
- Hyundai Motor Poland S.p.z.o.o.
- Hyundai Motor Czech s.r.o.
- Hyundai Motor Czech s.r.o., organizačná zložka Slovakia
- Hyundai Motor Netherlands B.V.
- Hyundai Motor Norway AS
- Hyundai Motor Sweden AB
- Hyundai Hydrogen Mobility Germany GmbH
- Hyundai Hydrogen Mobility AG
- Hyundai Commercial Vehicles & Hydrogen Europe GmbH
- Hyundai Motor Manufacturing Czech s.r.o.
- Hyundai Motor Türkiye Otomotiv A.Ş
- Genesis Motor Europe GmbH
- Genesis Motor Deutschland GmbH
- Genesis Motor Switzerland AG
- Genesis Motor UK Limited

2 PURPOSE AND DEFINITIONS

PURPOSE

Our Company aims to actively implement human rights management, prevent human rights violations, and mitigate related human rights risks. As such, the Company respects and supports all recognized human rights and labour-related international standards and guidelines, such as the Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, International Labor Organization Declaration on Fundamental Principles and Rights at Work, OECD Guidelines for Multinational Enterprises and OECD Due Diligence Guidance for Responsible Business Conduct, among others (see Appendix II).

The Human Rights policy outlines our commitment to identify, prevent and mitigate negative effects of business activities on human rights. It further defines the related standards and guidelines of the human rights principles established by our parent company, Hyundai Motor Company (HMC), in the [HMC Human Rights Charter](#).

DEFINITIONS

For the purposes of this policy, the following definitions apply.

- **Company / Organization / we / our / us** – All subsidiaries of Hyundai Motor Company beneath HME RHQ governance as mentioned in the section above.
- **Executives** – Refers to individuals who hold senior leadership positions within the organization and have the authority to make strategic decisions that impact the company's overall direction and operations.
- **Employee(s) / you / your** – Refers to all individuals employed by the Company, including permanent, temporary, full-time, part-time, interns, trainees, agency workers, expatriate coordinators, consultants, contractors, or sub-contractors working on behalf of the Company.
- **Business Partner / Third Party** – Refers to any individual or organization with which the Company has a business relationship, including but not limited to suppliers, dealers, distributors, contractors, advisers, agents, and other external stakeholders.
- **Customer** - Any individual or entity that purchases, leases, or subscribes to Hyundai products or services, including vehicles, parts, financing, and after-sales services—under terms compliant with Hyundai's corporate policies, local regulations, and global standards.
- **Policy** – Refers to the Human Rights policy, including any related procedures, guidelines, or appendices.

- **ILO** – Refers to the International Labour Organisation.
- **OECD** – Refers to the Organisation for Economic Cooperation and Development.
- **UN** – Refers to the United Nations.
- **UNGC** – Refers to the United Nations Global Compact.

3 SCOPE AND OBLIGATIONS

SCOPE

This Policy applies to all Executives and Employees of the Company

OBLIGATIONS UNDER THE POLICY

All executives and Employees of the Company have a responsibility to uphold the human rights principles during Company operations and when collaborating with Business Partners, Customers and Third Parties. All officers, Executives, and Employees of the Company shall perform their duties in accordance with the Policy, unless otherwise prevented by law.

Hyundai expects its Business Partners, suppliers and other parties who may contribute to Hyundai's products, services or business activities to respect the Company's human rights principles. Upon discovery of a non-compliance with HMC Human Rights Principles (see Annex III), the Company will take immediate action in accordance with relevant laws.

4 HUMAN RIGHTS AND EMPLOYEE WORKING CONDITIONS

The following defines the standards and guidelines for the Company's Employee's working conditions. For further details regarding our Global Human Rights Principles, please reference the HMC Human Rights Charter.

Prohibition of forced or compulsory labour

The use of all forms of forced or compulsory labour is prohibited.

Employees may not be made to work contrary to signed employment contracts or other legal document. Practices such as physical assault, restriction of free movement, intimidation, threat of dismissal, or unjustified withholding of salary for purposes of compulsory labour are prohibited.

The company does not physically retain Employee or job applicant identification cards, visas, or other documents that would restrict the actions of Employees or job applicants.

Prohibition of child labour

The use of child labour is prohibited. General minimum age for the admission of employment is defined within local law. The legal age requirement for all Employees is verified using identification cards or other legal documents.

Where persons under 18 years old may be employed (such as working students, interns, apprentices, or participants in similar programs, provided they comply with applicable laws

and guidelines), they shall be protected from working conditions that hinder their development. Such persons may not be tasked with high-risk or hazardous work, nor have their educational opportunities limited. The Company undertakes to comply with the provisions of applicable laws for the protection of minor(s) with regard to the employment relationship and working hours.

Prevention of discrimination and workplace harassment

In accordance with local requirements, our Company is committed to fostering a work environment free from discrimination and harassment. We do not tolerate any form of discrimination or harassment based on gender or gender identity, ethnic background or nationality, religion or world view, physical or mental ability, sexual orientation, social background or age. Further, we ensure non-discriminatory practices in the recruitment of new Employees and in the determination of salaries.

The Company ensures preventive measures, such as training, are implemented.

All instances of workplace harassment are thoroughly investigated and appropriately addressed. All Employees are encouraged to interact with one another respectfully and fairly, thereby contributing to the creation of a safe and inclusive workplace.

The Company aims to provide an accessible workplace for all Employees. Employees with disability requiring accommodations in the working environment, the way work is organized, or working times may request support from the Company in accordance with local law.

Working conditions

The Company is dedicated to providing a positive and inclusive work environment. The Company recognizes the importance of work-life balance.

The Company is committed to ensuring that all Employees' working hours comply with applicable labour laws, respect the work-life balance, ensure fair compensation, and prevent excessive overtime. Working hours are defined by the local office's working time policy and should be designed to provide flexible working time to meet Employee and Company needs.

When overtime is required to address urgent business needs, managers may request the Employees to work additional hours, whereby the maximum working hours and rest periods stipulated by law are strictly adhered to. It is the Company's policy that overtime requests should be exceptional and not a regular practice. Employees will be fairly compensated according to the legal standards in the respective country and the local office's overtime procedure, the individual employment agreements and any potential applicable collective bargaining agreements.

The Company is committed to fair and equitable remuneration practices and ensure equal pay for equal work or such of equal value, based on objective, transparent, and non-discriminatory criteria, including but not limited to factors such as role scope, skills, experience, performance, and market conditions.

We support Employees' professional development and operate a competency enhancement program to develop their skills. The Company provides professional development opportunities to allow Employees to develop in their careers.

Prohibition of unjustified dismissal

Every Employee has the right to protection against unjustified dismissal. All termination decisions must follow fair procedures and respect the rights and dignity of every employee, in accordance with the legal standards of the respective country.

Freedom of association and collective bargaining

We recognize the right of Employees to form and participate in legitimate bargaining organizations. The Company does not restrict Employee's right to participate in a specific bargaining organization or defend their interest, including strike actions. In the absence of such collective bargaining organization, all Employees are permitted to propose suggestions to the Company freely using the provided Employee feedback channels.

Employees will not be subjected to unfair treatment for engaging in personal activities to protect their rights or for participating in legitimate external bargaining activities. The Company does not restrict membership to bargaining organisations and does not make membership of a specific organisation, a condition of employment.

Health & Safety

The Company provides a safe and hygienic working conditions for Employees. A health & safety management system is operated to mitigate physical and mental risks and ensure compliance with all workplace health and safety requirements required by law. As required by law, Employees are provided appropriate protection measures to ensure their health and safety. In the event of an employee medical examination revealing abnormal findings due to work-related injury or disease, medical expenses shall be subsidised.

5 HUMAN RIGHTS IN OUR BUSINESS OPERATIONS

At Hyundai, we are conscious of the impact of our business operations. This section defines our responsibilities to protect the human rights of our customers and communities in which we operate. For further details regarding our Global Human Rights Principles, please reference [HMC Human Rights Charter](#).

Customers

Customers are at the centre of our business. All Executives and Employees of the Company must endeavour to protect the life, health, property, and personal information collected when providing products and services.

Transparent, detailed and accurate information about products and services are provided in accessible format using easy-to-understand language. To ensure comprehension, the Company will endeavour to provide all relevant materials in local language(s) when requested by the customer.

To avoid harming customers' life, health, and property of customers due to product defects, necessary care should be taken in the design, manufacture, sale, use (operation) and maintenance of the product in accordance with the laws and regulations. In the event of potential damage to customers arising from product or service defects, customers should be notified of the associated risks. Executives and Employees should ensure adequate measures to mitigate such risks, such as retrieval (recall), are implemented as soon as possible.

Local communities

The communities in which we operate are an integral part of our success. Environmental and safety impacts are evaluated during construction, operation and closure of physical facilities. New business activities should be reviewed for possible impact of the Company's relationship with the local community. The Company respects the rights of indigenous peoples and endeavours to obtain Free, Prior and Informed Consent (FPIC) from local residents in accordance with international standards and local regulations during the process of planning and implementation of business practices.

In no instance should business activities or conveyance of property rights create an undue or unfair advantage to the Company at the expense of local residents. All relevant laws and due diligence should be followed, in particular where local resident relocation may be necessary.

Data protection & privacy

We respect the privacy of individuals, in particular Employees, Customers and Business Partners and their fundamental right to the protection of personal data. The Company implements and applies the principles of privacy by design and privacy by default, to ensure that personal data is processed in accordance with the law and Company values. In particular, personal data is collected and processed only for specified and legitimate purposes, and is kept only as long as necessary for those purposes.

We take appropriate measures to enable individuals to exercise their rights and to provide them with relevant information regarding the processing of their personal data. All personal data is handled with the utmost care in accordance with the law, the General Data Protection Policy and other applicable internal policies.

Any request from government or public authority for the disclosure of personal data must be subject to appropriate legal review before release to prevent human rights violations.

Responsible supply chain management

In order to establish a sustainable supply chain, we monitor relevant risks arising from our suppliers and Business Partners. The results of such an evaluation will be considered when selecting Business Partners for commercial partnership. Where a potential human rights impact may be identified, the Company will notify the partner and, where possible and in accordance with relevant law, work with the partner to mitigate such risks in advance. Suppliers should be notified of the Company's Supplier Code of Conduct and its requirements.

We maintain a zero-tolerance policy against human rights violations. Upon discovery of non-compliance with HMC Human Rights Principles, the Employee or Executive should take immediate action in accordance with relevant laws. In the event of any infringement during

the collaboration, the Company reserves the right to terminate the cooperation with the Business Partner.

Guarantee of environmental rights

Environmental pollution may violate human rights, directly affecting people's lives and health. The Company recognizes environmental protection as key to corporate success. To this end, we establish relevant and reasonable criteria to monitor our impact and communicate our performance to internal and external stakeholders in accordance with local law. Domestic and international environmental laws and conventions are followed in all our business operations.

6 IMPLEMENTING HUMAN RIGHTS IN OUR OPERATIONS

To ensure the effectiveness of this Policy, the Company adopts relevant processes, actions, and monitoring measures to ensure implementation of our Company's human rights principles.

Governance

The ESG Committee and the Sustainability Management Committee, under the Hyundai Motor Company Board of Directors, maintain overall responsibility for activities related to protecting human rights across the company's global operations.

Respective subsidiary Executive management is responsible for ensuring compliance with human rights-related laws and Company-wide policies, and for the effectiveness of risk mitigation and reduction measures. Local implementation of policy requirements is the responsibility of those responsible at the respective sites.

Training on human rights in the workplace

Training is available to all employees on a routine basis to build awareness of the Company's human rights principles and implementation. Further role-specific training is also provided, focused on human rights risks relevant to job responsibilities. Through education, we aim to eliminate prohibited discriminatory acts by Employees and encourage active reporting of detected cases and identified human rights risks.

Human rights due diligence

Evaluation of human rights status in the workplace is conducted for all European subsidiaries with 50 or more employees. Assessments are conducted annually. Due diligence results and improvements to core indicators are monitored and reported annually to the HMC Board of Directors. When relevant, entities should establish improvement plans for human rights risks identified as a result of the assessment and monitor their implementation.

Human rights due diligence for Business Partners is incorporated into the broader due diligence process managed by the HME Compliance Department. While the primary focus is on compliance-related risks, adverse media screening is used to identify any past involvement in human rights infringements, as well as any such issues that may become publicly known during the course of cooperation.

Reporting a violation of human rights

Employees, Business Partners, and external Third Parties may report a suspected human rights violation and request assistance either verbally or in writing through the Hyundai Whistleblowing Reporting Platform or via email. To access the Whistleblowing Reporting Platform, please visit <https://app.oznam.to/hmmc>.

Our Whistleblowing Reporting Platform is designed to ensure that individuals can exercise their right to disclose a concern and that no reprisals are taken against the reporter, witnesses, or the individual mentioned/involved in the report. If you have any questions or concerns regarding the Whistleblowing Policy and/or the Whistleblowing Reporting Platform, you can raise them by calling, visiting, or sending an email to compliance@hyundai-motor.cz.

Equal Opportunity Employer

The Company is an equal opportunity Employer and is committed to maintaining a workplace free from discrimination, harassment, and retaliation.

Non-Discrimination

The Company prohibits discrimination based on race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, or any other protected status.

Compliance with laws

All Employees are expected to comply with applicable laws, regulations, and company policies while performing their duties.

7 IMPLEMENTATION & FINAL PROVISIONS

This Policy comes into force on the day of publication. It remains in force until it is revoked or replaced by another policy statement and supersedes any and all related regulations and policies previously in force.

To ensure the effectiveness of this Policy, the Company adopts relevant processes, actions, and monitoring measures to implement its human rights principles.

Communication of this Policy and its contents

This Policy will be communicated and made readily available to all Company Employees. Any Employee who may have questions or comments regarding this Policy or its contents may provide feedback to HMMC Legal Department.

8 RESPONSIBILITIES

To ensure effective governance of this Policy within the Company, a detailed Roles and Responsibilities (R&Rs) chart was established and is available in Appendix I.

9 POLICY REVIEW AND CONTROLS

The Company is committed to continuous improvement in accordance with the regulatory requirements. It ensures that adequate resources are allocated to support the responsible implementation and compliance with the Human Rights policy.

This Policy may be revised or updated from time to time by Hyundai Motor Europe ESG, with the approval of the respective management, to ensure compliance with changing laws, regulations, and Company policies. Employees will be notified of any amendments, and it is their responsibility to review and understand the changes.

10 NON-COMPLIANCE WITH THE POLICY

Failure to comply with this Policy is considered a violation of internal rules and may constitute a violation of the law. Depending on the severity of the violation, appropriate disciplinary measures may be taken, including termination of employment.

In cases where irregularities or non-compliance are identified, the Hyundai Motor Europe ESG team may:

- a. Launch dedicated communication to employees, reminding them about the key obligations stemming from the Policy,
- b. Consider if changes to the procedures based on this Policy require a review or update,
- c. Recommend to Compliance that the irregularity be investigated,
- d. Recommend to P&O that corrective action be taken against the Employee who is infringing the Policy.

11 RELATED POLICIES AND GUIDELINES

This Policy defines the standards by which the Company, its executives, and its Employees ensure adequate protection of human rights in our business activities. It aims to complement Company policies, guidelines, and procedures, including but not limited to:

- HME Code of Conduct.
- HMC Supplier Code of Conduct.

In case of contradiction, the highest standard will always apply, except in circumstances governed by local law.

12 APPENDIX I - R&RS

Department	Role	Responsibility
ESG Committee and Sustainability Management Committee - HMC	Policy Owner	The ESG Committee and Sustainability Management Committee under the Hyundai Motor Company Board of Directors maintain overall responsibility for activities related to the protection of human rights in global operations.
Subsidiary Executive Management	Compliance and local implementation	Responsible for ensuring compliance with human rights-related laws, company-wide policy, and the effectiveness of risk mitigation and reduction measures. Local implementation of policy requirements is the responsibility of those responsible at the respective sites.
HME ESG	HME Policy Owner	HME ESG is responsible for local adaptation, communicating, and monitoring the Human Rights Policy, in alignment with HMC and global standards.

13 APPENDIX II – POLICY REFERENCES

The Hyundai Motor Company Human Rights Charter has been established based on human rights-related provisions, standards, and initiatives specified under human rights standards.

- 1) UN, Universal Declaration of Human Rights (1948)
- 2) UNGC, A Human Rights Management Framework (2010)
- 3) UN, The UN Guiding Principles on Business and Human Rights (2011)
- 4) OECD, OECD Guidelines for Multinational Enterprises (2011)
- 5) OECD, Due Diligence Guidance for Responsible Business Conduct (2018)
- 6) ILO Declaration on Fundamental Principles and Rights at Work (2022)

The HME Human Rights Policy has additionally taken into consideration the following pertinent laws and regulations:

- 7) European Union Diversity Charter (2006)
- 8) European Pillar of Social Rights (2017)
- 9) Charter of Fundamental Rights of the European Union (2000)

14 APPENDIX III- HYUNDAI MOTOR COMPANY HUMAN RIGHTS KEY PRINCIPLES

Article 1 - Prohibition of Child Labour and Force Labour

Hyundai Motor Company prohibits child labour and adheres to a zero-tolerance principle for such unfair employment practices. It takes measures so that minors' opportunity for education will not be restricted due to their work. Hyundai Motor Company does not force any of its officers and Employees to work against their free will, for example, by engaging in any act of violence, threat, false imprisonment, or the like against any officer or Employee, and does not keep original copies of personal ID cards or visas for the purpose of forced labour.

Regarding the principles of prohibition of child labour and forced labour, Hyundai Motor Company respects and supports the following ILO conventions:

- No.29: Forced Labour Convention, 1930
- No.138: Minimum Age Convention, 1973
- No.182: Worst Forms of Child Labour Convention, 1999

Article 2 - Prohibition of Discrimination and Workplace Harassment

Hyundai Motor Company will not discriminate against any and all officers and Employees in relation to employment, such as recruitment, hiring, promotion, education, wages, welfare benefits, etc., on the ground of their gender, race, ethnicity, nationality, religion, disability, age, marital status or pregnancy, family status, social status, political opinion, etc., without reasonable grounds, and shall establish an organisational culture that respects the diversity of officers and Employees.

In addition, Hyundai Motor Company prohibits officers and Employees from causing physical or mental suffering or worsening the working environment, through coercive work orders, verbal abuse or the like by using his/her position or relationship in the workplace.

Article 3- Compliance with Working Conditions

Hyundai Motor Company shall comply with the statutory working hours of each country in which it operates its business and shall pay reasonable remuneration for service to all officers and Employees, together with payroll statements. All officers and employees are remunerated at rates above the minimum wage as defined by local laws. Hyundai Motor Company adheres to maximum working hour limitations in accordance with local legislation and ensures paid annual leave at levels that meet or exceed those stipulated by local regulations. Hyundai Motor Company does not demand any commission or brokerage fee from the Employee on the grounds of employment. In addition, Hyundai Motor Company will provide all officers and Employees with sufficient educational opportunities and a working environment appropriate for the performance of their duties to develop their capabilities and improve their quality of life.

Article 4- Humane Treatment

Hyundai Motor Company respects the privacy of officers and Employees and fully protects personal information, and it does not abuse, mentally or physically, or adversely treat any officer or Employee.

Article 5 - Guarantee of the Freedom of Association and Collective Bargaining

Hyundai Motor Company respects the labour relations laws of the country in which this Human Rights Charter is applied and provides sufficient opportunities 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, Hyundai Motor Company will engage in negotiations with employee representatives within the minimum consultation or notice periods stipulated by local laws.

Article 6 - Guarantee of Industrial Safety

Hyundai Motor Company regularly inspects the facilities, equipment, tools and others of the business premises so that all officers and Employees may work in a safe working environment and prepares appropriate measures to prevent physical and mental risks and support measures for follow-up management.

Article 7 - Protection of the Human Rights of Local Residents

All officers and Employees of Hyundai Motor Company are cautioned not to violate the human rights of the local residents when carrying out their work and shall make efforts to protect the rights to safety and health and freedom of residence of local residents. Moreover, Hyundai Motor Company does not discriminate against vulnerable groups such as children, migrant workers, the disabled and women and protects their human rights.

In particular, Hyundai Motor Company consider the impact of its business operations on local communities and respect the rights of indigenous peoples. Hyundai Motor Company endeavors to obtain Free, Prior, and Informed Consent (FPIC) from local residents in accordance with relevant international standards and local regulations throughout the process of planning and implementing business activities.

Article 8 - Protection of the Human Rights for Customers

All officers and Employees of Hyundai Motor Company must endeavour to protect the life, health, property, personal information collected from management activities of customers when providing products and services.

Article 9 - Responsible Supply Chain Management

In order to establish a sustainable supply chain, Hyundai Motor Company evaluates and manages ESG risks arising from the supply chain and conducts education and support activities for suppliers to prevent risks in advance.

Article 10 - Guarantee of Environmental Rights

Hyundai Motor Company recognises that environmental pollution can be a serious violation of human rights that directly affects people's lives and health and establishes environmental management policies and guidelines to minimise negative environmental impacts caused by business activities.

15 APPENDIX IV: POLICY'S IMPLEMENTATION CHECKLIST

Implementation Action	Responsible	Deadline
Communicate the revised Policy to Employees via Intranet	HME ESG & P&O	March 2026
Inform ESG team members of NSCs about the revised Policy	HME ESG	March 2026
NSCs to communicate the revised Policy to their Employees	ESG team members at NSCs	April 2026