

Workplace Ethics Policy

Chapter 1. General Provisions

Article 1 (Purpose)

This Policy aims to establish ethical principles for employees regarding relations among employees and with customers, suppliers, and competitors, and sets out the details of guidance and information in order to promote workplace ethics.

Article 2 (Scope of Application)

This Policy applies to all our employees and the employees of our suppliers including those working within the Company. Our suppliers include individuals, corporations, agents, brokers, and joint ventures that have various business relationships with Kia, unless specified otherwise by collective agreements or Rules of Employment.

Article 3 (Formation of Committee)

1. A Workplace Ethics Committee can be created to implement the current Policy.
2. The Regulations of the Disciplinary Committee shall apply *mutatis mutandis* to the composition and operations of the Workplace Ethics Committee and the appointment of its members.

Article 4. (Team in Charge)

The HR Team in the headquarters or local teams shall be in charge of the enforcement of the Policy.

Article 5. (Definition of Workplace Ethics Policy)

The Workplace Ethics Policy is a set of moral principles that guide employees' behaviors to uphold the highest ethical standards, respect individual dignity and the company's reputation, and adhere closely to integrity and

impartiality with pride in order to fulfill the vision and management principles of the Company.

Article 6. (Application of Mutatis Mutandis)

The Regulations of the Disciplinary Committee shall apply mutatis mutandis in the case of a principled violation of this Policy. Any issues not specified in the Regulations may be separately prescribed herein.

Chapter 2. Definition of Workplace Ethics Policy

Article 7 (Basic Principles of Workplace Ethics)

1. Employees shall faithfully perform their duties and responsibilities according to the Company's management principles.
2. Employees must carry out their responsibilities lawfully and by all applicable laws and regulations.
3. Employees shall faithfully manage the Company's properties and respect the confidentiality of information acquired in the course of business.
4. Employees shall constantly seek out new opportunities and proactively solve problems, rather than being complacent.
5. Employees must conduct themselves with dignity, recognizing that they are representing the Company in their areas of expertise.

Article 8 (Ethics Guidelines)

Employees shall comply with each of the items below to practice workplace ethics.

- A. Employees shall pursue an organizational culture based on principles and basics and build trust by avoiding any inappropriate behavior
- B. Employees must perform their duties with pride and responsibility at all times, realizing that they are protecting the Korean automobile industry.
- C. Employees shall never be engaged in wrongful behaviors, such as solicitation using their positions toward our suppliers.
- D. Employees shall never disclose any business-related information or acquire private benefit by using such information.
- E. All transactions shall be made according to the principles of transparency and fairness.
- F. Employees shall reject any improper work requests or other inappropriate requests for favors made by

another employee using his/her position.

G. All business activities carried out in and out of Korea must abide by all applicable local laws and regulations, as well as any existing business practices.

H. Employees shall not be engaged in any conduct that is a breach of the Basic Principles of Workplace Ethics in Article 7.

Chapter 3. Treatment of Breach of the Policy

Article 9 (Report of Breach)

1. When executives and employees notice ethical violations or receive such information from a third party, they must report it to the company, which will then establish and operate a workplace ethics report center within the competent team.
2. The Company shall keep the information about a whistleblower confidential and shall not retaliate against a whistleblower in any manner.
3. Retaliation against a whistleblower for the act of whistleblowing is subject to a harsher penalty within the scope permitted by the Company's internal regulations.

Article 10 (Treatment of Wrongdoers)

1. When a breach of this Policy is found, the department (team) or the Business Improvement Department shall report the conduct in letter with investigation results to the team in charge.
2. The team in charge shall review the report and decide on the treatment of the case according to the Regulations of Disciplinary Committee.
3. In light of the gravity of the situation, the relevant subcontractor will take appropriate measures, such as suspending transactions, as well as compensation for the company's loss.
4. The lead team will demand that the wrongdoer's supplier take appropriate action against its employee, as well as compensation from the supplier or the wrongdoer.

Article 11 (Disciplinary Action in the Event of Breach)

1. In principle, disciplinary actions against wrongdoers shall be decided according to the Regulations of Disciplinary Committee.
2. However, if disciplinary action is not specified by the Regulations of Disciplinary Committee, then it shall be

decided by this Policy as follows.

A. Misconducts subject to disciplinary actions

- ① Receiving payments from suppliers, demanding money using one's position, asking a favor using one's title or exerting pressure
- ② Receiving payments from colleagues, demanding money using one's position, asking a favor using one's title or exerting pressure

B. Disciplinary actions

- ① Receiving money from suppliers: disciplinary action against wrongdoers and those who fail to report such acts, as well as the suspension of business relations with the supplier(permanently in case of recurrence)
- ② Demanding money using one's authority : disciplinary actions to be taken against wrongdoers
- ③ Asking a favor using one's title or exerting pressure: Disciplinary Committee deliberates and decides whether to take disciplinary actions or not.

Chapter 4. Workplace Ethics Committee

Article 12 (Composition of Workplace Ethics Committee)

1. The Workplace Ethics Committee reviews cases in the first and appellate deliberation. The composition and appointment of its members are the same as the Disciplinary Committee.
2. The Regulations of Disciplinary Committee shall apply mutatis mutandis to the composition and appointment of members of Workplace Ethics Committee.

Article 13 (Convocation of Workplace Ethics Committee)

1. If any suspicious cases that may breach workplace ethics are found, then the Management Improvement Department or the team to which the wrongdoer belongs shall state all information about the breach in writing along with supporting documents to notify the secretary of each committee.
2. The secretary of each committee shall review and may call the Committee meeting as necessary.

Article 14 (Operation of Workplace Ethics Committee)

1. If an employee is subject to both disciplinary actions and rewards regarding workplace ethics, then the Disciplinary Committee shall review the case first. Then, the Reward Committee shall consecutively review the potential rewards.
2. In principle, any disciplinary actions to be taken due to breach of workplace ethics shall be deliberated and decided by the Committee.
3. The Regulations of Discipline Committee shall apply mutatis mutandis to the operation of the Committee

Article 15 (Follow-up Measures)

All divisions are subjected to an internal audit annually, and any breaches discovered can result in disciplinary action.