

# Code of Conduct and Business Ethics

## ***Introduction and purpose***

*A Corporate Code of Business Ethics and Conduct is a document of Hyundai Steel Slovakia s.r.o. (the "Company") that details acceptable behavior and practices at the workplace to ensure that all employees and effected persons work align with the company's mission, vision, and purpose.*

*The Company created a Corporate Code of Business Ethics and Conduct (the "Code") in accordance with efforts for Corporate social responsibility beyond the normal framework of compliance with legal regulations.*

*The Company have a strong commitment to promoting honest conduct and ethical business conduct by all Employees (as defined below) and compliance with the laws that govern the conduct of our business.*

*We believe that a commitment to honesty, ethical conduct and integrity is a valuable asset that builds trust with our customers, suppliers and employees. This Code has been designed to promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships and avoidance of conflicts of interest and to deter wrongdoing. The Code establishes rules and standards regarding behavior and performance and constitutes a part of the terms and conditions of employment. Violation of the rules and standards embodied in the Code is not tolerated and will subject those responsible to disciplinary action.*

*The Code applies to the Company, all employees and to an appropriate extent to our third parties - employees of other organizations working on company premises.*

*All Employees are required to read and understand the Code and comply with it.*

*Employees individually are ultimately responsible for their compliance with the Code and managers of individual departments are responsible for overseeing compliance.*



## **Vision and Company values**

### **Vision Statement**

#### **„Leading the new era of steel“**

*As an eco-friendly company, we will lead a new era for the steel industry by providing high value-added products and services, and by achieving global competitiveness based on cooperation with all our customers.*

*Company Core Values are the set of ethic's principles that govern a company's decision making and actions. They also serve as the foundation for the company culture, and the behaviors expected by its workforce. The top factor of employee satisfaction is the culture and values of an organization.*

### **Our core values:**



*We promote a customer-oriented corporate culture that ensures the best quality 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 work together and concentrate by having cohesion, maintaining communication and collaborating within the company and with business partners.*



*We believe that the future of our organization lies in the hearts and abilities of its individual members, whom we will help to develop their potential by creating a corporate culture that respects talent.*





*We respect the diversity of culture and customs, aspire to be the best at what we do, and strive to become a respected global corporate citizen.*

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## **Legal and regulatory compliance**

*The Company aims to comply with all applicable national and international laws, rules, legislations and regulations affecting our business in every respect.*

*The Company undertakes to comply with applicable laws (including local laws) and regulations, specifically on business conduct.*

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## **Code of ethics**

*All Company's employees are fully aware that ethics is a source of competitive advantage in business and we promise to make every effort to apply ethical behavior so that Hyundai Steel Slovakia is always considered a trustworthy company.*

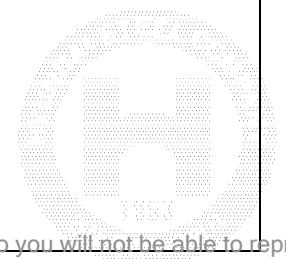
*1. We work honestly and fairly with a sense of co-ownership, and we are proud to work at Hyundai Steel Slovakia.*

*2. We fully comply with company policy and legislation related to our duties and our work.*

*- The above items include laws relating to safety and security.*

*3. We strive for the development of our company by creating a strategic partnership and mutual trust with our customers, through honest trading.*

*4. We will not act against ethical rules and will not accept money, entertainment or any other benefit from people involved in our business. An exception is formal dinners with business partners or gifts provided by them as part of building favorable partnership relations.*



5. We will not provide confidential company data, know-how or technical data obtained during our work to our competitors, nor will we use them for personal gain. We will not establish or operate a separate company based on our company's knowledge (confidential company data, know-how or technical data) or side work that may be a source of competitive business or may cause harm to our company.

6. We will not use confidential company data of previous employers of our employees in order to prevent competitive business and support fair-play business practices.

7. We will not do anything that can harm the good name of the company and will do everything to contribute to the progress of the company, the country and our society through continuous self-improvement.

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## **Confidentiality and protection of informations**

*It is important that every employee protects the confidentiality of company information. All employees may have access to proprietary and confidential information relating to the Company's business, clients and suppliers. Confidential information includes such items as non-public information regarding the Company's business, financial results and prospects and potential corporate transactions.*

*All employees acknowledges that they are obliged to ensure the protection of the information that the Company provides to them for the purpose of fulfilling their work tasks and declares that they will maintain the confidentiality of all information that is, or could be, confidential information.*

*Any information that the employees learn about in the course of performing their work tasks for the employer or in connection with them is considered confidential information.*

*The employees acknowledges that confidential information can only serve to them to fulfill his work tasks. Any disclosure of confidential information or part of it to third parties will be considered as a violation of the duty of protection and confidentiality.*

*In this context, every employee, when concluding an employment contract, signs :*

*CONFIDENTIALITY AND NON-DISCLOSURE AGREEMENT and Agreement on information protection and confidentiality according to §51 of the Act no. 40/1964 Coll. Civil Code as amended.*



## ***Labour regulations and Human rights***

### **Labour regulations and rights**

*Employees have the right to wages for work performed, to ensuring safety and health protection at work, to rest and recovery after work. The employer is obliged to provide employees with wages and create working conditions that enable employees to perform their work as best as possible according to their skills and knowledge, develop creative initiative and deepen their qualifications.*

*Discrimination, harassment, and disrespectful behavior in any form is prohibited in the Company, also in the recruitment process.*

*Employees and the employer are obliged to properly fulfill their obligations arising from labor relations.*

*Employees have rights arising from labor relations without any restrictions and without any direct or indirect discrimination. The details are regulated by sec. § 13 of the Labor Code and Act No. 365/2004 Coll. on equal treatment in certain areas and on protection against discrimination and on the amendment of certain laws (anti-discrimination law), as amended (hereinafter referred to as the "anti-discrimination law").*

*Women and men have the right to equal treatment when it comes to access to employment, remuneration and working procedure, vocational training and working conditions. Pregnant women, mothers up to the end of the ninth month after childbirth and breastfeeding women are provided with working conditions that protect their biological condition in connection with pregnancy, childbirth, care for the child after childbirth and their special relationship with the child after its birth. Women and men are provided with working conditions that enable them to perform a social function in raising and caring for children.*

### **Human right and freedoms**

*The Company respect and protect human rights, including the rights of minorities and Indigenous peoples, as well as women's rights.*

*All forms of forced labor, as well as all forms of modern slavery or other forms of domination or oppression in the workplace are prohibited in the Company.*

*The Company will not use or benefits from forced or involuntary labor. All employees enjoy freedom of movement during their employment. Personal/ work documents or payment of wage compensation may not be withheld.*



*The Company respects human rights and freedoms, which guarantee the inviolability of the person and his privacy, applies the right to respect the private and personal life of the employee, and follows the Convention on the Protection of Human Rights and Fundamental Freedoms, the Charter of Fundamental Rights of the EU, the Constitution of the Slovak Republic, the Civil Code and other valid legal regulations involving human rights and freedoms.*

*Employees' right to privacy in the workplace is limited by the right of the employer and his legitimate interests, which undoubtedly include the protection of property as well as the right to do business.*

## **Juvenile and Child Labour**

*Due to the nature of the business, the acceptable minimum age for employees of the Company is 18 years. In case of necessity, the employment of juvenile is governed by the regulations listed below.*

*In the hiring process, the Company verifies the employee's age by presenting an identification document with a photo (ID card, passport). In the case of the necessity of employing juvenile, the Company follows ZP §171 - §176 and is obliged to comply with all provisions of the legislation governing the employment of juvenile.*

*The Company can employ juvenile employees only with work that is appropriate for their physical and mental development, does not endanger their morals, and provides them with increased care at work.*

*The Company is obliged to create favorable conditions for the all-round development of the physical and mental abilities of young employees, also by specially adjusting their working conditions. When dealing with important issues related to juvenile, the Company closely cooperates with the legal representatives of juvenile. There is obligation to keep records of juvenile employees whom Company employs in an employment relationship. The record also contains the date of birth of juvenile employees.*

*The Company may not employ juvenile employees with overtime work, night work and may not order or agree with them on emergency work and a juvenile employee must not be employed in jobs that, taking into account the anatomical, physiological and psychological peculiarities at this age, are disproportionate, dangerous or harmful to his health.*

*The Company must not employ juvenile employees even with work in which they are exposed to an increased risk of injury or in the performance of which could seriously endanger the safety and health of fellow employees or other persons.*



*The work of a natural person under the age of 15 or the work of a natural person older than 15 years until the end of the school teaching period of the last school year of compulsory school attendance is prohibited.*

## **Antidiscrimination**

*The Company is obliged to treat employees in accordance with the principle of equal treatment established for the field of labor relations by a special law on equal treatment in certain areas and on protection against discrimination and on the amendment of certain laws (anti-discrimination law).*

*Discrimination of employees is prohibited in employment relations due to gender, marital status and family status, sexual orientation, race, skin color, language, age, adverse health condition or disability, genetic characteristics, faith, religion, political or other mindset, trade union activity, national or social origin, belonging to a nationality or ethnic group, property, gender or other status, or due to reporting criminality or other anti-social activity.*

*The exercise of rights and obligations arising from labor relations must be in accordance with good morals. No one may abuse these rights and obligations to the detriment of the other party to the employment relationship or co-employees.*

*The employee has the right to file a complaint with the employer in connection with a violation of the principle of equal treatment, non-compliance with the conditions for the exercise of rights and obligations in accordance with good morals, unjustified unauthorized infringement of the employee's privacy, an unauthorized prohibition to maintain confidentiality about working conditions or a prohibition to perform other gainful activities, as well as in connection with a violation of rights and obligations arising from the employment relationship. The employer is obliged to respond in writing to the employee's complaint without undue delay, make corrections, refrain from such action and eliminate its consequences.*

*A complaint in connection with the violation of the above principles is submitted to the Company by the employee through his superior, or by filing a complaint with the HR department responsible member.*

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## **Health & Safety Policy**

*The Company has established Health & Safety Policy to ensure the sustainable value of life through the provision of a safe and healthy work environment, in conjunction with the prevention of potential*



accidents that may occur across our business operations. This policy was created based on laws and regulations concerning health and safety and Company has established and use an effective and certified Occupational Health & Safety management system according to EN ISO 45001 : 2018.

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## **GDPR - Protection of Personal data**

*In the area of personal data processing and protection, we follow an internal directive. The Company may only collect personal data about the employee related to the employee's qualifications and professional experience and data that may be significant from the point of view of the work that the employee is to perform, is performing or has performed. The Company may not, without serious reasons based on the special nature of the Company's activities, violate the employee's privacy at the workplace and in the employer's common areas by monitoring him without being notified, or by checking letters addressed to the employee as a private person.*

*The Company undertakes to process the employee's personal data in accordance with the provisions of generally binding legal regulations governing the protection of personal data, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons in the processing of personal data and on the free movement of such data, which repeals Directive 95/46/EC (General Data Protection Regulation), Act No. 18/2018 Coll. on the protection of personal data and on the amendment of certain laws and any generally binding legal regulations that cancel, replace or implement them, in such a way as not to violate the rights of the employee.*

*The Company shall notify the employee, when concluding the employment contract, that the employer has implemented control mechanisms (e.g. camera system) that could violate the employee's privacy at the workplace and in the Company's common areas. The details of this control mechanism are regulated by the employer's internal regulation.*

*The Company informs (notifies) the employee when concluding the employment contract that, when checking the employee's work efficiency, he can monitor the use of the Internet and check the traffic of the Internet and websites during working hours on the Company's work tool.*

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## **Whistleblowing**

*The Company has a mechanism for reporting violations with adequate whistleblower protections against revengeful or retaliatory action.*



*The Company proceeds in accordance with Act 54/2019 Coll. on the protection of whistleblowers of anti-social activity. The anti-social activity whistleblower protection system is described in organizational directive MP 04-3-04 Principles of submission, verification and recording of anti-social activity initiatives, which is published on the information board and on the shared directory of Hyundai Steel Slovakia.*

*The employees of the Company's HR department are responsible for reporting and processing complaints of anti-social activity as well as any objections and comments to labor-legal matters.*

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## **Environmental Responsibility**

*We are all responsible for protecting the environment. As a Company, we will comply with all legislation and regulations protecting the environment. We are committed to ensuring that the environmental impacts of our operations are reduced wherever possible. We will monitor and assess the negative environmental impacts of our operations and will always address and seek to improve these. We are committed to pursuing best industry practice whenever possible.*

*The Company implements Environmental Policy and operate an effective and certified environmental management system according to EN ISO 14001:2015.*

*Company works on optimizing and minimizing of ecological footprint, resource consumption, and environmental impact.*

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## **Governance and Financial Responsibility**

*The Company concentrates on a deeper connection between the company's daily functioning and the strategic connection with business goals. Responsibility in the field of Governance is built on measurability and quantifiable goals.*

*The Company has established and use Quality Management System that is in compliance with the European Standard EN ISO 9001:2015 and IATF 16949:2016, and accepted responsibilities for their effectiveness .*

*The Company maintains financial responsibility and perform business dealings transparently and document them in a proper manner. Financial information are recorded accurately and reliably to faithfully reflect the business operations with complete reports.*



*Disclosure of financial and non-financial information is in accordance with Slovak laws and regulations that are generally known and publicly available and are in accordance with EU legislation.*

*The Company's employees are obliged to regularly review and comply with these laws, regulations and their amendments, as well as to comply with all statutory deadlines.*

*To the extent that Hyundai Steel Slovakia s.r.o. obtains information regarding the Company's business partners that is either designated as confidential or is clearly confidential by nature (hereinafter referred to as "Confidential Information"), the Company undertakes to maintain confidentiality regarding Confidential Information and not to provide Confidential Information to third parties without the consent of the parties concerned.*

*The Company is entitled to disclose Confidential Information if required by law or in accordance with applicable law by a court or a governmental, regulatory or other competent authority. Such disclosure shall not be considered a breach of confidentiality.*

*Unless prohibited by applicable law, the Company will use all reasonable efforts to notify the affected party in advance of any such disclosure. Otherwise, the Company will notify the affected party of such disclosure promptly after disclosure.*

*The Company also agrees, unless required by law, not to disclose information that could harm competition or infringe the intellectual property of third parties and individuals.*

*We direct our activities towards doing business in the sense of sustainable development and a highly competitive social market economy and as a Company undertakes to adopt responsible strategies, make such decisions or carry out such activities that are desirable from the point of view of the goals and values of the entire society.*

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*Company will encourage all stakeholders with whom we have business relations, including our suppliers, partners, and their entire supply chain to comply with this Code of Conduct and Business Ethics.*



Žilina 29.10.2024

Young Hoon Jang  
CEO

**Violation reporting channels :**

Web : <https://hyundai-steel.sk/>

Department : Hyundai Steel Slovakia , HR team

E-mail : [junasova@hyundai-steel.com](mailto:junasova@hyundai-steel.com)

Tel: +421 902 324 682

Postal address: Hyundai Steel Slovakia, Mobis ulica 417/1A, Gbeľany

Other : Box for suggestions located in the company

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