

# Code of Ethics and Conduct

Hyundai Motor Central and South America



# Dear Hyundai Family,

Hyundai, under the corporate vision of “Progress for Humanity”, has the firm purpose of creating a better and fairer world for everyone and, in this context, is strongly committed to its Corporate Governance and expects the same from its business partners and supply chain.

In this sense, we understand that Ethics and Compliance, essential parts of Corporate Governance, are crucial to direct the way of doing business, creating a better world for future generations, and promoting the sustainable development of all stakeholders, including our customers, suppliers, dealerships, business partners, employees, and local communities and thus, consequently, preserving the longevity and prosperity of Hyundai's presence in the market.

We all have a duty to act with integrity, promoting respect and diversity in the work environment and combating all forms of corruption, unfair competition and other illegal practices. Finally, we have an obligation to make ethical choices in our daily lives, always maintaining excellence and commitment to producing the best vehicles, offering the most modern mobility solutions, and providing the best service to our customers.

Therefore, I am pleased to reaffirm our commitment to Hyundai's Code of Ethics and Conduct, one of the main pillars of our Ethics and Compliance Program, which serves as a guide for our actions and decisions and provides direction for us to fulfill our obligation to conduct our business with the highest standards of integrity and governance.

I count on the engagement of each one of you, employees and partners, so that together, in accordance with the principles of this Code of Ethics and Conduct, we can strengthen our Corporate Governance and lead the construction of a better and more ethical society.

## Ethics and Compliance, we are all committed!



Jae Min Lee, COO / Production



Hae Sung Cho, CFO



Chul Youn Park, vice-presidente  
Sales



Chun Sik Hwang, vice-presidente  
Procurement



Ricardo Martins, vice-presidente  
Administration



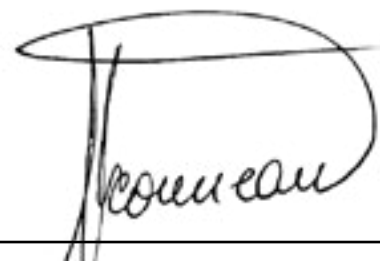
Angel Martinez, vice-presidente  
Sales



Marcos Oliveira, vice-presidente  
Production



Gerardo Carmona, Vice President  
Sales, Mkt & Communication  
and Product CSA



Airtou Cousseau  
President & CEO, Hyundai Motor Brasil &  
Hyundai Motor Central and South America



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# 1 Our Vision

Hyundai Motor Company is striving to provide freedom of movement to everyone by investing in mobility services, by building close relationship with leading mobility service providers and expanding our role beyond the automotive transportation sector. The company will play a pivotal role in global society’s transition to clean energy by helping make hydrogen and electricity as economically viable energy source.

## Our Vision: Progress for humanity.

We are here to do the right thing for humanity.

Humanity unites us and make us stronger.

Allowing us to strengthen our relationships feel connected and get more from life.

## Brand Manifesto

Our idea of future mobility based on the strong commitment that we give to society. We are here to do the right thing, for humanity.

Our focus on humanity means we understand what people want in life. To get the most out of the time we have.

We understand that time is the most precious commodity of all, the one thing money can’t buy.

That is how life is not just about spending time, it’s all about time well spent.

Our purpose is to reinvent the 24 hours that we equally given into quality time, making every moment truly worthwhile and rewarding.

This is our future mobility.

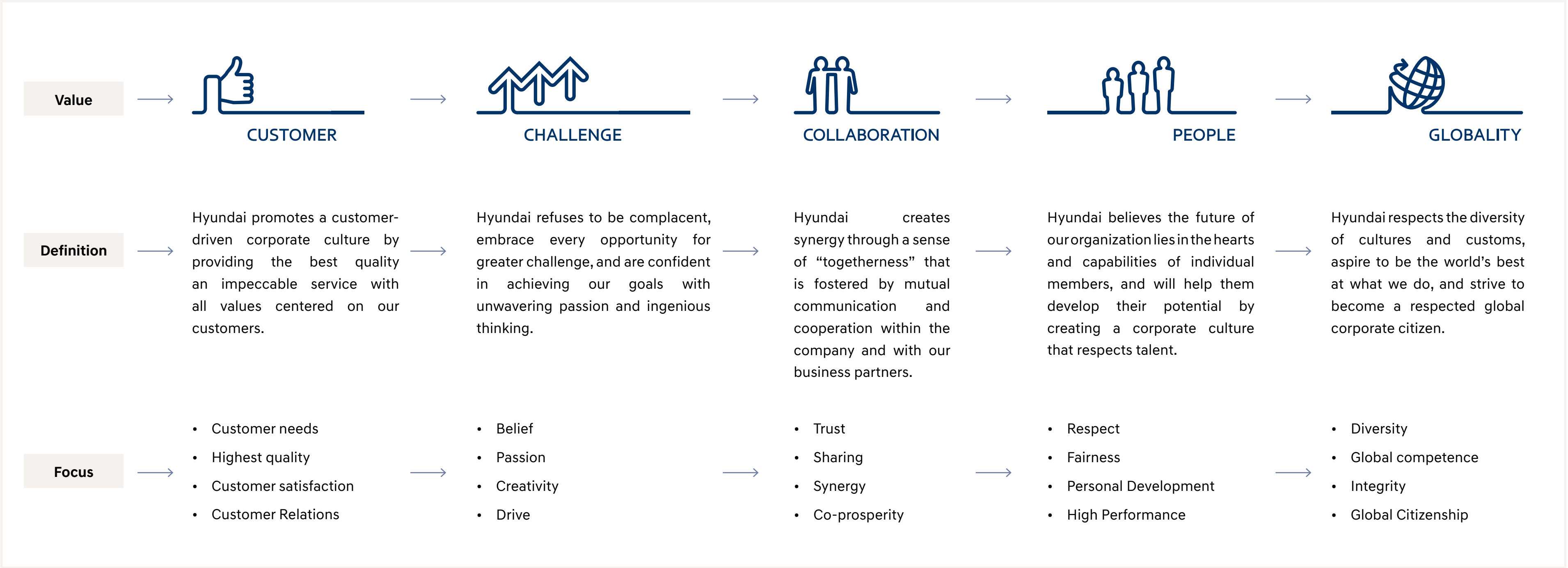
It’s not about going from A to B, it’s about the moments that truly matter.

## Conecting people with quality time.



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## 2 Corporate Values





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### 3 Together on the Ethics and Compliance Way

Hyundai believes that in order to be successful, the Ethics and Compliance way must be pursued together, thus, in addition to being mandatory for all Hyundai employees, we request that all our suppliers, service providers, dealers and business partners also observe the rules contained herein, as applicable and for as long as they maintain business relationships with Hyundai.

Sometimes in our day to day, we come across situations where we are not sure about how to act or position ourselves. If in doubt, consider the following points:

- Is my attitude in line with laws, rules, policies and procedures?
- Should I consult other people or departments before making a decision?
- How would I feel if my attitude / decision became public?
- If this attitude / decision becomes public, can the company or I be harmed? (financial, reputational, etc.)

Everyone must know and comply with the rules and internal and external policies applicable to the performance of our work or function. If in doubt, seek the Ethics and Compliance team.





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## 4 Work Environment

Hyundai believes that its employees shall carry out their activities in a harmonious work environment and do not tolerate any disrespectful conduct that interferes improperly with the individual performance of its employees or that creates a hostile and offensive environment in the workplace, such as disrespectful treatment, language and gestures, aggression, humiliation, inappropriate jokes and physical contacts, and also any form of discrimination or harassment.

We must strive to promote a work environment that brings work-life balance for our employees.

### Harassment

Harassment is a set of attitudes and behaviors practiced in a deliberate and systematic way in order to degrade the work environment and psychologically impact the affected people. Harassment can be moral or sexual:

Moral Harassment: Repeatedly exposing someone to humiliating or embarrassing situation(s) due to the work relation and in the performance of their duties. It is a conduct that harms the dignity and integrity of the individual, putting its health at risk and harming the work environment.

Sexual harassment: constrain someone, against their will, through words, gestures or other means, with the purpose of gaining sexual advantage or favor, using their condition of superior hierarchy or ancestry inherent to the exercise of work, position or function.

### Sexual Solicitation

Even if there is no hierarchy or ancestry relation inherent to the exercise of work, position or function, the practice of actions aimed at constrain someone, against their will, through words, gestures or other means, with the purpose of gaining sexual advantage or favor, is prohibited.

If the employee witnesses or considers that he/she/they has been subjected to an unfair practice, harassment or sexual solicitation in the work environment, he/she/they should immediately notify the direct leadership or a representative from Employee Relations Department or from the Ethics and Compliance team. Also it is possible for the employee to make a denunciation in the Ethics Line, Hyundai’s official denouncement channel.

### In Practice:

#### Allowed:

- ✔ Behave in a way that reinforces the good image and reputation of trust inside and outside the company;

- ✔ Treat in a courteous and respectful manner all members of the company, act with fairness in dealing with all employees, customers, service providers, suppliers, candidates, members of other organizations, government agencies and public in general;
- ✔ Stay calm and talk about problems to find the best solution;
- ✔ Encourage your colleagues to report any harassment they have suffered or witnessed;
- ✔ Comply with the job responsibilities specified in the job description and the Work Contract;
- ✔ Respect the corporate values of the company;
- ✔ Be fully engaged in the tasks related to your duties during the work day and any additional period that may be required and requested by the leadership, keeping up to date the tasks assigned to you.

#### Not Allowed: :

- ✗ Do not treat employees in an aggressive, violent, hostile, disrespectful, offensive, intimidating, abusive or disruptive manner, or causing any disorder, tumult or any kind of disturbance;
- ✗ Do not yell nor speak loud at employees;
- ✗ Do not intentionally demand tasks with impossible deadlines;

- ✗ Do not treat the internal and external client with rudeness, lack of respect, with inappropriate language, or fail to provide adequate service and/or cooperation;
- ✗ Do not neglect the performance of the duties or policies, standards and procedures of Hyundai;
- ✗ Do not behave in a manner contrary to morals and good practices and/or contrary to the customs and principles of Hyundai;
- ✗ Do not promote gambling or betting of any kind and for any purpose in the Workplace;
- ✗ Do not allow and/or participate in gambling during working hours;
- ✗ Do not use company facilities to conduct political, ideological, religious activities, sell products and services of any nature not directly related to Hyundai’s business or to encourage altercations due to personal beliefs and tastes;
- ✗ Do not make false accusations that might damage the image of another employee, third party or company.





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## 5 Diversity and Inclusion

Hyundai embraces diversity and believes that through differences we achieve our mission in an efficient, creative and collaborative way.

Therefore, Hyundai does not tolerate any practice of discrimination on the basis of cultural or ideological differences, disabilities, gender, color, ethnicity, nationality, origin, political convictions, religious beliefs, age, marital status, union status, social class, sexual orientation, gender identity or any other condition that generates a practice of discrimination.

In our recruitment processes, the company’s policy is to offer employment to candidates who have the best qualifications that fit the job requirements without any form of discrimination.

If the employee becomes aware of, witnesses or considers that he/she/them has been discriminated in the workplace, he/she/them should immediately report the situation through the Ethics Line, Hyundai’s official denunciation channel.

### In Prattice:

**Allowed::**

- ✔ When involved in recruitment or promotion, review the requirements of the role and of the candidates to ensure there is nothing potentially discriminatory. Ensure no potentially discriminatory questions are asked (ex: sexual orientation, religion, political position, etc). It is recommendable to prepare these questions in advance;
- ✔ Seek guidance immediately if you have any queries or concerns related to anything addressed about discrimination;
- ✔ Treat everyone with respect, inside and outside of Hyundai’s facilities, and do not discriminate people based on cultural or ideological differences, disabilities, gender, color, ethnicity, nationality, origin, political convictions, religious beliefs, age, marital status, union status, social class, sexual orientation, gender identity or any other condition;
- ✔ Respectfully reprehend and immediately make stop any discriminatory action, practice or joke from your subordinates or co-workers, encouraging dialog and comprehension of all involved;
- ✔ Follow all Hyundai policies, procedures and processes following the company´s values.



**Not allowed:**

- ✗ Do not act in a discriminatory manner on the basis of race, color, sex, sexual orientation, religious creed, age, marital status, nationality, party political choice, social status, physical characteristics of persons, or any other forms of discrimination;
- ✗ Do not turn a blind eye to any discriminatory practices or actions;
- ✗ Do not make assumptions about an employee or employee's ability to engage in activities because of their race, sex or other characteristic which could result in them being excluded or denied access to opportunities;
- ✗ Refrain from criticize or pass judgement on a persona due to their appearance, beliefs or positions despite of your own beliefs and opinions.



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## 6 Health and Safety

One priority of Hyundai is to preserve the health and safety of all its employees and all those that enter Hyundai’s premises. The company seeks to provide a healthy work environment and accident-free, for the well-being of all.

Before the beginning of the daily activities, employees allocated in workstations or activities subject to safety risks should be instructed on such risks, fire prevention measures, participate in labor gymnastics and strictly follow the safety instructions.

Any third party performing services and/or visiting Hyundai’s premises must also be instructed to comply strictly with all and every applicable safety rules.

Employees must perform their activities in a manner to prevent threat to life, physical and psychological integrity, health and safety of himself/herself/ themselves and his/her/their colleagues.

In case of any occurrences related to work safety, including problems with equipment or safety procedures, the member of the company must immediately bring the fact to the attention of his/her/their leadership, to the Health and Safety Department or the Employee Relations Department.

The Human Resources and Health and Safety Departments will specify the frequency of health examination, according to the nature of each labor activity.

### In Practice:

- Allowed:**
- ✔ Strictly follow the safety rules of the Company;
  - ✔ Keep your work station organized and clean;
  - ✔ When necessary, instruct other members about base measures related to security information, occupational safety, and fire preventives measures, among others;
  - ✔ Strictly comply with the special security procedures; wear uniforms, shoes and other working materials delivered for the specific use in their respective areas of operation; use the Personal Protective Equipment (PPE) required in the performance of your duties.
  - ✔ Submit to entrance, periodic and dismissal medical exams.

- Not allowed:**
- ✗ Do not neglect or break the work safety rules;
  - ✗ Do not enter in the Hyundai’s establishment, without an authorization, dangerous materials, including but not limited to, weapons of any nature, ammunition, explosives, or any other material, device or equipment, which could cause injury of any nature to the employees themselves, colleagues or third parties;
  - ✗ Do not consume or possess alcoholic beverages, illicit drugs or controlled substances without medical prescription, inside of Hyundai and do not work under its effects if they may affect your performance in your work or cause incidents for you, your colleagues or Hyundai’s assets;
  - ✗ Do not attempt to perform any tasks for which you have not been trained for;
  - ✗ Do not operate machinery or equipment for which you have not been trained for or do not have authorization to use;
  - ✗ Do not walk by places where you see an unsafe piece of equipment or an unsafe working situation and immediately report the situation to the appropriate safety representative as soon as possible;
  - ✗ Do not take risks just to get a job done more quickly. Safety systems and procedures are in place to protect all. We all have a duty to ourselves, our families and our colleagues to work in a safe manner;
  - ✗ Do not smoke outside authorized places.





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## 7 Environment

As a responsible corporation, that cares about the future and seeks to create a prosperous and sustainable society, respecting human values, Hyundai established environmental policy to help in the preservation of the environment, striving to:

- Recognize the environment as an essential element of the business of Hyundai.
- Defend the social responsibilities, the development and the supply of environmentally friendly vehicles.
- Devote special attention to environmental impact reduction and preservation of natural resources and energy for sustainable use at all stages of the life cycle of products that are produced in its premises, from development to production, sales, use and consciously dispose of them.
- Comply with all national and international environmental rules and agreements applicable to its business, pledging to continue improving the environmental management and publicly report the performance of Hyundai.

### In Prattice:

**Allowed:**

- ✔ Use raw materials, energy, fuel and other resources that have been validated by the Environment team, following instructions that have been provided, and always in an economic and efficient manner;
- ✔ Work in compliance with the laws and company's policies and procedures in relation to the protection of the natural environment and the development of environmentally friendly working environments;
- ✔ Make sure you are familiar with the Company's policies and procedures in relation to complying with environmental legislation and regulation, as well as the policies and procedures relating to creating and maintaining environmentally friendly workplaces;
- ✔ Raise any suggestions you may have about ways in which the Company may develop its strategies and policies regarding the environment;
- ✔ Inform the Ethics and Compliance team in case any environmental procedure is not attended or if any harmful effect is found in the workplace in order to prevent and remediate any situation that does not comply with Hyundai's policies and objectives.

**Not allowed:**

- ✘ Do not neglect and/or disobey the work safety and environment rules;
- ✘ Do not ignore actual or potential issues you identify regarding the impact working practices may have on the environment;
- ✘ Do not breach any environmental practices to save time. It is important that all employees take the time to make sure that they comply with Hyundai's policies regarding the environment;
- ✘ Do not underestimate environmental issues because they have a relevant part to play in ensuring a quality workplace, that is safe and environment friendly. In addition to the impact that these matters may bring to the community and the surroundings of Hyundai, there is also a risk to the company's reputation.



Hyundai planted 48,000 seedlings of native species near the factory in Piracicaba and reached the “zero landfill” goal, not sending waste to landfills.



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## 8 Protection of Company Assets and Resources

Hyundai employees must take care of the Company’s tangible and intangible assets against undue, inadequate, illegal or harmful use as well as loss or theft.

Tangible assets are those that can be seen and touched, such as office supplies, computers, cell phones, vehicles, real estate, tools and production material.

Intangible assets are goods that have no material existence and which we cannot touch but possess economic value such as our brand and our intellectual property.

Unless expressly provided in specific internal policies, the assets of the company should be used only as working tools and it is prohibited to use them for personal purposes

Any and all intellectual production that Hyundai employees design, create and/or formulate due to the exercise of their work, or that, in order to create or formulate such intellectual product, they have used resources, data, equipment, assets or the facilities of the company, belong to Hyundai, and the inventor will have no economic rights over them, with exception of moral rights and contractual provision stating otherwise.

Intellectual property are the inventions, literary and artistic works, symbols, names, images, designs and models used by commerce, regardless of registration.

The employees must inform the direct leadership, in writing, of all the ideas, discoveries, improvements and inventions of his/her/them that have been, or that will be produced with resources and in the facilities of Hyundai.

### In Prattice:

**Allowed:**

- ✔ Act with integrity and responsibility regarding the use and guard of Hyundai's assets;
- ✔ Use the company’s resources and assets (vehicles, cell phones, computers, etc) in strict compliance with Hyundai’s internal policies and applicable laws;
- Not allowed:**
- ✘ Do not destroy or damage Hyundai’s movable goods and real estate;
- ✘ Do not unduly take for private use or use by third parties any materials, equipment, tools, vehicles and other assets of Hyundai, unless otherwise authorized in specific internal policies.

## 9 Fraud Prevention

Hyundai values transparency and good-faith in the conduct of its business and does not tolerate the occurrence of fraud and deviations of any nature, in relation to the production process, the quality and safety of its products, the achievement of targets, and also regarding financial, tax and accounting management as well as any other company’s activities and business.

Fraud is an act committed intentionally in order to deceive or distort information to obtain advantages in a manner that causes harm to someone, to conceal irregularities and/or unduly benefit other persons and/or companies.

### In Prattice:

**Allowed:**

- ✔ Apply, disseminate and strictly follow the Code of Ethics and Conduct the Policies and Procedures, ensuring the correct execution of the activities and minimizing the risk of deviations and operational errors;
- ✔ Managers should reinforce in meetings with subordinates the message of honesty and integrity in business;
- ✔ Deeply know the activities performed and monitor any suspicious manner such as: activities performed before or after working hours

- without the manager authorization or permission, absence from the company without proper authorization, etc.;
- ✔ Establish control procedures to reduce the potential occurrence of fraud by, for example, approvals, authorizations, segregation of duties, periodic compliance review, and other similar measures;
- ✔ Carefully analyze all documents before any payment or reimbursement approval and verify if the internal controls related to the activities were properly perform before the document issuance. Also check the documents integrity, verifying if there are erasures, amendments or any kind of tampering;
- ✔ Establish a transparent relationship with third parties (dealers, suppliers, customers, etc.);
- ✔ Encourage team members to always act ethically by following the basic assumptions described above;
- ✔ Respect the norms and laws regarding accounting bookkeeping and issuance of financial reports;
- ✔ Always reflect the exact nature of transactions or reality of occurrences when issuing documents or reports.
- ✔ Always be aware of possible frauds. If you identify any suspicious activity, immediately report the fact to the Ethics and Compliance team.

**Not allowed:**

- ✘ Do not commit or conceal any type of fraud or attempt of fraud related to Hyundai’s business inside or outside the company;
- ✘ Do not falsify or hide any Hyundai documents;
- ✘ Never adulterate policies, KPIs, metrics or parameters with the aim of masking negative results;
- ✘ No entry, record, information or document may be forged, distorted, misleading, deliberately incomplete, hidden or give margin to misinterpretation.



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## 10 Quality and Safety of Products

As a manufacturer of consumer goods, Hyundai has a duty to ensure that its products meet all legal requirements regarding quality and safety. Hyundai employees must ensure that they follow all quality and safety policies, processes and standards and immediately inform their manager if they are aware of or believe there is a quality or safety issue in our products.

### In Prattice:

- Allowed:**
- ✔ Where appropriate, make sure you are familiar with the policies and the technical specifications for the company’s products;
  - ✔ Talk to your management about any concerns about potential or actual changes in the quality of a product as soon as possible;
  - ✔ Do check that any packaging containing goods complies with the necessary standards of Hyundai and legal requirements regarding packaging and labeling.

**Not allowed:**

- ✘ Do not ignore any actual or potential issues regarding product safety or quality. Report any issues to your line manager/supervisor as soon as possible;
- ✘ When appropriate, do not forget to check that all documentation relating to quality compliance and all quality checks have been completed;
- ✘ Do not use chemicals, raw materials or parts unless you are sure that they meet Hyundai’s quality standards and have been previously approved;
- ✘ Do not ignore actual or potential issues to increase volume or speed of your work. All the verifications, validations and process must be followed to ensure work efficiency, product quality and a safe and healthy workplace.





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## 11 Information Security

Confidential Information are important information of any kind or nature that are related to the company, such as: industrial and commercial secrets, operations, services, customers, agreements, fees, costs, marketing, business,accounting, financial statements, employees, software and others.

Hyundai’s confidential information is its sole and exclusive property and protected by the law. Employees must not, by any means, share, use, disclose or communicate directly or indirectly, any information related to Hyundai, to any person, or company / institution / entity, or withdraw any confidential information from Hyundai’s premises without prior authorization written consent of the leadership. Data Protection, Information Security, Data Loss Prevention and/or DPO, if personal data is involved.

Hyundai employees, service providers and business partners, should never share confidential information with spouse, companion, other family members, friends or any unauthorized recipients.

The obligation of secrecy remains after the termination of the employment contract or any other form of relationship with Hyundai, regarding the information obtained by the former employee, service provider and business partner during their time working along Hyundai. Thus, confidential information must be kept and cannot be disclosed, even if the former contract is no longer in force.

Documents related to lawsuits and other legal proceedings (printed or digital) are also confidential and should not be shared. Any employee that receives such documents by mistake must immediately report it to the Legal Department and then delete the document of all records, notifying the sender about the error.

Information concerning the company must be transmitted exclusively through the Public Relations Department, which is the sole department responsible for communication with external public and issues involving the media.

Employees, service providers and business partners must comply with the rules on the use and reproduction of software and other industrial and intellectual property protected by law. The installation of non-approved software or without the authorization of IT is prohibited.

The use of the Internet is exclusive to work-related activities, except for cases that aim at the practicality, convenience and productivity of the employee (e.g. internet banking). Sending confidential information to unauthorized destinations via the internet or any means such as uploads, forms, cloud services, storage services, servers or remote computers is prohibited. Do not access suspicious sites or sites that seek to violate any control of the company and do not click on dubious links. Inappropriate and abusive use will not be allowed and is subject to monitoring and enforcement of disciplinary measures.

Hyundai will monitor the system of professional emails used by its employees, service providers and business partners that use our infrastructure and

sending confidential e-mails to private e-mails or any unauthorized destination is not allowed.

Hyundai employees, service providers and business partners should never make illegal, unethical, unauthorized, or inappropriate use of the information system or company equipment. If you receive inappropriate messages, please inform the IT Department.





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Allowed:

- ✔ Only use software, devices and procedures that have been authorized and provided by the company;
- ✔ If you come across any suspect material (e-mails, attachments, links, images, videos, etc.) that may adversely affect the Company’s IT systems or equipment, report this to your IT department without delay;
- ✔ Ensure your screen is locked whenever you are not using your device;
- ✔ In case of loss or theft of any physical devices that belong to or contains Hyundai information (computers, laptops, cell phones, flash drives, smartphones, tablets, external hard drives, etc.) report it to the Data Loss Prevention team and IT Department as soon as possible, within 24 hours of the event, and follow all policies and directions informed by them;
- ✔ The responsibility for ensuring the availability, safeguarding, integrity, protection and confidentiality of Hyundai´s information rests with **EVERYONE**, whether employees, service providers or business partners;
- ✔ If you notice any unexpected or suspicious behavior on computers, laptops, tablets, servers, cell phones, etc., immediately contact the IT Department or Helpdesk for verification;
- ✔ Keep your passwords and access credentials confidential. Never report or share with others or write them down in a place where other people can have access. You are responsible for all activities associated with your credentials;
- ✔ Destroy information, physical devices and electronic storage media properly when no longer needed;

- ✔ Only share confidential or sensitive information with suppliers after you are sure there is a legal, valid and effective confidentiality agreement between the parties and that they are authorized destinations;
- ✔ Immediately report any loss or suspicion of data loss, incorrect sending of information to unauthorized destinations, accidental or not, to the Data Loss Prevention team, acting quickly, so it is possible to minimize possible impacts and risks;
- ✔ Keep all areas containing confidential information physically secure and allow access only to authorized people. Part of your job is to ensure that Hyundai data is properly protected and not damaged, lost or stolen.

Not allowed:

- ✘ Do not send, receive, download or store sexually explicit, rude, offensive, hostile or discriminatory material;
- ✘ Do not send, receive, download or store suspicious files or data or from unknown or doubtful senders because this increases the risk of virus spreading;
- ✘ Do not send, receive, download or store copyrighted material, trade secrets and similar materials, without the corresponding authorization or material that violates the rights of third parties;
- ✘ Do not send, receive, download or store any material designed for unlawful or unethical purposes, in violation of Hyundai policies or that may create obligations or be harmful to Hyundai;
- ✘ Do not use unauthorized devices (such as your private computer or unauthorized public clouds) to transmit, store or work on Hyundai’s confidential information;
- ✘ Do not open emails from unknown sources without verifying the source first;

- ✘ Do not make local copies of internal, restrict or confidential data or personal data on your laptop, cellphone or hard drive.
- ✘ Do not use or provide to third parties information from Hyundai that is privileged and not available to the public for the purpose of having or giving the third party any kind of advantage;
- ✘ Do not use corporate e-mail to pass on or start “chains”, carry out religious, political-party activities, among others;
- ✘ Do not use company assets and resources for games of chance;
- ✘ Do not discuss sensitive issues in public places, especially if you can´t tell if others are listening to the conversation;
- ✘ Don not leave drawers or cabinets with confidential information open, lock with the key and keep it always in your power or safely stored in a place that only you know and that is not visible or easy to access;
- ✘ Do not send non-public information that belongs to Hyundai to your own personal webmail, to the personal webmail of other employees, or to any unauthorized destinations;
- ✘ **NEVER** use you badge to “save a seat“ or leave it somewhere without your supervision and do not share photos of it on social media, it could be used for physical access to our premises and/or social engineering or gaining physical access to our facilities;
- ✘ Do not mix corporate passwords with personal passwords and avoid using the same password for multiple accounts, if one password is hacked or discovered, your other accounts will not be compromised;
- ✘ Do not respond to emails or phone calls requesting Hyundai’s information, including employee information, financial results or company secrets;



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## 12 Personal Data Protection

Hyundai is committed with the privacy of its customers, partners, service providers and employees, and respects the privacy and data protection laws and regulations that govern the processing of personal data, in particular the General Data Protection Law (Law number 13.709/2018 - “LGPD”).

Hyundai takes all necessary measures to make its data processing activities compliant with the standards set by the LGPD, and requires its partners and service providers to take equivalent measures. Personal data must always be processed only to the extent necessary to achieve a legitimate and legally authorized purpose.

Any personal data processing activity carried out by Hyundai or on behalf of Hyundai must occur only if there is a legal basis that justifies it and with adequate security measures. If you have any doubts about the legality of any personal data processing activity, please contact the DPO through the email [dpo@hyundai-brasil.com](mailto:dpo@hyundai-brasil.com).

The LGPD also establishes the rights that people can exercise over their personal data, such as the right of access, correction, anonymization, blocking, deletion, revocation of consent, portability, information, opposition and confirmation of the existence of treatment. Hyundai’s internal and external processes have been designed to respect these rights, and any new process or project developed by Hyundai must take

into account the need to comply with these rights. Likewise, whenever there is processing of personal data on behalf of Hyundai by partners or service providers, they must guarantee the same rights to the data subjects.

Whenever it is necessary to share personal data controlled by Hyundai with third parties, a specific contractual provisions to address the rules applicable to the personal data processing activities that will be carried out by the third party, must be formalized through an Attachment or Data Protection Agreement (“DPA”), or through personal data protection contractual clauses in the main contract. Among other safeguards, the document must provide, at least, confidentiality obligations in relation to such personal data, limitations on processing activities, and obligations to implement appropriate administrative, technical and organizational measures to prevent security incidents or any other undesired episode related to personal data shared by Hyundai.

The processing of personal data by Hyundai, its service providers and partners, as well as any possible transfer of this data must always be done with maximum security and in compliance with the laws and regulations in force. Among the various internal processes established to ensure such practices, Hyundai establishes, for example, minimum conditions for the processing of personal data, information security standards, technical standards, periodic training to understand and comply with obligations in relation to personal data protection, allocation of responsibilities and obligations to all employees, partners and service providers involved in processing activities, educational actions, internal mechanisms for supervision and mitigation of risks, procedures for responding to security incidents, among others.

A person in charge of Hyundai’s personal data processing activities (DPO) has been appointed, under the terms of the LGPD, who will act as a communication channel on the processing of personal data between Hyundai, the data subjects and the National Data Protection Authority (ANPD). In addition to external communication activities, the DPO shall be Hyundai’s focal point for all inquiries from employees, partners or service providers regarding the protection of personal data.

**ALL HYUNDAI EMPLOYEES, DELAERS, PARTNERS AND SERVICE PROVIDERS ARE RESPONSIBLE TO ENSURE THE PROTECTION OF PERSONAL DATA.**





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In Prattice:

Allowed:

- ✔ Understand and comply with national and international laws and regulations, as well as the above guidelines and other company policies, regarding the protection of personal data;
- ✔ Have all your department’s personal data processing activities mapped and aligned with the Data Protection team;
- ✔ Be extremely aware of and take appropriate action when collecting, processing, using, disclosing, storing and transferring personal data, giving them treatment of personal information;
- ✔ Consider the purpose for which data can be used before collecting the data and inform the data subject of each of these relevant purposes when collecting the data;
- ✔ Pay attention to the processing of personal data in the recruitment processes of new employees: (i) delete excessive personal data as soon as possible, when identified; (ii) collect sensitive data (such as a photo, data on racial or ethnic origin, religious conviction, political opinion, membership of a trade union or organization of a religious, philosophical or political nature, data relating to health or sex life, genetic or biometric

data) only when strictly necessary, and delete them as soon as they are no longer needed; (iii) ensure that, in case of recruitment through third parties (such as employment platforms or headhunters), a DPA or data protection clause is formalized with these third parties;

- ✔ When a data subject claims any of his rights guaranteed by the LGPD, instruct him to send his request to dpo@Hyundai-brasil.com;
- ✔ Participate in periodic trainings provided by Hyundai on personal data processing, good practices and security;
- ✔ Follow the Security Incident Response Policy and immediately notify the DPO at dpo@Hyundai-brasil.com, in the event of unauthorized disclosure/access or leakage of personal data, as well as in case of suspected personal data breach;
- ✔ Ensure that all third parties processing personal data for Hyundai have signed the Attachment or Data Protection Agreement (“DPA”), are located in a country that provides an adequate level of data protection, or that there is a level of sufficient security to ensure that personal data is processed at least in compliance with the LGPD.

Keep in mind that Hyundai’s compliance with LGPD depends on a collective effort - we count on your collaboration!

Not allowed:

- ✘ Do not collect, process, use, disclose or store personal data other than for legitimate purposes that require it and still inform the persons whose data are being obtained;
- ✘ Do not use personal data for a purpose that was not communicated to the owner at the time the data was collected;
- ✘ Do not collect or register sensitive personal data (racial or ethnic origin, sexual orientation, religion, health status, genetic data, etc.) unless absolutely necessary and, in this case, redouble your care in handling this data;
- ✘ Do not transfer personal data to third parties without thinking and considering the requirements of this Code of Ethics and Conduct and the law.



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## 13 Hiring Third Parties

Hyundai selects its suppliers impartially and in a transparent manner and based on objective criteria, namely: technical ability, economic aspects, legal compliance, and ethical behavior and does not allow any kind of favoring or discrimination.

Aiming to hire reputable partners committed to ethics and compliance and to ensure that business on its behalf are carried out in a transparent way, Hyundai created policies and guidelines for the acquisition of materials and services that must be observed and respected in the process of hiring third parties.

Contracts with third parties must be preceded by a process to get to know them (“Know your Supplier”), consisting of an assessment following the procedures and guidelines established by the Purchasing Department, in order to understand with whom we are doing business. This process also includes a Compliance assessment of these third parties to verify the existence of situations that may compromise or jeopardize Hyundai’s reputation.

Companies that have as owner, shareholder or manager any former Hyundai employee who have held positions prior to their termination in which they could influence purchase decisions or referring of service providers may not be contracted as suppliers or service providers for the division or department where such former employee worked for a period of 3 years, counting from the termination of the employment contract.

### In Prattice:

- Allowed:**
- ✔ Select the best qualified suppliers and service providers that always offer an adequate cost-benefit ratio;
  - ✔ Before hiring, carry out the technical and Compliance assessment of third parties and do not hire if irregularities are identified;
  - ✔ Maintain policies and practices that ensure transparent, fair and honest processes for all third parties involved in Hyundai's processes;

- ✔ Think carefully about any information you intend to share with suppliers. To ensure a supplier selection process as fair and professional as possible, ensure an equal access to information in terms of content and simultaneity to avoid undue competitive advantage to any of the suppliers participating in a bid process;
- ✔ Correctly follow Hyundai’s Purchasing Policy, paying attention to all the details listed in the Third Party Hiring process;
- ✔ Contact the Purchasing team and the Ethics and Compliance team if there are any questions and/or to confirm if certain behavior may violate the Purchasing Policy.

### Not Allowed:

- ✗ Never individually favor a third party over others based on personal preferences or criteria not foreseen in Hyundai Purchase Police;
- ✗ Do not hire third parties without observing the existing rules in the Purchasing Policy;
- ✗ Do not hire third parties with whom you have a family relationship or friendship, creating situations of conflict of interest;
- ✗ Do not hire third parties without carrying out the technical and Compliance assessments exposing Hyundai to financial and reputational risks;
- ✗ Never maintain relationships with suppliers and service providers in a way that may cause situations that contradict Hyundai’s Code of Ethics and Conduct;





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## 14 Gifts and Hospitalityes

No employee or member of his/her/their family shall accept, in the same calendar year, a gift, hospitality, favor or discount in excess of that established in Hyundai’s internal policies from suppliers, service providers, dealers or other partners who maintain or intend to have business relations with Hyundai.

Employees must return gifts that do not conform to this Code or any Hyundai policy along with an explanatory note on the company policy. If it is not possible or practical to return these gifts, the Ethics and Compliance team should be consulted to determine the destination and/or best action to be taken on a case-by-case basis. If the member of the company is not sure about the suitability or not of the gift received, he/she/they should look for the Ethics and Compliance team, or its management to clarify its doubts.

Gifts or souvenirs of inexpressive values, such as notebooks, pens, key chains, cups or caps with the supplier’s logo can be accepted, as long as there is no prohibition from the leadership.

Acceptance of entertainment (including football, golf, and other sport or cultural events) or other benefits to employees (or a member of the employee’s family) from current or potential business partners may influence or raise questions about recipient’s impartiality and compromise Hyundai’s reputation for fair treatment.

## 15 Donations and Sponsorship

The donations and sponsorships of Hyundai must always be carried out in a way to comply with our social responsibility, in accordance with the law and internal policies of the company, so as not to set up situations of corruption or conflict of interest.

All Hyundai donations and sponsorships must always be formalized by means of the appropriate legal instruments after approval of the areas of Government Relations, Human Resources, Legal and Compliance, especially if they are aimed at public agencies or projects.

Hyundai does not make donations (money or assets) to political parties, either directly or through interposed persons.

Laws and special rules apply to government agents. A great deal of caution is required with the offer and payment of hospitality and gifts to national and foreign public agents and/or person to them related (such as spouses, parents, etc.), as this may be understood, depending on the situation, as an undue advantage, not only by the Brazilian Anti-bribery Law (Law 12,846/2013), but also by other laws such as the Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act

### In Prattice:

**Allowed:**

- ✔ When giving or receiving gifts, hospitality or entertainment, check the intent or purpose;
- ✔ Accept and/or offer gifts that are consistent with usual business practices and serve a specific business purpose;
- ✔ Ensure that accounting records and supporting documentation reflecting attendees, favors and attentions should be properly documented, including clear and adequate description;
- ✔ In case of doubt as to the legitimacy or legality of any gift, favor or hospitality to be given and/or received the Ethics and Compliance team should be consulted before the commitment is taken;

### In Prattice:

**Allowed:**

- ✔ Only make donations and sponsorships in an absolutely transparent manner, for legitimate purposes and through appropriate legal instruments;
- ✔ Check the history and suitability of the institutions for which donations and sponsorship are intended, as well as their managers, quota holders or other public sponsors;
- ✔ Ensure that the donation and sponsorship contracts contain a clause of accountability and require the sponsored institutions or grantees comply with this obligation.

**Not Allowed:**

- ✗ Do not accept and / or offer gifts of significant value and that may be construed or perceived as a form of bribe;
- ✗ Never give or receive gifts, hospitality and entertainment with ANY IMPROPER PURPOSE, regardless of the value;
- ✗ 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;
- ✗ Never offer anything of value to public servants or persons related to them without first consulting the Hyundai Ethics and Compliance team.

**Not Allowed:**

- ✗ Do not commit to make donations or sponsorships of any nature without first checking with the Legal Department and Ethics, and Compliance Team if it can be authorized according to the law and current policies.



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## 16 Conflict of Interests

Conflicts of interest occurs when someone lets personal interests override the interests of the company, influence or appears to influence a decision making process.

Hyundai employees are expressly prohibited from offering and/or receiving from third parties goods, resources or advantages of any nature for the purpose of influencing, facilitating, establishing or maintaining business with Hyundai. It is also prohibited to facilitate, establish or maintain business on behalf of Hyundai that are not in the best interest of the company or that are not in compliance with Hyundai’s policies due to personal interests.

Hyundai employees or their family members shall not hold a corporate interest or management position in Hyundai’s suppliers, service providers or customers that may in any manner constitute a conflict of interest.

Employees hiring, merits and promotions should not be influenced by applicant’s relationships with any Hyundai member, suppliers, service providers or clients, including family, personal, political, ideological, religious or intimate relationships. If an individual has such relationships and has been hired, or indicated, measures must be taken to avoid any hierarchical link.

Employees who identify a situation of possible conflict of interest should immediately inform the Ethics and Compliance team to identify the best way to avoid the conflict of interest.

Annually, or in other periodicity defined in specific internal policies, employees of Hyundai’s administrative areas must complete and submit to the Ethics and Compliance team the Declaration of Conflict of Interest.

### In Prattice:

**Allowed:**

- ✔ Avoid situations in which your decisions may be compromised by personal relationships or favors, nor generating expectation of payment for favors received from third parties, business partners, etc.;
- ✔ Consult your manager or the Ethics and Compliance Team before commencing or continuing an external activity that may result in a conflict of interest;

- ✔ Communicate to the Ethics and Compliance Team, in writing, the exercise of any external activity that may be related to the performance of your duties or to Hyundai's interests. The Ethics and Compliance Team will provide the employee with guidance on what to do in each case;
- ✔ If in the third party contracting process a conflict of interest is identified, immediately notify the Ethics and Compliance team;
- ✔ Communicate the existence of situations in which the spouse or persons with a degree of kinship, direct or otherwise, are a supplier or employee or person contracted by the latter, and the functions of this person and the employee of Hyundai, as well as access to confidential information that they have in their respective companies, may constitute a situation of conflict of interest;
- ✔ Immediately communicate to the Human Resources Department and the Ethics and Compliance Team the existence of an affective relationship with people with whom you have a hierarchical link;
- ✔ Fill in the Conflict of interests form annually;
- ✔ Communicate to the Ethics and Compliance Team, via email compliance @hyundai-brasil.com, if your family member, should hold interest or managerial positions in suppliers, customers and/or competitors of Hyundai that may generate conflicts of interest of any nature.

**Not allowed:**

- ✘ No Hyundai employee should hold interest or managerial positions in suppliers, customers and/or competitors of Hyundai that may generate conflicts of interest of any nature;
- ✘ Do not work under any circumstances for companies that are in any way competitors of Hyundai. Such activities are prohibited because they may generate dubious situations regarding loyalty to the Company;
- ✘ Do not carry out personal activities at your place of work or during the working hours, nor use for private purposes, telephones, equipment, materials, information or other resources of the Company, unless with prior authorization from the hierarchical superior.





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## 17 Anti-Corruption Policy

Hyundai takes an ethical and law-abiding stance, combating all forms of corruption or bribes in the performance of its activities, and does not establish or maintain business relationships with partners who engage in corrupt practices.

Hyundai employees and people to them related should never offer, make or accept any kind of bribe, in their professional relations with public agents or business partners.

All suppliers, service providers and dealers of Hyundai shall expressly oblige themselves, by means of a contractual clause, to follow the provisions of the Anti-Corruption Law (Law Number 12.846 / 13) and their respective regulations, as well as the Foreign Corrupt Practices Act, - Act, 15 US.SC 7cc-1 et seq. - (“FCPA”) of the United States of America.

Should Hyundai or any of its employees be aware that any Hyundai service provider, dealer or business partner is involved in corrupt practices or bribery payments, it shall immediately take all necessary steps to discontinue the business relationship and when requested, cooperate with the authorities in what is necessary to combat any and all infractions to the law.

## 18 Antitrust

Hyundai conducts its business in order to ensure free competition and free enterprise, condemning the practice of acts harmful to competition such as cartel formation or any other acts aimed at limiting, distorting or harming the free market.

All suppliers, service providers and dealers of Hyundai shall expressly oblige themselves, by means of a contractual clause, to follow the Antitrust Law provisions (Law number 12.529 / 11) and its respective regulations.

### In Prattice:

In defense of free competition, in dealing with competitors:

**Allowed:**

- ✔ Discuss with competitors only general industry-wide matters, but never commercially sensitive information, such as price fixing, market division, production and sales strategies and standardization of conducts;

### In Prattice:

**Allowed:**

- ✔ When acting on behalf of Hyundai, always observe the applicable legislation, in particular the Anti-Corruption Law (Law no. 12.846/13) and its regulations;
- ✔ Consult the Legal Department and the Ethics and Compliance Team for more detailed guidelines and rules and make sure you follow them;
- ✔ Stay alert to the risks of bribery and corruption;
- ✔ Seek additional guidance from the Legal Department and the Ethics and Compliance team immediately if you are asked to do something that bothers you, seems unusual, or you suspect to be illegal.

**Not Allowed:**

- ✗ Never give gifts or other courtesies to any public official, national or foreign, without first consulting the Legal Department and the Ethics and Compliance team.
- ✗ Never offer, promise to pay, pay or authorize payments of value or

any other goods or undue advantages to any agent, public official, national or foreign, or any related person;

- ✗ Never hold meetings with public bodies or agents unaccompanied and in a suspicious environment without the knowledge of your managers and without consulting the Legal Department and the Ethics and Compliance team;
- ✗ Do not engage in any activity or transaction that could lead to a violation of the Code of Ethics and Conduct or any locally applicable laws and regulations;
- ✗ Do not be persuaded by others to do something that you suspect might be inappropriate, contrary to Hyundai policies or illegal, even if “everyone is doing it” or “have done it in the past”;
- ✗ Never try to induce someone to do something improper or illegal, even if “everyone is doing it” or have already done it in the past;
- ✗ Do not ignore, unjustifiably delay or fail to report any concerns you have about improper or illegal activities;
- ✗ Never prevent, hinder or prejudice, in any way, the action of public authorities.

- ✔ Compete fairly for participation in the market and conduct business observing the highest ethical standards;
- ✔ Think carefully about any information you give to customers or dealers; When making a benchmark make sure that the information to be exchanged is not commercially sensitive;
- ✔ Contact the Ethics and Compliance team if you are in doubt as to whether certain behavior could infringe competition law.

**Not Allowed:**

- ✗ Do not discuss, provide or receive commercially sensitive information, or address price and discount fixing, market and/or customer division, production and sales strategies, standardization of conducts or exchange of other commercially sensitive information;
- ✗ Do not improperly obtain information from competitors, partners or any other organizations, or use or disclose information obtained illegally;

- ✗ Do not deal with matters or practice acts intended to limit, distort or in any way harm free competition or free enterprise;
- ✗ Do not list, appoint or rank suppliers with illegal purposes;
- ✗ Do not draw up or make joint market strategies;
- ✗ Do not plan to boycott nor boycotting suppliers and / or competitors;
- ✗ Do not discuss participation in bids.
- ✗ Never offer an unfair advantage to a competing bidder;
- ✗ Never practice any conduct that may be considered fraud in bids and contracts with national or foreign governments.



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## 19 Money Laundering Prevention

Money laundering is a process by which criminals conceal the real source of proceeds from illegal practices. The goal is to turn “dirty money”, which came from criminal activity, into “clean money.” Money laundering directly funds the activities of criminal and terrorist groups. These groups are a risk to Hyundai and its employees as they may pose as a business partner that actually provides services as a form of money laundering. This can cause serious damage to the company’s reputation as well as other legal risks that should be avoided.

Hyundai repudiates money laundering and the financing of criminal activities and its employees should take the necessary precautions not to do business with partners (ex: service providers, suppliers and dealers) who may be practicing these activities.

In addition to a Money Laundering Prevention Policy and Combating the Financing of Terrorism, Hyundai has procedures, which must be observed by all employees in order to get to know the people and companies (1) with which Hyundai has or will have business (“Know your Supplier/Partner”); and (2) to which Hyundai sells its products and services (“Know your Client”) in order to reduce the risks of establishing business relationships with third parties involved in illegal activities.

### Situations that require attention:

- ⚠ Requests for payment or receipt from third parties/customers in cash;
- ⚠ Requests for payment to or receipt from third parties without contractual provision;
- ⚠ Request for payment on accounts that are not the usual ones or in name of third parties;
- ⚠ Request for payment on accounts located in countries where the partner is not located;
- ⚠ Business relationships with politically exposed persons;
- ⚠ Incompatibility between the economic-financial capacity of the third party/client and the operation associated with them.

When verifying a situation that is unusual and that may indicate the practice of suspicious activities, the members of Hyundai should immediately communicate their manager and the Ethics and Compliance team.

### In Prattice:

#### Allowed:

- ✔ Be compliant with Hyundai´s anti-money laundering policies and procedures;
- ✔ Keep a proper record of customers and business transactions;
- ✔ Be aware of the risk of Hyundai being used for money laundering;

- ✔ Report any concerns you have to your manager and the Ethics and Compliance Team;
- ✔ Confirm the source of any values received whenever you suspect that they may not be from a legitimate source;
- ✔ Be aware of any requests that seem unusual, for example, requests to make payments to unknown bank accounts or to third parties.

#### Not Allowed:

- ✗ Don't ignore your worries. It is better to investigate them and confirm that it's okay to act as if your worries don't exist.
- ✗ Do not make payments to unknown companies/persons or accounts bank accounts without first confirming the reason for making payments.
- ✗ Do not accept payments from unknown sources without confirming the reason for payment and, if possible, the origin of the amounts.
- ✗ Do not proceed with commercial transactions if the proper issuance of a note Supervisor. If any suspicious circumstances arise, please contact with the Ethics and Compliance team and the Legal department to clarify and analyze the situation and the risks involved.

## 20 Union Relations

Hyundai recognizes the importance and social relevance of the union entities nowadays, as well as believes in free negotiation as an instrument of equilibrium, for which it aims to have a relationship of respect and harmony with those entities.

Hyundai employees should not provide gifts or other courtesies to union representatives without first consulting the Employee Relations Department and/or his/her leadership.

The Employee Relations Department is responsible for all negotiations with union representatives.

### In Prattice:

#### Allowed:

- ✔ Maintain a transparent and law-abiding position in negotiations with trade unions, always, avoiding any situations that may appear suspicious or that constitute corruption, bribery or conflict of interest.

#### Not Allowed:

- ✗ Do not provide or offer gifts or other courtesies to trade union representatives without first consulting the Employee Relations and Legal Departments and the Ethics and Compliance Team;
- ✗ Do not provide or offer donations or sponsorships to trade unions without first consulting the Employee Relations and Legal Departments and the Ethics and Compliance Team.



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19	Money Laundering Prevention
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22	Denunciation Channel

## 21 Conduct and Disciplinary Measures

This Code of Conduct sets out exemplary behaviors establishing the standards of ethics and integrity to be observed by Hyundai employees and partners. Other conducts considered as inappropriate as well as, applicable disciplinary actions, including termination of employment contract, are described in Hyundai’s Internal Policies available to all employees.

Any employee who violates the rules of this Code of Ethics and Conduct will be subject to the application of disciplinary measures.

Violations of the principles and rules of this Code of Ethics and Conduct, as well as other Hyundai’s internal regulations, compromises the relationship of mutual trust that must exist between the parties involved and subject the offender to the penalties established in current legislation.

Once the violation is identified, prompt action will be taken by appropriate, fair, adequate, disciplinary measures in accordance with regulations and applicable laws.

The disciplinary measures defined for violations of the Code of Ethics and Conduct are adopted by Hyundai in accordance with the rules and employment contracts stipulated at the national or corporate level. Such measures may be: disciplinary orientation, verbal warning, written warning, suspension and even termination of employment contract for just cause, and may be applied regardless of their order of indication, according to the seriousness and/or recurrence of the offense committed.

## 22 Denunciation Channel

Hyundai’s employees, service providers, business partners and consumers who identifies any practice or act that is contrary to this Code of Ethics and Conduct must communicate the company through our official denunciation channel, called Ethics Line, through the following means.

E-mail to **ethicsline@hyundai-brasil.com** in which the whistleblower is free to write the complaint and may attach any evidence related to it.

On-line form available in Portuguese and English in our website at **<https://www.Hyundai.com.br/aHyundai/eticaecompliance/>**

By telephone Ethics Hotline - **0800-Hyundai (4986324)**. The whistleblower has access to an ARU (Automatic Response Unit) available in two languages: Portuguese and English.

Your registration will take place in two phases; the first to point out those involved in the complaint and, at the end, the whistleblower should record a message up to 5 minutes, with more details about the denunciation.

The confidentiality and anonymity is guaranteed to all involved in the denunciation, regardless if the whistleblower has identified himself/ herself or not in the denunciation.

Hyundai employees should fully cooperate with investigations of misconducts by the Compliance Team or Employee Relations Department.

Retaliation, punishment or any other acts shall not be tolerated:

a) any kind of bad use of Ethics Line Channel with the intent to offend and/or damage the reputation of other employees or third parties.

b) against people who: (1) report legitimate concerns, complaints, denunciations, breach of the law, the Code of Ethics and Conduct and other Hyundai internal policies; or (2) who cooperates with an internal investigation.





