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0	1.10.2025	New document				
1		Incorporation of global standards on Human rights management				

Human rights policy

Hyundai Mobis

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1. Introductory Provisions

1.1. Definition of Human Rights and Human Rights Management

Human rights are a set of moral principles or norms that describe certain standards of human behavior and are regularly protected as legal rights in national and international law. They are inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status (hereinafter referred to as "Human Rights"). Human rights are codified in several key international documents such as the Universal Declaration of Human Rights (UDHR), the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights (ICESCR). Together, these form the International Bill of Human Rights.

As Human Rights are considered

- civil and political rights (right to life, freedom of speech, right to a fair trial etc.),
- economic, social, and cultural rights (right to work, to education, to health, etc.) and
- collective or solidarity rights such as the right to self-determination, the right to development and the right to a healthy environment.

Human rights management is the integration of Human Rights protection principles into a company's governance, policies, risk management, and daily operations (hereinafter referred to as „Human Rights Management“). It ensures the business respects the rights of all stakeholders—employees, customers, suppliers, communities, and others affected by its activities.


The principles of **Human Rights Management** can be found in several **international documents and frameworks** such as the UN Guiding Principles on Business and Human Rights, the ILO Constitution, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, the OECD Due Diligence Guidance for Responsible Business Conduct or Corporate Sustainability Due Diligence Directive (CSDDD). These documents guide businesses in respecting and promoting Human Rights across their operations and supply chains.

1.2. Purpose of Establishing Human Rights Policy

The Mobis entities operating in Europe, more specifically listed in Annex I (hereinafter collectively referred to as the "European Mobis Entities") declare this Human Rights Policy (hereinafter referred to as "Policy") to actively implement Human Rights Management, prevent violation of Human Rights, and mitigate relevant risks related to Human Rights in operation of their business. The European Mobis Entities respect and support all above-mentioned international standards and guidelines relating to Human Rights and Human Rights Management. They will make every effort to identify negative impacts of business activities on Human Rights, prevent /mitigate such impacts, and prepare a relief process to minimize any negative impact on Human Rights.

1.3. A Range of Application of Human Rights Policy

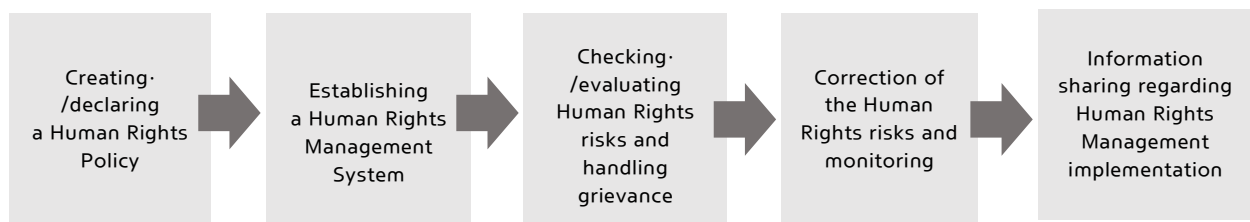
All the European Mobis Entities executives and employees of the European Mobis Entities, regardless of their status, are subject to this Policy and shall perform their job in compliance with this Policy. Moreover, the executives and employees of the European Mobis Entities shall follow the Policy when dealing with suppliers of goods / services, and by extension, encourage all stakeholders to respect this Policy. The executives and employees of the European Mobis Entities must always comply with all applicable laws and regulations valid for the area of Human Rights in all countries where the European Mobis Entities conduct their business, as well

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as with principles embodied in this Policy. If this Policy is in conflict with applicable local laws and regulations, the latter shall take precedence over this Policy and the European Mobis Entities shall make all reasonable effort to align this Policy with national laws and regulations.

1.4. Management System of Human Rights Risks

the European Mobis Entities will adopt an internal Human Rights Management system in accordance with this Policy to ensure respect for the Human Rights of all executives and employees and to mitigate risks, and will implement a due diligence policy for Human Rights to regularly evaluate / improve the Human Rights risks and fully share the results. The European Mobis Entities conduct a Human Rights risks assessment according to the principle of good faith and integrity and revise the Human Rights Management system based on the various considerations arising from social changes and their practical application .




2. Basic Principles

2.1. Prohibition of Child Labor and Forced Labor

The European Mobis Entities ban child labor and have zero tolerance for such an unlawful form of employment. Education shall always take precedence over work. The European Mobis Entities comply with all applicable laws and regulations relating to a minimum age for admission to employment. The HR department shall verify (during hiring process) the actual age of the applicant (by checking ID document) and in case of minor’s applicants, documents confirming completion of compulsory school attendance. Moreover, executives and employees are not forced to work against the freedom of their will – they enter into the employment relationship as a result of their free decision and consideration after confirmation of a successful job interview by the European Mobis Entities. Original identification documents and / or visa remain in the possession of the employee and are not stored by the employer.

2.2. Discrimination and Harassment Prevention

the European Mobis Entities do not discriminate in employment including during recruiting, hiring, promoting, educating, wage, and welfare depending on sex, gender, race, national, ethnic or social origin, religion, language, disability, age, marital status, pregnancy, sexual orientation, family status, political or other opinion, economic position, property, birth or other status of the employees unless the difference in treatment is justified by the nature of the activities carried out in the employment or by the circumstances in which those activities are carried out, where that ground constitutes a genuine and compelling requirement of employment, provided that the aim is legitimate and the requirement is proportionate. The European Mobis Entities have zero tolerance for unfair treatment. Furthermore, any activities that cause physical and / or mental harm such as sexual harassment, forced work orders, violent language, abuse of rank and position or conduct that deteriorates the working environment, as forms of discrimination, are prohibited and subject to the disciplinary

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proceeding.

2.3. Compliance with Working Condition

The European Mobis Entities comply with all applicable legislation on working time and ensure that employees are paid in accordance with relevant legal requirements and, where applicable, collective agreements. Employees receive appropriate compensation in line with applicable law (e.g., for night work, overtime), and all employees are provided with pay slips. Moreover, the European Mobis Entities do not ask for any commission from workers on grounds of recruitment. They provide employees with appropriate working environment in compliance with applicable regulations as well as education and training resources to support the development of their skills, experience and overall quality of life. The European Mobis Entities ensure that all employees receive wages that comply with legal requirement and exceed the minimum living wage.

2.4. Humane Treatment

The European Mobis Entities protect personal information and processes personal data in compliance with all applicable data protection regulation (including the EU General Data Protection Regulation (GDPR) and, where applicable, the Turkish Personal Data Protection Law No. 6698 (KVKK)). They also respect the privacy of all employees. The European Mobis Entities avoid any and all situations which could be considered as unequal or unfair treatment, including mobbing, bossing, harassment, or other abusive conduct.

2.5. Freedom of association and Collective Bargaining Right

The European Mobis Entities comply with all applicable laws and regulations relating to labor associations and collective bargaining. Every employee has the right to join a trade union and to participate in collective representation. Collective bargaining practices may vary among the European Mobis Entities and are carried out in accordance with the relevant national laws and established local procedures. Where collective agreements are in place, working conditions are negotiated with employee representatives within the legally defined framework. Through collective bargaining, as well as through the activities of trade unions in the workplace, the working conditions of the employees are continuously improved.

2.6. Industrial Safety and Security Personnel Management


The European Mobis Entities are committed to ensuring a safe working environment for all employees by conducting regular inspections of facilities, equipment, and tools, and by implementing appropriate measures to prevent physical and mental risks, including providing adequate post-incident support.

When engaging public or private security personnel, the European Mobis Entities comply with internationally recognized Human Rights standards and uphold the principle of minimizing physical intervention and respecting Human Rights.

2.7. Protection of Human Rights of Local Communities and Vulnerable Groups

The European Mobis Entities are committed to ensuring that the Human Rights of local communities, including indigenous peoples, are respected throughout all business activities. The European Mobis Entities uphold land, forest, and water rights, and strictly prohibit forced eviction. They also strive to protect the rights to health and safety and the freedom of residence.

Furthermore, the European Mobis Entities are dedicated to safeguarding the rights of

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vulnerable groups such as children, migrant workers, persons with disabilities, and women by preventing discrimination and promoting equality.

2.8. Protection of Human Rights of Business Associates

All the executives and employees of the European Mobis Entities make every effort to protect the personal information of business partners that is collected for health / property protection, and / or for management purposes, when providing goods and services.

2.9. Responsible Management for Supply Chain

The European Mobis Entities comply with all applicable laws and regulations relating to evaluating and managing environmental, social and governance ('ESG') risks arising from supply chain, and as applicable with OECD Due Diligence Guidance, including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Supplement on Tin, Tantalum and Tungsten, and Supplement on Gold. The European Mobis Entities also endeavors to support its business partners in preventing and reducing ESG risks.

2.10. Security of Environmental Rights

The European Mobis Entities recognize that environmental pollution can be a severe violation of Human Rights that affects life and health for everyone, and they aim to minimize negative impacts on environment resulting from their business activities, including by adopting appropriate environmentally friendly technologies.

3. Human Rights Management

3.1. Human Rights Management Structure

3.1.1 Responsibility for Human Rights Management

The European Mobis Entities manage/ supervise the current status of Human Rights Management through


- the chain of superiority, where superiors are responsible for compliance with Human Rights rules and obligations within their teams (sections) and / or departments;
- cooperation between HR department and Legal & Compliance team (section) responsible for the establishment and / or revisions of this Policy, and for the implementation of proposals for internal procedure adjustments related to Human Rights;
- Human Rights risk assessment;
- the investigating of violations of Human Rights including implementation of corrective actions, when necessary and
- other actions to educate and protect Human Rights.

3.2. Operation of Grievance Mechanism

3.2.1. Reporting/ Receiving/ Investigating of notices on violation of Human Rights

The European Mobis Entities provide reporting channel that allows employees, individuals or groups to submit a report (notice) in their local language, if they are aware of Human Rights risks or experience a Human Rights violation. Human Rights violation reports may also be submitted directly, using e-mail addresses of HR department / Legal & Compliance team (section) employees and through employees' representatives, including trade unions.

If the conduct described in the report qualifies as an "anti-social activity" under applicable

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EU whistleblowing regulations, the procedures for submitting, investigating, and addressing such reports, as well as the responsibilities and confidentiality obligations of the designated personnel, are governed by the relevant EU whistleblowing framework. In these cases, the Legal & Compliance team (section) is responsible for handling the report.

If the conduct **does not** fall under the scope of EU whistleblowing regulations, the investigation of the report is carried out in accordance with the Labour Code, and the HR department is responsible for managing the case.

If a report is assessed as well-founded, appropriate corrective measures must be implemented to remedy the Human Rights violation. Each case must be handled individually, taking into account its specific characteristics and circumstances. During the investigation, the presumption of innocence and the right to personal dignity must be respected. All investigations must be documented, and substantiated cases must be reported to the CEO.

Channel to Report Violation of Human Rights

<https://mobiseurope.integrityline.com/>

3.2.2. Protection of Whistleblowers

The European Mobis Entities shall maintain confidentiality regarding personal data of whistleblowers and victims as well as details of any report unless disclosure of any part or the report is necessary to conduct / complete the investigation. The European Mobis Entities shall ensure that whistleblowers and / or victims will not be subject to termination, threats, harassment, or other adverse action by reason of making a report / provision information requesting when investigating the report. The European Mobis Entities shall take appropriate disciplinary action against those who seek retaliation against any whistleblower and / or victims.

3.3. Education and Information

3.3.1. Education of Human Rights Management

The European Mobis Entities conduct an education on Human Rights management that aims to raise employees' understanding of Human Rights and improve their awareness of it. Education enables to inform about prohibition of discrimination among employees and guide them to report a violation of Human Rights.

3.3.2. Information on Human Rights Management


The European Mobis Entities may disclose information regarding this Policy, their plans for improvement in the area of Human Rights, Human Rights risk evaluation procedures, and related topics, in order to promote the Human Rights Management within the supply chain. For this purpose, the entities may use the most suitable communication channels and formats, such as corporate webpages or internal information systems, that ensure easy accessibility for employees across all organizations.

4. Human Rights Due Diligence

4.1. Identify and Evaluate Risks

4.1.1. Development of Evaluation Index

The European Mobis Entities, through and in cooperation with Hyundai Mobis as their mother company, develop and operate an inspection and due diligence index that evaluates Human Rights risks of working environment, workforce, industrial safety under local, European

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and international legislation such as UN Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidance for Responsible Business Conduct, and the Corporate sustainability due diligence directive (CSDDD).

4.1.2. Operation of Evaluation Process

The European Mobis Entities, through and in cooperation with Hyundai Mobis as their mother company, operate a process that identifies and evaluates potential risks on Human Rights and the current status of violation of Human Rights. The process enables to communicate with major stakeholders, identify risk factors that might occur throughout the business including the supply chain and business operation, and evaluate effects of the risk factors on the stakeholders.

There is a written assessment with the evaluation index and guidelines provided to a person who is subject to evaluate and if the result of self-diagnosis is insufficient, there shall be a recommendation to establish a self-improvement plan.

Based on the decision of the European Mobis Entities, as well as on the results of the written self-assessment, an on-site due diligence inspection may be conducted to inspect details of risks through internal regulations, systems, interviews, and on-site inspections. Moreover, a third-party audit company may conduct a separate audit to secure objectivity of written self-assessment and on-site due diligence.

If 'high risk' and 'Nonconformity' are identified after the written self-assessment/ on-site due diligence/ 3rd party audit, immediate improvements and corrective measures are required. The European Mobis Entities, in cooperation with Hyundai Mobis, revise the evaluation index and their process of Human Rights risks evaluation to clearly identify violation of Human Rights cases and to assess effectiveness of the evaluation process.

4.2. Implementation of Risk Improvement Plan

4.2.1. Derive and Discuss Improvement Plan

The European Mobis Entities, in cooperation with Hyundai Mobis, establish and implement an improvement plan for Human Rights risks according to the risk evaluation. Based on the result of the Human Rights risk assessment, the European Mobis Entities will create specific tasks to improve the areas of Human Rights risks by discussing with the respective departments (e.g. HR department, Legal & Compliance team (section), production departments).


4.2.2. Monitoring the Progress of Implementation

The European Mobis Entities, in cooperation with Hyundai Mobis, continuously monitor the progress of Human Rights risks improvement plans implementation. There shall be mutual communication between concerned departments to create schedule of tasks performance to ensure the expected outcome and if there is a delay in plan's implementation, proper measures shall be taken.

4.3. Information Sharing

To enhance effectiveness of Human Rights Management, the European Mobis Entities may use reports and information from all employees across the European Mobis Entities regarding significant implications and critical risks identified by the evaluation of Human Rights risks and their improvement plans reported via the superiority chain, through grievance channels or through trade unions.

The European Mobis Entities disclose all important information related to the Human Rights management on the website, within sustainability reports and / or using other channels that

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are easily accessible and clearly understandable for employees and other stakeholders.

5. Final Provisions

The Policy has been established on the basis of laws in regard to Human Rights, standards and initiatives stated in domestic/ foreign human rights standards and relevant regulations.


- ① UN, Universal Declaration of Human Rights (1948)
- ② UNGC, A Human Rights Management Framework (2010)
- ③ UN, The UN Guiding Principles on Business and Human Rights (2011)
- ④ OECD, The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (2023)
- ⑤ OECD, Due Diligence Guidance for Responsible Business Conduct (2018)
- ⑥ ILO, ILO Constitution (2015)
- ⑦ CSDDD, Corporate Sustainability Due Diligence Directive (2024)

This Policy is binding for all employees of the European Mobis Entities who are obliged to act in compliance with Human Rights principles. Breach of the obligations under this Policy might be assessed as breach of working obligations in disciplinary proceeding.

6. Annexes

Following annexes create an integral part of this Policy:

1. List of the European Mobis Entities,
2. Specific provisions applicable to Mobis Slovakia s.r.o..

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Annex I.

Following entities are considered as the European Mobis Entities:

MOBIS Parts Europe N.V. (“MPE”)
Zweigniederlassung Deutschland
Frankfurter Strasse 60-68
65760 Eschborn / Germany

Mobis Slovakia s.r.o. (“MSK”)
MOBIS ulica 1,
Gbelany 013 02
Slovak Republic


Mobis Automotive Czech s.r.o. (“MCZ”)
Hyundai 171/2
739 51 Nošovice
Czech Republic

Mobis Automotive System Czech s.r.o. (“MCZ OS”)
Mošnov 375
742 51 Mošnov
Czech Republic

Mobis Hungary Kft (“MHU”)
Daimler út 2/B
6000 Kecskemét
Hungary

Mobis Spain Electrified Powertrain, S.L. (“MSPe”)
Avenida de Navarra S/N, 31119 Imarcoain (Ciudad del transporte)
Navarra
Spain

Mobis Otomotiv ve Modül San. ve Tic. A. Ş. (“MTR”)
Asım Kibar Organize Sanayi Bölgesi 2. Cadde No:4
41310 İzmit-KOCAELİ
TÜRKİYE

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Annex II.

Taking into account the local regulations and practice, these provisions will apply to Mobis Slovakia s.r.o., MOBIS ulica 1, Gbeľany 013 02 Slovak Republic ("MSK"), alongside with the provisions of the Policy. Respective numbering used in the Annex II. corresponds to the numbering in the Policy itself.

2.1. Prohibition of Child Labor and Forced Labor

In case of minors, their employment is prohibited until they will reach the age of 15 years, and they will finish compulsory school attendance, which is 10 years.

2.5. Freedom of association and Collective Bargaining Right

In MSK, collective bargaining occurs every 4 years and this period corresponds to the period of the collective agreement's validity.

2.6. Industrial Safety and Security Personnel Management

Measurements of working environment conditions are performed periodically to assess compliance with applicable legislation in the area of organizational health and safety.

2.7. Protection of Human Rights of Local Communities and Vulnerable Groups

MSK states that no rights of indigenous people are affected by MSK's activities in Slovakia - there are no indigenous people associated with the area, where MSK perform its business activities. The rights of local residents are assessed as part of legislative processes.

Regarding the vulnerable groups, MSK provide employees included in such group with special working conditions where this results from the applicable legislation.


3.2. Operation of Grievance Mechanism

In case that the conduct (reported Human Rights violation) described in the report can be assessed as anti-social activity under Act no. 54/2019 Coll. on protection of whistleblowers, the rules for delivery, investigation and implementation of corrective actions as well as obligations of responsible person (incl. confidentiality obligation) are described in internal regulation MSK-LT-05 On Internal Whistleblowing System. L&C section is responsible for handling of such whistleblowing notices.

In other cases, when the described conduct (reported Human Rights violation) can't be assessed as anti-social activity under Act no. 54/2019 Coll. on protection of whistleblowers, the investigation of such reports is governed by Labour Code. HR department is responsible for handling of such reports.

Whistleblowing channel operated by MSK 24/7 is available here:
<https://mobis.sk/en/submit-the-whistleblowing-notice/>

5. Final Provisions

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This Policy is drawn up in Slovak and English language version. In case of any discrepancies, Slovak version shall prevail.