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	Version	Issue Date	Revision Details
Revision History	1.0	2020.07.27	Initial Release
	2.0	2023.10.26	Human Rights Policy of Hyundai Motor Group (Affiliates) applied
	3.0	2026.02.18	Incorporation of global standards on Human Rights Management


### [The person in charge]

Regional Legal & Compliance Team in Europe

※ Electronic approval

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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 and 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.

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 established and operating in Europe, as further specified in Annex I (hereinafter referred to as “Mobis”) hereby adopt this Human Rights Policy (hereinafter referred to as “Policy”) to actively implement Human Rights Management, prevent violations of Human Rights, and mitigate relevant risks related to Human Rights and its business operation. Mobis respects and supports all above-mentioned international standards and guidelines relating to Human Rights and Human

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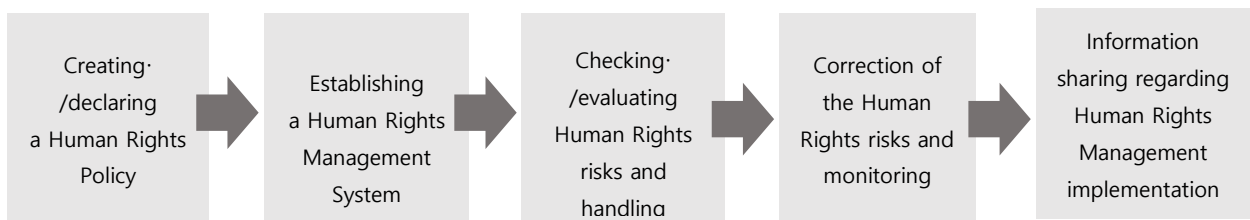
Rights Management. Mobis will make every effort to identify negative impacts of business activities on Human Rights, prevent/mitigate such impacts, and prepare a relief process to minimize any negative impact on Human Rights.

### 1.3. A Range of Application of Human Rights Policy

All executives and employees of Mobis, regardless of their status, are subject to this Policy and shall perform their jobs in compliance with this Policy. Moreover, the executives and employees of Mobis 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 Mobis must always comply with all applicable laws and regulations valid for the area of Human Rights in all countries where Mobis conducts its business, as well as with principles embodied in this Policy. If this Policy conflicts with applicable local laws and regulations, the latter shall take precedence over this Policy and Mobis shall make all reasonable efforts to align this Policy with national laws and regulations.

### 1.4. Management System of Human Rights Risks


Mobis 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. Mobis conducts a Human Rights risks assessment according to the principle of good faith and integrity and revises 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

Mobis bans child labor and has zero tolerance for such unlawful forms of employment. Education shall always take precedence over work. Mobis complies with all applicable laws and regulations relating to the minimum age for admission to employment. The HR department shall verify (during

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hiring process) the actual age of the applicant (by checking ID document) and in case of minor 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 Mobis. 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**

Mobis does not discriminate in employment, including during recruitment, hiring, promoting, training, wage, and welfare on the basis of 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. Mobis has zero tolerance for unfair treatment. Furthermore, any activities that cause physical and / or mental harm such as sexual harassment, forced work orders, violent or abusive language, abuse of rank and position, or conduct that deteriorates the working environment, as forms of discrimination, are prohibited and subject to disciplinary proceeding.


## **2.3. Compliance with Working Condition**

Mobis complies with all applicable legislation regarding working hours and ensures 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, Mobis does not ask for any commission from workers on grounds of recruitment. They provide employees with an 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. Mobis ensures that all employees receive wages that comply with legal requirements and exceed the minimum living wage.

## **2.4. Humane Treatment**

Mobis protects personal information and processes personal data in compliance with all applicable data protection regulations, (including the EU General Data Protection Regulation (GDPR) and, where applicable, the Turkish Personal Data Protection Law No. 6698 (KVKK)).

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They respect the privacy of all employees. Mobis avoids 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**

Mobis complies 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 Mobis 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 within the workplace, the working conditions of the employees are continuously improved.

### **2.6. Safety of Industrial Safety and Security Personnel Management**


Mobis is 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 the provision of adequate post-incident support. When engaging public or private security personnel, Mobis complies with internationally recognized Human Rights standards and uphold the principles of minimizing physical intervention and respecting Human Rights.

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

Mobis is committed to ensuring that the Human Rights of local communities, including indigenous peoples, are respected throughout all business activities. Mobis upholds land, forest, and water rights, and strictly prohibit forced eviction. Mobis also strives to protect the rights to health and safety and freedom of residence. Furthermore, Mobis is dedicated to safeguarding the rights of 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 executives and employees of Mobis make every effort to protect the personal information of business partners that is collected for health / property protection, and / or for management

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purposes, when providing goods and services.

## **2.9. Responsible Management for Supply Chain**

Mobis complies 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. Mobis also endeavors to support its business partners in preventing and reducing ESG risks.

## **2.10. Security of Environmental Rights**

Mobis recognizes 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 its 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**

Mobis manages and supervises 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 and / or departments;
- cooperation between HR department and the Legal & Compliance team 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 investigation 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**

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Mobis provides reporting channels that allow employees, individuals or groups to submit a report, in their local language, if they become 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 Employee Relations (ER) team / Legal & Compliance team employees and through employees' representatives, including trade unions.

If the conduct described in the report qualifies as an "anti-social activity" under applicable 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 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 Employee Relations (ER) team 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.

**Channels to Report Violation of Human Rights:**

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


**3.2.2. Protection of Whistleblowers**

Mobis shall maintain confidentiality regarding personal data of whistleblowers and victims as well as details of any report unless disclosure of any part of the report is necessary to conduct or complete the investigation. Mobis shall ensure that whistleblowers and / or victims are not subject to termination, threats, harassment, or other adverse action as a result of making a report or providing information when investigating the report. Mobis 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**

Mobis conducts an education on Human Rights management that aims to raise employees' understanding of Human Rights and improve their awareness of it. The education enables to

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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**

Mobis may disclose information regarding this Policy, its 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, Mobis may use the most suitable communication channels and formats, such as corporate webpages or internal information systems, that ensure easy accessibility for employees across the organization.

## **4. Human Rights Due Diligence**

### **4.1. Identify and Evaluate Risks**

#### **4.1.1. Development of Evaluation Index**


Mobis, through and in cooperation with Hyundai Mobis as its mother company, develops and operates an inspection and due diligence index that evaluates Human Rights risks of working environment, workforce, industrial safety under local, European 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**

Mobis, through and in cooperation with Hyundai Mobis as its mother company, operates a process that identifies and evaluates potential Human Rights risks and the current status of Human Rights violations. The process enables communication with major stakeholders, identifies risk factors that might occur throughout the business including the supply chain and business operations, and evaluates 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 Mobis, as well as on the results of the written self-assessment, an on-site due diligence inspection may be conducted to examine risk-related details 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

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diligence/ third-party audit, immediate improvements and corrective measures are required. Mobis, in cooperation with Hyundai Mobis, revises the evaluation index and its 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**

Mobis, in cooperation with Hyundai Mobis, establishes and implements an improvement plan for Human Rights risks according to the risk evaluation. Based on the results of the Human Rights risk assessment, Mobis will create specific tasks to improve the areas of Human Rights risks by discussing with the respective departments (e.g. HR dept., Legal & Compliance team, production departments).

### **4.2.2. Monitoring the Progress of Implementation**

Mobis, in cooperation with Hyundai Mobis, continuously monitors 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, Mobis may use reports and information from all employees across Mobis 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.

Mobis discloses all important information related to Human Rights management on the website, within sustainability reports and / or using other channels that 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)

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- 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 Mobis 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. Annex

### Annex 1

#### **MOBIS Parts Europe N.V. ("MPE")**

Zweigniederlassung Deutschland  
Frankfurter Strasse 60-68  
65760 Eschborn / Germany

#### **Mobis Slovakia s.r.o. ("MSK")**


MOBIS ulica 1,  
Gbeľany 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

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**Mobis Hungary Kft ("MHU")**

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Hungary

**Mobis Spain Electrified Powertrain, S.L. ("MSPe")**

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**Mobis Otomotiv ve Modül San. ve Tic. A. Ş. ("MTR")**

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