

# Compliance & Integrity Code



Movement that inspires

# The Kia Compliance & Integrity Code

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# 1. Introduction



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## 1. Introduction

# The Kia Compliance & Integrity Code

### What is it about?

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Compliance and integrity are about making the right choice in any given situation. Our behavior is the key for a culture of compliance that promotes the honest and ethical conduct of our business. Such conduct is beneficial for our customers, the global community, Kia and its employees. A culture of compliance helps us to fulfil our moral and legal obligations as global corporate citizens. To achieve such a culture, a guidance is needed to do the right things – and this is what the Kia Compliance & Integrity Code is for.

This code aims to clarify the major rules of Kia for issues of integrity and business ethics and setting the standards of behavior that Kia expects of each of its employees.

It is not all-encompassing and has not the answer to every possible situation that might be faced but it provides our principles under which everyone of us at Kia shall act and it reinforces an honest and ethical behavior.

### Who does it apply to?

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This code applies to everyone at Kia. This includes all Kia employees, officers and directors. No employee is above or exempt from the provisions of this code. Kia also expects its business partners – such as suppliers – to comply with our principles.



## 1. Introduction

# The Kia Compliance & Integrity Code

### What are the Responsibilities?

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Every employee regardless of his specific role is the face of Kia. As such, everyone at Kia has the responsibility to strengthen our reputation by behaving in the right way. Therefore, it is the personal responsibility of each person at Kia to know and apply the principles and rules of this code.

### What are the Consequences of Violation?

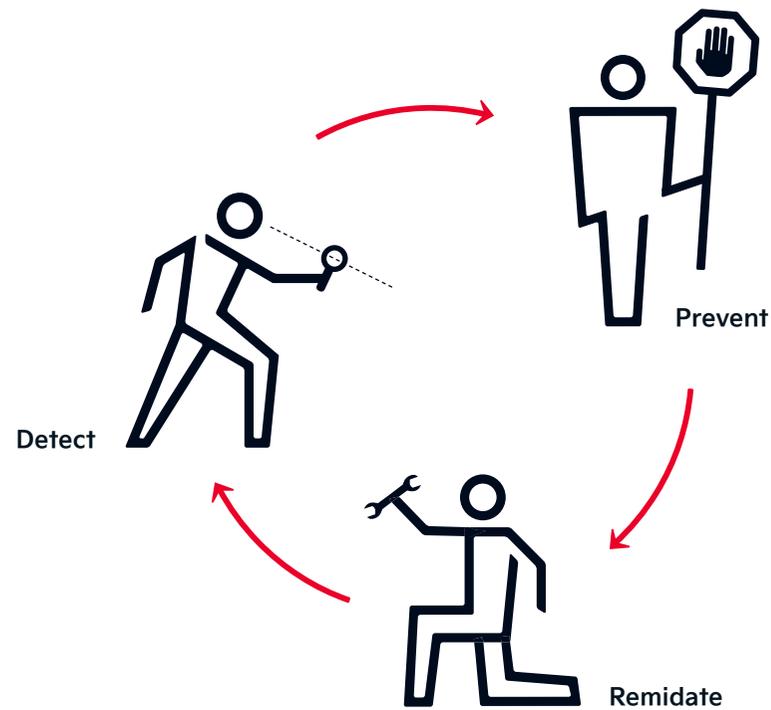
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The Kia Compliance & Integrity Code restates and reinforces the law. Consequently, violations of the provisions of this code can have a range of serious external and internal consequences for Kia. The guidance provided in this code is designed to help managing and ultimately avoiding risks, and Kia will do its best to support employees in complying with this Kia Compliance & Integrity Code.



# 1. Introduction

## The Kia Compliance & Integrity Code



## 2. Safety & Privacy



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## 2. Safety & Privacy

# Product Quality and Safety



### Our Principles

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Kia is a service provider and producer of goods that surround the daily life of people around the world. As a consequence, Kia has to ensure that its products and services comply with all applicable laws and regulations in relation to their quality and safety. 'Products' include vehicles, spare parts and anything else manufactured by Kia that comes into contact with consumers. 'Services' include connected cars services, mobility services or other services provided to customers by Kia.

Kia is responsible for ensuring that its products are safe and carry adequate instructions and warnings to enable consumers to use them safely.

Employees must ensure that they abide by all relevant company policies, procedures and quality standards in relation to product quality and safety.



## 2. Safety & Privacy

# Product Quality and Safety



### How We Act — Quality Assurance

Kia is committed to ensuring that all products are defect free. We have implemented a system of checks and quality control inspections to test and monitor the quality of Kia's products and their fitness for purpose, from the design and prototype stages through to manufacturing. These checks and inspections are designed to:

- **Actively monitor and sample all materials used during production;**
- **Sample products during the production phase;**
- **Carry out mechanical and performance testing to ensure that they meet Kia's quality standards.**

Technical specifications are drawn up for each product to ensure that all products achieve a uniform quality standard.

In order to maintain Kia's quality and safety standards, employees must utilize these systems and specifications at all appropriate times.



## 2. Safety & Privacy

# Product Quality and Safety



### How We Act — Product Safety

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Kia takes a proactive approach to compliance with legal rules and requirements regarding product safety including, but not limited to:

- The use of dangerous or hazardous chemicals or substances in our products;
- Labelling products in the correct manner including, for example, any necessary hazard warnings;
- Ensuring that all hazards have been sufficiently controlled, e.g., electrical insulation, moving parts, noise and ergonomic design;
- Providing formal declarations and documentation confirming the product's conformity with specific legal and technical requirements;
- Ensuring that our products do not produce any toxic, harmful or adverse effects on the user or consumer;
- Marking the products with any necessary compliance marks.

In the event that a defect is identified with a particular product, Kia has traceability and recall procedures in place to ensure that the defect is identified and rectified as quickly as possible. Employees should support this proactive approach and comply with any procedures put in place with regard to product safety.



## 2. Safety & Privacy

# Product Quality and Safety



### How We Act — Packaging

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Packaging includes all products used to contain, protect, handle and deliver goods. It includes returnable and non-returnable items such as boxes, pallets, labels, containers, tubes, bags, sacks, timber, glass, metals, plastics and ceramics. It can also include tape, wrapping, binding and tying materials. Kia must design packaging in consideration of safety aspects.

The packaging should protect Kia's product in transit and the customer from potential injury. It must also comply with any relevant labeling requirements, for example, in relation to hazardous chemicals.

Employees must have regard to applicable local and international laws and regulations when dealing with packaging.

Supplying quality and safe vehicles and other products is a core requirement of our business and must be treated with the utmost importance and priority.



## 2. Safety & Privacy

# Human Rights and Labor Standards



### Our Principles

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Operating a global business presents an array of challenges for pursuing good human rights practices. International regulations, supply chains, local laws and customs are examples of complex matters which companies must consider when conducting business overseas. Due to globalization and the influence of business in society, the relationship between business and human rights has become increasingly important.

Kia believes that it is important to respect the human rights of all individuals who work with, or could be affected by, its operations. In 2008, Kia joined the UN Global Compact as a sign of our commitment to human rights, labor, environment and anti-corruption.

Kia has developed its own guiding principles for human rights and labor standards and has developed these guiding principles to be consistent with the following human rights frameworks and charters:



## 2. Safety & Privacy

# Human Rights and Labor Standards

Kia intends that these guiding principles below will serve as the basis for its interactions and operations across its business. These principles will underpin Kia's behaviors and approach.



① The Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises

② The ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy

③ The International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work

④ The International Bill of Human Rights (UN Declaration and its two covenants 1948)

⑤ UN Guiding Principles on Business and Human Rights



## 2. Safety & Privacy

# Human Rights and Labor Standards



### How We Act — Commitment to Human Rights

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It is the goal of Kia to respect the human rights set out in the International Bill of Human Rights, which includes, not causing or contributing to adverse human rights impacts through its activities and addressing such impacts, if and when, they occur. Kia is committed to remediation where adverse impact is identified.

Employees must adhere to Kia's policies and comply with human rights laws and regulations within their jurisdiction.

Employees should also work to identify and monitor any human rights risks inherent in our business.



## 2. Safety & Privacy

# Human Rights and Labor Standards



### How We Act — Commitment to Ethical Labor Standards

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#### ⇒ **Child labor**

Kia will not use child labor.

Kia will comply with all applicable treaties, laws and regulations regarding the prohibition of child labor, including but not limited to, the ILO Convention and relevant local legislations.

#### ⇒ **Forced labor**

Kia will not use forced labor. Forced labor includes indentured labor, bonded labor, servitude, slavery and human trafficking. Individuals must not be coerced to work by violence or intimidation.

Kia will not charge any type of fee for workers to gain employment, nor will Kia require the retention of identification papers as a condition of employment. Individuals are free to terminate their employment by giving reasonable notice.



## 2. Safety & Privacy

# Human Rights and Labor Standards



### How We Act — Commitment to Ethical Labor Standards

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#### ⇒ Working hours, Wage and Benefits

Kia will comply with applicable laws and regulations on working hours.

Kia will compensate workers in compliance with minimum wage laws and regulations in addition to overtime laws and regulations.

#### ⇒ Freedom of Association and Collective Bargaining

Kia will respect the rights of workers to associate freely and bargain collectively where permitted under relevant laws. Workers may discuss working conditions with management without fear of retaliation.

Kia will respect the rights of workers to join an association and appoint representatives.



## 2. Safety & Privacy

# Health and Safety



### Our Principles

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Kia recognizes that good health and safety practices form an essential part of its business operations and is committed to ensuring the health and safety of all of its employees and those members of the public who may come into contact with those operations. Kia has a duty to put suitable arrangements in place to assess and manage the risks posed to the health and safety of employees in the workplace.

The principles set out here are intended to guide employees in minimizing the risks to themselves and others who could be affected by their actions in the workplace.



## 2. Safety & Privacy

# Health and Safety



### How We Act

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Employees must ensure that they abide by the policies and procedures implemented by Kia to ensure the health and safety of themselves and others in the workplace.

Employees must also ensure that they do not act in a way that may put the health and safety of them or their colleagues at risk.

Employees must report all breaches of health and safety policies and procedures to the appropriate safety representative.

In order to manage the risks to health and safety in the workplace, Kia identifies and assesses all of the risks and hazards which may arise in an employee's working environment.

Workplace hazards are identified through risk assessments, and any significant findings made during these risk assessments will be recorded in writing and acted upon by implementing preventative and protective measures.



## 2. Safety & Privacy

# Health and Safety



### How We Act

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Kia will provide employees with training on how to carry out their role safely, and tell them about the risks to their health and safety from current or proposed working practices.

Kia will also inform employees about how the risks are controlled and minimized, and provide them with any equipment and protection necessary for them to carry out their role (for example, clothing, shoes or boots, eye and ear protection, gloves, hats, masks, etc.).

Kia has a management structure in place, in relation to health and safety. The structure identifies those individuals who hold responsibility for the management of health and safety from the board level downwards.



## 2. Safety & Privacy

# Data Protection



### Our Principles

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Kia values the privacy of its employees, customers and third parties and is committed to protecting personal data that is provided to Kia. When employees collect, handle or otherwise deal with personal data, they have to consider the privacy of that individual's personal life, whether they are a colleague, (prospective) customer, supplier or other person. Personal data shall only be accessed by employees whose responsibilities and duties necessitate the processing of such personal data and only to the extent necessary for the specific purpose.



## 2. Safety & Privacy

# Data Protection



### How We Act

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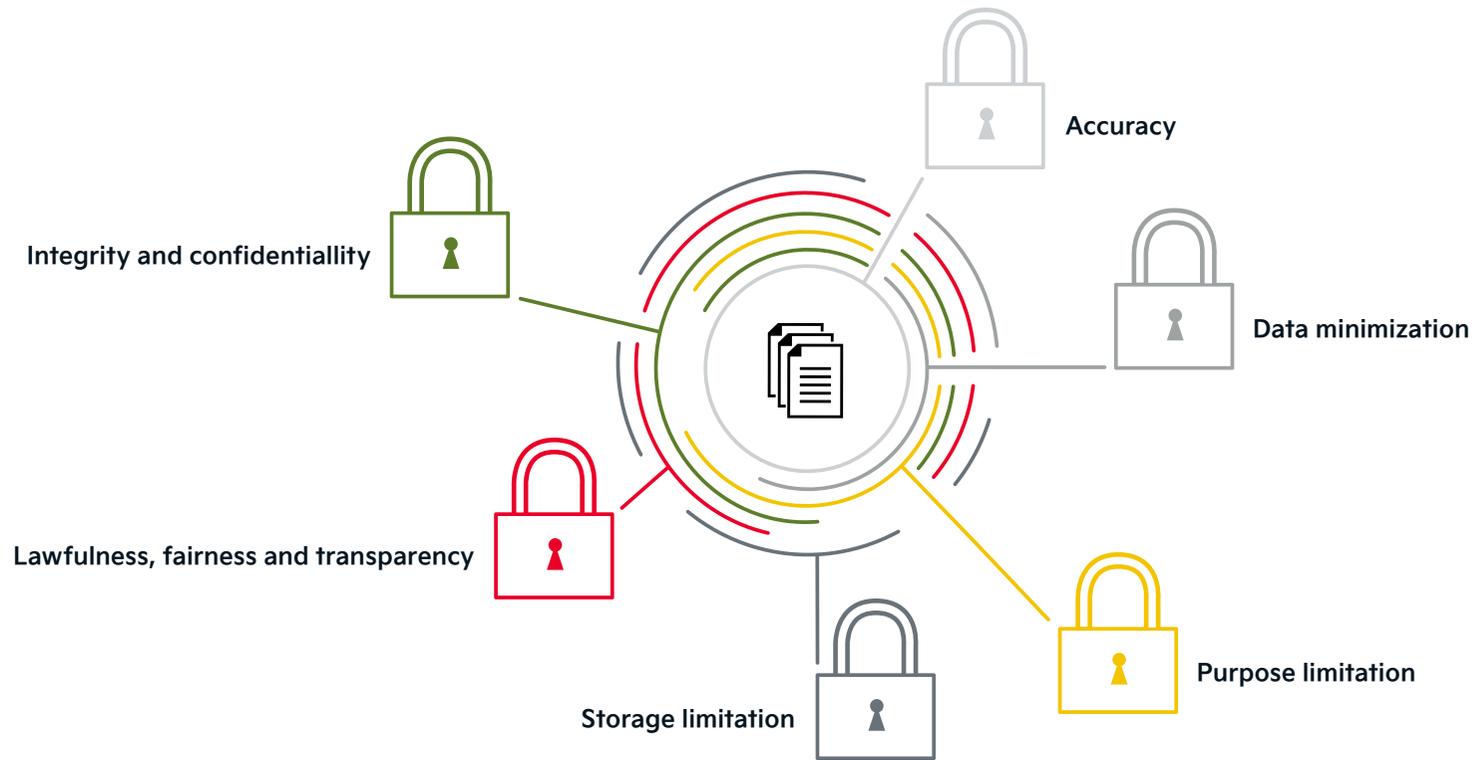
We process personal data only where we have an appropriate legal basis to do so and in a reasonable and transparent way. Whenever any personal data is processed – whether by collection, destruction, or any other action involving personal data – the applicable European and local data protection laws and our internal privacy policies and guidance must be complied with.

Our privacy teams throughout Europe provide support to the various departments in this respect and our data protection officers support also on questions of external stakeholders.



## 2. Safety & Privacy

# Data Protection



# 3. Environment & Equality



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## 3. Environment & Equality

# Protecting the Environment



### Our Principles

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Our relentless drive toward innovation and new possibilities corresponds with the importance of preserving the natural environment. Kia is dedicated to reduce the impact of Kia's business operations on the environment. Kia's green technologies are created to benefit both the current and future generations. Our automobiles are designed to minimize environmental impact from the product planning stage to disposal / recycling.

We strive to apply the most innovative green technologies available and are committed to ensuring that all of our workplaces are operating in an environmentally friendly way. Employees can assist in this by abiding by all policies and procedures implemented in their workplace in relation to the protection of the environment and the promotion of environmentally friendly working practices.



## 3. Environment & Equality

# Protecting the Environment



### How We Act

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#### ⇒ Climate Change

Kia will comply with all relevant legislation and regulations in relation to carbon and other greenhouse gas emissions.

Employees shall monitor compliance with Kia's policy regarding emissions as part of their daily roles.

#### ⇒ Energy Use

Kia will comply with all relevant legislation and regulation in relation to monitoring (and in some cases reporting) its energy use across Kia's operations.

Employees shall ensure that their daily duties do not result in increased energy usage and make sure that they abide by any local policies in relation to the reduction of energy use.

#### ⇒ Clean Air

Kia will comply with all relevant legislation and regulations in relation to ensuring air quality and regulating the amount of harmful substances released into the atmosphere. All employees shall ensure that they are aware of and abide by any local policies in relation to clean air.



## 3. Environment & Equality

# Protecting the Environment



### How We Act

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#### ⇒ **Use, Storage and Disposal of Industrial and Chemical Waste**

Kia is committed to reducing the amount of industrial and chemical waste generated during the production of its automobiles.

Kia will comply with all relevant legislation and regulations in relation to the use and safe storage of certain regulated chemicals and substances.

Where industrial and/or chemical waste is generated, Kia will comply with all relevant legislation and regulations in relation to the safe and responsible disposal of that waste.

Employees shall ensure that they abide by any local policies in relation to the use, storage and disposal of industrial and chemical waste.



## 3. Environment & Equality

# Protecting the Environment



### How We Act

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#### ⇒ Logistics

The transportation of raw materials and finished products is a significant factor in

Kia's overall impact on the natural environment. As a result, Kia is committed to reducing the environmental impact of such logistics operations.

#### ⇒ Recycling

Kia has implemented recycling strategies, mechanisms and targets in its operations, from the production process through to the buildings used by staff on a daily basis.

These strategies are designed to ensure that Kia complies with its duties in relation to legislation and regulation in this area and to encourage employees to contribute to and increase the levels of materials which are recycled within Kia's operations.

#### ⇒ Products

Kia is dedicated to developing new technologies and products which have minimal or no impact upon the environment. Many employees will be working to develop those technologies as part of their daily roles.



## 3. Environment & Equality

# Anti-Discrimination



### Our Principles

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Kia as a globally acting and multi-cultural company abides by anti-discrimination laws everywhere it does business. Indeed, compliance with anti-discrimination laws is becoming of ever greater importance as global customers increasingly value an organization's reputation for its ethical treatment of its staff. The actions and conduct of employees and others acting on Kia's behalf, are key in meeting this objective. It is Kia's policy to ensure that all workers are treated with dignity and respect and are able to work in an environment free from unlawful discrimination.

The clear objective for Kia is that all employees and those who interact with us are aware that there is no place for discrimination at Kia.



## 3. Environment & Equality

# Anti-Discrimination



### How We Act

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Kia prohibits all forms of unlawful discrimination at all times within the workplace and during working hours, as well as outside the workplace and / or working hours when dealing with customers, suppliers and other work-related third parties on business trips, at work-related or sponsored events and via social media.

Open and honest reporting of any known or suspected violation of our principles is crucial for ensuring the integrity of our reputation and protecting Kia's business.



### 3. Environment & Equality

## Anti-Discrimination



#### DO's

- Respect cultural and racial differences
- Be professional in conduct and speech
- Familiarize yourself with your workplace policies and act responsibly
- Seek further guidance immediately if you are subjected to, witness or become aware of anything you consider may constitute unlawful discrimination



#### DONT's

- Do not engage in any activity which amounts to discrimination
- Do not turn a blind eye to any discrimination practices or activities
- Do not treat anyone differently if they have alleged that they have been discriminated against as this could amount to further victimization / retaliation
- If you are asked to participate in investigation relating to alleged discrimination, do not disclose the details of the investigation



## 3. Environment & Equality

# Community Engagement



### Our Principles

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Kia recognizes itself not only as a business organization, but as an active corporate citizen of the international community. Accordingly, Kia makes great efforts to ensure a more sustainable future for all humankind, working closely together with all stakeholders with whom it maintains relations. We define these efforts collectively referred to as 'Corporate Social Responsibility' (CSR).

**'Kia, as a leading automaker, fulfills its social responsibilities and endeavors to make society a better place by continually challenging itself.'**

Kia's CSR Mission



### 3. Environment & Equality

# Community Engagement



#### How We Act

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We are committed to positively engaging with indigenous people and considering the interests of those in the communities where we operate. We will develop relationships with stakeholders of the local community to minimize any negative impact of our operations and will look to make strategic social investments and promote public policies that support social sustainability.

We are committed to supporting good causes and local communities wherever we do business. Kia encourages its employees to support local initiatives and support their colleagues in their CSR efforts where possible.

Kia also encourages employees to come forward with their own ideas for local causes which Kia might support by contacting.



# 4. Collaboration, Competition & Integrity



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## 4. Collaboration, Competition & Integrity

# Anti-Trust and Competition



### Our Principles

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Compliance with anti-trust and competition law is a central aspect of Kia's integrity. Whilst Kia believes in competing vigorously in the various businesses in which it is active, it is Kia's policy to compete in a lawful, fair and ethical manner and to fully comply with the applicable anti-trust or competition laws.



## 4. Collaboration, Competition & Integrity

# Anti-Trust and Competition



### How We Act

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#### Dealing with suppliers, dealers and customers

Kia will not discuss or share anything that is confidential to Kia's business with third parties, including competitors, suppliers, distributors (or dealers) or customers.

#### Dealing with competitors, trade associations and industry memberships

A breach of anti-trust or competition law involves an agreement (no matter how informal) to restrict, prevent or distort competition. Price-fixing and market-sharing agreements, whether horizontal or vertical, are hardcore infringements of anti-trust or competition law.

Kia will not make any of such formal or informal agreements that are prohibited under applicable law.



## 4. Collaboration, Competition & Integrity

# Anti-Bribery and Corruption



### Our Principles

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Bribery and corruption strike at the very heart of the values of Kia and its employees. Bribery and corruption, in both business and government, promotes a lack of integrity and dishonest business conduct, fuels political instability and stunts economic development. Bribery and corruption are damaging for everyone from global businesses to individual consumers, including of course Kia, its employees and, most importantly, our customers.

Kia abides by anti-bribery and corruption laws everywhere it does business.



## 4. Collaboration, Competition & Integrity

# Anti-Bribery and Corruption



### How We Act

---

Kia will not engage in bribery or corruption in any form, whether it involves private individuals, companies or public officials.

Kia will never directly or indirectly accept, solicit, agree to receive, offer, promise or give a bribe or other improper payment.

Kia does not tolerate employees or business associates who pay bribes.

Kia forbids the use of third parties, agents or business associates by employees to undertake activity which is prohibited under these principles and relevant laws.

Kia has a zero tolerance approach towards those who do not comply with these principles.



## 4. Collaboration, Competition & Integrity

# Anti-Bribery and Corruption



### DO's

- Remain alert to the risks of bribery and corruption
- Seek further guidance immediately if you are being asked to do something which makes you uncomfortable, seems unusual or which you suspect may be illegal
- In case of doubt, consult the Kia compliance team for more detailed guidance and ensure that you comply with them



### DONT's

- Do not engage in any activity or transaction which would lead to a breach of our principles, any locally applicable anti-bribery and corruption policies or any applicable laws and regulations
- Do not ignore or fail to report any concerns you have about improper or illegal activity, or other 'look the other way'
- Do not ever attempt to induce anyone else to do something improper or illegal, even if 'everyone else is doing it'



## 4. Collaboration, Competition & Integrity

# Anti-Money Laundering



### Our Principles

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Money laundering is a crime that consists of taking assets from illegal activities and concealing them or putting them back into circulation. We do not engage in money laundering and we take appropriate reporting measures to prevent it.



## 4. Collaboration, Competition & Integrity

# Anti-Money Laundering



### How We Act

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We aim to conduct business solely with reputable partners who operate in line with legal provisions and who use resources from legitimate sources.

Kia and its employees are vigilant against the risk of assisting any suspicious conduct on the part of customers, business partners and other third parties.



## 4. Collaboration, Competition & Integrity

# Anti-Money Laundering

Employees must be aware of the following warning signs that could indicate money laundering:

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- **Orders that are inconsistent with a customer's or supplier's usual practices**
- **Requests to pay in cash**
- **Requests to make payments to or accept payments from third parties**
- **Requests to make payments to suppliers or agents to accounts in a country where the supplier or agent is not located**
- **Requests to ship products to a country other than the buyer's or seller's home country with apparent justification**



## 4. Collaboration, Competition & Integrity

# International Trade



### Our Principles

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Kia's international business operations require a compliance with different regulations relating to the area of external trade, customs and tax law.

Compliance with those areas of law builds trust with customers, authorities and other public stakeholders while irregularities may cause a significant damage to Kia. This refers to the reputation of the whole Kia group but also to every individual that may be affected by negative consequences.



## 4. Collaboration, Competition & Integrity

# International Trade



### How We Act

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Kia and its employees will comply with all sanctions laws and regulations that apply in the countries in which we do business.

Specifically neither Kia nor any of its employees will make any funds, or any of our products and services directly or indirectly available to or for the benefit of a Designated Person or otherwise in breach of sanctions measures.

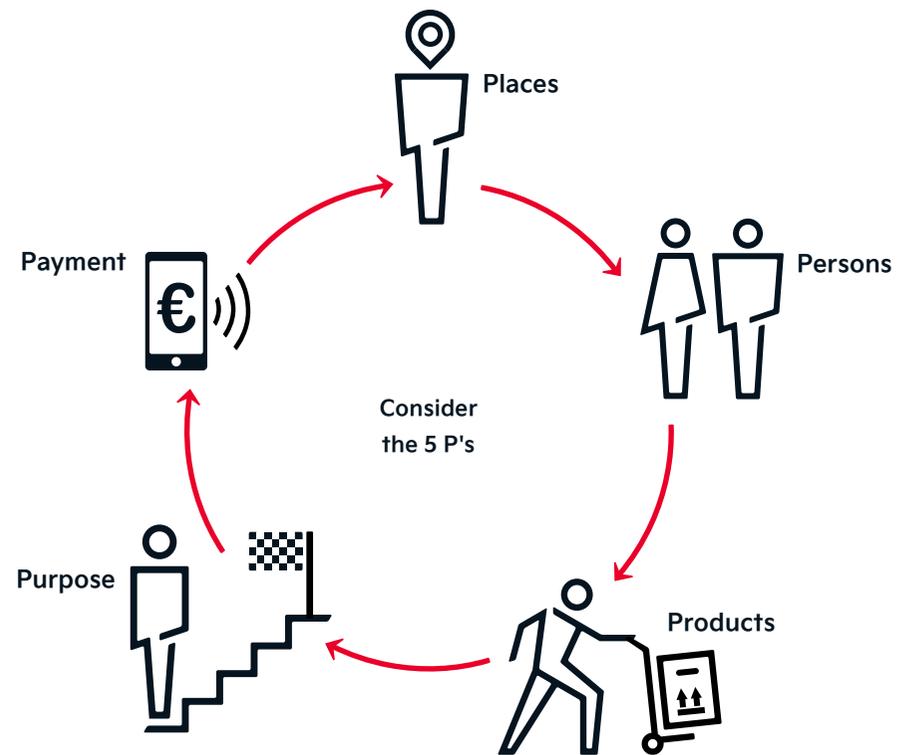
Kia and its employees will comply with all import/customs laws and regulations that apply in the countries in which we do business.



## 4. Collaboration, Competition & Integrity

# International Trade

Employees must remain vigilant to ensure compliance with international trade law and regulation.



## 4. Collaboration, Competition & Integrity

# Insider Trading



### Our Principles

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Insider information is non-public information about Kia which could provide a financial advantage when used to buy or sell securities (i.e., shares) in Kia. We do not trade on or disclose this information which would be likely to have a significant impact on the trading price of Kia shares and other assets. We hold insider information confidential unless released into public domain by competent persons / authorized management.



## 4. Collaboration, Competition & Integrity

# Insider Trading



### How We Act

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Employees that have access to such insider information are prohibited to engage in transactions that are not in line with these principles, including but not limited to:

- **Never buy or sell company securities or the securities of other publicly listed companies if you have insider information (this is known as 'insider trading');**
- **Never 'tip' others to trade if you know insider information; and**
- **Never disclose insider information to anyone, including other employees (unless they need the information to do their job).**



# 5. Communication & Behavior



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## 5. Communication & Behavior

# Anti-Harassment



### Our Principles

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Kia abides by anti-harassment laws everywhere it does business. Legal protection for harassment varies around the world, and whilst Kia respects local cultures and differences in the area of harassment, it has the utmost respect for the individual and will always seek to ensure that employees are treated with dignity and respect. Indeed, compliance with anti-harassment laws is becoming of ever greater importance as global customers increasingly value an organization's reputation for its ethical treatment of its staff. Therefore, it is important that employees protect Kia, its reputation, fellow employees and stakeholders from the risks associated with harassment. The actions and conduct of employees and others acting on Kia's behalf, are key in meeting this objective.

It is Kia's policy to ensure that all employees are treated with dignity and respect and are able to work in an environment free from unlawful harassment, intimidation, bias, bullying and any other offensive conduct. Therefore, it is the obligation of all employees to protect Kia from actions that may be in contravention of local laws. The clear objective for Kia is that all employees and those who interact with Kia are clear that there is no place for harassment at Kia.



## 5. Communication & Behavior

# Anti-Harassment



### How We Act

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Kia prohibits all forms of harassment in the workplace. Harassment is any unwelcome or offensive language or behavior directed at another person on the basis of any identifying personal characteristic. Harassment includes unwelcome sexual advances or innuendos, offensive jokes, derogatory slurs, and offensive visual images.

Employees have a responsibility to ensure that they understand local anti-harassment laws and to report any violations they know or suspect may be occurring.

Open and honest reporting of known or suspected harassment is crucial for ensuring the integrity of Kia's reputation and protecting Kia's business. This ultimately protects the jobs of every one of our employees.



## 5. Communication & Behavior

# Anti-Harassment



### DO's

- Familiarize yourself with local anti-harassment laws
- Encourage colleagues to report any harassment they have been subjected to if they inform you of it
- Treat all colleagues equally and with respect



### DONT's

- Do not engage in any activity which amounts to harassment
- Do not turn a blind eye to any actions which constitute harassment
- Do not assume that respect for colleagues need only be shown within working hours as activities outside work could also contravene anti-harassment laws
- Do not treat anyone any differently if they have alleged that they have been harassed on the basis of being part of the protected class. This could amount in further victimization / retaliation



## 5. Communication & Behavior

# Conflicts of Interest



### Our Principles

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Conflicts of interest can arise in many situations in the workplace. They exist where the interests of one of our employees conflict or have the potential to conflict with the interests of Kia or where an employee's judgment could be influenced or appear to be influenced by a personal interest or benefit.

Kia respects the rights of its employees to manage their personal affairs in any way they choose, but it is important that those interests are lawful and do not conflict with the interests of Kia.



## 5. Communication & Behavior

# Conflicts of Interest



### How We Act

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#### **Contracting with related companies, family or friends**

Employees must not be involved in procurement decisions relating to companies in which they or their family or friends hold an interest, as it may give an appearance that the employee has improperly influenced the procurement decision.

If an employee is aware that Kia is considering contracting with any such person or company (whether the employee is involved in the procurement decision making process or not), the employee must disclose the relevant interest to their line manager and the Legal/Compliance Team so that any necessary steps can be taken to avoid any appearance of impropriety.



## 5. Communication & Behavior

# Conflicts of Interest



### How We Act

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#### **Taking advantage of business opportunities**

A clear conflict would arise if an employee were to take a business opportunity for themselves or another, in the course of their employment with Kia that would otherwise fall to Kia.

Employees may only take advantage of business opportunities that would otherwise fall to Kia if Kia has been offered the opportunity and declined it.

#### **Employing family or friends**

Employees must not be involved in recruitment decisions relating to their family or friends, as it may give the appearance that they have improperly influenced the recruitment decision. Whilst family and friends of our employees may be employed, there must not be any direct or indirect supervisory or management control or reporting between them.



## 5. Communication & Behavior

# Conflicts of Interest



### How We Act

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#### **Outside engagements/directorships**

Employees must not take any role in or provide services or information to a competitor company whilst employed by Kia. It is important that employees disclose any existing outside engagements or directorships upon commencement of their employment at Kia, so that we can work together to assess whether there may be a conflict and to put steps in place to mitigate or eliminate such conflict.

Employees must seek approval from Kia before taking on any outside engagements or directorships that may impact upon their ability to perform their job or may otherwise give rise to a conflict.

Employees may not undertake work for outside engagements or directorships during working hours, nor shall employees utilize company resources for such occasions.



## 5. Communication & Behavior

# Conflicts of Interest



### How We Act

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#### **Financial interests in competitor companies or contracting companies**

Employees may not hold any financial interest in any company which is a competitor to Kia, as this may give an incentive (or the appearance of an incentive) to act against the best interests of Kia.

Interests in companies over which employees have no business control or influence, where they hold a small shareholding for example, are excluded from this rule.



## 5. Communication & Behavior

# Drugs & Alcohol in the Workplace



### Our Principles

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We at Kia do not tolerate intoxication at work. By doing so, we aim to preserve the health of our employees, improve work safety and strengthen our work efficiency.



## 5. Communication & Behavior

# Drugs & Alcohol in the Workplace



### How We Act

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We do not work under the influence of any drugs and alcohol.

Employees must ensure that any use of alcohol outside of working hours does not impair their ability to perform their duties for Kia in a safe manner.

Kia maintains a zero-tolerance policy regarding all intoxicating substances and illegal drugs.

Employees may not report to work under the influence of such substances or use them during the workday.



# 6. Governance & Assets



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## 6. Governance & Assets

# Company Assets



### Our Principles

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Kia assets include tangible assets like vehicles, IT equipment parts etc. and intangible assets like intellectual property rights, expertise and certain data. Those assets are the property of Kia and essential for our success.

Therefore, Kia protects its assets and resources against any loss, damage, fraud, disclosure and any other negative influence or unauthorized use.

Likewise, we treat third-party assets that are in our possession with the same level of care.



## 6. Governance & Assets

# Company Assets



### How We Act

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Intellectual property rights, such as patents, trademarks, copyrights, design rights, know-how and trade secrets, are key to Kia's business, and employees must respect such rights in their day-to-day activities.

Employees have the duty to take all necessary steps and precautions to protect Kia's intellectual property rights.

Material assets, as a rule, shall not be used for private purposes, except explicitly agreed differently and shall in no way be used for illegal purposes. This does especially apply to IT equipment like computers and smartphones.

Respecting the intellectual property rights of third parties is one of Kia's key values.

Kia does not tolerate any unauthorized use, theft or misappropriation of any third party's intellectual property rights.



## 6. Governance & Assets

# Integrity of Records & Information Management



### Our Principles

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Accuracy and reliability on financial statements are essential for a proper management of Kia.

We record and report information in an accurate, complete and honest way. We aim to provide a true view on our financial external reporting like income statements, balance sheets and cash flows to ensure that all accounting books and records reflect the actual transactions and the actual financial situation of our company.

Employees have access to this financial information and also to other internal information about Kia, its clients, partners and other employees while fulfilling their duties.

Some of this information business is confidential as it is of strategic or commercial value or may underlie data protection law if it is considered personal data. A disclosure of such information affects the interests of Kia or the respective stakeholder of the confidential information.



## 6. Governance & Assets

# Integrity of Records & Information Management



### How We Act

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We do not make any false statements. We keep our records on transactions transparent, accurate and complete and in accordance with applicable laws. We record all of our payments in a proper way and do not keep unrecorded funds or assets.

Confidential information shall be disclosed only to Kia employees who need access to the information when fulfilling their duties.

Before disclosing any such information inside or outside the company, it is the responsibility of each individual to ensure that the recipient is entitled to receive such data and information and to take appropriate additional measures to safeguard the information such as confidentiality agreements.



# 7. Contact



Movement that inspires

## 7. Contact

# Whom to Contact

### Compliance Platform

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You can also use Kia Compliance: Tell Me, our compliance platform to report concerns or any misconduct.

Kia Compliance: Tell Me can be accessed under [www.kia.com/eu/compliance/tellme](http://www.kia.com/eu/compliance/tellme).

Our compliance platform ensures confidential handling of any submission or question. Submissions can even be made completely anonymously.

### Compliance Team

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In case of questions or concerns, contact your local compliance manager or the Kia EU compliance team:

E-mail: [complianceEU@kia.eu](mailto:complianceEU@kia.eu)

Tel: +49 69 850928 266



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**United Kingdom**

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