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	Hyundai Mobis Compliance Reporting/Whistleblowing Center Operation Guidance	Date	2023. 09
		Revision No.	0

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Chapter 1 General Provisions

Article 1 (Purpose) This guideline aims to establish specific details for the receipt, review, handling, and reporting of reports/whistleblowing content through the "Compliance Reporting/Whistleblowing Center" (hereinafter referred to as the "Reporting/Whistleblowing Center") within the "Hyundai Mobis Compliance Helpline" (hereinafter referred to as the "Helpline") established in accordance with Article 13 (Operation of Reporting/Whistleblowing Channels and Protection of Reporters/Whistleblowers) of the "Hyundai Mobis Compliance Work Regulations" of Hyundai Mobis (hereinafter referred to as the "Company") and aims to define the necessary matters for the efficient operation of the Reporting/Whistleblowing Center.


Article 2 (Definitions) The definitions of terms used in this standard are as follows:

1. "Service Provider" refers to the company that provides the right to use the Helpline through a Helpline usage agreement for a certain period.
2. "Compliance Officer" refers to the persons appointed under Article 542-13 of the Commercial Act, who perform the duty of conducting compliance education and training programs, checking compliance with compliance control standards, and reporting related matters to the board of directors.
3. "General Manager" refers to the head of the compliance organization as defined in Article 7 of the Compliance Work Regulations, who has the final decision-making authority over the operation process and related policies of the Reporting/Whistleblowing Center.
4. "Operator" refers to the persons responsible for the overall operation and management of the Reporting/Whistleblowing Center, including the assessment of the categories of reports/whistleblowing cases, monitoring the progress of receipt and processing, replying to inquiries, and initiating investigations.
5. "Responsible Division" refers to the division designated by the General Manager as the dedicated organization for each category of report/whistleblowing, considering handling authority by

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division and division of duties within the division.

6. "Person in Charge" refers to the persons designated by the head of the Responsible Division among the members of that division to receive, investigate, take measures, and respond to reports/whistleblowing for each category of report/whistleblowing.
7. "Assisting Division" refers to the division that performs tasks requested by the person in charge for the investigation and measures on reports/whistleblowing, and has the handling authority to carry out the requested tasks.
8. "Reporter/Whistleblower" refers to the persons who submits the content of a report/whistleblowing to the Reporting/Whistleblowing Center.
9. "Subject of Report/Whistleblowing" refers to the persons identified as the entities responsible for the violation described in the reported/whistleblowing content received to the Reporting/Whistleblowing Center.
10. "Related Party" refers to all persons directly or indirectly related to the reported/whistleblowing content, as specified by the reporter/whistleblower or confirmed during the investigation process, including witnesses, accomplices, other victims, and those who cooperate with the report/whistleblowing.


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Article 3 (Protection of Reporters/Whistleblowers) ① All entities with access to the content of reports/whistleblowing, including the General Manager, Operator, Person in Charge, Assisting Division, and management, shall comply with the following:

1. The personal information of reporters/whistleblowers and the content of whistleblowing shall be kept confidential.
2. Reporters/whistleblowers shall not face any disadvantages due to the act of reporting/whistleblowing.
3. If the reporter/whistleblower themselves have been involved in illegal or improper conduct related to the reported/whistleblowing, the normalcy may take into account.
4. In cases where the reporter/whistleblower is an employee of the Company, he/she shall take appropriate measures in consideration of all matters when requesting personnel measures, such as changing his/her position, on the grounds that he/she may be disadvantaged in personnel affairs.
5. Information that may disclose the identity of the reporter/whistleblower and Related Parties shall not be disclosed until violations are confirmed as a result of an investigation into reports/whistleblowing.

② The Operator shall verify whether there have been any disadvantages or retaliation due to reporting/whistleblowing within three months from the day after the notification of the investigation's conclusion. If the reporter/whistleblower responds that there were disadvantages or retaliation, an investigation shall be conducted, and if it is confirmed that disadvantages or retaliation occurred, the General Manager shall be informed. In such cases, the General Manager shall request appropriate actions, including corrective measures and measures to prevent recurrence, from the entities responsible for the disadvantages or retaliation.

Article 4 (Operation Management) ① The Operator shall monitor the overall operation of the Reporting/Whistleblowing Center and, if any violations of this guideline are found, he/she shall obtain approval from the General Manager to request corrective actions from the relevant entities.

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② The Operator may, with the approval of the General Manager and the cooperation of the Person in Charge, conduct education or campaigns to increase awareness and promote the use of the Reporting/Whistleblowing Center.


③ If it is determined that the Person in Charge for a type of report/whistleblowing can no longer perform their duties, the head of the Responsible Division shall select a new Person in Charge and request authorization from the Operator, with approval from the General Manager to grant the authority.

Chapter 2 Reporting Subjects, Methods, and Handling Procedures

Article 5 (Types and Methods of Reporting/Whistleblowing) ①The types of reporting/whistleblowing for the Reporting/Whistleblowing Center are as follows:

1. Violation of Fair Transactions/Subcontract: Violations of laws under the jurisdiction of the Fair Trade Commission, such as the Fair Trade Act, Subcontracting Act, and Agency Act, related to subcontractors and agencies
2. Unfair job performance/accepting and providing improper profits: Conflicts of interest, improper requests and acceptances, unfair and illegal work directions, acquisition and provision of improper financial benefits (money, gifts, favors), etc.
3. Human Rights Violations: Sexual harassment and workplace bullying, impersonal acts, unfair discriminatory acts, other human rights violations, etc.
4. Distribution of Gray parts: Overseas distribution of domestic A/S parts, illegal distribution of unauthorized parts, etc.
5. Other unethical conducts: Damage to the company's reputation, violation of side hustle policy, neglect of duties, violation of other employee codes of conduct, etc.

② Reporters/whistleblowers shall report through the website or smartphone app provided by the service provider and enter and submit the reporting/whistleblowing content according to the specified format determined by the Reporting/Whistleblowing Center.

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Article 6 (Exclusion of Reporting/Whistleblowing Subjects) ① The Operator may conclude the investigation without conducting it in cases where the reporting/whistleblowing content falls under any of the following:

1. Where the types of reporting/whistleblowing does not correspond to Article 5, paragraph 1;
2. Where the reporter/whistleblower repeatedly reports/whistleblows without specific reasons even though the matter has been concluded through the Reporting/Whistleblowing Center or other channels;
3. Where it is determined to be unfounded slander, defamation, or abusive language;
4. Where it is simple complaints, inconveniences, discourteous behavior, unilateral complaints, or personal emotional expressions, etc.;
5. Where the reporter/whistleblower requests to cancel the report/whistleblowing through the Reporting/Whistleblowing Center.


② Despite the circumstances specified in Article 6, paragraph 1, the Person in Charge may conduct an investigation if the content of the report/whistleblowing is confirmed or it is determined to be a violation of compliance.

Article 7 (Receipt Confirmation of Report/Whistleblowing) ① When a report/whistleblowing is received, the Operator shall share the content with the General Manager.

② The Person in Charge shall notify the reporter/whistleblower of the receipt of the report/whistleblowing within five working days from the day after the registration date.

③ The Operator may consult with relevant Person in Charge if adjustments are necessary for newly registered types of reports/whistleblowing. In accordance with the consultation, the Person in Charge shall notify the reporter/whistleblower of the information as specified in Paragraph 2.

Article 8 (Review and Determination of the Need for Investigation on the Report/Whistleblowing) ① The Person in Charge shall review the report and determine the type of handling process within 10 working

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days from the day after notifying the reporter/whistleblower of the receipt of the report/whistleblowing, through the Compliance Reporting/Whistleblowing Center. However, in cases where it is difficult to notify within the specified period due to unavoidable reasons, the details shall be shared and discussed with the Operator.

② If the review of the report/whistleblowing content results in a notification of "Request for Submission of Documents (Additional Information)," the Person in Charge may request the reporter/whistleblower to supplement requirements, such as additional information or evidence within a maximum of 14 days, up to 2 times. In cases where a longer period for supplementation is deemed necessary due to the complexity of the case, it may be extended. In this case, the Person in Charge shall notify the reporter/whistleblower of the handling process type within 10 working days from completion date of the requirements supplementation.


③ Despite the provision of a supplementation period according to paragraph 2, if specific facts, evidence, or information necessary for the investigation are not supplemented without special reasons, the Person in Charge may notify the reporter/whistleblower of "Automatic Conclusion" and conclude the investigation.

④ If the report content falls under the jurisdiction of an affiliate, joint venture, or partner company, the Person in Charge shall report the matter to the relevant company and notify the reporter/whistleblower of the referral and conclude the investigation.

⑤ The decisions regarding the review of report/whistleblowing and whether to initiate an investigation, as described in paragraphs 1 through 4, shall be based on internal standards, and the reporter/whistleblower shall be notified after making the decision for initiating an investigation.

⑥ The operator may request to share or reevaluate the relevant reasons from the responsible person in charge regarding the decisions related to the review of report/whistleblowing and the initiation of investigations as described in paragraphs 1 through 4.

Chapter 3 Conducting Investigations and Notifying Results

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Article 9 (Conducting Report/Whistleblowing Investigations) ① When the review results of the reporting/whistleblowing content indicate "Initiate Investigation," the Person in Charge may conduct an investigation focusing on the factual circumstances in the reporting/whistleblowing content, and the Person in Charge may request related divisions for any evidence provided by the reporter/whistleblower or any other materials that may assist in confirming the factual circumstances. However, information that requires the consent of the person in accordance with laws and regulations related to personal information shall not be arbitrarily used without prior consent.

② If additional information is needed during the investigation process, the Person in Charge may request the reporter/whistleblower to supplement information by applying the provisions of Article 8, Paragraph 3, and if the reporter/whistleblower fails to supplement information, the investigation can be concluded by applying the provisions of Article 8, Paragraph 4.

③ If the Person in Charge or Operator deems it necessary, taking into consideration the severity of the matter and other factors during the investigation process, to conduct an external investigation, they shall obtain approval from the General Manager to report the matter to the investigative agency.

Article 10 (Notification of Investigation Results on Report/Whistleblowing) ① The Person in Charge shall complete the investigation within 60 days from the notification date of initiating investigation and notify the reporter/whistleblower of the results within 14 days from the completion date. However, if there is a request for additional information during the investigation process or if there are valid reasons, the deadline for completing the investigation may be extended. In cases of extension, the reasons for the extension and the duration shall be notified to the reporter/whistleblower.

Article 11 (Management and Reporting of Report/Whistleblowing) ① Within the scope of compliance with Article 3, Paragraph 1, Subparagraph 1 of this guidance, the Operator and the Person in Charge may utilize the reporting/whistleblowing content for the purpose of promoting a culture of compliance and improving the system.

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② The Operator must record and manage the reporting/whistleblowing content and handling results, and for this purpose, the Operator may request relevant information from the Person in Charge for each type of reporting/whistleblowing.

③ The General Manager must regularly report on the operation status of the Compliance Reporting/Whistleblowing Center to the Compliance Officer and the Compliance Officer shall make regular reports to the management. For this purpose, the General Manager and the Compliance Officer may request relevant information from the Person in Charge for each type of reporting/whistleblowing.

④ If requested by the Compliance Officer, General Manager, and Operator, the Person in Charge shall share the progress and results of handling the reporting/whistleblowing.

Chapter 4 Supplementary Provisions

Article 12 (Application of Standards) These standards take precedence over other regulations when processing violations reported through the Reporting/Whistleblowing Center. However, if applying other internal regulations is more favorable to the reporter/whistleblower, those internal regulations shall be applied.

Addendum

These standards will be effective from 18/09/2023.