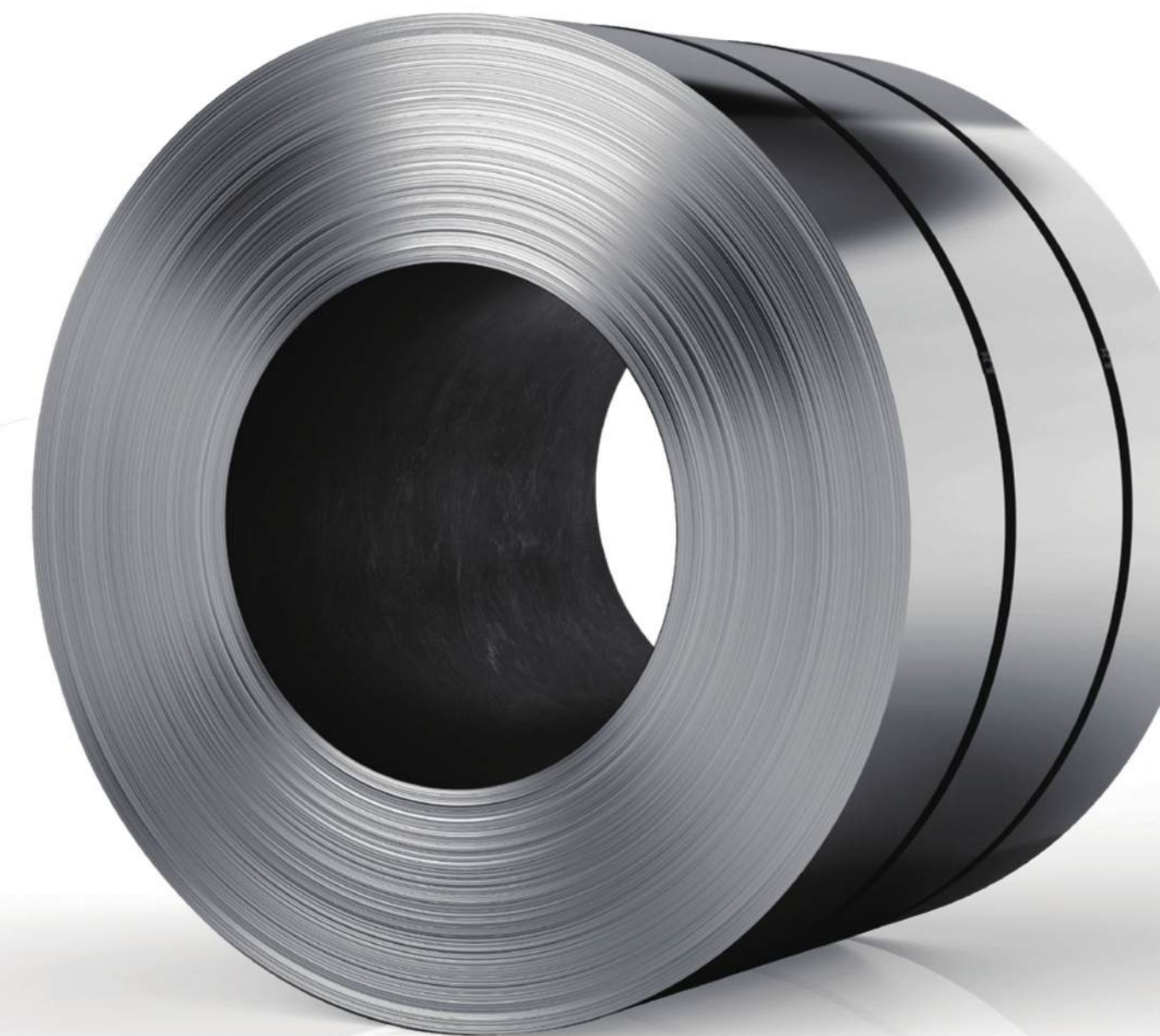


Code of Ethics

Hyundai Steel Czech s.r.o.



Leading The New Era Of Steel

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President's Foreword



Dear colleagues,

At Hyundai Steel Czech, integrity and responsibility are the foundation of everything we do. Our Code of Ethics is more than a set of rules—it's a reflection of our commitment to fairness, transparency, and respect for all stakeholders.

This Code serves as a guide to help us navigate challenges and uphold the trust that others place in us. I encourage you to embrace these principles in your daily work and speak up if you encounter anything that compromises our values.

Thank you for your dedication to upholding the highest ethical standards. Together, we can ensure a lasting legacy of trust and success.

Sincerely,
Joon Il Kim
President of Hyundai Steel Czech

1. Code Of Ethics

Introduction

The Code of Ethics is the foundation of our commitment to integrity, accountability, and respect in all aspects of our work. It provides clear guidelines for ethical decision-making, ensuring that our actions reflect our values and responsibilities to colleagues, partners, and the community. This Code is a guide to maintaining trust and upholding the highest standards as we navigate complex challenges together.



Why Do We Have It?

The Code of Ethics is the foundation of our commitment to integrity, accountability, and respect in all aspects of our work. It provides clear guidelines for ethical decision-making, ensuring that our actions reflect our values and responsibilities to colleagues, partners, and the community. This Code is a guide to maintaining trust and upholding the highest standards as we navigate complex challenges together.

By creating of the Code of Ethics, we establish a clear framework for ethical behavior, fostering trust, integrity, and accountability within an organization. It guides employees in making responsible decisions, ensures compliance with laws and regulations, and reinforces the company's values and culture. A well-defined Code of Ethics also enhances the organization's reputation, builds stronger relationships with stakeholders, and helps prevent misconduct by setting clear expectations for conduct.



2. Key Values

Hyundai Steel Czech is strongly dedicated to the key values related to the quality assurance of supplied products and creation of safe and healthy work environment for its employees. Active quality policy, which provides a framework for setting goals for quality, occupational health and safety, environmental management system and promotion of healthy lifestyle is one of the priorities of the Company's global strategic development plan.



Core Values and Principles



We Set Expectations

- We clearly communicate what the organization stands for
- We provide a unified standard of behaviour for all members

We Build Trust and Integrity

- We reinforce honesty, fairness and respect
- We foster accountability and transparency in actions

We Promote Positive Culture

- We encourage collaboration and inclusivity
- We reduce conflicts by aligning individual behaviours with shared goals

We Support Long-term Goals

- We serve as a guide for ethical decision-making
- We help maintain consistency, even during challenges

3. We Are Responsible For Safety

We are all responsible for ensuring a safe environment by adhering to the principles outlined in our Code of Conduct. This means acting with integrity, following safety protocols, reporting any potential risks or violations, and treating everyone with respect. By staying vigilant and proactive, we create a workplace where everyone feels secure and valued.



We Are Responsible For Safety



We Follow Safety Policies

- We adhere to all safety procedures, guidelines, and legal requirements at all times
- We stay informed about updates to safety policies and apply them in daily activities

We Manage Risks Proactively

- We identify and report hazards or unsafe conditions immediately
- We take actions to prevent accidents or injuries before they occur

We Take Accountability

- We accept responsibility for our actions and their impact on safety
- We act responsibly to ensure the well-being of everyone in our environment

We Are Responsible For Safety



We Report Concerns

- We report violations, risks, or incidents promptly without fear of retaliation
- We use appropriate channels to escalate safety concerns effectively

We Respect and Cooperate

- We treat everyone with respect and foster a safe, inclusive environment
- We collaborate to uphold safety standards and resolve any issues

We Stay Prepared

- We participate in required safety training and maintain emergency readiness
- We understand and follow emergency procedures and know how to use safety equipment

4. Environmental Protection

At Hyundai Steel Czech is environmental protection a core value that guides everything we do. We are committed to minimizing our environmental impact, promoting sustainability, and integrating eco-friendly practices into our operations. By adhering to responsible resource management, reducing waste, and fostering innovation, we strive to contribute to a healthier planet for future generations.



Environmental Protection



Sustainability First

- We prioritize sustainable practices in our operations, minimizing waste and reducing our carbon footprint

Full Accountability

- We take responsibility for our environmental impact, continuously monitoring and improving our processes

Transparency & Integrity

- We maintain open communication with stakeholders, ensuring honesty in our environmental reporting

Environmental Protection



Pollution Prevention

- We implement strict measures to reduce emissions, manage waste responsibly, and prevent contamination

Corporate & Government Collaboration

- We engage with policymakers and industry leaders to drive meaningful environmental change

Education & Advocacy

- We invest in environmental awareness programs, empowering our employees and communities to take action

How We Contribute Every Day

At Hyundai Steel Czech, every employee actively contributes to our commitment to environmental protection. Sustainability is embedded in our daily operations, and each team member plays a crucial role in making a positive impact.



Sustainable Daily Practices

- Our employees minimize waste by using digital alternatives, reducing paper and plastic consumption
- We conserve energy by turning off unused lights and equipment, optimizing workplace efficiency
- Responsible waste disposal, including recycling is a standard practice across all departments

How We Contribute Every Day

Reducing Our Carbon Footprint

- We support our employees in using public transportation by covering 100% of their travel cost



Employee-Led Clean-Up Drives

- Our teams regularly participate in community clean-up events, helping to maintain local parks, rivers, and urban spaces

5. We Respect Our Employees

We genuinely care about creating a workplace where every our employee feels respected, supported, and appreciated. Our commitment to fairness and integrity isn't just a policy—it's the way we work together every day. We want our employees to feel empowered, heard, and valued, because your contributions are what make our company thrive.



We Respect Our Employees



Equal Opportunities & Fair Treatment

- We provide equal opportunities for all employees, regardless of gender, background, or beliefs
- Discrimination and harassment are not-tolerated, and we maintain a zero-tolerance policy against any form of workplace misconduct

Fair Compensation & Benefit

- Employees receive competitive salaries and benefits that reflect their contributions
- We support work-life balance through flexible hours, and possibility of remote work

Professional Growth & Development

- We invest in our employees through training, mentorship, and career advancement opportunities
- Employees are encouraged to upskill and innovate, fostering both personal and professional growth

We Respect Our Employees



Encouraging Civic Engagement

- We encourage our employees to engage in their communities and participate in the political process, whether through voting, volunteering, or advocacy
- While we encourage individual engagement, Hyundai Steel Czech maintains a neutral stance on political matters as an organization
- We focus on creating a work environment where all employees, regardless of political affiliation, can work together with respect and understanding

Open Dialogue & Mutual Respect

- We promote open dialogue and encourage respectful discussions, but we do not tolerate any behavior that undermines the inclusive, supportive environment we strive to maintain
- It is important that we all feel safe and valued, no matter our political beliefs

6. We Are Responsible And Transparent Business

At Hyundai Steel Czech, ethical business practices are non-negotiable. We hold ourselves accountable to the highest standards of honesty, fairness, and integrity in every decision we make. There is no room for misleading information, unfair treatment, or unethical shortcuts. We operate with full transparency, ensuring that customers, employees, and partners always know where we stand. Compliance with laws and industry regulations is our baseline—we go beyond that to uphold true corporate responsibility.



Fair Competition



We are firm believers that healthy competition drives innovation, improves quality, and benefits consumers. We are committed to competing in a way that is not only lawful but also fair and ethical.

For us, this means focusing on offering the best products and services based on merit—through innovation, superior customer service, and responsible business practices. We don't engage in unethical tactics such as false advertising, misleading claims, or exploiting competitors. Instead, we focus on the value we bring to the market and let that speak for itself.

We respect the rights of our competitors and believe in maintaining a competitive environment that is rooted in fairness, transparency, and integrity. We understand that when businesses compete ethically, it leads to a better experience for consumers and a stronger, more sustainable market overall. Our dedication to fair competition is a cornerstone of our corporate culture, and we continue to uphold this principle in every aspect of our business.

Confidential Information and Intellectual Property



We take the protection of confidential information and intellectual property seriously. We ensure that sensitive data is securely stored, shared only with authorized individuals on a need-to-know basis, and never misused for personal or competitive advantage. Our commitment to confidentiality extends beyond employment, reinforcing trust and compliance at all levels of our organization.

We also uphold the highest standards when it comes to intellectual property. We respect copyrights, patents, trademarks, and trade secrets, ensuring that all proprietary work is properly attributed and used ethically. Our team follows strict guidelines to prevent unauthorized use or distribution of protected materials while ensuring that creators receive the recognition and compensation they deserve. By prioritizing integrity and accountability, we foster a culture of respect, innovation, and professional responsibility.

Anti-Money Laundering Measures



At Hyundai Steel Czech, we take the fight against money laundering seriously. This means we have strict rules in place to prevent anyone from using our business to hide or move money gained through illegal activities. We follow all laws and regulations to ensure our financial transactions are clean, transparent, and legally sound.

To do this, we carefully check who we do business with, making sure our customers and partners are legitimate. We also keep an eye out for any unusual transactions that might indicate suspicious activity, and if necessary, we report them to the authorities.

Our team is trained to recognize potential risks, so we can act quickly if something doesn't seem right. By staying vigilant and following these rules, we help protect our company, our customers, and the financial system from being misused for illegal purposes.

Personal Data Protection

The privacy and protection of personal data—whether it belongs to our employees, customers, or other individuals—is one of our top priorities. We understand the serious consequences that can arise from mishandling personal information or breaching privacy, which is why we are fully committed to ensuring secure, transparent, and lawful data processing.

We only collect and use personal data when we have a clear legal basis and a legitimate purpose. Additionally, we process data only for as long as necessary and to the extent required for our operations, always implementing strict safeguards to prevent loss, unauthorized access, or misuse.

All individuals involved in handling personal data are bound by confidentiality obligations or contractual agreements to uphold the highest security standards. By following these principles, we ensure compliance with applicable regulations while maintaining the trust and privacy of those who entrust us with their information.



7. Fight Against Corruption

At Hyundai Steel Czech, we have a zero-tolerance policy towards corruption. Bribery, kickbacks, or unethical conduct are strictly prohibited. All transactions must be transparent and fully compliant with the law. Any violation will result in immediate disciplinary action. We are committed to maintaining the highest standards of integrity and will not tolerate actions that undermine trust.



Bribery



Bribery is defined as the offer or acceptance of anything that could be considered a bribe with the intent to influence decisions or gain an unfair advantage. We take a strict stance against bribery, and any employee who is offered, promised, or asked to provide a bribe must report it immediately.

Special care must be taken when giving or receiving gifts or other benefits, such as invitations to events. Even when the intention behind the gift is harmless, we must avoid situations that may give the impression that the gift could influence decisions. To minimize this risk, the following principles must be followed:

- Gifts or benefits must be given without the intention to influence the recipient's judgment or actions.
- They should be of reasonable value and frequency.
- All gifts or benefits must be exchanged openly and transparently.
- Gifts should not be given or received at inappropriate times, such as during a supplier selection process or when finalizing a contract.

Any gifts or benefits that violate these guidelines, or those specified in our internal policies, must be refused and returned to avoid any appearance of impropriety. By adhering to these standards, we ensure a fair, transparent, and ethical business environment.

Conflict of Interest



A conflict of interest arises when personal interests, whether for personal benefit, the benefit of a close individual, or at the expense of a third party, are in opposition to the interests of Hyundai Steel Czech. Conflicts of interest can take various forms, such as:

- Business dealings with relatives or acquaintances.
- Personal relationships between family members in the workplace, especially when there is a hierarchy of superiority or subordination.
- Ownership of shares or interests in competitors or business partners.

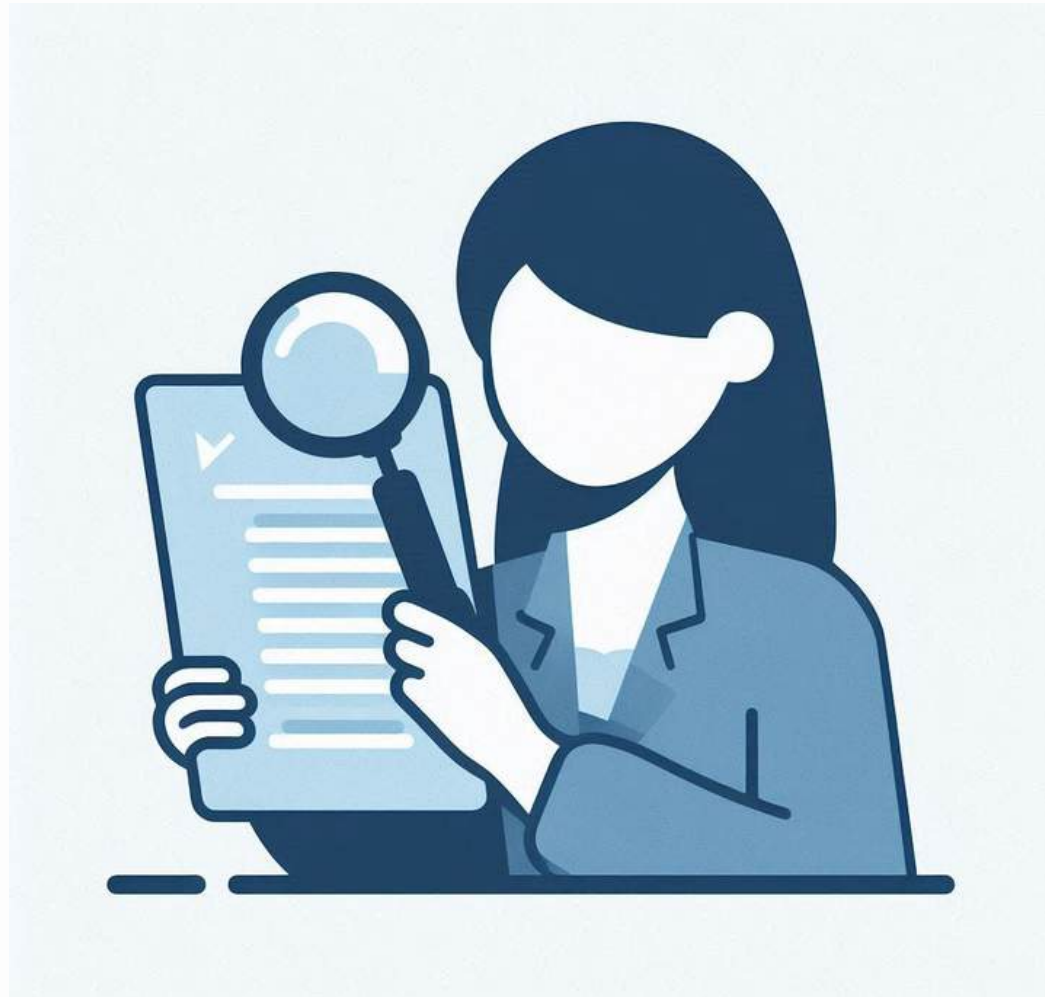
Such conflicts may result in damage to the company's assets, reputation, and loss of trust from employees, business partners, or customers. Therefore, every employee is obligated to prevent any potential conflict of interest and report it immediately if one arises or is likely to occur. All decisions should be made with the best interests of the company in mind, ensuring fairness and transparency in every business transaction.

8. How to Make a Report?

At Hyundai Steel Czech we all contribute to ethical business conduct by following the Code of Ethics. If you witness or suspect any violations, it is essential to report them. You don't need to be certain or gather evidence; reasonable suspicion is enough. However, false reports or those made with harmful intent are not allowed. Reporting helps protect the company's reputation, as well as your own integrity, ensuring a transparent and ethical environment.



How to Submit a Report?



1. Identify the Concern – Ensure that the issue is related to a violation of the Code of Ethics, company rules, or any unethical behavior, including suspected violations of legal or regulatory requirements.

2. Choose the Reporting Method:

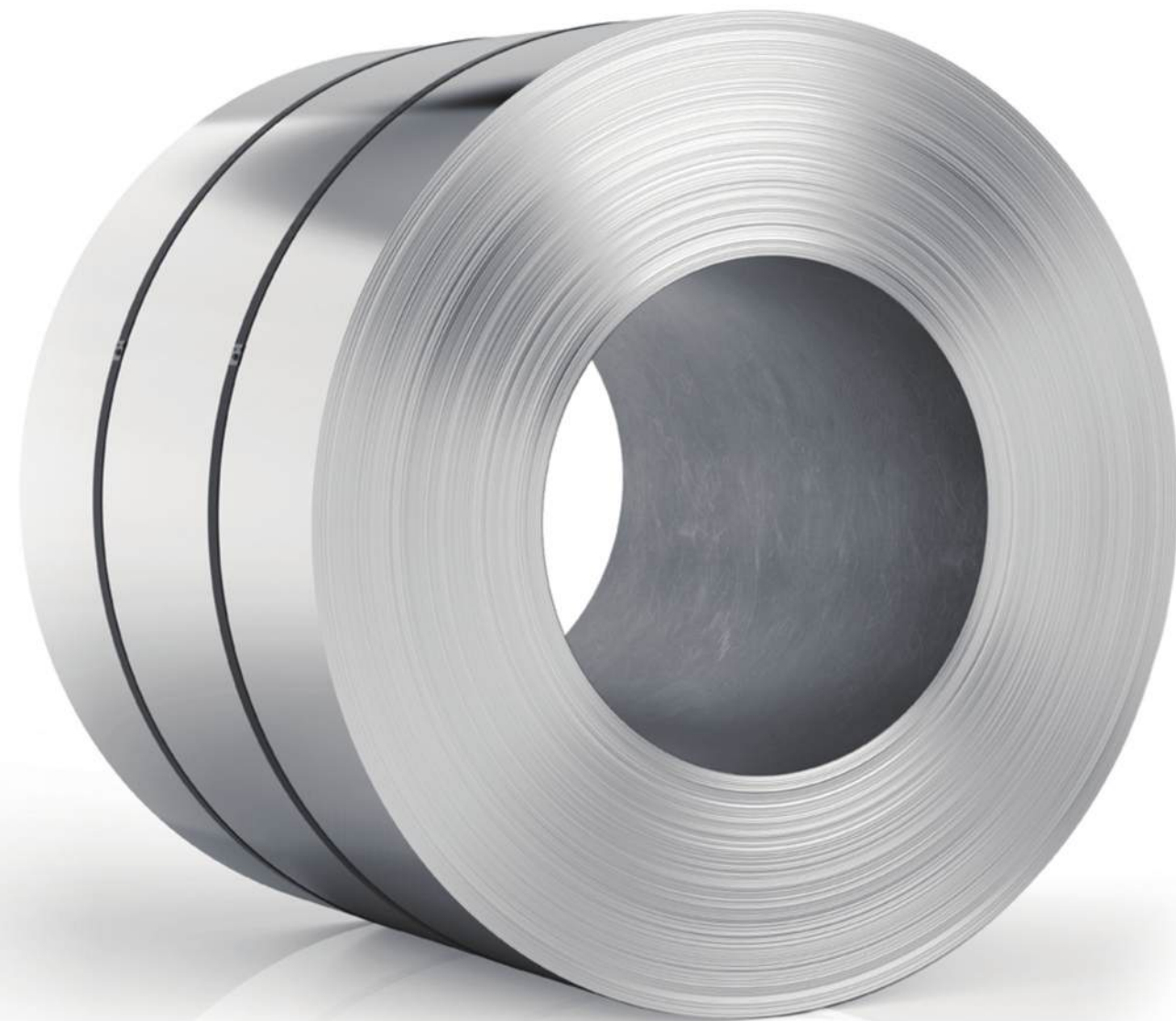
- By completing the website form
- By e-mail to our HR: ruzickova@hyundai-steel.com
- In person, by e-mail or telephone to the designated persons

3. Provide Relevant Details – You do not need to have all the evidence, but provide as much detail as possible about the suspected violation, including what happened, when, and any individuals involved.

4. Maintain Confidentiality – Reports should be made confidentially, and your identity will be protected to the extent possible, as long as there is no abuse of the reporting process.

5. Follow Up – After submitting the report, you may follow up with the relevant department if you haven't received acknowledgment or an update within a reasonable timeframe.

Remember, reporting suspected misconduct helps protect the company, its employees, and its reputation.



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