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Hyundai Steel Conflict Minerals (Responsible Minerals) Policy

	Version	Record on enactment & revision	Contents of enactment & revision
Enactment & Revision History	1	March, 2025	Initial Enactment

[Team in charge]

Procurement Planning Team

[Officer in Charge]

Head of Procurement Division

1. Purpose and System

1.1 Purpose of Enactment

Hyundai Steel's Conflict Minerals (Responsible Minerals) Policy (this “Policy”) aims to address and improve issues such as human rights violations and environmental destruction that may occur in the process of the mining and purchasing of Conflict Minerals/Responsible Minerals. This is achieved through the establishment of a responsible mineral supply chain, with the participation of not only relevant employees but also supply partners.

1.2 Definitions

1) 'Conflict Minerals' refer to tin, tungsten, tantalum, and gold produced in the 10 African countries (the Democratic Republic of Congo, the Republic of Congo, Sudan, Rwanda, Burundi, Uganda, Zambia, Angola, Tanzania, and the Central African Republic) where conflicts occur.

2) 'Responsible Minerals' refer to minerals other than Conflict Minerals that raise human rights violations or environmental destruction issues during the mining process.

3) 'RMAP' stands for 'Responsible Minerals Assurance Process', which is a due diligence and assurance program for conflict-free smelters conducted by the Responsible Minerals Initiative (RMI).

4) 'Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act' refers to the provision related to Conflict Minerals in the bill enacted by the U.S. Congress to enhance U.S. financial stability by strengthening the accountability and transparency of the financial system.

5) 'OECD Due Diligence Guidance' refers to recommendations that, when implemented by companies, help prevent and address various negative impacts related to workers, human rights, the environment, bribery, consumers, and corporate governance in their operations, supply chains, and other business relationships.

1.3 Scope of Application

1) This Policy applies to all officers and employees within the company's financial consolidation scope, including headquarters, domestic/overseas production and sales corporations, branches, and subsidiaries.

2) Officers and employees subject to this Policy should encourage suppliers, agencies, outsourcing partners, etc., to comply with this Conflict Minerals (Responsible Minerals) Policy.

3) If the actions recommended in this Policy are in conflict with the laws of the relevant country, the country's laws take precedence.

2. Policy Operation

2.1. Strategic Direction

To prevent the sale of Conflict Minerals/Responsible Minerals for funding wars or causing human rights and environmental issues such as labor exploitation during mining, Hyundai Steel transparently manages the supply chain related to Conflict Minerals/Responsible Minerals as follows, based on the U.S. Congress's 'Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act' and the 'OECD Due Diligence Guidance'.

2.2. Guideline

1) Hyundai Steel prohibits the use of 3TG conflict minerals (tin, tantalum, tungsten, and gold), which are unethically mined in conflict zones.

2) Hyundai Steel supports suppliers to trade with RMAP-certified smelters through regular training and provision of Conflict Minerals/Responsible Minerals management guidelines.

3) Hyundai Steel verifies that suppliers do not handle Conflict Minerals/Responsible Minerals through questionnaires and written confirmations.

4) When Conflict Minerals/Responsible Mineral risks are identified within the supply chains of suppliers, Hyundai Steel demands improvements to establish a responsible supply chain.

5) Hyundai Steel continuously strives to minimize negative impacts on society and the environment, such as human rights violations and environmental damage that may occur during mineral mining, and actively shares reports on these activities with various stakeholders.