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Department in Charge	Sustainability Management Team

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## Hyundai Steel Donation and Sponsorship Policy

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Enactment & Revision History	Version	Record on Enactment and Revision	Contents of enactment /revision
	0	May 2019	Initial Enactment
	1	May 2021	Revised
	2	August 2023	Revised
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	4		
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**[Team in Charge]**

Sustainability Management Team

**[Division in Charge]**

Head of Strategy Planning Division

All donations and sponsorships provided by Hyundai Steel must align with our business activities and be managed in an ethical manner. We neither donate to, nor sponsor, companies that are involved in political or financial conflicts, nor those that are linked to specific political parties or groups. To this end, we have established and implemented the following policy on donations and sponsorships.

## 1. Scope

This policy applies to all company employees and third parties in the countries and regions in which we operate, and must be communicated in a timely manner from the commencement of business relations.

## 2. Management

2-1 Charitable donations must comply with the following conditions.

- Compliance with all relevant laws.
- Not for the purpose of receiving business advantages through improper means.
- Conducted via proper charitable organizations.
- Strictly for charitable purposes.

2-2 Sponsorships cannot be provided without the formal approval of a decision-maker with relevant authority.

2-3 No worker under the employment of the company shall provide monetary payments, or other such donations, to a political party, political entrants, or political candidates.

2-4 Donations and sponsorships linked to, or arising from, auctions, bidding, contract renewals, or future business relationships are strictly forbidden. Further, we shall not provide charitable donations or sponsorship contracts in such a way that we receive favorable terms from relevant organizations or subsidiaries (related parties).

## 3. Mandatory items

3-1 All donations and sponsorships must be reviewed to confirm alignment with our ethical

policies, such as our Anti-Bribery and Corruption Policy.

3-2 All donations and sponsorships shall be reported to, and approved by, the relevant decision-maker.

3-3 Employees who violate this policy may be subject to disciplinary action. Violations that are considered gross misconduct may result in termination of employment.

3-4 All employees are responsible for reading, understanding, and complying with this policy, and shall not conduct any activities that violate, or might violate, this policy.

3-5 This policy is managed in alignment with Hyundai Steel's Anti-bribery and Corruption Policy, Donations, Invitations and Hospitality Policy, Conflict of Interest Policy, Procurement Policy, and Code of Ethics.

#### **4. Governance**

The Board of Directors has overall responsibility for ensuring that this policy complies with the company's legal and ethical obligations, as well as for ensuring that all individuals within the company comply with the policy.

#### **5. Oversight and Review**

5-1 To oversee compliance with relevant policies, processes, and internal controls, an appropriate system to measure and report outcomes shall be established.

5-2 Senior personnel (e.g., managers in departments overseeing ethical and legal affairs) shall regularly review the appropriateness, relevance, and effectiveness of this policy, and oversee policy outcomes and implementation. Improvement measures that are identified shall be implemented in a timely manner.