

Human Rights Charter

| Charter Enacted in February, 2018 |

As a sustainable company that will grow for over 100 years, Hyundai Steel is striving to realize the value of respect for human rights throughout its management activities in order to realize social responsibility and to communicate and grow with its various stakeholders.

Hyundai Steel complies with standards and regulations of international organizations related to labor and human rights such as the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights (Ruggie Framework) and the International Labour Organization Convention. In addition, we ensure that all stakeholders in Hyundai Steel comply with the above mentioned international human rights and labor regulations.

Hyundai Steel supports the UN Global Compact and has established its organization, operational structure, monitoring, measures, and internal and external reporting processes in accordance with the Ten Principles and Good Business: Implementing the UN Guiding Principles on Business and Human Rights. To this end, we have established the following human rights management policies and operational guidelines. We will become a global corporate citizen based on communication and trust with stakeholders through continuous implementation efforts.

Hyundai Steel's human rights management policy

- 01 Respect human rights of employees and ensure their dignity as human beings.
- 02 Promote an active prevention approach to prevent human rights violations by stakeholders.
- 03 Consider human rights factors in all business stages, such as product development, production, sales and service provision.
- 04 Identify the human rights risks of all communities in which we operate businesses, and take the lead in realizing human rights respect values.

Operating instruction

Humane treatment	Try to avoid mentally or physically inhumane treatment to realize human dignity and values. In cases of inhumane treatment, take strict measures according to the relevant regulations.
Elimination of Forced Labor	Respect the free will of workers to work. Prevent all forms of forced labor due to abuse, intimidation, detention, trafficking, and slavery. Comply with the Labor Standards Act in relation to labor contracts.
Elimination of Child Labor	Comply with regulations on child labor, provide appropriate procedures and support for child workers in accordance with laws and regulations, and continuously check compliance with laws and regulations.
Prohibition of employee discrimination	Respect the diversity of all employees, and prevent any kinds of discrimination and unreasonable treatment in the personnel process such as employment, wages or promotion, due to nationality, race, age, gender identity, educational background, disability, religion, political orientation and social status.

Compliance with working hours	Comply with local regulations on working hours including regular, overtime and holiday work. Continuously monitor amendments to laws and regulations to prevent any violations.
Guarantee of freedom of association	Promote sound organizational development through smooth and continuous communication between labor and management. Ensure freedom of association in accordance with local labor relations laws and prevent any unfair treatment based on trade union membership and activities.
Privacy Protection	Protect the personal information of stakeholders including customers in accordance with local laws and regulations. Do not use personal information without the consent of the parties, or use it for purposes other than those disclosed when it was given.
Participation in community activities	Identify potential impacts on communities near worksites, listen to community feedback to prevent problems and strive for continuous communication.

Management Process of Human Rights Risks

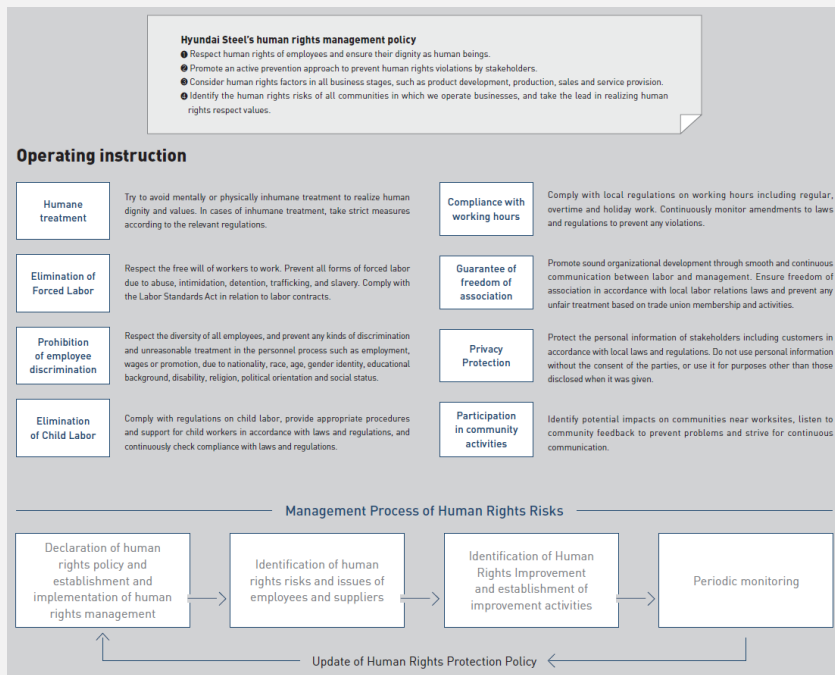
We conduct human rights assessments every year for our worksites and suppliers to prevent human rights risks as defined in the Hyundai Steel's human rights management policy and operating instruction. We conduct surveys containing human rights items for worksites to evaluate whether they comply with the human rights management policy and operating instruction. Suppliers implement CSR self-assessment including human rights. And they conduct on-site inspections for their worksites where any major risk is identified. When risks related to human rights are identified, we identify and resolve the related issues to protect human rights throughout our business.



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| Charter Revised in January, 2019 |

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| Charter Completely Revised in July, 2020 |

1. OUTLINE

A. Purpose of Establishing the Charter for Human Rights

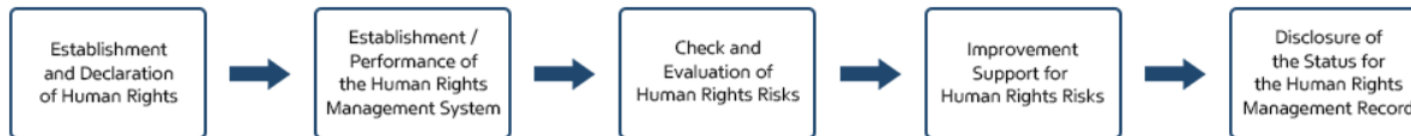
In order to have Hyundai Steel proactively support human rights, prevent human rights violations following the operation of the business simultaneously and moderate pertinent risk, Hyundai Steel hereby proclaims the Charter for Human Rights. For human rights management, Hyundai Steel is committed to complying with a wide range of recognized human rights/labor-related international standards and guidelines, such as the Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights and International Labor Organization and OECD Due Diligence Guidance for responsible Business Conduct, among others.

B. Scope of Application of the Charter for Human Rights

This Human Rights Charter applies to all executives and employees of Hyundai Steel, including production and sales corporate bodies at home and abroad, subsidiaries. In addition, executives and employees of Hyundai Steel follow this Charter for Human Rights when collaborating with suppliers, sales and service organizations, and furthermore, we recommend that all stakeholders under the transaction relations respect this Charter for Human Rights. In the event that the matters handled under this Charter for Human Rights contradict the laws and regulations of the local state, the local laws and regulations are complied with first, and with the exception of cases of having special provisions in the laws of local states, articles of incorporation or company regulations of organization, and so forth the works are carried out in accordance with this Charter for Human Rights of Hyundai Steel.

C. Human Rights Risk Management System

Hyundai Steel should establish an internal system required for implementing the human rights management in accordance with this Charter for Human Rights for respecting the human rights of all officers and employees and relieves the ensuing risk, and the human rights risk is regularly evaluated and improved, sufficiently sharing the result with stakeholders. The organization in charge of human rights management for Hyundai Steel carries out the management system of human rights risk following the principle of good faith and due diligence, and reviews the human rights management procedure on a regular basis, actively reflecting social change to revise the management system.



2. BASIC PRINCIPLE

Article 1 Prohibition of Discrimination

Hyundai Steel does not discriminate against anyone in the aspect of employment, promotion, education, wage, welfare, etc. on the ground of gender, race, ethnicity, nationality, religion, disability, age, family status, social status, and political opinion for all officers and employees and it structures the organizational culture to respect the diversity of officers and employees.

Article 2 Compliance with Working Conditions

Hyundai Steel complies with the legal work hours for each country where it engages in business and it pays all officers and employees reasonable wages for the work together with the wage statement. In addition, it provides a work environment appropriate for the performance of duties and sufficient opportunity of education for developing the competency of and improving the quality of life for all officers and employees.

Article 3 Humane Treatment

Hyundai Steel respects the privacy of officers and employees and fully protects personal information and it does not abuse, mentally or physically, or adversely treat any officer or employee.

Article 4 Guarantee of the Freedom of Association and Collective Bargaining

Hyundai Steel respects the labor relations laws of the country where this Charter for Human Rights is applied to provide sufficient opportunity for communication with all officers and employees.

Article 5 Prohibition of Forced Labor and Child Labor

Hyundai Steel does not engage in any act of violence, threat, false imprisonment or the like against any officer or employee and it does not coerce any work against the free will by the method of demanding a personal ID or company ID. In addition, child labor is prohibited in principle and the company takes measures so that minors' opportunity for education will not be restricted due to their work.

Article 6 Guarantee of Industrial Safety

Hyundai Steel regularly inspects the facilities, equipment, tools and others of the business premises for all officers and employees to work in a safe work environment and prepares the support plan for post management and appropriate measures for the purpose of preventing physical and mental hazards.

Article 7 Protection of the Human Rights of Local Residents

All officers and employees of Hyundai Steel are cautioned not to interfere with the human rights of the local residents when carrying out their work. Moreover, the rights to safety and health for local residents, and freedom of residence are protected.

Article 8 Protection of the Human Rights for Customers

All officers and employees of Hyundai Steel must make it their highest priority to protect the life, health and property of customers when providing products and services, and must make their best endeavors to protect the personal information collected from management activities.

3. ESTABLISHMENT OF THE SYSTEM

A. Establishment of Governance

① Responsibility of Human Rights Management

Hyundai Steel should manage and supervise the status of promoting the human rights management through the meetings of committees or management conferences participated in by the highest decision makers or decision makers of major departments or working conferences participated in by decision makers of key departments. The role of committees, management conferences, or working meetings and the scope of responsibility could be classified for the 1) review of the establishment or revision of the Charter for Human Rights, 2) presenting opinions on revising pertinent internal regulations, such as the personnel system, employment regulations, audit standards and others, 3) recommendation for actions on implementation and result of evaluating human rights risks, 4) instruction for investigation on cases of human rights violations and deliberation for relief plans, and 5) other matters deemed to be required for the protection of human rights.

② Performance of Human Rights Management

Hyundai Steel should have the organization to be in charge of human rights management to carry out the relevant affairs. The works to be carried out by the organization in charge of human rights management may be classified for the 1) establishment and revision of the Charter for Human Rights, 2) establishment of the human rights management execution plan, 3) evaluation of the human rights risk, 4) operation of the grievance channel, and, 5) in-house education and report as well as external communication.

B. Operation of the Grievance Procedure

① Report and Reception of Violations of Human Rights

Hyundai Steel should operate a channel to receive the report from officers and employees or other persons or organizations (reporters) that suffer a human rights violation or perceived human rights risk. Upon receiving a report of a human rights violation, the characteristics of the individual report case are considered in discussion for a detailed relief plan regarding the case of human rights violence by the pertinent department.

Grievance Channel to Report Violations of Human Rights

- ▶ Name of department: Sustainability Management Team
- ▶ E-mail: reboraws@hyundai-steel.com
- ▶ TEL: +82-2-3464-6617
- ▶ Mail(Address): Sustainability Management Team, Hyundai Steel, 12, Heolleung-ro, Seocho-gu, Seoul, Republic of Korea

② Processing of Reports on Violations of Human Rights

Hyundai Steel shall, with reference to court precedents, regulations of relevant government agencies, past internal practices and other industrial practices, strive to identify the best course of remedial action with support from the legal department. In the event that the cases of human rights violence exercise significant influence on freedom and the rights of victims or it is highly likely to create risks to the corporate reputation, the relief plan may be discussed by a committee, management conference, practical meeting and gatherings in which the highest decision makers participate.

③ Guarantee of Status for Reporters

Executives and employees of all Hyundai Steel must not disclose, reveal or otherwise report any personally identifiable information that may be used to identify a reporter. All information relating to victims, incidents, remedial procedures and outcomes, as transmitted during the reporting and notification process, must be kept strictly confidential. In addition, measures must be implemented to protect employees from adverse consequences arising from the reporting of human rights violations and risks.

C. Education and Efforts to Raise Awareness

① Human Rights Management Education

Hyundai Steel should encourage the promotion of the understanding of human rights of officers and employees and improvement of perception, and process the human rights management education with the purpose of the internal promotion scheme for human rights management and delivery of the enforcement plan. Through the human rights management education, discriminatory acts by officers and employees are prohibited and should also encourage aggressive reporting of detected cases and risks of human rights violation.

② Enhancing Human Rights Management

Hyundai Steel is encouraged to share information pertaining to the Charter for Human Rights, its implementation plan, and the human rights risk assessment process and associated outcomes, not only within Hyundai Steel, but also with suppliers, sales/service organizations and other organizations with which Hyundai Steel has trading relationships. Such content is shared via the optimal channels (voice, video and written media) and methods (Korean, English, etc.) for all organizational members to conveniently access information relating to human rights management.

4. RISK MANAGEMENT

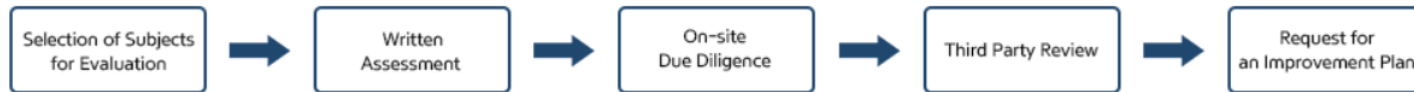
A. Evaluation of Risk

① Development of the Evaluation Index

Hyundai Steel should reflect the UN Guiding Principles on Business and Human Rights, OECD Due Diligence Guidance for Responsible Business Conduct, human rights management guidelines from the Ministry of Justice (currently in development), and others based on the basic principle of this Charter for Human Rights to develop and operate the assessment and due diligence index to evaluate the work environment, work conditions, human resource operation, industrial safety, and human rights risks to local residents and customers.

② Operation of the Evaluation Process

Hyundai Steel should operate the evaluation process to confirm the possibility of having potential human rights risks and status of actual cases of human rights violence with the subject of the organization included within the scope of this Charter for Human Rights. The self assessment should be made by providing the evaluation index and guidelines to the subject of evaluation, and with respect to the insufficient matters shown in the result of self assessment by the subject of evaluation, the establishment of a self improvement plan is recommended. On the basis of the written assessment result, the on-site due diligence that confirms the risk in detail may be processed through the internal regulations, system confirmation interview, on-site assessment process related to human rights with the subject of the organization. In addition, in order to secure the objectivity of written assessments and on-site due diligence, a 3rd party audit may be processed through an independent 3rd party agency. Further, with respect to 'high risk' and 'non-conforming matters' detected through written assessment, on-site due diligence or 3rd party audit, it may request immediate improvement or establishment of an improvement plan. Hyundai Steel should regularly review and revise the evaluation index and process for human rights risks in order to accurately find cases of human rights violations and efficiently operate the evaluation process.



B. Performance of Risk Improvement

① Formulation and Stipulation for Improvement

Hyundai Steel should establish plans for improvement and performance regarding the human rights risk formulated as a result of evaluating the human rights risk. The head office that received the evaluation of human rights risk, production and sales corporate bodies at home and abroad, subsidiaries, second-tier subsidiaries, suppliers, sales/service organization, and other organizations in transactions should formulate the detailed enforcement tasks to carry out the improvement plan for the risks.

② Monitoring of the Performance Status

Hyundai Steel should continuously monitor whether the person in charge of the organization that received the evaluation of human rights risks is diligently and effectively performing the mutually stipulated improvement plans. Mutual communication should be made regularly in order to process for the detailed task execution to meet the schedule and the expected outcome is secured in time, and if it is expected not to carry out the improvement plan, required measures can be undertaken.

C. Disclosure of Status and Outcome

① Report to the Key Decision Makers

Hyundai Steel should report meaningful indications, important risks and improvement plans confirmed through the evaluation of human rights risk to the major decision makers, including the committees and working conference of management meetings. The report data obtained with the approval of the committees, management meetings, major decision makers, etc. may be shared with the applicable departments and others through enhancing the effectiveness in promoting the human rights management.

② Information Disclosure

Hyundai Steel should disclose the information on cases of reports for human rights violations and evaluation results on human rights risks, measures of its improvement and moderation on the homepage, integrated report, and sustainable management report or separate channels on human rights white book, etc., and it should select the disclosure channel that offers easy access and clear understanding for officers, employees and other stakeholders.

5. APPENDIX

A. Contact Information of the Person in Charge

Person in charge of the Human Rights Charter for Hyundai Steel

- ▶ E-mail: rebornws@hyundai-steel.com
- ▶ TEL : +82-2-3464-6617
- ▶ Mail : Sustainability Management Team, Hyundai Steel, 12, Heolleung-ro, Seocho-gu, Seoul, Republic of Korea

B. Reference

This Charter for Human Rights has been established on the basis of human rights-related provisions, standards and initiatives specified under domestic and overseas human rights standards and pertinent laws and regulations.

- ① UN, Universal Declaration of Human Rights (1948)
- ② UNGC, A human Rights Management Framework (2010)
- ③ UN, The UN Guiding Principles on Business and Human Rights (2011)
- ④ OECD, The OECD Guidelines for Multinational Enterprise (2011)
- ⑤ OECD, Due Diligence Guidance for Responsible Business Conduct (2018)
- ⑥ National Human Rights Commission of Korea, Manual of Human Rights Management for Public Institutions (2018)
- ⑦ National Human Rights Commission of Korea, Checklist for Human Rights Impact Assessment Operated by Institutions (Corporate enterprises) (2018)
- ⑧ Ministry of Justice, Guideline for Human Rights Management Standards for Corporate Enterprises (Tentative) (2019)

Head of Business Management Division

Myung-gu Lee