

# Human Rights & Supply Chain Transparency Statement

Hyundai Rotem Company

2025



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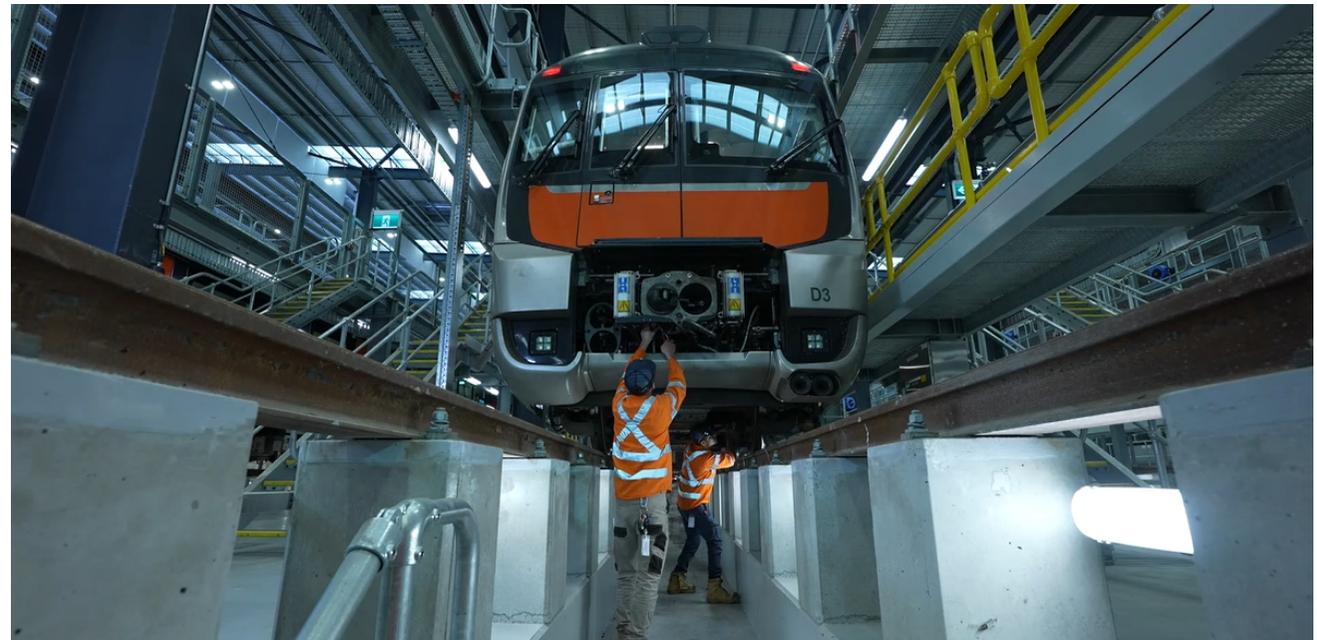
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## About this statement

Hyundai Rotem Company (**Hyundai Rotem**) is a company registered in Changwon, Gyeongsangnamdo, Republic of Korea (**Korea**), under the Korean business registration number 194211-0036336.

Hyundai Rotem works to provide creative innovation for a better future. As part of our core values, we believe in respect for talent and in communication and co-operation.

This Statement applies to Hyundai Rotem’s financial year starting on 1 January 2024 and ending on 31 December 2024. It aims to comply with the requirements of the Australian Modern Slavery Act (ABN: 81 615 545 492) and Canada’s Fighting against Forced Labour and Child Labour in Supply Chains Act (BN: 766329510) by outlining the steps Hyundai Rotem has taken to identify and address the risks of modern slavery, forced labour, and child labour in its operations and supply chain, as well as its assessment of the effectiveness thereof.





## Our structure, operations and supply chain

### Structure

Hyundai Rotem Company was established in 1999 and as of 31 December 2024 operated 21 branch offices overseas. Hyundai Rotem's primary manufacturing facilities are located in the cities of Changwon and Dangjin in Korea, and its primary research centre is located at Uiwang, Korea.

As of 31 December 2024, Hyundai Rotem employed 5,053 people, consisting of 4,182 people based in or expatriated from the head office in Korea and 871 people outside of Korea. As of 31 December 2024, Hyundai Rotem owned or controlled four other corporations in Korea as well as 12 corporations abroad as follows:

Entity Name	Date of Incorporation	Registered Address	Principal Business Activities
Hyundai Rotem USA Corporation	2004.01.22	12750 Center Court Drive, Suite 150 Cerritos, CA 90703	Railway production and sales
Hyundai Rotem Smart Electric America	2024.03.15	2078 Rustin Ave Riverside, CA 92507	Railway production and sales
Rotem Equipments (Beijing) Co., Ltd	2006.06.30	Shunyi Qu Nanfaxin Zhen Jiaogezhuang Cun Cunwei Huixi 300m, Beijing, China	Automobile equipment sales and maintenance
Hyundai EURotem Demiryolu Araçları Sanayi ve Ticaret A.Ş.	2006.07.04	Ahi Evran Cad. Polaris Plaza No.1 K.4 D.23 34398 Maslak, Sarıyer, İstanbul	Railway production and sales
MAINtrans	2008.06.24	38 Gaehwadong-ro 8-gil, Banghwa2-dong, Gangseo-gu, Seoul, Korea	Railway maintenance
Rotem SRS	2021.01.05	20 Gukjegeumyung-ro, Yeongdeungpo-gu, Seoul, Korea	Railway operations and maintenance
S-Trans	2023.08.23	66 Yeouidae-ro, Yeongdeungpo-gu, Seoul, Korea	Railway operations and maintenance
Gimpo Gold Line SRS	2024.03.08	Yangchon-yeok-gil 139, Gimpo-si, Gyeonggi-do, Korea	Railway operations and maintenance
Hyundai Rotem Brasil Industria E Comercio De Trens Ltda.	2013.04.03	Av. Marginal 26-036, No. 3400, Fazenda Bom Retiro, CEP 14.801-970, Araraquara/SP	Railway production and sales
Hyundai Rotem Company – Hyundai Eurotem Demiryolu Araçları San. ve Tic. A.Ş. Ortak Girişimi	2016.02.03	Ahi Evran Cad. Polaris Plaza No.1 K.4 D.23 34398 Maslak, Sarıyer, İstanbul	Railway sales
Hyundai Rotem – Hyundai Eurotem Mahmutbey Projesi Ortak	2016.06.24	Ahi Evran Cad. Polaris Plaza No.1 K.4 D.23 34398 Maslak, Sarıyer, İstanbul	Railway sales
Hyundai Rotem Europe Sp. z o.o.	2023.05.12	WFC Building, 19 Ful. Emilii Plater 53, 00-113 Warszawa, Poland	Defense maintenance
Hyundai Rotem Australia PTY LTD	2024.03.26	Level 3, Suite 3.02, 1 Epping Rd (ABN 48 676 126 891)	Railway sales and business development
HR Mechanical Services Limited	2016.12.14	16E, Shakespear Avenue, Trentham, Upper Hutt, New Zealand, 5018	Railway maintenance
Rotem SRS Egypt LLC.	2024.02.02	66 El Shazly Street, Agoza, Giza, Egypt	Railway maintenance
Rotem SRS Ukraine LLC.	2021.04.06	Kyiv City, Zvirynetska Str., House 63, Office 1, Ukraine	Railway maintenance

\*Newly incorporated subsidiaries in the reporting period include Gimpo Goldline SRS, Hyundai Rotem Smart Electric America, and Hyundai Rotem Australia PTY LTD



## Operations

Hyundai Rotem’s business activities encompass three business divisions: Rail Solutions, Defense Solutions, and ECO Plant Business. The operations of Hyundai Rotem primarily encompass office activities, manufacturing, maintenance, field services, and project-site-based work.

The Rail Solutions division manufactures and supplies railway vehicles, including Electric Multiple Units (EMUs), High Speed Trains (HSTs), Light Rail Vehicles (LRVs), Diesel Multiple Units (DMUs), locomotives, passenger coaches and freight wagons to 39 countries across the world. It also manufactures and supplies core electrical equipment of railway vehicles including train control management systems (TCMS), traction motors, propulsion systems, and auxiliary power units. It is actively expanding its business scope into rail systems and rail services such as operations maintenance. In order to respond to future market demands, it is accelerating the development and deployment of new vehicles such as catenary-free trams, double-decker electric vehicles, and hydrogen-electric trams.

The Defense Solutions division manufactures and supplies ground weapon systems, including main battle tanks, wheeled armored vehicles, and multi-purpose unmanned ground vehicles. Hyundai Rotem has been recognized for its competitiveness in the global market for ground weapon systems with cutting edge technology, such as its K2 Main Battle Tank. In line with changes in the global business environment, Hyundai Rotem is also striving to develop state-of-the-art technologies such as unmanned systems, artificial intelligence, and autonomous driving, as well as combining new energy technologies such as electrification and hydrogen fuel-cell based platforms to its products.

The ECO Plant Business division is involved in steel and automobile production infrastructure. Based on its

technological expertise, Hyundai Rotem has successfully entered smart factory and smart logistics businesses. It is also working to build hydrogen infrastructure, such as hydrogen charging stations and hydrogen extractors, to lead the realization of the global hydrogen economy and entry into a hydrogen society.



## Supply chain

In 2024, Hyundai Rotem engaged with 1,701 suppliers from 30 different countries (1,368 domestic suppliers and 333 international suppliers). The following is an operational and geographical breakdown of Hyundai Rotem’s supply chain and sourcing across all three of Hyundai Rotem’s business divisions.

### Operational breakdown of the supply chain across all three business divisions

#### Rail Solutions Division

- Purchase of vehicle body parts, design components, and electrical parts
- External manufacturing and E&M (Electrical & Mechanical) system procurement

#### Defense Solutions Division

- Procurement of defense-related parts and components

#### ECO Plant Business Division

- Purchase of plant equipment and parts
- Production and construction-related procurement

#### Cross-Divisional Supply Chain Operations

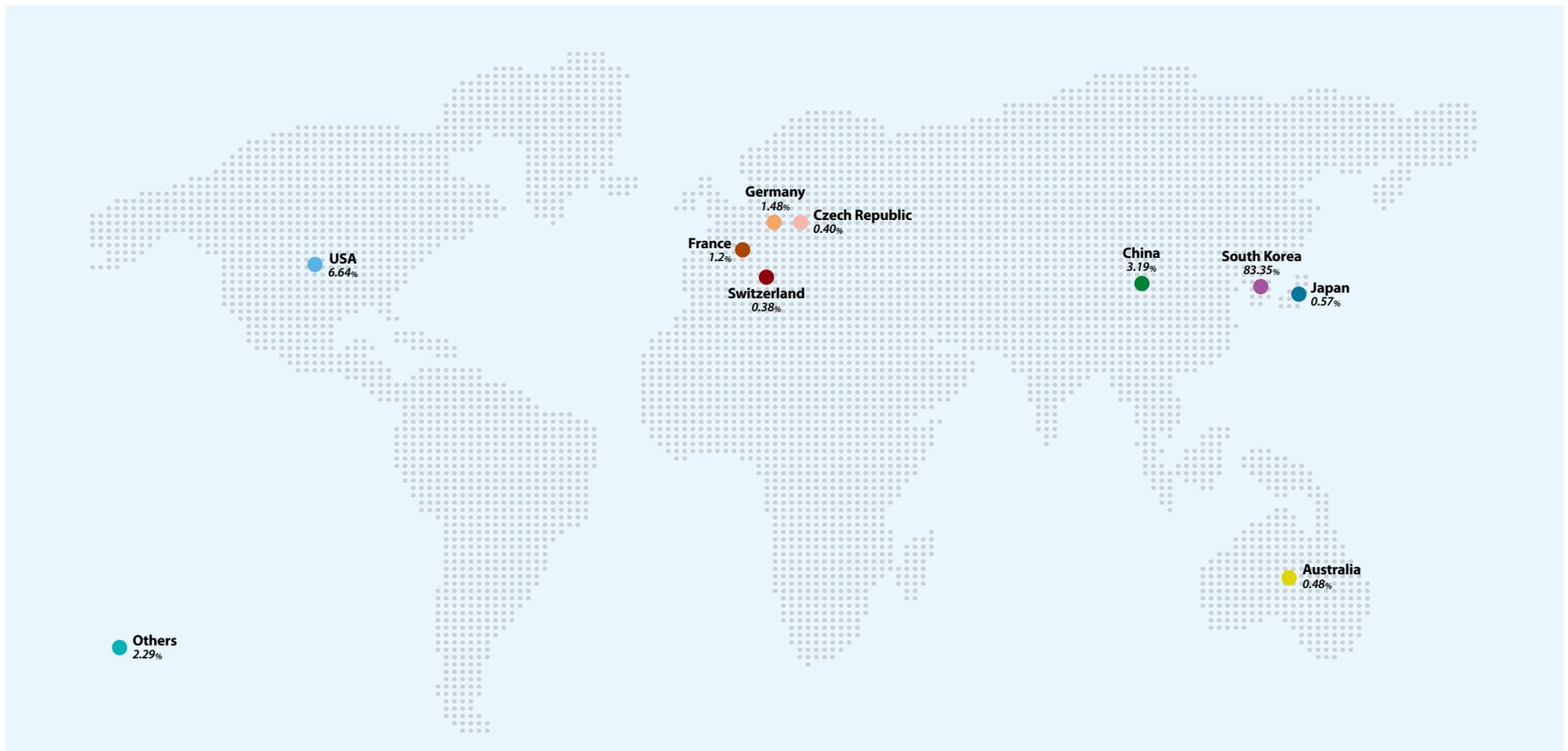
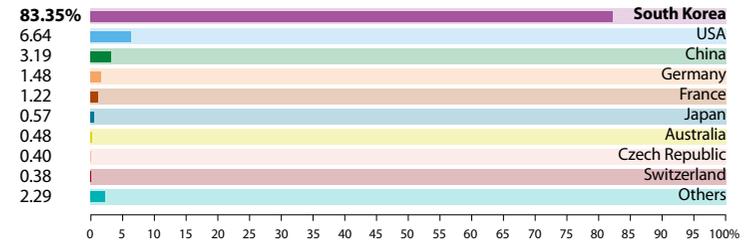
- Global sourcing and procurement of raw materials
- Import/export operations, including customs clearance, transportation, and packaging
- Design services, outsourcing, facility materials, and in-house construction



### Geographical breakdown of suppliers across all three business segments

97.71% of the spend was with suppliers operating within the 9 countries below.

As indicated above, the majority of Hyundai Rotem's suppliers are based in South Korea.





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## Risks of modern slavery in our operations and supply chain

As our workforce consists primarily of professionally qualified and skilled employees, we consider the risk of modern slavery within our direct operations to be very low. However, given that our procurement activities span a wide range of industries and countries, we recognize that modern slavery risks may still be present, either directly or indirectly, through our supply chains. Specifically, we consider that lower-skilled workers within these supply chains may face a higher risk of exploitation, including low pay, excessive working hours, and challenges in fully exercising their labour rights.

To address this, we are committed to enhancing our due diligence processes to better detect, assess, and understand the scope and impact of these risks. We plan to strengthen and expand the evaluation criteria used to assess suppliers, continuing to incorporate themes relevant to modern slavery. Additionally, we aim to develop a more comprehensive supply chain risk mapping that reflects the geographic locations, as well as the nature of the products and services we source.

We will continue collaborating with our suppliers to identify potential instances of modern slavery and to support the implementation of effective preventive or remediation measures where necessary.





# Actions taken to assess and address identified risks, including due diligence and remediation processes

## Policies

In firm belief that ethical management is the keystone to being a global company that contributes to sustainable development, Hyundai Rotem implemented its Ethics Charter and its Supplier Code of Conduct, so as to apply to both Hyundai Rotem as well as its affiliates, including production and sales corporate bodies in Korea and abroad, subsidiaries, second-tier subsidiaries and joint ventures.

Hyundai Rotem’s **Ethics Charter** (<https://www.hyundai-rotem.co.kr/en/sustainability/ethics/standard/content.do>) sets out the values and conduct standards expected from our executives and employees, affiliates, subsidiaries, joint ventures in South Korea and abroad. This encompasses the obligation to conduct operations in accordance with internationally recognized standards. The Ethics Charter also provides guidance on accessing our reporting channel, Cyber Journal (online reporting channel). It is accompanied by our **Code of Ethics** (<https://www.hyundai-rotem.co.kr/en/sustainability/ethics/guidelines/content.do>), which provides detailed guidelines relating to the principles for our employees. The topics addressed by The Ethics Charter include the following:

- Human Rights
- Child Labour and Forced Labour
- Discrimination
- Equal Opportunity
- Workplace Harassment/Bullying
- Safety and Health
- Work-Family Balance
- Stakeholder Engagement
- Governance and Reporting
- Monitoring and Due Diligence

- Internal Control
- Whistleblower Protection

As part of its commitment to establishing a sustainable supply chain, Hyundai Rotem’s **Supplier Code of Conduct** (<https://www.hyundai-rotem.co.kr/en/sustainability/together/partner-roles/content.do>) requires suppliers to comply with applicable regulations on corporate management and implement best practices in the areas of ethics, environment, labour, human rights, safety, health and management systems. The Supplier Code of Conduct is based on Drive Sustainability’s Global Automotive Sustainability Practical Guidance and refers to the Responsible Business Alliance’s Code of Conduct. It also takes into account recent global legislative trends addressing human rights and environmental issues in supply chain management, such as the EU Corporate Sustainability Due Diligence Directive, as well as other relevant laws and regulations related to corporate sustainability. The fourth section of the Supplier Code of Conduct outlines our policy and guidelines on managing key labour and human rights issues, including: A. Prohibition of Child Labour, B. Prohibition of Forced Labour, C. Non-Discrimination and No Harassment, D. Wages and Benefits, E. Working Hours, F. Humane Treatment, G. Freedom of Association, H. Ethical Recruitment.

In 2024, to align with changes in the regulatory landscape and to ensure adherence to company standards, Hyundai Rotem updated its standard commercial terms for domestic suppliers. The updated terms explicitly prohibits the use of forced labour under any circumstances, requires compliance with all relevant laws and regulations related to human rights, and mandates adherence to Hyundai Rotem’s Supplier Code of Conduct. It further enables us to request prompt remediation and conduct audits in the event of non-compliance. The updated terms have been integrated into our contracts system and is being applied to all domestic suppliers.



Hyundai Rotem's **Charter for Human Rights** (<https://www.hyundai-rotem.co.kr/en/sustainability/human-rights/content.do>) builds upon the UN's Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the International Labor Organization conventions, the OECD Due Diligence Guidance for Responsible Business Conduct, the OECD Guidelines for Multinational Enterprise, the National Human Rights Commission of Korea's Manual of Human Rights Management for Public Institutions, and its Checklist for Human Rights Impact Assessment Operated by Institutions (Corporate Enterprises) and the Korean Ministry of Justice's Guideline for Human Rights Management Standards for Corporate Enterprises. The Charter for Human Rights outlines matters such as basic principles, governance and operation of the human rights risk management system as well as education and awareness-raising efforts.

In addition to the above, Hyundai Rotem has established a **Diversity & Inclusion (D&I) Policy** (<https://www.hyundai-rotem.co.kr/en/sustainability/vision/policy/view.do?seq=1983&pageIndex=1&searchInput=>) to promote an inclusive workplace culture where individuals of all backgrounds can thrive. The policy reaffirms the company's commitment to equality and non-discrimination, ensuring fair treatment regardless of gender, race, nationality and cultural background, religion, age, disability, or any other status protected by law. It supports a work environment that values diverse perspectives and fosters innovation through mutual respect and equal opportunity. Hyundai Rotem seeks to support a respectful and equitable workplace while reinforcing its responsibility to uphold human dignity across its global operations and value chain.

## Training

Hyundai Rotem considers training a vital component of risk management and adopts a multi-tiered approach to ensure its effectiveness. Our procurement staff receive specialized

training to stay on top of corporate sustainability regulations and legislation relevant to our operations, with a particular emphasis on supply chain due diligence requirements across various jurisdictions.

At the foundational level, we ensure all employees understand their legal, regulatory, and compliance obligations. This includes mandatory human rights education—covering topics such as the prevention of sexual harassment and workplace abuse—in line with legal standards.

Beyond this foundation, we provide targeted training sessions tailored to regulatory updates and our business priorities. These sessions are refreshed annually to remain relevant.

In 2024, we prioritized equipping our procurement staff with the skills to implement an evolving due diligence framework. With the expansion of on-site audits, we trained our procurement staff ahead of written assessments and audits. This training addressed ESG regulatory trends (domestic and international), methods for evaluating and managing ESG in the supply chain, and industry-specific case studies.

This training was delivered to senior managers and managers in the Procurement Division.

## Supplier engagement

To cultivate a shared understanding of supply chain due diligence, Hyundai Rotem offers suppliers training that details regulatory requirements and addresses sustainability issues comprehensively. This prepares suppliers to respond accurately and effectively to our written evaluations and related requests. Furthermore, following the annual due diligence process, we hold feedback sessions to review findings and establish clear expectations for the future based on the outcomes.

By continually refreshing the training module and aligning it with regulatory and operational developments, Hyundai Rotem ensures that both our staff and suppliers are well-prepared to meet evolving standards.

## Due diligence

Hyundai Rotem conducts an annual Human Rights Impact Assessment to assess and address human rights risks within our operations. This assessment is grounded in the core principles outlined in Hyundai Rotem's Charter for Human Rights and encompasses employees across all functions and levels. Conducted through an online survey, the assessment is designed to capture employees' perceptions of our human rights management practices and identify any potential risks. The findings inform our evaluation of the human rights management system's effectiveness and guide the development of targeted improvement measures.

In regard to our supply chain, Hyundai Rotem works to reduce supply chain risks by collaborating with suppliers across various stages of our business relationships, enabling us to address both ongoing and anticipated risks:

## Internal evaluation

Hyundai Rotem screens suppliers both prior to engagement and throughout the course of transactions. While these processes are not specifically designed to address modern slavery, they enable us to assess suppliers' ability to meet our requirements, identify any irregularities, and evaluate their reliability. Hyundai Rotem's Procurement, EHS, and Quality Management teams conduct supplier assessments through a combination of documentation reviews (annually) and site visits (as needed). Based on the evaluation results, suppliers undergo classification, with top performers receiving advantages such as priority in



procurement rights or exemption from providing contract performance security. After completing the yearly supply chain ESG due diligence, we honour the top-performing supplier in cooperation and improvement with the 'Best Supplier' designation. Conversely, suppliers with lower performance may encounter repercussions such as reduced bidding opportunities or potential removal from Hyundai Rotem's supplier registry.

### Third-party sustainability audits

For an in-depth analysis and management of sustainability risks, including modern slavery, within our supply chain, we engage a third-party consulting firm to assess the sustainability performance of our suppliers. Our assessment process, which includes both written evaluations and on-site audits, is conducted annually and focuses on our key trading partners. In 2024, a total of 186 companies were evaluated, and 52 companies were audited on-site.

Initially, suppliers undergo a written evaluation, which reviews their policies, actions, and any instances of non-compliance with the principles outlined in our Supplier Code of Conduct and relevant international standards and guidelines. Our questionnaire incorporates global ESG initiatives, industry-specific issues, and covers four key categories: environment, business ethics, labour/human rights, and health and safety.

Following the written evaluations, on-site audits are conducted for selected suppliers. The selection criteria include written evaluation scores, media screening results, and any history of legal violations.

During the on-site audits, a team of third-party sustainability experts and Hyundai Rotem's procurement and sustainability staff visit the supplier's facilities. The audit process involves document reviews, facility inspections, and issue identification. Additionally, Hyundai Rotem provides suppliers with detailed

guidance on improving sustainability practices. To ensure the presence of all relevant personnel, including those responsible for human rights management, suppliers are notified of the audits in advance.

### Reporting

Hyundai Rotem recognizes that reliable reporting channels is key to identifying, investigating, addressing potential misconduct. To facilitate this, we provide a range of publicly available reporting options that foster transparent and open engagement with all stakeholders.

One such channel is the Cyber Journal whistle-blowing hotline (<https://ethics.rotem.co.kr/en/cyber/report.asp>), an online platform where individuals can report irregularities, misconduct, legal violations, or breaches of business conduct guidelines. This channel is available 24/7 via online and telephone and is open to all stakeholders. The Cyber Journal guarantees anonymity and confidentiality for all users. Reports are typically processed within one to two weeks, and users can track the progress of their submissions.

In addition, we offer a dedicated reporting channel for human rights violations on **our website** (<https://www.hyundai-rotem.co.kr/ko/sustainability/human-rights/content.do>). To address supplier concerns, we hold annual supplier representative seminars, along with regional subgroup meetings, where suppliers can make suggestions or report any misconduct.

### Investigations

Hyundai Rotem is committed to conducting internal investigations based on clear, enforceable criteria to maintain consistency and fairness. Hyundai Rotem's Reporting Protocols include safeguards such as exemption from responsibility, the

prevention of retaliation, and the protection of whistleblowers. The Reporting Protocols and the Charter for Human Rights mandate that executives and employees across all entities not disclose personally identifiable information that could reveal the identity of the reporter. They are also required to protect employees from any adverse consequences arising from reporting human rights violations. We regularly review the frequency of grievances reported and resolved, and disclose the results in our Sustainability Report.

Should issues such as child labour or forced labour be reported, Hyundai Rotem policy is to search for the appropriate remedial solutions based on court precedent, regulations of the competent authority, and past internal and external industry practices. In cases of serious infringement of human rights that require higher level decisions, committee or upper management-meetings (in which the CEO is present) may be opened in order to properly address the grievances.

### Next steps

Hyundai Rotem employs a continuous improvement strategy to effectively address the complexities of modern slavery risks. As global regulations on the prevention of modern slavery continue to strengthen, Hyundai Rotem plans to expand the scope of audits conducted at business sites and suppliers overseas. One of our key objectives for the coming year is to enhance monitoring of our overseas business sites, as these locations tend to be smaller in size and operate under varying legal frameworks. This requires us to maintain a working understanding of local laws and regulations, as well as remain agile in keeping up with any changes. Given that each country's legal landscape differs, we seek to continuously enhance our understanding of these jurisdictional differences and improve our management system accordingly.



# Assessing the effectiveness of the actions taken

## Internal evaluations

Hyundai Rotem’s ESG Taskforce oversees the effectiveness of the company’s human rights management system through Key Performance Indicators (KPIs). The Taskforce is composed of designated departments and staff responsible for each sustainability area, including human rights management and supply chain due diligence. Each year, the Sustainability Team, along with representatives from each department, reviews the management of sustainability issues and establishes KPIs. The Taskforce regularly reviews risk management procedures and monitors the implementation of improvement measures. The performance of these departments is directly reflected in the evaluation of the senior management of each business division, and the results are reported annually to the CEO.

Every year, Hyundai Rotem conducts a human rights impact assessment to ensure the absence of any incident regarding forced labour and child labour. The assessment is structured around the fundamental principles in the Company’s Human Rights Charter. We monitor the percentage of negative responses to evaluate the effectiveness of our management in each area, using the results to develop action plans for continuous improvement.

For our supply chain due diligence, we adopt a similar approach, identifying improvement areas from written assessments and on-site visits, setting targets, and regularly monitoring their implementation.

## External evaluations

The third-party expert consulting firm we engage for supply chain due diligence conducts media screening and on-site inspections to identify any controversies related to sustainability issues, including modern slavery, and other legal breaches, including violations of business ethics and workplace health and safety standards.

In 2024, our due diligence procedures and risk detection tools identified no instances of modern slavery within our operations or supply chain. Consequently, we have not observed any cases of income loss among vulnerable families linked to our initiatives to eradicate forced labour and child labour.

Nevertheless, Hyundai Rotem recognizes the importance of adopting a holistic approach to improve our business practices in ways that address the root causes of forced labour and child labour, such as poverty. To this end, we have established and continue to operate local community CSR programs. These initiatives include supporting low-income communities, covering medical expenses for low-income families, and providing capacity-building training for individuals with developmental disabilities. As part of our global outreach efforts, in 2024, we supported the development of Syrian refugee children in Egypt, specifically in the Borg El Arab and Montaza areas, by providing psychosocial support (PSS) and improving the educational environment.



## Process of consultation

All entities which Hyundai Rotem owns or controls (as identified in section B of this statement) ultimately report to the head office of Hyundai Rotem in Korea, where the Corporate Planning Group, Management Support Division and the Procurement Division are based.

In relation to the Charter for Human Rights and the Ethics Charter, the entities report to the Management Support Division, in the head office of Hyundai Rotem in Korea. In relation to the

Supplier Code of Conduct, the entities report to the Procurement Division based in the head office of Hyundai Rotem in Korea.

Ultimately, both the Management Support Division and the Procurement Division report to the Corporate Planning Group, which is in charge of sustainable development and corporate social responsibility planning and directly reports to the Chief Executive Officer (CEO) of Hyundai Rotem.

## Other relevant information

### External recognition by independent third parties

Hyundai Rotem undergoes an annual evaluation by the Korea Institute of Corporate Governance and Sustainability (KCGS), one of South Korea’s leading ESG assessment organizations. KCGS evaluates companies listed on the KOSPI market, South Korea’s primary stock exchange for publicly traded firms. In 2024, Hyundai Rotem achieved an A+ rating, placing it among the top 2.5% of the 794 companies assessed. The KCGS rating system spans seven tiers: S, A+, A, B+, B, C, and D. In 2024, A+ was the highest rating awarded, with the S rank remaining unattained.

Aligned with international standards, the assessment evaluates a company’s ESG governance effectiveness, risk management practices, overall performance, and transparency in engaging with stakeholders on sustainability issues.

Additionally, in 2024, Hyundai Rotem received an AA (Excellent) rating for its Compliance Program (CP) from the Korea Fair Trade Commission (KFTC), South Korea’s regulatory authority for economic competition. This evaluation measures the effectiveness of a company’s compliance practices, particularly in promoting fair trade between businesses and suppliers. The AA rating highlights Hyundai Rotem’s commitment to fostering cooperative and ethical relationships with its suppliers. The CP assessment examines leadership commitment to fair trade, the strength of a company’s compliance program, and its robustness (including training, monitoring, and enforcement).

### Health and Family-Friendly Company Certification

Hyundai Rotem is certified as a “Health-Friendly Company” by the Ministry of Health and Welfare of the Republic of Korea, a recognition first earned in 2023, and continues to hold the “Family-Friendly Company” certification from the Ministry of Gender Equality and Family, reaffirmed in 2022 after its initial award in 2014.

The Health-Friendly Company certification highlights our efforts to foster a health-conscious workplace culture and environment, in line with the National Health Promotion Act. This distinction is awarded based on evaluations across four key areas—health-focused management, culture, activities, and employee satisfaction—alongside assessments of compliance with the Labour Standards Act, Occupational Safety and Health Act, and ethical management standards.

Beyond this, Hyundai Rotem remains recognized as a Family-Friendly Company, reflecting our ongoing dedication to creating a supportive corporate environment that promotes work-life balance and diversity. This certification, maintained since 2014, evaluates adherence to laws such as the Labour Standards Act, Equal Employment Opportunity and Work-Family Balance Assistance Act, and Gender Equality Act, underscoring our commitment to these principles.

Hyundai Rotem continues to prioritize employee well-being, labour rights, and human rights in the workplace, upholding robust management systems to sustain a healthy and inclusive organizational culture.



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## Approval and attestation

This statement was approved by Hyundai Rotem Company's Board of Directors on 14 May 2025.

I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects.

I am providing this attestation in my capacity as the CEO of Hyundai Rotem Company, with the authority to bind Hyundai Rotem Company.

**Lee, Yong-Bae**

CEO and Chair of the Board of Directors  
14 May 2025  
Hyundai Rotem Company



## Appendix - How we have addressed reporting criteria

The table below outlines where in this Statement we have addressed the mandatory reporting requirements of the Australian Modern Slavery Act, Canada's Fighting against Forced Labour and Child Labour in Supply Chains Act, and the California Transparency in Supply Chains Act.

(Note: Hyundai Rotem Company and its U.S.-based subsidiary, Hyundai Rotem USA, are not currently subject to mandatory

reporting under the California Transparency in Supply Chains Act, but have chosen to provide voluntary disclosure in line with responsible business practices. This Statement applies to both entities, which operate under aligned internal systems and supply chain practices, and are held to the same standards under the direct oversight of Hyundai Rotem Company.)

Hyundai Rotem Company Statement	Disclosure Requirements		
	 <b>Modern Slavery Act 2018</b>	 <b>Fighting against Forced Labour and Child Labour in Supply Chains Act</b>	 <b>California Transparency in Supply Chains Act</b>
A. Reporting Entity (p. 1)	• Reporting entity covered by the statement	-	-
B. Our Structure, Operations, and Supply Chain (p. 1-3)	• Entity's structure, operations and supply chains	• Reporting entity's structure, activities and supply chains	-
C. Risks of Modern Slavery in Our Operations and Supply Chain (p. 4)	• Risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	• Parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk	-
D. Actions Taken to Assess and Address Identified Risks, Including Due Diligence and Remediation Processes(p. 4-8)  - Policies: p. 4-5 - Supplier certification: p. 5 (Code of Conduct) - Training: p. 5-6 - Risk assessment and verification: p. 6 - Audits: p. 6-7 - Remediation: p. 7 (Reporting and Investigations) - Remediation of loss of income to vulnerable families: p. 8	• Actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	• Policies and due diligence processes in relation to forced labour and child labour  • Any measures taken to remediate any forced labour or child labour  • Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains  • The training provided to employees on forced labour and child labour	• The extent to which the company engages in verification of product supply chains to evaluate and address risks of human trafficking and slavery  • The extent to which the company conducts audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains  • The extent to which the company requires direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business  • The extent to which the company provides employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products
E. Assessing the Effectiveness of the Actions Taken (p. 8)	• How the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	• How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains	• The extent to which the company maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking
F. Process of Consultation (p. 8-9)	• Process of consultation with any entities the reporting entity owns or controls	-	-
G. Other Relevant Information(p. 9)	• Any other relevant information	-	-

