Compliance and Business Ethics Policy

1. Purpose

HD Hyundai Oilbank (hereinafter referred to as the "Company") aims to be a respected company that contributes to its customers, shareholders, the nation, and society, grounded in the core values of "Innovation leading the world, Fearless challenges, Respect for each other, Safety for all." In addition, the Company establishes this Policy to foster sustainable management as part of its performance of social responsibilities and role.

2. Scope

This Policy applies to the Company, its affiliates, officers, employees, suppliers, and their employees (hereinafter referred to as "all stakeholders"). While the Company practices compliance and business ethics based on this Policy, it shall give precedence to the applicable local laws and regulations of relevant jurisdictions.

3. Basic Principles

The Company and all stakeholders shall comply with social norms and order, striving for the sustainable development of the Company through transparency and fairness in all management activities.

1. The Company and all stakeholders shall adhere to domestic and international laws, as well as the Company's regulations and guidelines, ensuring that all decisions are based on laws and principles and possess moral legitimacy.
2. The Company and all stakeholders shall fulfill their social responsibilities and obligations as members of the local community and contribute to the advancement of the nation and humanity.
3. The Company and all stakeholders shall not engage in illegal or unfair transactions in order to establish fair competition and an impartial trading order.

4. The Company and all stakeholders shall ensure transparency and fairness in transactions between the Company and its suppliers, building mutual trust.
5. The Company and all stakeholders shall examine and reinforce internal control and management systems to ensure the systematic implementation of compliance and business ethics.
6. The Company and all stakeholders shall actively participate in related inspections, education, and training provided by the Company to understand and practice the importance of compliance and business ethics.
7. The Company and all stakeholders shall report any illegal, unfair, or corrupt activities through the whistleblowing system upon discovery, and the Company shall implement thorough measures to protect whistleblowers.

4. Specific Principles by Area

(Corruption)

The Company shall base its strategic management decisions on compliance with anti-corruption laws and shall establish and maintain an anti-corruption management system to ensure transparency and integrity in its management activities and business performance. The Company shall identify and assess potential corruption risks and evaluate the appropriateness and effectiveness of control measures to mitigate these risks. The Company shall set goals in line with the purpose of implementing the anti-corruption management system and continuously develop and promote related activities.

(Integrity in Job Performance and Prevention of Bribery)

All stakeholders shall not seek any form of economic or non-economic benefit from other stakeholders, such as suppliers, by abusing their superior position. Additionally, the Company shall not offer economic benefits, such as money or valuables, to domestic or foreign public officials, current or future business partners, or others for the purpose of obtaining personal or business-related illicit benefits.

(Anti-Monopoly and Fair Trade)

The Company and all stakeholders shall comply with fair trade laws when conducting business related to the Company. Furthermore, the Company and all stakeholders shall not direct, approve, condone, assist, or participate in violations of relevant laws and regulations. Officers and employees of the Company are strictly prohibited from any actions that restrict competition, such as monopolization and collusion, and shall comply with laws and regulations related to fair trade as well as the Company's fair trade regulations and guidelines. The Company shall organize and operate a voluntary fair trade compliance program and conduct educational and inspection activities related to compliance.

(Prevention of Conflicts of Interest)
The Company and all stakeholders shall take steps to prevent conflicts of interest, and the Company's officers and employees shall report any conflicts of interest in any transaction through the 'Conflict of Interest Reporting System.' Furthermore, the Company and all stakeholders shall immediately report to the relevant department if a conflict of interest with the Company has occurred or is likely to occur in relation to their duties. The Company shall establish and maintain a monitoring system to prevent conflicts of interest.

(Legitimate Use of Company Assets and Prevention of Money Laundering)
The Company's tangible assets and intangible assets, such as information, technology, and know-how, shall be used solely for approved business purposes, and its officers and employees shall be held accountable for any misappropriation or unauthorized disclosure of such assets. Company funds shall not be used for personal purposes and shall be expended only for official business activities. Officers and employees shall prevent the diversion of funds for money laundering or other illicit activities at the Company's business sites and in its operating regions. The accounting department shall report any transactions suspected of violating anti-corruption laws, regulations, or the Anti-Corruption Act Compliance Guidelines to the responsible department and take appropriate actions as instructed.

(Prevention of Fraudulent Acts)
The Company applies a zero-tolerance policy to any fraudulent acts committed by its officers and employees. Fraud includes, but is not limited to, theft, misuse of funds or other resources, bribery and corruption, false accounting, and the provision of false information. Forgery of signatures or documents is strictly prohibited, and the actual use of resources or documentation shall correspond accurately with the supporting evidence.

5. Governance

The Company's compliance, ethics, and fair trade departments shall carry out relevant activities to enforce this Policy and to achieve the stated goals. The Company shall appoint a Compliance Officer, an Anti-Corruption Officer, and a Fair Trade Compliance Officer. These officers, as delegated by the Board of Directors or the Chief Executive Officer, shall bear overall responsibility for the operation and management of the compliance and business ethics management system.

(Last Updated: April 2025)