

GENESIS MOTOR EUROPE CODE OF CONDUCT

THE GME CODE OF CONDUCT

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MESSAGE FROM THE MANAGING DIRECTOR

At Genesis, we are at the starting point of an audacious journey, the journey towards a sustainable future. With today's drivers making more responsible choices towards a better future, Genesis is taking firm steps forward to create a more sustainable future for driving. We have been focused on bringing positive changes to customers' lives. We consider our customers to be our guests, which comes from the Korean principle of son-nim 손님.

The Genesis Motor Europe Team and I are strongly committed to protect the customer trust put in our brand and business. We do business with integrity, lawfully and responsibly. The GME Code of Conduct ("the GME Code") presents our values, working principles and expectations from all who work for us and work with us.

The GME Code is designed to provide guidance and to help you make the right decisions each and every day, which we know that may sometimes be challenging. However, it's the only way, we protect our reputation, business and ultimately each other.

We all need to understand the principles and follow them in everything we do in connection to GME business. If you cannot find an answer to your questions in the GME Code, ask for guidance. You can contact your Manager, HR or your Compliance Team. We encourage everyone to speak up, ask questions and raise concerns honestly and confidently.

Thank you for your support and commitment.



Lawrence Hamilton
Managing Director
Genesis Motor Europe GmbH



02. GME INTEGRITY PRINCIPLES



2. GME INTEGRITY PRINCIPLES

GME identifies five integrity principles as part of our business ethics that shape our corporate culture.

B

BOLDNESS

We are brave. We are open for challenges.
We are proud of doing the right thing.
We are brave enough to speak up, if anything is wrong.

I

INTEGRITY

We live by integrity: uncompromising and consistent adherence to ethical values and principles of GME.

R

RESPONSIBILITY

We take responsibility for our actions. We acknowledge that we are accountable for the results of our decisions.

T

TRUST

We protect the trust put in our business and our team. Trust is fragile. We know that we should build and maintain it with consistency each and every day.

H

HARMONY

We love differences and diversity. We listen to and respect each other. Harmony makes us ONE TEAM.

A close-up photograph of a person's hand, adorned with three thin silver rings, resting on a dark red leather car center console. The hand is positioned over a silver, textured rotary knob. To the right of this knob is a silver push-button with a white top. The background is softly blurred, showing the interior of a car with light-colored fabric seats.

03. THE GME CODE

3. THE GME CODE

How we work as a team and how we do business matter. The GME Code illustrates our working principles and gives us guidance on how to act at workplace, online and in interactions with third parties.

The GME Code:

- Brings together the GME integrity principles and internal regulations.
- Sets out our expectations.
- Aims to help all team members in making the right decisions.
- Is an integral part of GME Integrity & Compliance Program, which frames our compliance efforts to ensure adherence to laws and regulations.

WE ALL ADHERE TO THE GME CODE

“We” or “us” in the GME Code mean Genesis Motor Europe, its subsidiaries (“GME Entities”), our directors, managers and team members.

The GME Code applies to all directors, managers and team members of GME and GME entities.

We request that our Business Partners abide by our GME Code of Conduct for Business Partners and apply their own standards to be compliant with the laws and to meet our expectations.

WE ALL TAKE PERSONAL RESPONSIBILITY

- We read, understand and follow the GME Code.
- We conduct business in accordance with the standards set out in the GME Code, GME policies and guidelines.
- We seek guidance and support, if we are unsure about the most appropriate course of action to take:

Contact point: [Your Compliance Team](#)

Email: compliance@eu.genesis.com

- We report actual or potential violations of law, GME Code or any other internal or external regulations. Please see the last chapter for more information on our Whistleblower Protection Policy and for the multiple channels to report violations or raise concerns.
- We acknowledge that the violations of the GME Code will be subject to disciplinary actions up to termination.

LEADERS AT GME HAVE PARTICULAR RESPONSIBILITIES

Senior Management leads the way with integrity:

- Sets an open and honest company culture, where everyone feels safe to speak up, without fear of retaliation.
- Takes proper action in case of misconduct.

Managers:

- Lead by example.
- Are mindful of compliance risks within their area of responsibility.
- Raise awareness and ensure compliance within their teams.

HOW TO USE THE GME CODE?

The Code is split into several chapters including a Glossary as the final chapter. Each section includes OUR POLICY related to the relevant topic, indicates OUR EXPECTATION, points out INFORMATION RESOURCES and contact point to provide SUPPORT.

HOW TO MAKE A DECISION IN SITUATIONS WHICH ARE NOT SET FORTH IN THIS CODE?

The GME Code handles miscellaneous topics. However, you can always face situations where we do not have an explicit regulation set out in this Code.

Ask yourself the following questions before taking action:

- Is it honest, legal and ethical?
- Is it in line with GME principles set out in the GME Code?
- Does it feel “right”?
- If asked for explanation, can I stand for it and justify it?

If the answer to any of these questions is “No”, please ask for guidance.

NEED ADVICE?

If you have any question or concern, you can contact your Compliance Team.



04. WE ARE COMMITTED TO BEING
A GREAT PLACE TO WORK

4. WE ARE COMMITTED TO BEING A GREAT PLACE TO WORK

We want to create and maintain a workplace where team members can carry out their activities in a respectful and inclusive environment. We do not tolerate disrespectful behaviour that could have a negative impact on the well-being and individual performance of our team members.

4.1 CULTURE OF DIVERSITY AND INCLUSION

OUR POLICY

We appreciate differences and we embrace diversity.

We promote an inclusive working environment where everyone can bring their whole selves to work. Our leaders are responsible for creating and maintaining a culture of tolerance, impartiality and openness.

We do not tolerate any form of violence, harassment, discrimination, bullying and any other offensive conduct, whether sexual, physical, verbal or psychological.

OUR EXPECTATION

- Be mindful of differences and sensitivities.
- Never use offensive or disrespectful language or visuals in internal or external communications.
- Avoid humiliating, offensive, intimidating behaviours towards other team members or Third Parties, noting that such behaviours may lead to sanctions imposed not only to GME but also to team members, in accordance to applicable local laws.
- Report if you witness any form of harassment or retaliation.

4.2. EQUAL TREATMENT AND OPPORTUNITY

We fairly provide equal opportunities to all team members exclusively based on skills, performance and potential.

We do not discriminate for reasons of ethnical background, nationality, social class, age, gender, gender reassignment, marital status, pregnancy, sexual orientation, ideology, public opinion, religion or any other condition.

OUR EXPECTATION

- Ensure providing equal treatment and opportunities from hiring to the end of employment relationship to all team members.

NEED ADVICE?

If you have any question or concern related to this topic, you can contact your Compliance Team.



05. WE DO BUSINESS
WITH INTEGRITY

5.1 ANTI-BRIBERY AND CORRUPTION

OUR POLICY

Our success comes from our desirable and sophisticated products and unique services. We do not “buy” any business or enjoy favourable treatment.

We prohibit bribery and corruption in all its forms. We do not offer, promise or provide any financial benefit or other advantage to another person to improperly influence business decisions. We do not accept the same.

We also do not permit others to provide them on our behalf.

OUR EXPECTATION

- Work with Business Partners who share our commitment.
- Take particular care when dealing with public officials and authorities.
- Do not make facilitation payments (small payments or favours provided to public officials to expedite a routine administrative procedure).
- Do not be a part of bribery or corruption through practices such as gifts, invitations, sponsorships, donations or preferential treatment.
- Do not ignore the signs of corrupt behaviour.
- Document business expenses accurately and transparently.
- Inform your Compliance Team immediately if you receive a request for a kickback, facilitation payment or any other inappropriate offer.

NEED MORE INFORMATION?

For further information please see GME Business Ethics and Anti-Corruption Policy.

NEED ADVICE?

If you have any question or concern related to this topic, you can contact your Compliance Team.

5.2 GIFTS AND ENTERTAINMENT

OUR POLICY

Providing or accepting gifts, hospitality and entertainment can be misused and misinterpreted, and can also create a conflict of interest in case of exchanges with Business Partners.

We do not offer, promise, give, or receive gifts, hospitality or entertainment for improper purposes, for instance to gain improper advantage, to exert influence on Third Parties, for preferential treatment.

OUR EXPECTATION

- Do not give or accept improper gifts, hospitality or entertainment which may result in a bribe or in a corrupt practice.
- Provide or accept gifts, hospitality and entertainment which are consistent with the GME Business Ethics and Anticorruption Policy.
- While providing or accepting gifts, hospitality and entertainment, ensure that these are disclosed and documented transparently and accurately.
- If you are unsure whether any gifts, hospitality and entertainment is appropriate or not, contact your Compliance Team.

NEED MORE INFORMATION?

For further information, please see GME Business Ethics and Anticorruption Policy; Conflict of Interest Policy.

NEED ADVICE?

If you have any question related to this topic, you can contact your Compliance Team.

5.3 CONFLICTS OF INTEREST

OUR POLICY

We must act in the best interest of GME and avoid conflicts of interest including the appearance thereof. This means avoiding any activities, relationships, or other circumstances that interfere with our status, duties and position as team members of GME.

Appearance of conflict of interest refers to situations where a team member's impartiality can be questioned, especially in cases when a reasonable person may have the impression that a team member would show favour toward someone. Disclosure of potential conflict of interest and seeking the proper approval may prevent it from becoming a conflict of interest.

OUR EXPECTATION

- Be open and transparent: Disclose any personal relationship or activity which may interfere with GME business or bring your loyalty or work performance in question – for instance recruitment decisions including family or friends, having a financial interest in any company which is a competitor, outside business or employment.
- Do not use any information or opportunities for personal gain, from which you become aware of due to your position at GME – for instance taking advantage of business opportunities that would otherwise fall to GME.

- Disclose and seek approval where you or a family member can benefit from a GME business decision – for instance GME buying products, properties, services from a company where you or a family member hold interests.
- Do not get involved in decisions which cast doubt on your objectiveness – for instance procurement decisions relating to Business Partners in which your family or friends hold an interest or recruitment decisions related to family or friends.
- Do not give or accept gifts, hospitality or entertainment to/from Business Partners that are not consistent with our GME Business Ethics and Anti-corruption Policy.

NEED MORE INFORMATION?

For further information, please see GME Conflict of Interest Policy.

NEED ADVICE?

If you have any question related to this topic, you can contact your Compliance Team.

5.4 RESPECT OF COMPETITION LAWS

OUR POLICY

We believe in fair and free competition and conduct business in compliance with competition and antitrust laws.

We do not enter into any agreements with competitors which result in a cartel by fixing prices, dividing target markets or customers, collusive tendering or limiting supply.

We do not share commercially sensitive information directly or indirectly (through a third party such as consultants or trade associations), such as prices, costs, tenders, customers, markets, suppliers or business plans and strategies.

We respect our competitor's confidential information and obtain competitive information only through legal and ethical means.

OUR EXPECTATION

- Do not share commercially sensitive information.
- Do not enter into conversations on sensitive topics with competitors and leave meetings or events immediately in case of such discussions.
- Contact your Compliance Team:
 - Immediately in case you inadvertently come in possession of a competitor's confidential information.
 - Prior to meeting with competitors at trade association meetings or industry events.

NEED MORE INFORMATION?

For further information, please see GME Antitrust and Fair Competition Policy.

NEED ADVICE?

If you have any question related to this topic, you can contact your Compliance Team.

5.5 PROHIBITION OF MONEY LAUNDERING AND TERRORIST FINANCING

OUR POLICY

GME supports the fight against financial crime in all its forms and is committed to compliance with all relevant laws. This includes a commitment to conduct business in a manner that is designed to prevent Money Laundering and Terrorist Financing, and to refrain from activities that could potentially facilitate Money Laundering and Terrorist Financing.

OUR EXPECTATION

Immediately contact your Compliance Team in case of suspicious activities of customers, Business Partners and other third parties:

- Orders or purchases that are not consistent with customer's or Business Partner's usual business.
- Requests for cash payments or unusual payment terms.
- Requests to make payments to or accept payments from third parties.
- Requests for making a payment on an account located in a country different to the one where the business partner is located.

NEED MORE INFORMATION?

For further information, please see GME Anti-Money Laundering Policy.

NEED ADVICE?

If you have any question related to this topic, you can contact your Compliance Team.

5.6 INTERNATIONAL TRADE

OUR POLICY

We are committed to complying with all international trade, export control and import laws in the countries we operate:

- Sanctions regulations, which prohibit conducting business in certain countries, with certain individuals or companies and with certain products.
- Export control regulations, which restrict export of specific goods, technology and software to certain countries or to certain end users.
In addition to goods, export control restrictions may also apply to technical drawings sent by email.
- Import/customs regulations, which govern import products and duties for these products.

We prohibit commercial activity with companies, organizations, groups or individuals named in sanction lists.

OUR EXPECTATION

- Before starting a cooperation, check if the jurisdiction subject has been under restrictive and or sanctions measures (e.g. embargo).
- Ensure that the items involved in a transaction are not prohibited or restricted for supply to certain destinations.
- Do not do business with persons and entities target by sanction measures.
- Do not export any product that is subject to export control regulations without considering whether an export license is required.

NEED ADVICE?

If you have any question related to this topic, you can contact your Compliance Team.

5.7 INSIDER TRADING

OUR POLICY

Insider trading involves in abusing a company's secrets, knowledge, sales information, organisational information such as a merger and acquisition, stock price information, and internal decision-making.

We do not leak insider secrets, knowledge or information obtained either directly or indirectly in the course of employment, nor use such illicit gains for the purpose of pursuing individual interest.

OUR EXPECTATION

- Do not get involved in any form of insider trading to gain any advantage from having access to price sensitive information.
- Never buy or sell company securities or the securities of other publicly listed companies if you have insider information.
- Never 'tip' others to trade if you know insider information; and
- Never disclose insider information to anyone, including other team members (unless they need the information to do their job).

NEED ADVICE?

If you have any question related to this topic, you can contact your Compliance Team.

5.8 COMPANY COMMUNICATIONS AND REPRESENTATION

OUR POLICY

Only authorised departments or persons can make public statements on behalf of GME. We only speak on GME's behalf when we are authorised to do so.

We want our GME colleagues to feel empowered to post on social media, get involved in relevant conversations around our business, and share key business updates and good news. As our activities in social media have a vital impact on our brand and reputation, we must communicate honestly, responsibly and respectfully.

OUR EXPECTATION

- Follow GME Social Media Guidelines.
- Do not make public statements on GME's behalf: If you're commenting on anything GME would have an interest in, make it clear that your opinions are your own and you're not speaking on behalf of the business.
- Do not share non-public, confidential, or sensitive information.
- Act with professionalism and avoid speculation and rumours.
- Contact GME Social Media Team if you are unsure if a content is appropriate.

NEED MORE INFORMATION?

For further information, please see GME Social Media Guidelines.

NEED ADVICE?

If you have any question related to this topic, you can contact your Compliance Team.



06. WE PROTECT
GME ASSETS

6. WE PROTECT GME ASSETS

OUR POLICY

We must use GME's assets entrusted to us properly and responsibly. GME assets are tangible and intangible assets including the digital and electronic assets, for instance office supplies, devices (computers, tablets, mobile phones), vehicles, real estate, tools, software and any other items made available to us to perform our work.

We must use GME's assets for business purposes, protect them from unauthorised access, use and disclosure.

We protect access to GME's facilities and prevent unauthorised entry.

OUR EXPECTATION

- Do not use of GME's assets for private personal purposes.
- Only use authorised software and devices.
- Safeguard internal documents and information.
- Protect GME's assets from loss, theft or unauthorised access.
- Return GME's assets properly by the end of employment relationship.

NEED MORE INFORMATION?

For further information, please see GME Security Policy.

NEED ADVICE?

If you have any question related to this topic, you can contact your Compliance Team.

6.1 INFORMATION SECURITY

OUR POLICY

GME's business information is a crucial asset and competitive advantage. We must safeguard GME's confidential information and trade secrets.

We also treat the third party information in our possession with the same level of care and protection.

OUR EXPECTATION

- Follow our information security policies.
- Never disclose confidential information without the prior written authorisation of GME.
- Never disclose confidential information to third parties prior to having confidentiality agreements.
- Do not discuss or display confidential information out of work place where it can be heard or seen by unauthorised third parties.
- Be mindful of not discussing confidential information in open office spaces.

NEED MORE INFORMATION?

For further information, please see GME Security Policy.

NEED ADVICE?

If you have any question related to this topic, you can contact your Compliance Team.

6.2 INTELLECTUAL PROPERTY

OUR POLICY

We set off on our audacious journey with the maxim: At Genesis, design is brand, and brand is design.

Our design, technologies and innovations lie at the heart of our business and must be secured through trademarks, patents, designs, copyright and trade secrets (“Intellectual Property Rights” or “IP Rights”). IP rights are key to our business and must be protected.

We are committed to respecting intellectual property, trade secrets confidential and proprietary information of others. Unlawful use may result in severe consequences for GME and team members, such as civil, criminal and administrative liability and will damage our reputation.

OUR EXPECTATION

- Keep Genesis’ intellectual property confidential and respect confidential information of others.
- Never use any material protected by an IP Right without the authorisation of the right-holder.
- Be vigilant and ensure that third party materials are used only in accordance to the terms of the relevant license.
- If you notice that a third party is infringing or misusing Genesis’ IP Rights, contact your Compliance Team immediately.

NEED MORE INFORMATION?

For further information, please see GME Intellectual Property Right Guidelines.

NEED ADVICE?

If you have any question related to this topic, you can contact your Compliance Team.

6.3 DATA PROTECTION

We are always faced with fierce competition while the threat of data leakage is ever present. To guard ourselves from such threat and remain competitive, we ask our team members to do their best to protect data by acting autonomously and responsibly.

The protection and responsible handling of personal data of customers, team members and other persons associated with GME is a key objective for our company. A breach of data protection regulations can have legal and economic consequences that must first be taken into account and can also result in far-reaching damage to our reputation.

OUR EXPECTATION

- Be extremely aware of and take appropriate action when collecting, processing, using, disclosing, storing and transferring personal data.
- Process, use, disclose or store personal data only if we have a legal basis for it (e.g. the consent of the data subject).
- Access personal data only, if it is strictly required for the performance of your work and use as little data as possible from a data subject.
- Secure the processing of personal data by Third Party service providers of the Company by involving your Compliance Team during the selection procedure.
- Do not transfer personal data internally and to Third Parties, in particular when they are located outside the EU, without checking if the transfer is allowed.
- Notify your Compliance Team immediately in case of a (potential) data breach.

NEED MORE INFORMATION?

For further information, please see [GME Data Protection Policy](#).

NEED ADVICE?

If you have any question related to this topic, you can contact your Compliance Team.



07. WE ENSURE SAFETY
AND QUALITY

7.1 HEALTHY AND SAFE WORKPLACE

OUR POLICY

We take great care of the well-being of GME team members. GME is strongly committed to providing a healthy and safe work environment.

We comply with occupational safety and health laws and security regulations that apply to our workplace. Our commitment also includes the health and safety of our customers, visitors and business partners.

OUR EXPECTATION

- Follow the internal rules related to health and safety.
- Do not put health and safety of yourself or your colleagues at risk.
- Never work under the influence of any substance (drugs and alcohol) that could prevent you from doing your job safely and effectively.
- Report any actions or decisions that may entail health and safety risks.

NEED MORE INFORMATION?

For further information, please see GME Security Policy.

NEED ADVICE?

If you have any question related to this topic, you can contact your Compliance Team.

7.2 PRODUCT QUALITY AND SAFETY

OUR POLICY

The quality of our products and services is fundamental to our success. We create and manufacture products that are safe to our customers.

We comply with laws, regulations and standards that apply to our products. We implement a system of check and quality control inspections to test and monitor the quality of our products.

In the event that a defect is identified with a particular Genesis product, GME has traceability and recall procedures in place to ensure that the defect is identified and rectified as quickly as possible.

OUR EXPECTATION

- Where appropriate, make sure you are familiar with GME's quality standards and the technical specifications of GME's products.
- Raise any concerns you have about potential or actual changes in the quality of a product. Do not ignore any potential issues you identify regarding product safety or quality.
- When appropriate, do not forget to check that all documentation relating to quality compliance and all quality checks have been completed.

NEED ADVICE?

If you have any question related to this topic, you can contact your Compliance Team.



08. WE LOVE
OUR PLANET

8.1 ENVIRONMENT

OUR POLICY

Our customers are making responsible choices towards a better future. Likewise, GME is taking bold steps into the future, by making responsible choices to protect the environment and creating a more sustainable future for driving.

We continuously develop high-performance technology and eco-friendly cars to create positive changes in our customers' lives.

We think of new ways that can exist in balance with nature. We see this as a chance to make a difference for the future of our home.

GME recognizes the environment as the key success factor and creates corporate values through proactive environmental management.

OUR EXPECTATION

- Comply with the environmental regulations wherever we operate.
- Work with Business Partners who share our commitment.
- Never avoid an environment-friendly practice to save time.
- Do not underestimate your individual impact: consume energy and other resources economically and efficiently.
- Report immediately if you become aware of violations of environmental regulations.

8.2 RESPECT FOR HUMAN AND LABOUR RIGHTS

OUR POLICY

We respect and protect human rights by complying with all applicable laws and internationally recognised human rights.

We make sure that we are not directly or indirectly complicit in human rights abuses.

We eliminate all forms of forced and compulsory labour, child labour, modern slavery and human trafficking and discrimination in respect of employment and occupation.

OUR EXPECTATION

- Treat everyone with respect and dignity.
- Work with Business Partners who respect human and labour rights.
- Report and take the necessary steps immediately if you become aware of any human rights abuses in our supply chain.

NEED ADVICE?

If you have any question related to this topic, you can contact your Compliance Team.



09. WE SPEAK UP

9. WE SPEAK UP

We are committed to creating a work environment where team members feel encouraged to ask questions, raise concerns and report wrongdoing.

We embrace a just culture which is based on building trust so that team members can also report their own honest mistakes without fear of retaliation.

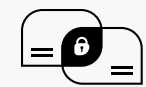
If you know or suspect a violation of the GME Code, GME policies and/or applicable laws may be occurring, report it:



In person by contacting your Manager, HR, Senior Management or your Compliance Team



Per email at compliance@eu.genesis.com



By using the online Whistleblower Platform, where you can also report anonymously.¹

We will take your concern seriously and take proper action.

9.1 ANTI-RETALIATION POLICY

GME will not tolerate any form of retaliation against reporting persons, including threats of retaliation and attempts of retaliation.

If a team member believes that he/she has suffered retaliation as a result of raising a genuine concern, he/she should also report this through the Whistleblower Platform.

¹ Please use the link herein to report anonymously: <https://hyundai.gan-compliance.com/caseReport>

NEED MORE INFORMATION?

For further information, please see GME Whistleblower Protection Policy.

NEED ADVICE?

If you have any question related to this topic, you can contact your Compliance Team.

9.2 THE WHISTEBLOWER PLATFORM

Whistleblower Platform is an online platform which allows team members to raise a concern or report a violation in confidence and anonymously, if they wish. In the Whistleblower Platform, team members will be requested to disclose relevant information in connection to their concern (e.g. background for concern, persons involved, factual evidence if available).

Reporting a violation or concern will prompt the following actions:

∨	REPORT	Whistleblower makes a report.
∨	ACKNOWLEDGEMENT	Whistleblower receives an acknowledgement of receipt.
∨	ANONIMITY	If reported anonymously, communication will be conducted on an anonymous mailbox of the Whistleblower Platform.
∨	DESIGNATION	Report will be directed to the designated persons of your Compliance Team.
∨	INVESTIGATION	In case the allegation is plausible, your Compliance Team will develop an investigation plan. If asked, team members should cooperate fully in an investigation.
∨	RESULT	Whistleblower will receive a notification of closure.
∨	REMEDIATION	Depending on the result, if substantiated, disciplinary measures may be imposed by HR. GME may also take further remediation actions such as trainings or improvements in policies or procedures.

NEED MORE INFORMATION?

For further information, please see GME Whistleblower Protection Policy.

NEED ADVICE?

If you have any question related to this topic, you can contact your Compliance Team.

A woman with voluminous curly hair, wearing a light-colored, long-sleeved top and matching pants, stands next to a white car. The driver's side door is open, revealing a modern interior with a light-colored steering wheel, a digital instrument cluster, and a central infotainment screen. The background is a blurred outdoor setting.

10. GLOSSARY

10. GLOSSARY

The terms in this Glossary have the following meanings for the purpose of this code and relevant section.

<p>ASSETS/ GME ASSETS</p>	<p>GME assets include:</p> <ul style="list-style-type: none"> • Tangible assets (e.g. real estate, office supplies, machinery, equipment, cash, inventory). • Intangible assets (e.g. trade secrets, intellectual property, patents, trademarks, licenses and permits). • Digital assets (e.g. photos, videos, audio files, graphics,PDFs, spreadsheets, documents etc.). • Electronic assets (e.g. devices, software, tools, information systems, programs). 	<p>COMMERCIALLY SENSITIVE INFORMATION</p>	<p>Refers to prices, costs, purchase prices, terms and conditions of business (e.g. campaign conditions, investments, volumes), general business/market strategy, customers, available capacity and utilisation rates, any other information such as confidential information or trade secrets which a competitor would not normally be able to discover.</p>
<p>BRIBERY</p>	<p>Is offering, promising, giving a financial or other advantage to improperly influence a decision or secure an order. (Active Bribery).</p> <p>Is also requesting, receiving accepting a financial or other advantage for personal gain by abusing power and trust. (Passive Bribery).</p> <p>Is a form of corruption which does not only occur in connection with Public Officials but also in commercial practice. (Commercial Bribery).</p>	<p>CONFIDENTIAL INFORMATION</p>	<p>Confidential information refers to any non-disclosed information, including non-public ideas, new products and design, business plans and strategies, financial information, internal communications and other business information, that can only be shared internally on a strict need-to-know basis.</p>
<p>BUSINESS PARTNER</p>	<p>Is any natural or legal person, with whom Genesis has a business relation based on a contractual relationship. e.g. suppliers, vendors, consultants, strategic partners etc.</p>	<p>CORRUPTION</p>	<p>Is any dishonest and unlawful behaviour to gain an advantage through illegitimate means. Bribery, fraud, embezzlement and money laundering are examples of corruption.</p>
<p>CHARITABLE DONATION</p>	<p>Is a voluntary contribution (often in form of financial support) made to a non-profit organisation to support its cause without expecting anything in return.</p>	<p>ENTERTAINMENT</p>	<p>Is performances or activities that entertain people, which are not directly related to the core business activities. E.g. cultural, sport and leisure events etc.</p>
		<p>FACILITATION PAYMENT</p>	<p>So called “grease payments” are “small bribes” given to secure or expedite the performance of a routine action. Facilitation payments are usually made to public officials to speed up a routine public procedure.</p> <p>These may be also in form of small gifts, meals etc. Facilitation payments fall under bribes and constitute criminal offence in most of the jurisdictions and therefore strictly prohibited at Genesis Motor Europe entities.</p>
		<p>FAMILY MEMBERS</p>	<p>Are spouses, parents, siblings, children, grandparents, aunts, uncles, nieces and nephews as well as relatives-in-law.</p>
		<p>GIFT</p>	<p>For the purpose of this Policy, gift is anything of value given by a natural or legal person (giver) to another natural or legal person (recipient) willingly without any legal or contractual obligation. e.g. benefits of any kind, travel tickets, free tickets to events, meals, discounts, use of company assets, etc.</p>

HARASSMENT	Is an unwanted conduct takes place with the purpose or effect of violating the dignity of the person concerned based on age, gender, gender reassignment, race or ethnic origin, religion or belief, disability, marriage and civil partnership, pregnancy and maternity, sexual orientation or other aspects of their identity.
HOSPITALITY	Is food, drink, entertainment, etc. that an organization provides for invitees and visitors. E.g. meals, trips, events etc.
INTEGRITY	Lexically refers to being honest and having strong moral principles. For the purpose of this Policy, Integrity means uncompromising and consistent adherence to ethical values and principles of GME set out in the GME Code of Conduct.
IMPROPER PAYMENT	Is any non-routine payment, which is usually not required by law or by a contractual obligation. e.g. cash payments, excessive fees, commissions, incorrect amounts etc.
PUBLIC ENTITY	Refers to public institutions, public organizations, governmental bodies. The term also implicates state-owned/controlled companies (e.g. telecommunications, post, energy, oil and gas, state-funded medical institutions, schools and universities etc.)
PUBLIC INTERNATIONAL ORGANISATION	Means an organisation whose members are any of the following: <ul style="list-style-type: none"> • Countries or territories, • Governments of countries or territories, • Other public international organisations, • A mixture of any of the above. e.g. EU, United Nations, World Bank, IMF, NATO, World Trade Organisation etc.
PUBLIC OFFICIAL	Are individuals who hold a legislative, administrative or judicial office (either appointed or elected); any person exercising a public function, including for a public agency or a public enterprises (e.g. a state owned enterprise); any official or agent of a public international organisation. Domestic (National) Public Official: official or public officer as defined by the national law of the country in which the person in question performs that function for the purposes of application of the criminal law of that country.

Foreign Public Official: official or public officer exercising the above mentioned public functions abroad.

E.g. EU-officers and employees; national, regional, local or municipal governmental bodies; Embassy staff; other diplomatic service staff e.g. delegations to NATO, UN, etc. ; armed forces/defence, police and other criminal law enforcement agencies, political parties, party officials and any level of political office; certain roles and functions of Royal Families, etc.

RETALIATION Is any negative behaviour, in a work-related context, against a Whistleblower upon reporting an actual or potential violation, which causes or may cause unjustified detriment to the Whistleblower.

THIRD PARTIES For the purposes of this Policy, are natural persons who are not Employees of Genesis Entities and legal persons which are not owned or controlled by Genesis Entities. E.g. Business Partners, suppliers, consultants, agents, family members and relatives of Employees etc.

TRADE SECRET Is business information:

- that is not publicly known or accessible.
- that has a commercial value due to being secret.
- that is subject to appropriate confidentiality and secrecy measures.

TEAM MEMBER(S) Are all employees including full or part-time or temporary employees, interns, working students, agency team members, expatriates, coordinators working at GME Entities in Europe. The definition also extends to persons who should be regarded as equivalent to dependently employed workers because of their economic dependence.

WHISTLE BLOWER Is a reporting person, often an employee, who discloses information about any wrongdoing or misconduct being committed within GME or in connection with GME business, which is harmful for Genesis interests and reputation.

