

**Corporate Human Rights Benchmark
2020 Company Scoresheet**

Company Name Kia Motors Corporation
Industry Automobiles
Overall Score (*) 10.5 out of 100

Theme Score	Out of	For Theme
1.7	10	A. Governance and Policies
0.7	25	B. Embedding Respect and Human Rights Due Diligence
2.1	15	C. Remedies and Grievance Mechanisms
1.1	20	D. Performance: Company Human Rights Practices
2.1	20	E. Performance: Responses to Serious Allegations
2.9	10	F. Transparency

(*) While other sectors are being measured against a reduced set of CHRB Core UNGP Indicators this year the Automotive Manufacturing sector is being measured against the full CHRB Methodology as it is the first year that the sector has been analysed.

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: UNGC principles 1 & 2: The Company is a signatory to the UN Global Compact. The CEO states that 'Kia Motors has pursued sustainability management activities that meet the highest global standards since its declaration to CSR commitment and it becoming a signatory to the UN Global Compact in 2008'. [UNGC participant website, N/A: unglobalcompact.org & 2020 Sustainability Magazine, 18/06/2020: pr.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs: The Company indicates that 'for human rights management, Kia Motors 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'. However, the use of the wording 'comply with' does not qualify as a formal commitment to the initiative following CHRB Criteria. [Human Rights Charter, 06/2020: pr.kia.com] • Not met: OECD: The Company states: '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'. Those include the OECD Guidelines for Multinational Enterprise. However, no commitment to the OECD Guidelines for Multinational Enterprises found. [Human Rights Charter, 06/2020: pr.kia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: UNGC principles 3-6: The Company is a signatory to the UN Global Compact. The CEO states that 'Kia Motors has pursued sustainability management activities that meet the highest global standards since its declaration to CSR commitment and it becoming a signatory to the UN Global Compact in 2008'. [2020 Sustainability Magazine, 18/06/2020: pr.kia.com & UNGC participant website, N/A: unglobalcompact.org] • Not met: Explicitly list ALL four ILO for MO suppliers: The supplier code, regarding human rights, requirement list includes non-discrimination, child labor, forced labor and freedom of association. As for freedom of association it states: 'Suppliers should respect the right of employees to associate and bargain collectively, and allow them to form and manage lawful bargaining bodies'. However, 'should the recommendations in this Supplier Code of Conduct contradict the laws of the countries in which our suppliers operate, the laws of the relevant countries shall supersede the content contained herein'. It is not clear whether it expects suppliers to commit to respect these rights in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'the laws of the relevant countries shall supersede the content contained herein' (CHRB does not ask to break the law, but to provide alternatives where it makes explicit reference to local law and how it can impede respecting these rights). [Supplier Code of Conduct, 06/2020: pr.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: In its Human Rights Charter, among its basic principles are: Prohibition of Discrimination; Guarantee of the Freedom of Association and Collective Bargaining; Prohibition of Forced Labor and Child Labor. However, the Company also states that '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 Kia Motors'. It is not clear whether it is committed to respect these rights in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that 'the local laws and regulations are complied with first'. (CHRB does not ask to break the law, but to provide alternatives where it makes explicit reference to local law and how it can impede respecting these rights). [Human Rights Charter, 06/2020: pr.kia.com] • Met: Respect H&S of workers: Regarding Safety and Health, the Company states that 'We are committed to taking all measures necessary to ensure the safety and well-being of our executives and employees, and to maintain working environments safe from occupational accidents, injuries, disasters, disease and contagion'. [Ethics Charter-Code of Conduct, 06/2020: pr.kia.com] • Not met: H&S applies to MO suppliers: The Company indicates that 'Suppliers should comply with the health and safety laws and regulations of the countries where they maintain business operations obtaining and maintaining all required permits and licenses'. Not clear if there's a requirement to health and safety beyond law compliance. [Supplier Code of Conduct, 06/2020: pr.kia.com] • Not met: Working hours for workers: The Company indicates that it 'complies with the legal work hours for each country where it engages in business'. However, no evidence found of references to standard weekly hours or the Company explicitly committing to respect ILO conventions on working hours. [Human Rights Charter, 06/2020: pr.kia.com] • Not met: Working hours for MO suppliers: Regarding working hours, the Company indicates in its Supplier Code of Conduct: 'Suppliers should comply with all applicable laws, in relation to legally defined working and resting hours of the countries where they maintain business operations. Suppliers should ensure that any hours worked beyond normal work hours are voluntary, and provide lawful compensation for overtime if employees work overtime under unavoidable circumstances. Suppliers should ensure that all employees receive at least one day off every week'. However, no details found regarding requirements for suppliers to commit to a maximum of 48 hours for standard weekly hours or to respect international standards on working hours. [Supplier Code of Conduct, 06/2020: pr.kia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.3.MO.a	Commitment to responsible sourcing of minerals	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Responsible mineral sourcing in conflict areas • Not met: Based on OECD Guidance • Met: Requires responsible mineral sourcing from suppliers: The Company indicates in its Supplier Code of Conduct: 'Responsible Sourcing of Materials: Suppliers should establish processes to verify the source regions and refineries of all minerals contained in their products, including conflict minerals such as tin, tungsten, tantalum, to gold. [...] These four minerals, which are extracted in African conflict areas (ten countries including DR Congo), may cause social issues such as human rights abuse and child labor. Exporting these resources may help fund civil wars or conflict, creating international concern'. [Supplier Code of Conduct, 06/2020: pr.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responsible conflict mineral sourcing covers all minerals • Not met: Suppliers expected to make similar requirements of their suppliers
A.1.3.MO.b	Commitment to respect human rights particularly relevant to the industry (ICT)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Women's Rights • Not met: Children's Rights • Not met: Migrant worker's rights • Not met: Expecting suppliers to respect these rights: In its Supplier Code of Conduct, it indicates that suppliers 'should endeavor to improve the working environment to support socially vulnerable groups, including the disabled and immigrants'. However, it is not clear the Company expects its suppliers to respect migrant workers' rights. [Supplier Code of Conduct, 06/2020: pr.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business principles • Not met: Convention on migrant workers • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: As stated in its 2020 Sustainability Magazine, Kia Motors 'believes that interactive communication with stakeholders is the cornerstone for a sustainable management for an even brighter future. Close communication with stakeholders keeps the company abreast of the latest sustainability issues around the world from different perspectives, equipping it with insight into future trends while remaining in constant contact with stakeholders. Kia Motors mobilizes all available channels to listen to the voices of stakeholders and then reflect them in its material issues for both the present and the future'. Furthermore, in its Ethics Charter, it indicates that 'By proactively identifying stakeholders who may impact, or be impacted by, the company's decision-making, we are committed to communicating and taking action with regard to important matters concerning sustainability'. [2020 Sustainability Magazine, 18/06/2020: pr.kia.com & Ethics Charter-Code of Conduct, 06/2020: pr.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy: As for processing of reports on violations of Human Rights, the Company states: 'Kia Motors 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'. However, 'strive to' is not considered a formal statement commitment following CHRB wording criteria. [Human Rights Charter, 06/2020: pr.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with MO suppliers to remedy impacts

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) Score 2 <ul style="list-style-type: none"> • Not met: Expects MO suppliers to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: CEO or Board approves policy: In its Human Rights Charter, the CEO, in an introductory letter, states: 'Kia Motors aims to promote human rights management to guarantee decent human lives for all our stakeholders, including officers and employees, and provide them with stable working conditions. (Corporate name) has established this Charter for Human Rights by reflecting the understanding of officers, employees and stakeholders, as well as the principles stipulated in the "Universal Declaration of Human Rights", The UN Guiding Principles on Business and Human Rights and other global initiatives. Based on this Charter for Human Rights, each affiliate will efficiently operate the organizational structure and operation system for Human Rights management and operate the process to inspect and mitigate the Human Rights violations and related risks'. [Human Rights Charter, 06/2020: pr.kia.com] Score 2 <ul style="list-style-type: none"> • Not met: Board level oversight for HRs: It also indicates, in the Human Rights Charter: 'Kia Motors 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'. Moreover, as it is stated in the 2020 Sustainability Magazine: 'Kia Motors' Corporate Governance & Communication Committee, which serves under the BOD to supervise actual ethical management practices, ensures positive momentum for ethical management'. However, it is not clear a Board committee is tasked with specific governance oversight of one or more areas of respect for human rights. The Company also indicates, in the same Magazine, that 'Since 2008, the CSR committee has been chaired by the CEO and consists of chief officers in charge of trust-based management, environmental management, and social outreach initiatives. (...) In 2020, we are planning to further upgrade the global CSR framework to attain our goal of "2025, Global Sustainability Leading Company"'. The project "2025, Global Sustainability Leading Company" includes human rights aspects, and although the CEO is part of the Board, the committee seems to be set at senior executive level, and not board of directors. [Human Rights Charter, 06/2020: pr.kia.com & 2020 Sustainability Magazine, 18/06/2020: pr.kia.com]
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Board/Committee review of salient HRs • Not met: Examples or trends re HR discussion: Regarding its CSR Committee, the Company indicates: 'In 2016, there were discussions and an approval of efforts towards spreading Kia's CSR activities internationally'. Although the CSR Committee is chaired by the CEO, it is not clear these discussions took place at Board level. [2020 Sustainability Magazine, 18/06/2020: pr.kia.com] Score 2 <ul style="list-style-type: none"> • Not met: Both examples and process
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Incentives for at least one board member • Not met: At least one key MO HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2, the Company is signatory to the UNGC. • Met: Senior responsibility for HR: The Company indicates that 'Since 2008, the CSR committee has been chaired by the CEO and consists of chief officers in charge of trust-based management, environmental management, and social outreach initiatives. The Sustainability Management Team serves as the assistant administrator of all company-wide CSR activities. In fact, the CSR Committee developed Kia's global CSR framework to spell out how best it can fulfill its corporate social responsibility through constant reviews and improvements. In 2016, there were discussions and an approval of efforts towards spreading Kia's CSR activities internationally. This gave birth to the Global CSR Working Council for Sustainability Management and Social Outreach. In 2020, we are planning to further upgrade the global CSR framework to attain our goal of "2025, Global Sustainability Leading Company". These activities include human rights. [2020 Sustainability Magazine, 18/06/2020: pr.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Day-to-day responsibility: The Company indicates that 'The Sustainability Management Team serves as the assistant administrator of all company-wide CSR activities'. However, no further details found, including how the day-to-day responsibility is allocated across the range of relevant functions and carried out. [2020 Sustainability Magazine, 18/06/2020: pr.kia.com] • Not met: Day-to-day responsibility for MO in supply chain
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Senior manager incentives for human rights • Not met: At least one key MO HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: HR risks is integrated as part of enterprise risk system: One of the key tasks for its goal '2025, Global Sustainability Leading Company' is 'Establishing an ESG risk management system within the board of directors'. However, it is not clear how attention to human rights risks are integrated as part of its broader enterprise risk management systems. [2020 Sustainability Magazine, 18/06/2020: pr.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication/ dissemination of policy commitment(s) within Company's own operations	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to ILO core conventions: See indicator A.1.2. The Company is signatory to the UNGC. • Not met: Communicates its policy to all workers in own operations: The Company indicates that it '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 Kia Motors, but also with suppliers, sales/service organizations and other organizations with which Kia Motors have 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'. However, no details found on how it communicates its policy commitment(s) to all workers including local languages where necessary. [Human Rights Charter, 06/2020: pr.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to all 4 ILO core conventions • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.4.b	Communication/ dissemination of policy commitment(s) to business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to all 4 ILO core conventions for suppliers • Met: Requiring MO suppliers to communicate policy down the chain: The Company indicates, in its Supplier Code of Conduct: 'we have defined a Supplier Code of Conduct which requests that our suppliers comply with the rules and regulations applicable to corporate management, as well as adopt the best practices concerning ethics, the environment, labor/human rights, safety/health, and management systems'. Moreover, 'In management decision making and operational business processes, all suppliers of Hyundai Kia Motors should consider the provisions of this Supplier Code of Conduct'. 'Suppliers should recommend that subcontractors with contractual obligations in planning, designing, selling and manufacturing goods and services should manage ethical, environmental, labor/human rights, safety/health factors. Suppliers should write and manage appropriate documents to prove their compliance with this Supplier Code of Conduct. Such documents should be based on facts and reflect business operations'. [Supplier Code of Conduct, 06/2020: pr.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How HR commitments made binding/contractual: See above. However, it is not clear that human rights policy commitments are contractually binding. [Supplier Code of Conduct, 06/2020: pr.kia.com] • Not met: Including on MO suppliers
B.1.5	Training on Human Rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Scores at least 1 on A.1.2 • Not met: Trains all workers on HR policy commitments: In its 2020 Sustainability Magazine, the Company indicates that 'In addition to the legally mandated training, the company has carried out specialized courses for a total of 340 trainees to help them internalize safety leadership through such courses as safety job-competency'. Also, 'To protect female employees from sexual harassment, every Kia employee is obliged to receive education on related regulations, corporate policy, and corrective measures at least once a year'. In its Ethics Charter – Code of Conduct, it states that 'Organizations implementing this Ethics Charter and Code of Conduct shall provide appropriate training to assist executives and employees in respecting and implementing the content and spirit of this Ethics Charter and Code of Conduct'. Moreover, in its tab 'About CSR' the Company indicates that 'All Kia employees take compliance training every year while employees at the relevant team receive fair trade training'. However, although workers seem to take part in training sections, it is not clear all its workers are trained on its human rights policy commitment(s). It is not clear if it is covered in the yearly compliance training. [2020 Sustainability Magazine, 18/06/2020: pr.kia.com & About CSR, N/A: kia.com] • Not met: Trains relevant MO managers including procurement: As it was mentioned above, in its tab 'About CSR' the Company indicates that 'All Kia employees take compliance training every year while employees at the relevant team receive fair trade training'. However, it is not clear relevant managers and workers receive specific human rights training relevant to their role, including at least procurement. [About CSR, N/A: kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Scores at least 1 on A.1.2 • Not met: Monitoring implementation of HR policy commitments: The Company indicates, in its Human Rights Charter, that it '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. (...) Kia Motors 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 (...) 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. (...) Kia Motors 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'. According to its 2020 Sustainability Magazine: 'Guided by globally competitive human rights protection guidelines, the company will run regular assessments of its human rights management practices to single out and correct human rights risks with all its business management activities'. However, no details found on how the Company is actually monitoring its implementation of its human rights policy commitment. No further details found of how this system is being run. [Human Rights Charter, 06/2020: pr.kia.com & 2020 Sustainability Magazine, 18/06/2020: pr.kia.com] • Not met: Monitoring MO suppliers: The Company indicates that 'Suppliers should provide evidence of compliance with this Supplier Code of Conduct during regular written assessments or on-site visits carried out by Hyundai Kia Motors or designated third parties'. The Supplier Code of Conduct reflects the Company's human rights expectations. However, no details found on how the Company is currently monitoring its suppliers. No further details found of how this system is being run. [Supplier Code of Conduct, 06/2020: pr.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Describes corrective action process: As stated in its Human Rights Charter, the Company indicates that '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'. However, it is not clear the Company's corrective action process, nor is it the numbers of incident. [Human Rights Charter, 06/2020: pr.kia.com] • Not met: Example of corrective action • Not met: Discloses % of MO supply chain monitored

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.7	Engaging business relationships	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: HR affects MO selection of suppliers: The Company indicates: ‘In management decision making and operational business processes, all suppliers of Hyundai Kia Motors should consider the provisions of this Supplier Code of Conduct. Hyundai Kia Motors, and third party entities commissioned by Hyundai Kia Motors, may verify and inspect, within the scope permitted by the law, whether suppliers are complying with the provisions of the Supplier Code of Conduct. Based on inspection and investigation outcomes, Hyundai Kia Motors may recommend that suppliers respond to any identified risks, and if so, suppliers will establish plans and implement countermeasures to mitigate these risks’. However, although the Supplier Code of Conduct contains the Company’s human rights expectations, it is not clear how human rights performance is taken into account in the identification and selection of potential business relationships. [Supplier Code of Conduct, 06/2020: pr.kia.com] • Not met: HR affects on-going MO supplier relationships: As indicated above, suppliers should consider the provisions of this Supplier Code of Conduct and may have to respond and mitigate any identified risk, however, it is not clear how human rights performance is taken into account in decisions to renew, expand or terminate business relationships. [Supplier Code of Conduct, 06/2020: pr.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Working with MO suppliers to improve performance
B.1.8	Approach to engagement with potentially affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Stakeholder process or systems: The Company provides a list of stakeholders, which include employees and local communities and the communication channels for each stakeholder. In the case of employees, the Company indicates that engagement can occur through ‘Labor-Management Council, Employment Stability Committee, company magazine, CSR newsletter, online channels (intranet knowledge community Kia-In, Tong), Employee Counseling Center, reports’. As for local communities, communication happens through ‘Social contribution activities and campaigns, corporate websites, exchanges with local communities (regular meetings, invitation to Kia plants), corporate information channels (websites, social media, reports)’. However, it is not clear how the Company has identified affected and potentially affected stakeholders. [2020 Sustainability Magazine, 18/06/2020: pr.kia.com] • Not met: Frequency and triggers for engagement: Although the Company indicates that it ‘consistently communicates its sustainable future with stakeholders through a number of channels’, it is not clear the frequency and the triggers for engagement on human rights issues. [2020 Sustainability Magazine, 18/06/2020: pr.kia.com] • Not met: Workers in MO SC engaged • Not met: Communities in the MO SC engaged <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them: The Company states: ‘Kia Motors mobilizes all available channels to listen to the voices of stakeholders and then reflect them in its material issues for both the present and the future’. The Company discloses its materiality assess results take into consideration stakeholders views. However, no details found on views given by the stakeholders on human rights issues and how the Company took those views into account. [2020 Sustainability Magazine, 18/06/2020: pr.kia.com]

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifying risks in own operations • Not met: Identifying risks in MO suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context): The Company indicates that Its human rights risk management is made up of self-assessment, written assessment, on-site due diligence, third party audit and a request for an improvement plan. On the basis of a written assessment result, an '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'. However, this indicator looks for description which includes how relevant factors are taken into account, such as geographical, economic, social and other factors when assessing its human rights risks, to determine which are the Company's salient risks. [Human Rights Charter, 06/2020: pr.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Public disclosure of salient risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks: Kia Motors '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'. However, this seems a description of how the system should be articulated. No details found on actual system implementation to mitigate the different human rights risks and impacts that the Company faces. [Human Rights Charter, 06/2020: pr.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Including in MO supply chain • Not met: Example of Actions decided <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: System to check if Actions are effective: Kia Motors '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'. However, this seems a description of how the system should be articulated. No details found on actual system implementation to track the actions taken to tackle human rights risks that the Company faces. It is also not clear if this refers to corrective action plans for specific locations following non-compliance cases or tracking risk-based approach actions. [Human Rights Charter, 06/2020: pr.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.5	Communicating: Accounting for how human rights impacts are addressed	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks: See indicator B.2.1 • Not met: Comms plan re assessing risks: See indicator B.2.2 • Not met: Comms plan re action plans for risks: See indicator B.2.3 • Not met: Comms plan re reviewing action plans: See indicator B.2.4 • Not met: Including MO suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications: Kia Motors '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'. However, it is not clear how it ensures that the affected or potentially affected stakeholders and their legitimate representatives are able to access these communications. [Human Rights Charter, 06/2020: pr.kia.com]

C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/ mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company indicates that 'Kia Motors 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'. It then provides an email address, a telephone number and mail address to report human rights violations. [Human Rights Charter, 06/2020: pr.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Not met: Channel is available in all appropriate languages • Met: Expect MO supplier to have equivalent grievance systems: The Company indicates, in its Supplier Code of Conduct, that 'Suppliers should operate a grievance mechanism allowing employees who confirm or identify violations of ethics, environmental, labor/human rights, safety/health laws and regulations to seek advice and raise concerns. These mechanisms should allow employees to report infringements of their individual rights or interests'. Moreover, 'All suppliers may recommend other business entities in the supply chain including lower tier suppliers and subcontractors, to comply with the provisions contained within this Supplier Code of Conduct'. [Supplier Code of Conduct, 06/2020: pr.kia.com]
C.2	Grievance channel(s)/ mechanism(s) to receive complaints or concerns from external individuals and communities	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Company indicates that 'Kia Motors 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'. It then provides an email address, a telephone number and mail address to report human rights violations. [Human Rights Charter, 06/2020: pr.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages • Not met: Expects MO supplier to have community grievance systems • Not met: MO supplier communities use global system
C.3	Users are involved in the design and performance of the channel(s)/ mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages users to create or assess system • Not met: Example of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: MO suppliers consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/ channel(s) are publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Response timescales • Not met: How complainants will be informed: The Company indicates that 'Employees can vent their grievances and check the progress and results on how their grievances are being handled through the company's intranet'. However, it is not clear how concerns are received, processed and addressed and how those making complaints are informed throughout the process, including stakeholders. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Who is handling the complaint <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.5	Commitment to non-retaliation over complaints or concerns made	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Public statement prohibiting retaliation • Not met: Practical measures to prevent retaliation: The Company indicates: ‘Executives and employees of all Kia Motors 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’. However, no evidence of a actual measure in place to prevent retaliation found. [Human Rights Charter, 06/2020: pr.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects MO suppliers to prohibit retaliation: According to the Supplier Code of Conduct, ‘Suppliers should protect employees who report ethical concerns relating to unreasonable actions such as layoffs, threats, retaliation, and mockery. Employees who report such concerns should have their identity protected’. However, this indicator looks for evidence that the Company expects suppliers to prohibit retaliation against workers and other stakeholders. [Supplier Code of Conduct, 06/2020: pr.kia.com]
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks: Regarding processing of reports on human rights violations, the Company indicates: ‘Kia Motors 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’. However, it is not clear what approach it would take to provide or enable a timely remedy for victims. [Human Rights Charter, 06/2020: pr.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

D.5 Automotive Manufacturing

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.1.a	Living wage (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Living wage target timeframe: The Company indicates in its Human Rights Charter that 'Kia Motors 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'. However, it is not clear it pays all workers a living wage or has set a target timeframe for paying all workers a living wage. Living wages, should cover basic needs, plus some discretionary for employees and his/her family and or depends. [Human Rights Charter, 06/2020: pr.kia.com] • Not met: Describes how living wage determined: According to the 2020 Sustainability Magazine, basic pay 'is determined as per a standardized compensation scheme according to the duration of service and is done so without gender discrimination'. Moreover, 'On March 18, 2019, the company and the labor union reached a special agreement on bonuses, ordinary wages and a wage system improvement, paving the way for a reasonable enhancement to the wage system'. It is not clear this agreement covers all regions (workforce) where it operates. [2020 Sustainability Magazine, 18/06/2020: pr.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Achieved payment of living wage • Not met: Regularly review definition of living wage with unions
D.5.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Living wage in supplier code or contracts: In its Supplier Code of Conduct, the Company indicates: 'Suppliers should compensate workers in accordance with the applicable laws and regulations of the countries where they maintain business operations. (...) Suppliers should ensure pleasant working conditions and strive to provide all employees with benefits to improve quality of life'. However, it is not clear it includes living wage requirements in its contractual arrangements with its suppliers or its supplier code of conduct. No further evidence found. Living wages, should cover basic needs, plus some discretionary for employees and his/her family and or depends. [Supplier Code of Conduct, 06/2020: pr.kia.com] • Not met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress
D.5.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Avoids business model pressure on HRs • Not met: Positive incentives to respect human rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
D.5.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifies suppliers back to product source <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Discloses significant parts of supply chain and why
D.5.4.a	Prohibition on child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Does not use child labour: In its Human Rights Charter, the Company indicates that 'child labor is prohibited in principle'. It clarifies in its sustainability report that its Employment Regulations stipulate that only a person 18 years old or above qualifies for employment. [Human Rights Charter, 06/2020: pr.kia.com & Sustainability Report, 05/2019: pr.kia.com] • Not met: Age verification of job applicants and workers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remediation if children identified

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Child Labour rules in codes or contracts: According to its Supplier Code of Conduct, the Company indicates: 'Suppliers should ban any and all forms of child labor in principle, verifying the age of all employees and applicants through legitimate documents such as identification cards and birth certificates. If hiring young workers, suppliers should not employ them in high-risk jobs as defined by safety and health standards, and should have appropriate measures in place to ensure educational opportunities. Suppliers should not receive goods and services from businesses that are engaged in child labor or that violate applicable laws, and should take necessary action if such violations are confirmed'. However, it is not clear remediation programmes is part of its child labour requirements. No further evidence found. [Supplier Code of Conduct, 06/2020: pr.kia.com] • Not met: How working with suppliers on child labour <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress
D.5.5.a	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Pays workers in full and on time • Not met: Payslips show any legitimate deductions: The Company indicates that it 'pays all officers and employees reasonable wages for the work together with the wage statement'. However, it is not clear the payslip discloses any legitimate deductions. [Human Rights Charter, 06/2020: pr.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters
D.5.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Debt and fees rules in codes or contracts: The supplier code states that 'Suppliers should not receive goods or services from businesses (...) that engage in forced labor due to debt relations, and should take necessary measures if such violations are confirmed'. However, no evidence found, in its contractual arrangements with suppliers or within its supplier code of conduct, of requirement that the supplier, as employer, pays all costs or charges involved in the recruitment process. [2020 Sustainability Magazine, 18/06/2020: pr.kia.com] • Not met: How working with suppliers on debt & fees <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.5.5.c	Prohibition on forced labour: Restrictions on workers (in own production or manufacturing operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Does not retain documents or restrict movement: The Company indicates it 'does not coerce any work against the free will by the method of demanding a personal ID or company ID'. [Human Rights Charter, 06/2020: pr.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How sure about agencies or brokers

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Free movement rules in codes or contracts: According to its Supplier Code of Conduct, the Company indicates: 'Suppliers should not, for the purpose of restricting employees' personal activities, require employees to submit their identification cards or visas, nor should they engage in activities such as assault, intimidation, or confinement for the purpose of forced labor'. [Supplier Code of Conduct, 06/2020: pr.kia.com] • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.5.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: In its Human Rights Charter, it states that 'Kia Motors 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'. Furthermore, in its 2020 Sustainability Magazine, the Company 'upholds the three labor rights stipulated in the Constitution of the Republic of Korea, and guarantees the right to fair and free union activities as per the Collective Agreement. Kia Motors always consults its labor union concerning major management issues at annual collective bargaining and regular Labor-Management Council meetings'. However, no commitment found, covering all its operations, to not interfering with the right of workers to form or join trade unions (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law) found. [Human Rights Charter, 06/2020: pr.kia.com & 2020 Sustainability Magazine, 18/06/2020: pr.kia.com] • Not met: Discloses % covered by collective bargaining: The Company indicates that 'As of 2019, union members with the right to collective bargaining numbered 29,626 persons, or 83.5 percent of Kia Motors' domestic workforce'. However, it seems to cover only domestic operations. It is not clear the overall percentage of its global workforce whose terms and conditions of work are covered by collective bargaining agreements. [2020 Sustainability Magazine, 18/06/2020: pr.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
D.5.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: FoA & CB rules in codes or contracts: According to its Supplier Code of Conduct, the Company indicates: 'Suppliers should respect the right of employees to associate and bargain collectively, and allow them to form and manage lawful bargaining bodies. Suppliers should engage, with sincerity, in collective bargaining negotiations with the representatives of employees. Suppliers should allow individual employees to freely recommend negotiation terms if their representatives are absent'. However, no evidence found of requirements to prohibit intimidation, harassment, retaliation and violence against union members and union representatives, within its contractual arrangements with its suppliers or supplier code of conduct. [Supplier Code of Conduct, 06/2020: pr.kia.com] • Not met: How working with suppliers on FoA and CB <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.7.a	Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Injury Rate disclosures: The company reports that in 2019 the Occupational Accident Rate was 0.98. Figure refers to Sohari, Hwaseong, Gwangju and plants and others (headquarters, sales, and service centers). It is not clear the data covering global operations. [2020 Sustainability Magazine, 18/06/2020: pr.kia.com] • Not met: Lost days or near miss disclosure • Not met: Fatalities disclosures <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Set targets for H&S performance • Not met: Met targets or explains why not
D.5.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Sets out clear Health and Safety requirements: According to its Supplier Code of Conduct, the Company indicates: 'Suppliers should comply with the health and safety laws and regulations of the countries where they maintain business operations, obtaining and maintaining all required permits and licenses. Suppliers should operate an occupational health and safety management system that includes organization, planning, procedures, and outcome analysis to prevent health and safety-related accidents'. No evidence found, however, of specific guidelines for different health and safety requirements. [Supplier Code of Conduct, 06/2020: pr.kia.com] • Not met: Injury rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosures <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How working with suppliers on H&S • Not met: Provide analysis of trends in progress made
D.5.8.a	Women's rights (in own production or manufacturing operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Process to stop harassment and violence: The Company indicates that 'To protect female employees from sexual harassment, every Kia employee is obliged to receive education on related regulations, corporate policy, and corrective measures at least once a year'. [2020 Sustainability Magazine, 18/06/2020: pr.kia.com] • Not met: Working conditions take account of gender: The Company indicates that 'In 2019, 123 employees were on childcare leave, with 30 employees on maternity leave (including miscarriage/stillbirth leave). There were also 14 pregnant employees who used the flexible work hour system for an average of 20.8 days per person'. However, it is not clear how it takes into account differential impacts, on women and men, of working conditions more broadly, including to reproductive health. [2020 Sustainability Magazine, 18/06/2020: pr.kia.com] • Not met: Equality of opportunity at all levels: In its Ethics Charter, the Company states: 'We shall provide executives and employees with equal opportunities for training and capacity development, assess them fairly based on performance, and give them fair compensation'. In addition, in its 2020 Sustainability Magazine, it indicates that it 'guarantees equal opportunity for self-development to all its employees, regardless of their background. In addition, its performance-oriented promotion policy has continuously increased the ratio of female managers to the overall workforce. (...) All employees are entitled to equal opportunity without discrimination for their (...) gender under the corporate bylaws (...). Basic pay is determined as per a standardized compensation scheme according to the duration of service and is done so without gender discrimination'. However, it is not clear how it provides equality of opportunity for women in the workforce that are monitored and maintained throughout all levels of employment, as evidence seems to refer to increasing managers proportion. [Ethics Charter-Code of Conduct, 06/2020: pr.kia.com & 2020 Sustainability Magazine, 18/06/2020: pr.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Meets all of the requirements under score 1

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.8.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Women's rights in codes or contracts: According to its Supplier Code of Conduct, the Company indicates: 'Suppliers should not employ pregnant women (...) in high-risk jobs and should endeavor to improve the working environment to support socially vulnerable groups, including the disabled and immigrants'. Besides, 'Suppliers should not engage in any form of discrimination based on gender (...) in hiring and employment practices and access to training'. However, it is not clear suppliers' requirements include the provision of equal pay for equal work, and measures to ensure equal opportunities throughout all levels of employment. [Supplier Code of Conduct, 06/2020: pr.kia.com] • Not met: How working with suppliers on women's rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Provide analysis of trends in progress made
D.5.9.a	Working hours (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Respects max hours, min breaks and rest periods in its own operations: The Company indicates: 'Kia Motors complies with the legal work hours for each country where it engages in business'. However, it is not clear the Company respects applicable international standards and national laws and regulations concerning maximum hours and minimum breaks and rest periods in its own operations. No evidence found of references to standard weekly hours or that the Company respects ILO conventions on working hours. [Human Rights Charter, 06/2020: pr.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How it implements and checks this
D.5.9.b	Working hours (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Working hours in codes or contracts: According to its Supplier Code of Conduct, the Company indicates: 'Suppliers should comply with all applicable laws, in relation to legally defined working and resting hours, of the countries where they maintain business operations. Suppliers should ensure that any hours worked beyond normal work hours are voluntary, and provide lawful compensation for overtime if employees work overtime under unavoidable circumstances. Suppliers should ensure that all employees receive at least one day off every week'. No evidence found, however, of requirement to respect international standards (in addition to national laws and regulations) concerning regular week hours and maximum hours, in its contractual arrangements with its suppliers or supplier code of conduct. [Supplier Code of Conduct, 06/2020: pr.kia.com] • Not met: How working with suppliers on working hours <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.5.10.a	Responsible Mineral Sourcing: Arrangements with Suppliers and Smelters/ Refiners in the Mineral Resource Supply Chains	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Due diligence in accordance with OECD Guidance in supplier contracts: The Company indicates in its Supplier Code of Conduct: 'Suppliers should establish processes to verify the source regions and refineries of all minerals contained in their products, including conflict minerals mineral such as tin, tungsten, tantalum, to gold.' However, it is not clear whether this Code is part of a contractual agreement with suppliers and there is no reference to the OECD Due Diligence Guidance. [Supplier Code of Conduct, 06/2020: pr.kia.com] • Not met: Works with smelters/refiners and suppliers to build capacity <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Contractual requirement to disclosure smelter/refiner information • Not met: Contractual requirement covers all minerals

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.10.b	Responsible Mineral Sourcing: Risk Identification in Mineral Supply Chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Risk identification and disclosure in line with OECD Guidance • Not met: Identification of smelter/refiners and OECD Guidance Score 2 <ul style="list-style-type: none"> • Not met: Discloses smelters/refiners judged in line with OECD Guidance • Not met: Risk identification and disclosure covers all minerals
D.5.10.c	Responsible Mineral Sourcing: Risk Management in the Mineral Supply Chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes mineral risk management plan for supply chain • Not met: Monitoring, tracking and whether better risk prevention/mitigation over time Score 2 <ul style="list-style-type: none"> • Not met: Disclose better risk prevention/mitigation over time • Not met: Suppliers and stakeholders engaged in risk management strategy • Not met: Risk management and response processes cover all minerals
D.5.11	Responsible Materials Sourcing	[SD.5.10]	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Due diligence for raw materials in supplier code/contracts: According to its Supplier Code of Conduct: 'When primarily handling minerals and raw materials, suppliers should strive to verify, internally and externally that they are not engaged in human rights abuses, violations of ethics, nor producing negative environmental impacts in the processing of minerals and raw materials'. However, no explicit requirements to conduct due diligence for raw materials found in the Supplier's Code. [Supplier Code of Conduct, 06/2020: pr.kia.com] Score 2 <ul style="list-style-type: none"> • Not met: Works with suppliers to build capacity in risk assessment and due diligence • Not met: Meets all requirements under score 1 • Not met: Identify the sources of high-risk raw materials in its supply chain

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 8.44 out of 80 points scored in themes A-D & F has been applied to produce a score of 2.11 out of 20 points for theme E.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	0.87 out of 4	Out of a total of 60 indicators assessed under sections A-D of the benchmark, Kia Motors made data public that met one or more elements of the methodology in 13 cases, leading to a disclosure score of 0.87 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> • Met: Company reports on GRI: The company report against the GRI standard. [2020 Sustainability Magazine, 18/06/2020: pr.kia.com] • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0 out of 4	Kia Motors met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.5.1.a: Living wage (in own production or manufacturing operations) • Not met: Score 2 for D.5.7.a: Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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