

Company Name Kia Motors Corporation
Industry Automotive (Own Operations and Supply Chain)
Overall Score 7.9 out of 100

Theme Score	Out of	For Theme
1.9	10	A. Governance and Policies
1.1	25	B. Embedding Respect and Human Rights Due Diligence
2.5	20	C. Remedies and Grievance Mechanisms
0.9	25	D. Performance: Company Human Rights Practices
1.6	20	E. Performance: Responses to Serious Allegations

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 2022 Methodology document for the sector concerned. 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	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Universal Declaration of Human rights (UDHR): The Human Rights Charter states 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'. [Human Rights Charter, 06/2020: pr.kia.com] Score 2 <ul style="list-style-type: none"> Met: Commitment to the UNGPs: The Human Rights Charter states 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'. [Human Rights Charter, 06/2020: pr.kia.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Company has a commitment to the ILO Core: The Company indicates that 'Kia intends that these guiding principles below will serve as the basis for its interactions and operations across its business. These principles will underpin Kia's behaviors and approach'. It includes The International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. 'Serving as the basis is not considered a formal statement of commitment according to CHRB wording criteria. [Compliance and Integrity Code, N/A: kia.com] & [Code of Ethics (Slovakia), N/A: kia.sk] Not Met: Company has a 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

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			<p>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, or provide alternative mechanisms for freedom of association and collective bargaining in contexts where these rights are restricted under local laws: The Company also indicates in its Compliance and Integrity Code that ‘Kia will respect the rights of workers to associate freely and bargain collectively where permitted under relevant laws’. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Human Rights Charter, 06/2020: pr.kia.com] & [Compliance and Integrity Code, N/A: kia.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company expect suppliers to commit to ILO Core: Although the Company expresses that it expects its suppliers to comply with its Compliance and Integrity Code, the Code itself does not imply a commitment to the ILO Core. As indicated above, it is not clear whether it will provide alternative mechanisms where freedom of association and collective bargaining are restricted under local law. [Compliance and Integrity Code, N/A: kia.com] • Not Met: Company explicitly list All four ILO for suppliers: The supplier code includes requirements on non-discrimination, child labor, forced labor and freedom of association. In relation to collective bargaining, 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]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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: Commitment to 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: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: The Company indicates, on its Ethics Charter, that it ‘complies with the legal work hours for each country where it engages in business’. Moreover, according to its Compliance and Integrity Code ‘Kia will comply with applicable laws and regulations on working hours’. However, no evidence found that the Company commits to respecting ILO labour standards on working hours or that it publicly states that workers shall not be required to work more than 48 hours (60 including overtime paid at premium rate) and have minimum breaks. [Human Rights Charter, 06/2020: pr.kia.com] & [Compliance and Integrity Code, N/A: kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Expect suppliers to commit to H&S of their workers: 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: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			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]
A.1.3.a.MO	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (MO)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Responsible mineral sourcing • Not Met: Based on OECD Guidance • Met: Requires suppliers to commit to responsible mineral sourcing: 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] Score 2 <ul style="list-style-type: none"> • Not Met: Commits to follow OECD Guidance for all minerals • Not Met: Suppliers expected to make similar requirements of their suppliers
A.1.3.b.MO	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (MO)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Women's rights • Not Met: Children's rights • Not Met: Migrant worker's rights • Not Met: Expects 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] Score 2 <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: Expecting suppliers to respect these rights
A.1.4	Commitment to remedy	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: The Company commits to remedy: It indicates that 'Kia is committed to remediation where adverse impact is identified'. [Compliance and Integrity Code, N/A: kia.com] • Met: Company expect suppliers to make this commitment: It indicates that 'Kia is committed to remediation where adverse impact is identified'. The Compliance and Integrity Code states that suppliers are also expected to comply with the principles stated on it. [Compliance and Integrity Code, N/A: kia.com] Score 2 <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives • Not Met: Work with suppliers to remedy impact
A.1.5	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) • Not Met: Company expect suppliers to make this commitment Score 2 <ul style="list-style-type: none"> • Not Met: Work with HRD to create safe and enabling environment

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	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: Board level responsibility 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 2021 Sustainability Magazine: 'Kia Motors' Sustainability Management Committee [formally Corporate Governance & Communication Committee], operating under the BoD oversees the non-financial risks by making reports and deliberating on ESG plans and implementation progress at least twice a year'. The role of the Committee was expanded 'by establishing the role of oversight for ESG plan including Safety, Health and Environment (SHE) plans, and the committee also make decisions related to environmental policy'. 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 2020 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. No further information was found in recent documents. [Human Rights Charter, 06/2020: pr.kia.com] & [2021 Sustainability Report, 2021: worldwide.kia.com] • Not Met: Describe HR expertise of Board member <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Speeches/letters by Board members or CEO
A.2.2	Board responsibility	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: Board/Committee review HRs strategy • Not Met: Examples/trends re HR discussion in the last reporting period: 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. No further information could be found in recent documents. [2020 Sustainability Magazine, 18/06/2020: pr.kia.com] & [2021 Sustainability Report, 2021: worldwide.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	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: Incentives for at least one board member • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and 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: Board process to review business model and strategy • Not Met: Describe frequency and triggers for reviewing <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

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	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: Score of 1 on A.1.2.a • Met: Senior responsibility for HR implementation and decision making: 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 fulfil 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: How it assigns 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. No further information was found in the most recent documents. [2020 Sustainability Magazine, 18/06/2020: pr.kia.com] & [2021 Sustainability Report, 2021: worldwide.kia.com] • Not Met: Day-to-day resources and expertise allocation in own ops • Not Met: Resources and expertise allocation in the 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 HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other senior management performance
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. No further information was found in the most recent documents. [2020 Sustainability Magazine, 18/06/2020: pr.kia.com] & [2021 Sustainability Report, 2021: worldwide.kia.com] • Not Met: Provides an example <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) to workers and external 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: Score of 1 on A.1.2.a • 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: 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: Meets ILO requirement for suppliers on A.1.2.a • Not Met: Steps to communicate policy commitments to supply chain • Met: Requires suppliers to communicate policy requirements: 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: Company requires suppliers to cascade down to their 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.a • Not Met: How workers are trained 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. No further information was found in the most recent documents. [2020 Sustainability Magazine, 18/06/2020: pr.kia.com] & [About CSR, N/A] • Not Met: Trains relevant 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] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet company's HR commitment • Not Met: Disclose % trained
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.a • Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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]</p> <ul style="list-style-type: none"> • Not Met: Proportion of supply chain monitored • Not Met: Describe how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • 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: Disclose findings and number of corrective action
B.1.7	Engaging and terminating 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 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 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: Describe positive incentives offered to respect human rights • Not Met: Working with suppliers to meet HR requirements
B.1.8	Approach to engagement with 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 to identify and engage with workers/communities in the last two years: 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 Counselling Center, reports'. As for local communities, communication happens through 'Social contribution projects, exchanges with local communities near business sites (regular meetings, factory opening)'. However, it is not clear how the Company has identified affected and potentially affected stakeholders. [2021 Sustainability Report, 2021: worldwide.kia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Discloses stakeholders that HRs may be affected • Not Met: Provides two examples of engagement with stakeholders Score 2 <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues: 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] & [2021 Sustainability Report, 2021: worldwide.kia.com] • Not Met: Describe how views influenced company's HR approach

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Identifying risks in own operations: The Company indicate that 'Kia conducts a human rights impact analysis based on the Kia Human Rights Charter to assess the level of human rights risk awareness. Through 105 detailed items in eight major areas, such as non-discrimination, prohibition of forced labor and child labor, and occupational safety, the level of awareness at each workplace is analyzed and areas of improvement are identified. The results are shared with stakeholders through various channels including our official website. ' Score 2 <ul style="list-style-type: none"> • Not Met: Identifying risks through relevant business relationships • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
B.2.2	Assessing human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describe process for assessment of HR risks and discloses salient HR issues: 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] Score 2 <ul style="list-style-type: none"> • Not Met: How process applies to supply chain • Not Met: Public disclosure of the results of HR assessment
B.2.3	Integrating and acting on human rights risks and impact assessments	0	The individual elements of the assessment are met or not as follows: Score 1 <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] Score 2 <ul style="list-style-type: none"> • Not Met: Description of how global system applies to supply chain • Not Met: Example of actions decided on at least 1 salient HR issues

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.4	Tracking 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 for tracking or monitor if actions taken 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] • Not Met: Lessons learnt from checking system effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights 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: Provides two examples of comms with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% 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. In addition, 'Kia implemented various on/offline grievance reporting systems to create a healthy working environment. For online reporting, we designed the UI so that employees who use Autoway, our groupware system, can have easy access through the OneClick HR banner located on the main screen.' [Human Rights Charter, 06/2020: pr.kia.com] & [2021 Sustainability Report, 2021: worldwide.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Channel is available in all appropriate languages and workers aware • Met: Describe how workers in the supply chain have access to grievance mechanism: 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] • Met: Expect Suppliers to convey expectation to their own suppliers: 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	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: 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. However, it

Indicator Code	Indicator name	Score (out of 2)	Explanation
	external individuals and communities		is not clear if the company has a grievance channel that communities can access it. [Human Rights Charter, 06/2020: pr.kia.com] Score 2 <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness • Not Met: Communities access mechanism direct or through suppliers • Not Met: Expect supplier to convey expectation to their own suppliers
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Engages users to create or assess system • Not Met: Examples (at least two) of how they do this Score 2 <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Response timescales and how complainants will be informed • Not Met: Describe support (technical, financial, etc) available for equal access by complainants Score 2 <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Escalation to senior/independent level: The company states that "In the event that the cases of human rights violence exercise significant influence on freedom and the rights of victims or it is highly likely to create risks to the corporate reputation, the relief plan may be discussed by a committee, management conference, practical meeting and gatherings in which the highest decision makers participate." However, it is unclear whether this escalation to senior level of decision making is under the control of the complainant or if it is an automated mechanism. [Human Rights Charter, 06/2020: pr.kia.com]
C.5	Prohibition of retaliation for raising complaints or concerns	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Public statement prohibiting 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' • 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] Score 2 <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: 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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions Score 2 <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.7	Remedying adverse 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: Describes how remedy has been provided • Not Met: Says how it would provide remedy for victims if no adverse impact identified: 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 to systems, processes and practices to stop similar impact • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	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: Number grievances filed, addressed or resolved and outcome achieved: In its latest report, the company says that 'In 2021, 13 complaints were received, and the grievance officers offered immediate feedback on 7 cases of workplace change, 3 cases of workplace atmosphere improvement, 1 case of company rule violation, and 2 HR system recommendations.' Additionally, the company says that the number of violations of the Code of Ethics was 81, the number of violators of the Code of Ethics was 153. What's more, Kia also says that the number of actions taken was 157 (such measures were: fire, suspension, payout, reprimand, warning etc). [2022 Sustainability Report, 2022: worldwide.kia.com] • Not Met: How lessons from mechanism improve management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% 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: Pays living wage or sets target date: 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 2021 Sustainability Magazine, basic pay is determined 'through an equal and fair compensation system regardless of nationality/gender. In 2020, the HR system was improved so that individual performance was reflected in individual compensation through the establishment of a compensation system linked to absolute evaluation. 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. [2021 Sustainability Report, 2021: worldwide.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Paying living wage • Not Met: Definition of living wage reviewed with unions

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: Discloses living wage requirements 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: Assessment of number affected by payment below living wage • Not Met: Provides 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 (purchasing practices) • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices
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 direct and indirect suppliers back to manufacturing sites (factories or fields) <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.5.4.a	Prohibition of 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 workers recruited <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remediation if children identified
D.5.4.b	Prohibition of 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: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.5.a	Prohibition of forced labour: Recruitment fees and costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Job seekers and workers do not pay recruitment fee: 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] • Not Met: Commits to fully reimbursing if they have paid: 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] Score 2 <ul style="list-style-type: none"> • Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters
D.5.5.b	Prohibition of forced labour: Recruitment fees and costs (in the 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: 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 Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made
D.5.5.c	Prohibition of forced labour: Wage practices (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Pays workers in full and on time • Not Met: Payslips show any legitimate deductions Score 2 <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.5.5.d	Prohibition of forced labour: Wage practices (in the 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: Requirement for suppliers to pay workers in full and on time in codes or contracts • Not Met: How working with supply chain to pay workers regularly and on time Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.5.5.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	1	The individual elements of the assessment are met or not as follows: Score 1 <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] Score 2 <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.5.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <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 working with suppliers on free movement Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 / Steps to avoid intimidation or 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 2021 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] & [2021 Sustainability Report, 2021: worldwide.kia.com] • Not Met: Discloses % total direct operations covered by collective CB agreements: 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: Meets both requirements under score 1
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: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress
D.5.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of 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: Describes process to identify H&S risks and impacts: The Company indicates 'We established a specialized management system by hiring experts in safety and health, and operating a professional qualification process. Work processes and sites with high risk of serious accidents are analyzed and improved by external experts, and risks are handled in advance by increasing investments in facilities and their improvements.' [2021 Sustainability Report, 2021: worldwide.kia.com] • Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: The company reports that in 2021 the Lost Time Injuries Frequency Rate was 1.96 [2021 Sustainability Report, 2021: worldwide.kia.com] • Not Met: Discloses Fatalities for last reporting period • Not Met: Occupational disease rate for last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Set targets for H&S performance • Not Met: Met targets or explain why not or what is doing to improve management systems

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.7.b	Health and safety: Fatalities, lost days, injury, occupational disease 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 and lost days (or near miss disclosures) for the last reporting period • Not Met: Fatalities disclosures for lasting reporting period • Not Met: Occupational disease rates for the last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provide analysis of trends in progress made
D.5.8.a	Women's rights (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: Process to stop harassment and violence against women • Not Met: Working conditions take account of gender: The Company indicates that 'In 2020, 202 employees were on childcare leave, with 54 employees on maternity leave (including miscarriage/stillbirth leave)'. 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. [2021 Sustainability Report, 2021: worldwide.kia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Measures and steps to address gender pay gap at all levels of employment • Not Met: Provides analysis of trends demonstrating closing gender pay gap
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: Assessment on the number affected by discrimination or unsafe working conditions • 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] • Not Met: Assesses ability to comply with its commitments when allocating work/targets <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How it implements and checks this in its operations

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.9.b	Working hours (in the 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: 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 Score 2 <ul style="list-style-type: none"> Not Met: Assessment of number affected by excessive working hours 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	The individual elements of the assessment are met or not as follows: Score 1 <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 Score 2 <ul style="list-style-type: none"> Not Met: Contractual requirement to disclosure smelter/refiner information Not Met: Contractual requirement covers all minerals
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 Not Met: Disclose better risk prevention/mitigation over time Score 2 <ul style="list-style-type: none"> 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	0	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] Not Met: Works with suppliers to build capacity in risk assessment and due diligence Score 2 <ul style="list-style-type: none"> 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 6.31 out of 80 points scored in themes A-D has been applied to produce a score of 1.58 out of 20 points for theme E.

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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