



LG Magna Supplier Code of Conduct

LG Magna e-Powertrain Co., Ltd. and its Affiliates' ("LG Magna") Supplier Code of Conduct (hereinafter: the "Code") stipulates what LG Magna requires from its suppliers so that they will implement a safe working environment, respect the human rights of their employees, fulfill their responsibilities to protect the environment, and operate their business ethically. LG Magna may change this Code as deemed appropriate. LG Magna (and/or external auditors) may visit supplier facilities to assess compliance with this code and request improvements if needed. Capitalized terms that are not defined in the Code shall have the meaning ascribed to them in the Purchasing Terms and Conditions of LG Magna.

1. Respecting the human rights of workers (Labor)

A. Voluntary work (prohibition of forced labor)

Suppliers shall not force labor (slavery, human trafficking, etc.) on workers against their will. During recruitment, they shall enter into a written labor contract, drawn up in a language workers can understand, and provide a copy to the workers. When hiring foreign workers, workers shall keep their identity or immigration documents, e.g. passports and work permits. Suppliers shall not limit workers' freedom of movement unreasonably, and workers shall be able to resign freely when they so desire. Suppliers shall not require workers to pay recruiting fees.

B. Prohibition of hiring child and management of juvenile workers

Suppliers shall not use child labor. 'Child' refers to person under the age of 15 or under the minimum age for employment stipulated by local laws. Workers under the age of 18 shall not perform work that is likely to jeopardize their health and safety, nor shall they be required to work overtime or at night. Student workers shall be supported and managed separately from regular workers depending on the training programs.

C. Prohibition of excessive overtime

Total working hours per week shall not exceed the standard pursuant to the local law or 60 hours. Also, at least 1 holiday shall be allowed for every 7 days.

D. Wages and welfare

Wages shall be paid for regular working hours in excess of the statutory minimum wage, and additional premium shall be paid for overtime/night work. Wage deduction is not allowed as a disciplinary action. (However, deductions for the hours employees did not work due to tardiness will be acknowledged.) Suppliers shall faithfully pay workers' social insurance premiums.

E. Humane treatment

Suppliers shall respect the human rights of all workers, and make sure that workers are not subjected to sexual harassment, sexual abuse, physical punishment, mental/physical coercion, abusive language, unreasonable restriction or brutal or inhumane treatment. To this end, suppliers shall clearly stipulate disciplinary procedures, implement and announce them to workers.

F. Prohibition of discrimination

In employment practices, such as hiring, wages, promotion, compensation and educational training opportunities, suppliers shall not discriminate on account of race, skin color, age, gender, sexual



orientation, gender identity and expression, ethnic origin, disability, pregnancy, religion, political orientation, labor union membership, nationality or marital status. Suppliers cannot require health examination of items that may be used to discriminate against workers or jobseekers (pregnancy, etc.). Also, suppliers shall take reasonable measures so that workers can practice religious obligations.

G. Guaranteeing the freedom of association

Suppliers shall guarantee workers' rights to freely organize and join labor unions pursuant to local laws, and to engage in collective bargaining, peaceful assembly and reject such activities. Workers or workers' representatives shall be able to share their opinions on working conditions and management policies and their difficulties with the management without fear of discrimination, retaliation or threats.

2. Safe working environment (Health & Safety)

A. Industrial safety

Suppliers shall conduct risk assessments to understand the possibility of workers being exposed to safety risk factors. Suppliers shall design safe processes, implement technical/administrative control and preventive maintenance, prepare safety regulations and continuously provide training and necessary personal protective equipment (PPE) to workers, and supervise the use of such PPE according to the results of risk assessment.

B. Emergency preparedness

Suppliers shall identify emergencies likely to occur and requiring high-priority responses, and establish response plans. Suppliers shall make sure that it is possible to always open emergency exits, and maintain evacuation capabilities by conducting regular evacuation drills, in which all employees participate, at least once a year.

C. Prevention of industrial accidents and diseases

Suppliers shall implement the following procedures to prevent industrial accidents and occupational diseases and to prevent their recurrence: a) reporting issues; b) classifying and recording types of injuries and diseases; c) providing necessary treatment; d) taking corrective/preventive measures after analyzing the root causes; e) supporting workers' return to work after treatment.

D. Managing the exposure of harmful factors in the working environment

Suppliers shall regularly monitor their work environments, e.g. harmful chemicals, noises and dust to which workers can be exposed, understand their impacts, and take technical measures and supervise so that workers are not exposed to a level higher than accepted standards.

E. Managing physically demanding work

Suppliers shall identify physically demanding tasks, e.g. repetitious work and handling of heavy objects, and improve processes or conduct job rotation or have workers stretch/exercise to prevent musculoskeletal disorders.

F. Machine safeguarding

Suppliers shall regularly conduct safety inspections of all dangerous equipment. For the safety of workers, suppliers shall provide physical protective devices/barriers and interlocks, and conduct preventive maintenance of the equipment.

G. Cafeteria and dormitory management



Suppliers shall provide employees with clean restrooms, drinking water, and a place where they can hygienically cook/store/eat food. The dormitories provided by suppliers or labor dispatch companies shall be clean and safe, and provide appropriate emergency exits, cooling/heating, ventilation, personal lockers or space with a lock.

H. Health and safety education

Suppliers shall regularly provide safety and health training for workers, and the safety and health information workers shall know shall be posted in the facility.

3. Environment-friendly workplace management (Environment)

A. Compliance with environmental laws (licensing and reporting)

Suppliers shall acquire and maintain all environmental licenses (ex: discharge/preventive equipment installation/operation/change reports) as required by law, and fulfill the obligation to report. Suppliers shall also stay up-to-date on the latest legal revisions and comply with them.

B. Pollution prevention and reduction of resource/energy consumption

Suppliers shall make efforts to reduce and eliminate resource/energy consumption and waste discharge by improving processes, using alternative sources of energy, conducting preventive maintenance, preserving resources, recycling and reusing. Suppliers shall make efforts to reduce power and fuel consumption and minimize greenhouse gas emissions by enhancing energy efficiency.

C. Hazardous substance management

Suppliers shall identify all chemicals and other materials (including hazardous waste) likely to contaminate the environment when leaked, and make efforts to safely store, transport, use, recycle, reuse and dispose them. Suppliers shall identify areas where soil and rainwater pollution are possible when chemicals are leaked, establish countermeasures and conduct counter-leak drills at least once a year.

D. Waste and wastewater management

Suppliers shall understand the characteristics of the waste and wastewater, treat them according to laws before discharging them, and make efforts to reduce them. During wastewater treatment, suppliers shall record treatment efficiency and always make sure wastewater is discharged within the standard.

E. Air pollution management

Suppliers shall understand the characteristics of VOC (volatile organic compounds), aerosols, corrosive gases, dust, ozone depletion materials and combustion byproducts in the processes, and treat them according to laws before discharging them. The treatment efficiency of preventive equipment shall be monitored at all times.

F. Compliance with regulations regarding hazardous substances in products and processes

Suppliers shall comply with all the latest hazardous substance management standards of LG Magna.

4. Ethics

A. Compliance with "Jeong-Do" management and prohibition of illegal gains

According to the Jeong-Do Management policy of LG Magna, suppliers are prohibited from engaging



in corrupt practices, such as receiving bribes including presents and embezzlement, and shall continuously regulate and monitor for such occurrences. All transactions shall be transparent and accurately recorded in accounting books.

B. Information disclosure

Suppliers shall disclose, as is, information on the status of labor/health and safety/environment practices, business activities, corporate governance, financial status and performance according to related laws and prevailing industry practices.

C. Protection of intellectual property rights

Suppliers shall respect all intellectual property rights, and protect such rights when transferring technology/know-how. Suppliers shall also safely protect all information of LG Magna.

D. Fair trade, advertising and competition

Suppliers shall comply with the applicable regulations and standards regarding fair trade (prohibition of collusion), advertising and competition.

E. Identity protection and prohibition of retaliation

Suppliers shall operate an employee reporting channel that guarantees anonymity and ensures confidentiality so that workers can participate without fear of retaliation.

F. Personal Information

Suppliers shall systematically protect the personal information of all interested parties (including suppliers, clients, consumers and employees). Suppliers shall also comply with personal information protection/information security laws when collecting, storing, processing, transmitting and sharing personal information.

**5. Materials not obtained through illegal and unethical means;
Special requirements for conflict minerals**

The Supplier shall establish and maintain a policy to prevent the use of materials sourced through any illegal and unethical means.

As part of or in addition to such policy, the Supplier shall establish and maintain a policy to ensure that Conflict Minerals contained in Goods do not directly or indirectly finance or benefit an Armed Group in the Democratic Republic of the Congo or an Adjoining Country. The Supplier shall exercise due diligence on the source and chain of custody of Conflict Minerals contained in Goods and make Supplier's due diligence measures available to LG Magna upon request. The supplier shall also respond promptly to LG Magna requests for information regarding the results of Supplier's due diligence measures, including but not limited to the country of origin or smelters and refiners used to process Conflict Minerals contained in Goods.

The terms "Conflict Minerals," "Armed Group," and "Adjoining Country" have the meanings ascribed to such terms in the rules and regulations of the U.S. Securities and Exchange Commission promulgated under Section 13(p) of the Securities Exchange Act of 1934, as amended.

6. Management system



A. Management's declaration of its will to comply and responsibilities

As responsible representative(s) for complying with this Code of Conduct, the suppliers' executive management shall express their will to comply in writing and post it at their workplaces. The management shall also review their compliance at least once a year.

B. Responding to external requirements

Suppliers shall understand the latest laws including this Code and customer requirements, and conduct regular compliance evaluations (audits). As a result of the audit, suppliers shall analyze the root causes of nonconformities, and take corrective/preventive measures.

C. Risk assessment and management

Suppliers shall identify potential risks in terms of labor, ethics, the environment, health and safety. They establish a management plan for risks identified having a high probability and significant impact, and report the implementation status to management at least once a year.

D. Improvement objectives

Suppliers shall establish written performance, objectives, targets and implementation plans in terms of labor, ethics, the environment, health and safety, and evaluate the implementation status at least once a year.

E. Training and communication

To comply with this code and laws, suppliers shall operate training programs for managers/workers, and share clear information on policies, goals and performance with workers, next tier suppliers and LG Magna.

F. Listening to employees' opinions and improvement

Suppliers shall evaluate employees' level of understanding the code, collect their opinions, and improve the procedure for practical implementation.

G. Documentation

Suppliers shall manage relevant documents and records in accordance with relevant laws and internal document management standards.

H. Suppliers' responsibilities

Suppliers shall deliver this code to their next tier suppliers, require them to comply with it, and monitor their compliance to the code.

References

The following standards were used in preparing this code and may be a useful source of additional information.

EICC Code

<http://www.eiccoalition.org/standards/code-of-conduct/>

ILO International Labor Standards

<http://www.ilo.org/global/standards/lang--en/index.htm>



ILO Code of Practice in Safety and Health

www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf

OECD Guidelines for Multinational Enterprises

<http://www.oecd.org>

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals
from Conflict-Affected and High-Risk Areas

<http://www.oecd.org/investment/mne/mining.htm>

United Nations Convention Against Corruption

www.unodc.org/unodc/en/treaties/CAC/index.html

United Nations Global Compact

www.unglobalcompact.org

Universal Declaration of Human Rights

www.un.org/Overview/rights.html

ISO 14001

www.iso.org

SA8000 and SAI(Social accountability international)

<http://www.sa-intl.org/>