

HD Construction Equipment Hyundai  
North America Inc.

S-211 Fighting Against Forced Labour  
& Child Labour in Supply Chains

Annual Report FY25

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## Report

### I. Introduction

HD Construction Equipment Hyundai North America Inc. (“HNA”) is the North American supplier of various types of Hyundai construction equipment and material handling forklifts. An integral part of HNA’s business operations is establishing a supplier relationship with diverse component distributors, equipment dealers, and end-user customers.

To briefly summarize, HNA is fully committed to conducting business in an ethical and compliant manner with respect to all applicable laws and regulations where it transacts business. As this report will further detail herein, HNA takes a methodical approach to ensure that all business relationships are transparent and uphold Hyundai’s ethical standards and values in the course of business.

### II. Steps Taken to Prevent and Reduce the Risk of Forced Labour and Child Labour

In ongoing efforts to prevent and reduce the risk of forced labour and child labour at any stage of importing and selling goods in Canada, HNA has implemented a number of measures during the previous financial year. In addition to the specific actions identified in the reporting questionnaire, HNA aligns its practices with those of its parent company, HD Construction Equipment Co., Ltd. (“HCE”) of Korea, a committed member of the United Nations Global Compact (“UNGC”).

HNA supports the Ten Principles of the UNGC, which encompasses core commitments to human rights, labour, environment, and anti-corruption. In doing so, we uphold and comply with the International Bill of Human Rights and the fundamental principles expressed in the International Labor Organization (“ILO”) declarations.

HNA is fully devoted to respecting the human rights of all individuals connected to our operations including employees, stakeholders, suppliers, dealers, and end-user customers. We maintain a zero-tolerance policy for abusive language, violence, sexual harassment, and other inappropriate behaviors that undermine a respectful and inclusive environment both within our organization and in our dealings with business partners and external partners. Any reported human rights violations are promptly addressed in accordance with internal policies, procedures, and regulations, under the leadership of the Human Rights Management Committee. We conduct ongoing education and awareness programs aimed at preventing forced labour and child labour as well as promoting a broader culture of human rights respect within our workforce and supply chain.

## III. Structure, Activities and Supply Chains

HNA is an Illinois corporation established to promote and distribute the products of its parent company, HCE, in the North American market. HCE is a global construction equipment manufacturer headquartered in Korea, which operates under the umbrella of HD Hyundai group of companies.

HNA's North American headquarters is located in Norcross, Georgia. HNA partners with over 170 dealer locations across the United States (U.S.) and Canada to offer a comprehensive range of construction equipment including, but not limited to, excavators, wheel loaders, compact construction equipment, specialty machinery, and material handling forklifts. HNA currently employs approximately one hundred fifty (150) full-time and part-time employees in the U. S. and engages four (4) agents in Canada on a contractual basis to support the dealer sales and service operations. HNA does not maintain any corporate entity in Canada. For clarity, HNA's four (4) agents operate strictly as an independent contractor in Canada.

To manage environmental, social, and governance ("ESG") risks within our supply chain, HNA adheres to the Supplier Code of Conduct established by its parent company. This Code is designed to ensure business practices and compliance with global labor and human rights standards throughout the supply chain. In addition, HCE has developed specific Supply Chain ESG Management Policies to guide the implementation of its standards. These policies cover key areas such as ethics, environment, labour practices, human rights, occupational safety and health, and supply chain management systems. The policies apply to all suppliers and subcontractors entering into agreements to provide goods or services to HCE or HNA. These standards are based on global standards such as the UN Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises, the ILO Core Conventions, and other relevant international benchmarks.

## IV. Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour

HNA unequivocally rejects all forms of human rights violations, including forced labour and child labour in both its direct or indirect operations and across its supply chain. To ensure the protection and promotion of human rights, HNA has established a structured governance framework that facilitates regular coordination between the Board of Directors and relevant organizational units. At the core of this framework is Hyundai's Human Rights Management Code, which articulates our key values and principles. This Code outlines:

- The formal Human Rights Policy;
- The operation of a Human Rights Management Committee;
- The implementation of human rights impact assessments; and

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- The processes for remedial action in cases of human rights violations.

To support responsible business conduct, HNA requires all dealers and/or business partners to complete a Due Diligence Questionnaire. This measure ensures that all dealers and business partners comply with all applicable laws and regulations before entering into a business relationship.

Within the supply chain, strict standards are imposed on all suppliers. Suppliers are required to verify the age of employees and job applicants through legal documents such as identification cards and birth certificates and must not source goods and services from any entity found to be engaged in child labour or in violation of applicable laws. Suppliers must employ individuals in compliance with the applicable laws and regulations of the jurisdiction in which they operate. Additionally, suppliers are required to prohibit any form of forced labour or compulsory labour against the will of employees, including work performed under threat, coercion, or as a result of debt or physical/mental restraint. Products and Services must not be sourced from any business partners involved in forced labor or any related exploitative or unethical practices.

HNA has taken an additional step toward compliance by implementing an internal policy against forced labor and child labor in supply chains. This policy is designed to provide awareness and clarity of the corporate position on forced labor and child labor. Moreover, the policy is intended to ensure compliance throughout business operations by outlining formal requirements for all suppliers, vendors, and business partners. Lastly, the policy effectuates procedures and responsibilities of each department's role in combatting forced labor and child labor, provides reporting procedures for employees, outlines remediation and corrective action steps, and implements documentation and recordkeeping standards.

## V. Risk Areas in Business and Supply Chains and Risk Management Measures

HNA recognizes that while its direct operations present a low risk of forced labour and child labour, certain segments of its global supply chain that involve the extraction of raw materials carry a higher potential risk for such violations. In response to these concerns, HCE and all its subsidiaries, including HNA, have implemented comprehensive risk assessment and mitigation measures to address potential exposure to forced labour and child labour in these areas.

Specifically, heightened attention is given to verifying the origins and smelters of all minerals and raw materials, including conflict minerals and responsible minerals such as tin, tungsten, tantalum, and gold, included in the product. Suppliers must check whether social and environmental issues such as serious human rights violations, ethics violations, and negative environmental impacts have occurred or occur at the origins and smelters of minerals and raw materials in accordance with

the relevant process. If suppliers mainly deal with minerals and raw materials, they must conduct their own investigation or acquire external certification to confirm that the mining and processing of the minerals and raw materials are not related to human rights violations, ethical violations, and negative environmental impacts. If suppliers have a reasonable suspicion that the raw materials they use are illegal, have a negative impact on the environment, or are procured through unethical methods, an appropriate policy must be established to prevent their use. Suppliers must not use raw materials and minerals (tin, tantalum, tungsten, gold, etc.) of specific origin within our supply chain in accordance with the 'OECD Guidelines on the Responsible Supply Chain of Minerals from Conflict and High-Risk Areas' under any circumstances. Ultimately, Suppliers must provide relevant evidence, such as a certificate of origin, upon request from HCE and its subsidiaries.

## VI. Remediation Measures for Forced Labour or Child Labour

To date, HNA has not identified any instances of forced labour and child labour within its operations or supply chains. Accordingly, no remediation measures have been necessary or undertaken at this time.

Nonetheless, HNA remains committed to taking immediate and appropriate corrective action should any such cases be identified in the future. In alignment with the company's Human Rights Management Code and Supplier Code of Conduct, any confirmed violation would trigger a formal investigation and response process, led by the appropriate internal governance bodies. Potential remedial actions may include suspension or termination of business relationships, the implementation of corrective action plans, and engagement with stakeholders to ensure the protection and restitution of affected individuals.

HNA continues to monitor its operations and supply chain with diligence and transparency. Moreover, HNA is prepared to respond effectively to any identified risks of forced or child labour.

## VII. Remediation of Income Loss to Vulnerable Families

To date, HNA has not identified any instances where actions taken to eliminate forced labour and child labour within its operations or supply chains have resulted in the loss of income to vulnerable families. HNA remains mindful of the potential unintended consequences of due diligence and compliance activities on economically vulnerable communities. Should future measures to eliminate forced or child labour result in income disruption to affected families, HNA is committed to working collaboratively with stakeholders including suppliers, local partners, and civil society organizations to identify and implement appropriate mitigation and support strategies, in alignment with internationally recognized human rights and responsible business practices.

## VIII. Employee Training on Forced Labour and Child Labour

HNA, in alignment with its parent company, provides biannual training to all employees to prevent forced labour and child labour and to foster a culture of human rights and compliance. These training programs are conducted in accordance with U.S. and Korea's relevant legal frameworks including, but not limited to, the Equal Employment Opportunity Act, the Act on the Employment Promotion and Vocational Rehabilitation of Persons with Disabilities and the Labor Standards Act. Training sessions are held twice a year and cover key topics such as the prohibition and prevention of forced labour and child labour, workplace harassment prevention, and human rights awareness including rights of persons with disabilities. Additionally, regular mandatory education is provided to reinforce compliance, increase employee sensitivity to human rights risks, and ensure a safe, respectful, and inclusive work environment across all operations.

## IX. Assessment of Effectiveness in Preventing Forced Labour and Child Labour

HNA assesses its effectiveness in preventing the use of forced labour and child labour through regular human rights impact assessments. These assessments are designed to proactively identify and prevent potential human rights risks associated with its business operations and supply chains. The Human Rights Management Committee of the parent company was established to enhance the human rights management level, and human rights impact assessments were conducted based on the standard form provided by the National Human Rights Commission in Korea. This process includes evaluating the perspectives of various stakeholders such as employees, customers, shareholders, business partners, local communities, and the government, all specifically in relation to HNA's operations. These impact assessments help ensure that HNA's policies and procedures remain effective and aligned with international standards and best practices in human rights, including the prevention of forced labour and child labour.

## X. Contact Information

For further inquiries or more detailed information, please contact us:

<https://na.hd-hyundaice.com/about-us/contact-us/>

Address: 6100 Atlantic Blvd., Norcross, GA 30071

Phone: 678-823-7777

Toll-Free: 1-877-509-2254

Fax: 678-823-7778

## Attestation

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”), and in particular section 11 thereof, I hereby attest that I have reviewed the information contained in the report on behalf of the entity listed above. To the best of my knowledge, and having exercised reasonable diligence, I attest that the information contained in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year indicated above.

I have the authority to bind HD Construction Equipment Hyundai North America Inc.

Signature	 _____
Name	<u>Seongbae Park</u>
Title	<u>President &amp; CEO</u>
Date	<u>May 8, 2026</u>
Entity	<u>HD Construction Equipment Hyundai North America Inc.</u>