



Kia

Responsible Minerals Report

May 2026

[1. Overview]

A. Purpose of Publication

Kia recognizes that ensuring ethical responsibility throughout the supply chain is essential to achieving its vision of 'Progress for Humanity'. Minerals used in our automobile parts, such as tin, tantalum, tungsten, gold, cobalt, and key raw materials for EV batteries, may entail serious risks of human rights abuses and environmental pollution if mined in Conflict-Affected and High-Risk Areas (CAHRAs), including the Democratic Republic of Congo and adjacent countries.

Accordingly, Kia has established a systematic supply chain management system and actively engages suppliers in these efforts to build a supply chain completely free from the illegal mining and trading of minerals. In addition, we identify, assess, prevent, mitigate, and remediate risks of adverse impacts through risk-based continuous monitoring and due diligence.

Kia implements responsible minerals and conflict minerals management in compliance with relevant laws and international standards, including the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas," "OECD Guidelines for Multinational Enterprises," "UN Guiding Principles on Business and Human Rights," "ILO Fundamental Conventions," "Universal Declaration of Human Rights," the International Bill of Human Rights including the "International Covenant on Civil and Political Rights" and the "International Covenant on Economic, Social and Cultural Rights," as well as the "United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)" for the protection of indigenous peoples' rights, and the "European Union Battery Regulation (EUBR)".

This report is published to fulfill Kia's commitment to transparently disclosing to stakeholders and the public its social and environmental risk management and responsible mineral due diligence efforts in the sourcing and procurement of raw materials.

B. Reporting Scope

[Responsible Minerals Application in Vehicle Components and Materials]

As the automotive industry transitions into an electrification-centered smart mobility solution provider, the scope and importance of raw materials required for vehicle manufacturing are undergoing significant changes. In addition to iron and aluminum widely used in conventional car bodies and engines, the stable and ethical sourcing of conflict minerals and other responsible minerals (such as cobalt, lithium, and nickel) used in EV batteries and electronic components has become central to our supply chain management.

This report covers the entire supply chain of responsible minerals used in Kia's major vehicles and electrification components. As of 2026, the current status of 22 minerals included in the responsible minerals management scope and their application in major vehicle parts is as follows.

Key Materials & Minerals in Vehicle Parts

Category	Vehicle Parts & Materials
Tin	Vehicle connectors, sensors, printed circuit boards, etc.
Tungsten	Valves, spark plugs, piston rings, etc.
Tantalum	Sensor circuits, communication modules, electronic control units, capacitors, etc.
Gold	ECU circuits, connector plating, sensor contacts, etc.
Cobalt	Batteries, high-temperature bearings, turbine blades, exhaust gas purification catalysts, etc.
Nickel	Batteries, valves, engines, stainless steel, etc.
Lithium	Batteries, wheel bearings, etc.
Natural Graphite	Batteries, lubricants, fillers, etc.
Copper	Batteries, wiring, connectors, motors, etc.
Mica	Batteries, motors, etc.
Iron	Car bodies, engines, wheels, bolts, etc.
Aluminum	Transmissions, motors, engines, wheels, etc.

[Reporting Period]

The primary reporting period of this report covers January 1, 2025, through December 31, 2025. However, to comprehensively demonstrate Kia's sustainable mineral management efforts, some major goals for 2026 have been included in the content.

[2. Responsible Minerals Management System]

A. Policies Related to Responsible Minerals

Kia operates a company-wide mineral management system by enacting and revising three core policies: the Responsible Raw Materials Sourcing Policy, the Responsible Minerals Sourcing Policy, and the Supplier Code of Conduct, to practically implement global standards and relevant laws, and to prevent human rights and environmental issues that may arise during the sourcing process across the entire supply chain, including minerals.

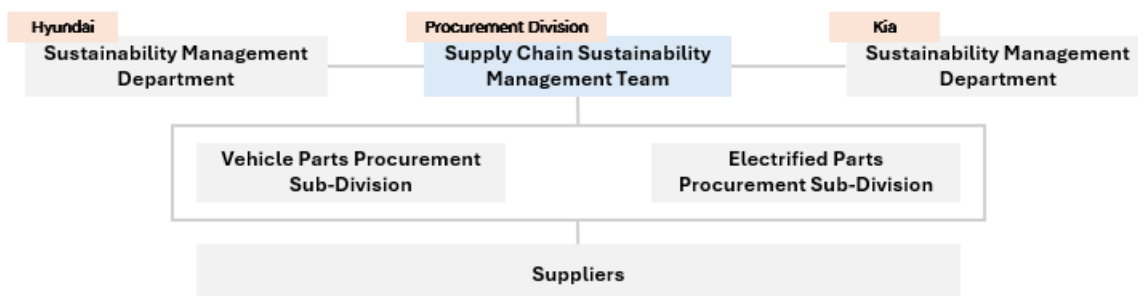
By organically linking these policies, we strictly manage the use of responsible minerals and conflict minerals (3TG) unethically mined in Conflict-Affected and High-Risk Areas (CAHRAs), and block production involving child labor and direct or indirect forced labor at all stages of the supply chain. In addition, considering the impact of mineral sourcing on local communities, we respect and guarantee the principle of Free, Prior and Informed Consent (FPIC) of indigenous communities.

- **Kia Responsible Raw Materials Sourcing Policy**
- **Kia Responsible Minerals Sourcing Policy**
- **Kia Supplier Code of Conduct**

※ Kia ESG Policy Web page [Link](#)

B. Responsible Minerals Management Organization

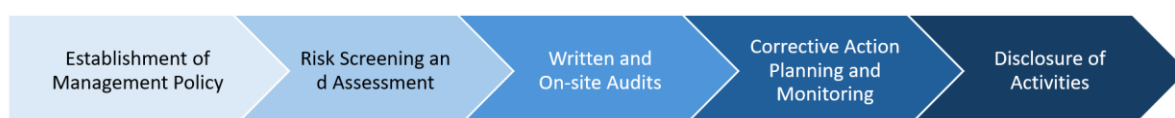
Kia has an organization that oversees the management process for the systematic implementation of social responsibilities related to conflict minerals. The Supply Chain Sustainability Management Team within the Procurement Division continuously manages and monitors responsible mineral risks of each purchasing business unit and supplier throughout the year. In addition, it forms a consultative body with relevant departments, such as the Kia and Hyundai Motor Company Sustainability Management Division—responsible for company-wide risk management and sustainability strategy, as well as external affairs and legal departments. Through regular quarterly meetings of the consultative body, we manage and operate responsible mineral-related risks in an integrated manner in connection with corporate-wide ESG perspectives and sustainable management goals.



C. Responsible Minerals Management Process

To realize responsible raw material sourcing within the global supply chain, Kia has established a Responsible Sourcing Management System (RSMS) and a supply chain due diligence procedure. The RSMS is based on the “OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas” and is designed to effectively address OECD Annex II risks. Furthermore, it aligns with major international frameworks, including the Responsible Minerals Initiative (RMI) and the European Union Battery Regulation (EUBR).

In addition, Kia regularly monitors the performance and effectiveness of its Responsible Sourcing Management System (RSMS) to ensure alignment with this Policy and evolving international standards. Based on this, Kia revised the Responsible Minerals Sourcing Policy in August 2025 through internal consultation with relevant departments, and is committed to continuously improving the RSMS in line with global best practices and stakeholder expectations. The RSMS will be reviewed and updated at least every two years, or sooner if significant changes in circumstances, regulations, or supply chain risks arise.



[3. Kia's 2025 Responsible Minerals Management]

A. Target Minerals

[Responsible Minerals Management Roadmap]

Kia is progressively expanding the scope of minerals under management. Based on the results of the mineral materiality assessment in 2024, we selected a total of five minerals—four conflict minerals (tantalum, tin, tungsten, gold) and cobalt—as high-priority minerals, strengthened related policies, and established a management system. From 2025 onward, including battery materials, we have included 22 minerals with potential human rights and environmental risks in mining processes in our responsible minerals management scope. We are implementing differentiated management by selecting priority minerals for management based on the sustainability risks and materiality of each mineral.

[Results of Responsible Minerals Materiality Assessment]

Kia continuously monitors the use of conflict minerals that are illegally or unethically mined and distributed in conflict-affected areas within our supply chain, as well as responsible minerals that may raise human rights and environmental issues during the mining process. Among these, to select and intensively manage critical minerals with high relevance to our business and a strong need for management, we conducted a mineral materiality assessment in 2025 that comprehensively considered the following factors to derive priority minerals for management.

- Global regulatory trends: New regulations and legal obligations in major countries, such as the "European Union Battery Regulation (EUBR)"
- Distribution of high-risk areas: Whether the main production sites of the minerals fall under Conflict-Affected and High-Risk Areas (CAHRAs)
- Impact of human rights and environmental risks: The severity of human rights and environmental risks to local communities during the mining process, such as child labor, forced labor, severe environmental destruction, and gender-based violence
- Our sourcing strategy: The importance and sourcing proportion of the mineral for our essential components, such as EV batteries
- Stakeholder interest: Media screening, reflecting areas of interest from NGOs, suppliers, associations, and academia
- Others: Global certification status

Evaluation Criteria	Conflict Minerals (Tin, Tungsten, Tantalum, Gold)	Battery Material Minerals (Cobalt, Lithium, Nickel, Natural Graphite)	Other Minerals (Mica, Platinum, Palladium, Rhodium, etc.)
Global Regulations	High	High	Low
Distribution of High-Risk Areas*	High	High	Mid
Human Rights and Environmental Risks	High	High	Mid
Strategic Sourcing	Mid	High	High
Stakeholder Interest	High	High	Mid
Others (global certification status, etc.)	High	Mid	Low
Materiality assessment result	High (high-priority minerals)	High (high-priority minerals)	Mid

※The specific scope of High-Risk Areas (CAHRAs) applies the definitions under the OECD Due Diligence Guidance for Responsible Minerals and relevant laws, which are regularly reviewed and updated.

As a result of the assessment, a total of 22 responsible minerals were selected as management targets. Among them, taking into account the materiality of risks and their relevance to our business, we selected a total of eight minerals—tin, tantalum, tungsten, gold, cobalt, nickel, lithium, and natural graphite—as high-priority minerals in 2025 and carried out management activities. For the 22 minerals, we identified the mineral inclusion status of parts used in all our vehicle models and whether they were traded with certified smelters through CMRT, EMRT, and AMRT surveys. In addition, for the eight minerals selected as high-priority minerals, we conducted both on-site audits and written assessment (SAQ, Self-Assessment Questionnaires) targeting mines and smelters to perform a multi-layered analysis of risk factors within the supply chain.

As of January 2026, among the 22 minerals for management, 16 minerals have smelters certified by the RMAP (Responsible Minerals Assurance Process), while six minerals do not yet have an RMAP certification system in place. For the 16 minerals with RMAP-certified smelters, our principle is to source through certified smelters, and if uncertified smelters are used, we require improvements so that certification can be obtained within a reasonable timeframe.

For the six minerals without an RMAP certification system, we apply the obligation of best efforts in accordance with the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas". Accordingly, suppliers are required to ensure transparency for the responsible sourcing of these minerals, comply with relevant international industry standards and guidelines, and actively seek alternative verification methods.

[Management Measures by Mineral]

Kia classifies minerals and applies differentiated due diligence measures based on the characteristics of the raw materials and the level of risk.

Category	Management Template	Management Measures
Conflict Minerals	CMRT (Conflict Minerals Reporting Template)	Verify whether it is an RMAP ¹⁾ certified smelter
Battery Material Minerals	EMRT (Extended Minerals Reporting Template)	Verify whether it is a certified smelter, conduct due diligence based on OECD Guidelines
Other Minerals	AMRT (Additional Minerals Reporting Template)	Verify relevant certifications such as LPPM ²⁾ , conduct risk identification and mitigation measures based on OECD Guidelines

¹⁾ RMAP (Responsible Minerals Assurance Process): A responsible minerals assurance process operated by the RMI (Responsible Minerals Initiative) that grants certification by evaluating the systems and processes for verifying the use of conflict minerals in the supply chain and responsible minerals sourcing.

²⁾ LPPM (London Platinum and Palladium Market): A supervisory body for the platinum and palladium trade in the London precious metals market, operating the Responsible Sourcing Programme for the ethical and responsible operation of the platinum and palladium supply chains.

[Introduction to High-Priority Minerals]

The main production sites, usage in products, and major issues in the supply chain for the eight high-priority minerals, including conflict minerals and critical battery materials, are as follows.

Mineral	Major Production Sites	Major Usage	Major Issues
Tantalum (Ta)	Democratic Republic of Congo, Rwanda, Mozambique	Electronic components, high-temperature precision alloys, medical devices, etc.	High concerns regarding funding of armed groups, forced displacement, and violation of indigenous peoples' rights; frequent issues of forest and soil destruction and air pollution during mining.
Tin (Sn)	China, Indonesia	Solder for electronics, plating, alloys, chemical materials	High reliance on artisanal and small-scale mining (ASM); high risks of conflict funding and child labor; risks of encroachment on biodiversity conservation areas and leakage of acidic/radioactive substances.
Tungsten (W)	China, Vietnam	Cemented carbides, high-speed steel tools	High concerns regarding funding of armed groups, forced displacement, and violation of indigenous peoples' rights; frequent issues of forest and soil destruction and air pollution during mining.

Mineral	Major Production Sites	Major Usage	Major Issues
Gold (Au)	China, India, South America, etc.	Electronic component connections and plating, jewelry, investment assets	High risks of funding armed groups in conflict areas and money laundering; causes severe soil and water pollution due to the use of hazardous chemicals and acidic discharges during smelting.
Cobalt (Co)	Democratic Republic of Congo, Russia, Australia, Canada	Lithium-ion batteries for EVs, mobile phones, computers, etc.	High proportion of ASM, leading to high risks of child labor, corruption, and acidic wastewater discharge. In our on-site audits, no serious human rights abuses were found, but environmental/safety infrastructure issues, such as erosion of tailing facilities, were identified.
Nickel (Ni)	Indonesia	Stainless steel, lithium-ion batteries, etc.	High risks of hazardous chemical and acidic wastewater leakage, biodiversity degradation, and violation of indigenous peoples' rights. In our on-site audits, deficiencies in physical safety measures (e.g., chemical storage) and the need for improvement in employment contract clauses were identified.
Lithium (Li)	Australia, Bolivia, Chile, Argentina	Cathode materials for lithium-ion batteries, ceramics, glass	Mining operations generate significant water resource depletion and contamination, posing high risks of biodiversity loss and conflict with local communities, including indigenous peoples.
Natural Graphite (C)	China, Brazil, Mozambique	Anode materials for EV batteries, lubricants, pencil leads, etc.	Risks of child/forced labor and corruption; issues of air and water pollution due to inadequate management of hazardous substances during mining and processing.

B. Compliance with Responsible Minerals Sourcing Policy

To realize responsible mineral sourcing, Kia has established management policies and operational plans, solidifying a company-wide management system accordingly. This policy clearly defines the minerals prohibited from use within our supply chain and encompasses the core labor principles set by the International Labor Organization (ILO) (guaranteeing freedom of association and the right to collective bargaining, eliminating forced labor, effectively abolishing child labor, eliminating discrimination in employment and occupation, and ensuring a safe and healthy working environment) and the payment of a living wage. It requires that these fundamental labor rights be guaranteed within the supply chain. We demand compliance with these labor rights standards at all stages of the mineral supply chain and

operate by reflecting them in the evaluation items for supplier assessments and on-site audits. Furthermore, it is designed to meet international responsible sourcing standards and serves as the foundation for implementing ethical sourcing activities across the entire supply chain.

[Responsible Minerals Training for Employees]

Kia regularly conducts training to enhance the policy implementation capabilities of employees who perform internal tasks related to conflict minerals, encouraging them to actively recognize and report issues that hinder sustainability during the procurement process.

[Responsible Minerals Policy Training for Suppliers]

Kia provides practical support to suppliers so they can effectively implement the Responsible Minerals Sourcing Policy and ensure transparency. First, to aid suppliers' understanding, we distribute a responsible minerals management guide and host an annual supplier briefing session to emphasize the policy direction and the importance of management.

In particular, in March 2025, we conducted intensive training for Tier 1 suppliers and EV battery suppliers. In this training, we shared the background of responsible minerals management, global regulatory trends, and our management policy, and provided practical guidance on completing CMRT/EMRT forms and working with RMAP-certified smelters, helping suppliers strengthen their management capabilities. Furthermore, we are establishing ethical sourcing standards across the entire supply chain by strongly requiring that the Responsible Minerals Sourcing Policy be applied and enforced throughout the lower-tier supply chain.

In addition, to substantively ensure suppliers' obligations to manage responsible minerals, Kia has integrated and managed these obligations throughout the entire contract and registration process.

All contracts and agreements with suppliers explicitly include responsible minerals management obligations, with strict compliance required. In 2025 in particular, the key provisions of the revised Responsible Minerals Sourcing Policy and Supplier Code of Conduct were fully incorporated into new contracts, ensuring that suppliers are clearly aware of their strengthened obligations on responsible minerals and conflict minerals management.

Category	Unit	2025
Responsible Minerals Briefing Session	Persons	1,893
Training on ESG Policy Revisions	Persons	2,096

[Supplier Commitments to Use RMAP-Conformant Smelters]

In 2026, Kia is asking Tier 1 suppliers to sign a Written Pledge to Use RMAP-Conformant Smelters, with the aim of strengthening the effectiveness of the Responsible Minerals Sourcing Policy. The pledge covers the following:

- Use of RMAP-Certified Smelters: For responsible minerals where RMAP-certified smelters exist, we recommend sourcing through certified smelters.
- Certification for Non-Certified Smelters: Where non-certified smelters are in use, suppliers are encouraged and required to work toward obtaining RMAP conformance within a reasonable timeframe.
- Where No RMAP-Certified Smelter Exists: The best-efforts obligation under the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" applies.
- Sanctions for Non-Compliance: Where serious human rights or environmental risks under OECD Annex II are identified and no meaningful improvement efforts are made, substantive corrective actions will be required, and suspension of business may be considered if necessary.

Through this pledge, Kia asks Tier 1 suppliers to apply the same RMAP principles to their sub-tier supply chains—including Tier 2, Tier 3, and beyond—and to monitor compliance on a regular basis. The goal is to progressively extend the reach of our responsible minerals management policy across the entire mineral supply chain, beyond Tier 1 suppliers.

C. Risk Screening

Kia conducts supply chain mapping to ensure transparency and manage risks across all upstream and downstream stages of responsible minerals and conflict minerals.

[Identification of Value Chain by Mineral]

We have a traceability system capable of identifying mineral sourcing routes by digitizing upstream suppliers and business partners within the RSMS.

e.g. Lithium (Li)

Upstream: Lithium mining → Refining (Li_2CO_3 /LiOH production)

Midstream: Cathode material manufacturing, Battery cell manufacturing

Downstream: EV completed vehicle, Battery pack assembly

Using a product-based approach, we map the mineral-containing components used in key EV models and assess the associated risks among mineral-sourcing suppliers.

[CMRT/EMRT/AMRT Survey]

To assess mineral usage across the supply chain, Kia required all suppliers of mass-production parts to submit CMRT, EMRT, and AMRT data. For suppliers with incomplete submissions, the Company gathered feedback regarding their challenges and reiterated the importance of active engagement in the responsible minerals and conflict minerals management process. This resulted in a data submission rate of over 93%, among which approximately 630 suppliers were confirmed to be actually using 3TG minerals.

Based on the CMRT/EMRT data submitted by suppliers, we checked their transaction status with RMAP-certified smelters. Accordingly, we requested suppliers not trading with conformant smelters to implement responsible mineral sourcing policies and trade with conformant smelters, encouraging all

suppliers to thoroughly manage responsible minerals and conflict minerals and faithfully fulfill their social responsibilities.

[Smelters and Refiners in the Supply Chain]

The countries where the identified Smelters or Refiners (SoRs) in our supply chain are located, by mineral, are as follows:

- Tantalum: 13 countries (Germany, USA, Brazil, Japan, India, China, Rwanda, etc.)
- Tin: 23 countries (Taiwan, Belgium, Bolivia, Vietnam, Spain, Indonesia, Philippines, Australia, DRC, etc.)
- Tungsten: 12 countries (Taiwan, Germany, Vietnam, Brazil, China, Philippines, Japan, South Korea, etc.)
- Gold: 47 countries (Germany, USA, Mexico, Brazil, Canada, China, India, Indonesia, Japan, Zimbabwe, South Korea, etc.)
- Cobalt: 23 countries (Morocco, USA, Indonesia, India, China, Philippines, South Korea, DRC, etc.)
- Nickel: 14 countries (South Africa, USA, Belgium, Brazil, Indonesia, India, Japan, China, Australia, etc.)
- Lithium: 6 countries (USA, Argentina, India, China, Chile, Australia)
- Natural Graphite: 1 country (China)
- Copper: 23 countries (USA, Belgium, Brazil, Chile, Turkey, China, Zimbabwe, Zambia, Australia, South Korea, DRC, etc.)

[Geopolitical Risk Mapping of the Supply Chain]

CAHRAs (Conflict-Affected and High-Risk Areas) refer to areas where serious human rights abuses and environmental risks exist or are high due to armed conflict, fragile governance, and lack of security. Kia filters suppliers in CAHRAs, classifying them as a high-risk group for intensive management.

We analyze supply chain geopolitical risks based not only on the EU CAHRAs list but also on credible external indicators considering each regional context. We comprehensively consider indicators required for reference when identifying CAHRAs in the RMI guidelines, such as Dodd-Frank Act regulated countries, the Human Development Index, U.S. Department of Labor (USDOL) List, Heidelberg Conflict Barometer, and Corruption Perceptions Index, to determine geopolitical risks.

In particular, Kia reflects the Red Flags defined in Annex II of the OECD Due Diligence Guidance in its supply chain risk assessment. In 2025, in response to the due diligence requirements of the EU Battery Regulation (EUBR), we conducted a risk assessment based on Conflict-Affected and High-Risk Areas (CAHRAs) targeting the battery supply chain. Currently, we are building an EUBR traceability system and plan to disclose more detailed inspection results once the system is completed.

D. Written Assessment and On-site Audits

As a result of the supply chain geopolitical analysis, we conduct multi-layered assessments to verify actual risks for supply chains requiring relatively intensive management and high-priority minerals.

To this end, Kia regularly conducts a Supply Chain Sustainability Risk Written Assessment for suppliers handling conflict minerals (3TG) and critical battery materials such as cobalt, lithium, nickel, and natural graphite. The assessment includes responsible minerals-related questions designed to identify human rights and environmental risks within those supply chains. Furthermore, for supply chains identified as high-risk through the written assessment, we concurrently conduct on-site audits for responsible minerals through independent third-party specialized organizations.

[On-site Audit Process]

Kia conducts on-site audits based on relevant guidelines and regulations, such as the "OECD Due Diligence Guidance" and "EU Battery Regulation," focusing on suppliers identified as high-risk supply chains during the risk screening process. After conducting audits through independent third-party organizations, areas requiring improvement are identified, and the audit results are transparently shared with the suppliers. Subsequently, we request suppliers to establish improvement plans and submit their corrective action plans within specified timeframes, and continuously monitor the implementation status.

[Mine and Smelter Audit Overview]

In 2025, to directly verify human rights and environmental risks in the critical battery mineral supply chain, Kia conducted on-site audits at a total of three mines and smelters in the Democratic Republic of Congo and Indonesia through an independent third-party audit organization (RCS Global). In particular, this on-site audit secured objectivity and reliability through an independent third-party organization, while Kia's internal responsible minerals personnel also accompanied the audits to gain an in-depth understanding of actual risk factors on-site, thereby enhancing the effectiveness of risk management. The audit applied the "OECD Due Diligence Guidance," "EU Battery Regulation," and IRMA Critical Requirements as evaluation standards, covering all areas of human rights, labor, environment, and governance. Specifically, it included one cobalt-copper (Co-Cu) mine and smelter in the Democratic Republic of Congo, one nickel (Ni) smelter in Indonesia, and one nickel (Ni) mine in Indonesia.

Although Indonesia is not officially designated as a Conflict-Affected and High-Risk Area (CAHRA), as environmental pollution issues have frequently been raised during the nickel mining process recently, audits were conducted as a proactive risk management measure. In 2026, we plan to expand the scope of continuous management by conducting audits on 8 mines and smelters.

Category	Unit	2025	2026 (Target)
Mine/Smelter/Refiner On-site Audits	Sites	3	8

[On-site Audit Results by Site]

Cobalt-Copper (Co-Cu) Mine and Smelter (Democratic Republic of Congo)

An audit was conducted on an integrated cobalt-copper mining and smelting operation in the Democratic Republic of Congo. The following positive practices were noted: the site sources raw materials only from its own mining concessions based on a valid mining license, complies with relevant legal procedures, including Free, Prior and Informed Consent (FPIC), when acquiring land, and maintains communication channels with local community stakeholders. In addition, no serious human rights abuses, such as forced labor, child labor, and involvement with illegal armed groups, were found. However, the overall human rights/labor management system and environmental risk management infrastructure were found to be vulnerable. Multiple non-conformances were identified in the area of social responsibility, such as the absence of a human rights due diligence process and inadequate external grievance channels, and in the environmental aspect, critical environmental/safety risks were identified, including the temporary suspension of ISO 14001 certification, neglect of major erosion within the tailing facility, and the absence of an engineer in charge of safety monitoring. Kia demanded the submission and implementation of a corrective action plan considering the severity of the identified risks, and is continuously monitoring the improvement implementation status.

Nickel (Ni) Mine (Indonesia)

This site sources only nickel directly extracted from its own mine, eliminating the risk of mixing materials from external sources, and maintains an excellent management system across environmental, health, and safety areas at the site level, such as maintaining ISO 14001 and ISO 45001 certifications and acquiring the 'Green' rating from the Indonesian Ministry of Environment's PROPER program. In addition, the facility has also demonstrated positive practices, including the installation of solar panels on residential facilities to support its transition to renewable energy, and the operation of maternal health and education programs for the local community. However, building an 'upstream supply chain governance' that meets OECD guidelines was identified as a major task. The absence of an official responsible mineral sourcing policy, lack of CAHRA identification procedures, and failure to publish external reports on audit results were identified as non-conformances, indicating that a systematic supply chain due diligence management structure was not established, and thus the establishment of systematic governance was required.

Nickel (Ni) Smelter (Indonesia)

An audit was conducted on a large-scale nickel hydrometallurgical smelter located in Morowali, Central Sulawesi, Indonesia. This site demonstrated excellent capabilities in supply chain transparency by establishing an official responsible sourcing policy for critical battery minerals such as nickel and cobalt and operating an ERP (Enterprise Resource Planning)-based mineral traceability system. In addition, forced labor and child labor were not identified, and it was confirmed that human rights due diligence and grievance channels are operating appropriately. However, some improvement tasks were identified due to the existence of excessive disciplinary deduction clauses within the contracts of some foreign workers. In addition, advancing the site's safety and tailing (mineral residue) management capabilities was identified as a key area for improvement. Physical safety measures were found to be inadequate,

such as the lack of secondary containment vessels in the hazardous chemical warehouse, and the omission of emergency exit signs and emergency lighting in indoor exercise facilities and hazardous waste warehouses. Accordingly, we recommended supplementing the proactive physical safety monitoring system, such as analyzing the height and slope of tailing accumulations using satellite imagery, and are currently inspecting the implementation of improvements.

On-site Audit Results - Non-conformance Status by Area

As a result of the three on-site audits conducted in 2025, a total of 58 non-conformances (47 Major, 11 Minor) were identified. In particular, reflecting the operational characteristics of mines and smelters where large-scale infrastructure and manpower are deployed, key improvement tasks were derived in the areas of 'Social Responsibility' (safety and health, labor conditions, etc.) and 'Environmental Responsibility' (tailing facilities, etc.) directly linked to the working environment. In addition, non-conformances were also identified in the 'Governance and Due Diligence Management System' area, such as the need to formalize supply chain management policies in writing.

Area	Nickel Smelter in Indonesia	Nickel Mine in Indonesia	Cobalt-Copper (Co-Cu) Mine and Processing Facility in DRC
Due Diligence System	1	8	9
Governance	1	3	4
Social Responsibility	2	6	10
Environmental Responsibility	2	0	12
Total	6	17	35

On-site Audit Results - Non-conformance by Severity

Severity	Nickel Smelter in Indonesia	Nickel Mine in Indonesia	Cobalt-Copper (Co-Cu) Mine and Processing Facility in DRC
Critical	0	0	0
Major	3	16	28
Minor	3	1	7
Total Non-conformances	6	17	35

E. Establishment of Improvement Plans and Monitoring

To resolve the risks identified as a result of the audits, Kia sets response priorities based on the severity and urgency of the risks and manages progress through performance objectives and Key Performance Indicators (KPIs). All risk assessment results and improvement statuses are regularly reported to management committee meetings involving key decision-makers. We also continue to monitor the proportion of procurement from RMAP-certified smelters.

[Corrective Action Plan Development and Implementation]

Kia completed on-site audits at three sites in the second half of 2025 and, in collaboration with an independent third-party organization, is working with each site to develop and implement site-specific corrective action plans to address a total of 58 identified non-conformances (47 Major, 11 Minor). Suppliers have established corrective action plans for the identified non-conformances, and improvement measures are being carried out sequentially according to the audit timing and implementation stage of each site.

Major improvement examples are as follows:

- **Expansion of Safety and Health Infrastructure:** Regarding inadequate physical safety measures identified during on-site audits, such as improper storage of hazardous chemicals and missing safety signs, secondary containment vessels to prevent leakage of hazardous substances have been fully installed, and large-scale new chemical storage facilities are being completed for relocation. In addition, missing emergency exit signs and emergency lighting in the workplace have also been installed to improve worker evacuation facilities.
- **Tailing Facility Management Enhancement:** To mitigate critical environmental and safety risks, such as the risk of erosion and collapse of tailing facilities, automated patrol and landslide monitoring systems using drones are being newly introduced. Furthermore, emergency response capabilities have been strengthened by conducting joint emergency rescue drills in preparation for tailing slope collapse in connection with nearby industrial complexes and relevant departments.
- **Embedding Environmental and Safety Management Systems:** Sites with weak environmental and occupational health and safety management systems were required to obtain internationally recognized certifications, including ISO 14001 (Environmental Management System) and ISO 45001 (Occupational Health and Safety Management System). Accordingly, suppliers are securing structural management capabilities by revising internal policies to meet the standards and undergoing certification audit procedures.

[Supplier Corrective Action Process]

When risks are identified through assessments and audits, Kia requires Tier 1 suppliers to develop a corrective action plan. The CAP request document outlines the identified issues and requires suppliers to specify clear improvement objectives, concrete corrective actions, responsible parties, and completion deadlines. In addition, suppliers must also submit a list of 'supporting evidence', such as documents and photos, that can prove the implementation of the actions. Tier 1 suppliers must prepare and submit this to Kia within approximately two weeks to resolve the identified risks. Subsequently, Tier

1 suppliers must communicate the risk details to their sub-tier supply chains and demand CAP implementation to ensure that substantive improvements are made. During this process, Kia actively supports Tier 1 suppliers in accordance with the "Supply Chain Sustainability Management Policy" to ensure that improvement efforts are disseminated to the sub-tier supply chain.

[Responsible Disengagement and Impact Assessment]

For suppliers facing difficulties with voluntary corrective actions, we primarily support them in strengthening their management capabilities through means such as training and on-site audit consulting. If all improvement efforts fail—for instance, when a supplier intentionally provides false information or completely fails to demonstrate any improvement efforts—Kia may, as a last resort and within the scope of internal policies and relevant laws, suspend or terminate transactions with the supplier.

Before making a final decision to suspend or terminate a transaction, we operate a process to proactively assess the potential adverse impacts this decision may have. Through this assessment, we analyze the human rights, livelihood, and environmental harm that could impact workers, local communities, and other stakeholders affected by the disengagement. If termination is unavoidable, we proactively establish and execute mitigating measures to minimize the adverse impacts, such as a transition period, alternative sourcing plans, and worker support measures.

F. Result Reporting and Disclosure

[Grievance Handling for Conflict and Responsible Minerals]

Kia operates various highly accessible channels to allow the raising of grievances related to human rights abuses, environmental damage, bribery and corruption, forced labor, child labor, and gender-based violence that may occur during the conflict and responsible minerals sourcing process. These are open to all stakeholders, including employees, suppliers, civil society organizations, and indigenous peoples in affected local communities. In addition, we operate on the principle of providing protective measures that guarantee the strict anonymity of the complainants and strictly prohibit any form of retaliation. In 2025, we promoted our grievance handling system externally through process improvements, policy announcements, and the distribution of mutual cooperation letters. In addition to internal channels, officially recognized external non-judicial grievance procedures, such as the RMI Online Grievance Mechanism, RBA's Grievance Mechanism, and OECD National Contact Points (NCPs), are also accepted as valid reporting means. The scope of reporting covers not only violations of the Responsible minerals policy but also all issues that may hinder the sustainability, legality, and ethics of the procurement process.

The number of grievances received through all channels in 2025 was 19, none of which were related to responsible minerals. Upon receiving each reported case, we take appropriate corrective or remedial actions according to established procedures and provide periodic feedback to the complainants regarding the investigation progress and processing results. For significant matters, complainants are also guaranteed the right to meet directly with the responsible officer of the Company.

[Minerals Management Outlook]

To strengthen the reliability and sustainability of the supply chain, Kia is continuously expanding the proportion of sourcing from smelters and refiners certified by the RMAP. In addition, we encourage suppliers to actively participate in credible industry initiatives and third-party certification programs, such as Copper Mark and IRMA (Initiative for Responsible Mining Assurance).

To build a responsible minerals supply chain, we are establishing and promoting goals to expand RMAP certification for each major mineral, and we are strengthening transparency across the supply chain by collecting written pledges to use RMAP-conformant smelters.

Kia transparently discloses performance and process information related to these conflict minerals management activities to various stakeholders through its Sustainability Report and other channels.

[Information Disclosure and Stakeholder Communication]

Kia is committed to disclosing information regarding responsible mineral sourcing and management activities to stakeholders in a clear and accessible manner.

The Company establishes a separate mineral management policy enacted in accordance with international guidelines and posts it on its official website. Furthermore, information on responsible sourcing activities is disclosed at least once a year through various channels, including the Kia website, Sustainability Report, and Responsible Minerals Report. Key disclosure items include:

- Policies and procedures related to responsible sourcing
- Supply chain risk assessment results (including identified key risks)
- Grievance receipt and handling results
- Progress of risk mitigation and continuous improvement activities

Kia provides relevant information in a clear and accessible manner so that all stakeholders, including employees, suppliers, and the general public, can clearly and easily understand and participate. Furthermore, going beyond one-way information disclosure, we actively respond to individual requests for information disclosure and inquiries from various stakeholders, such as global NGOs, evaluation agencies, and customers, continuing transparent communication. In 2025, we faithfully responded to a total of 14 conflict/responsible minerals-related requests and inquiries received from external stakeholders, transparently demonstrating our supply chain management efforts and performance.

[External Requests and Inquiries on Conflict and Responsible Minerals]

Category	Unit	2025
Response to Stakeholder Requests	Cases	14

[4. Appendix]

A. Participation in Major Initiatives

Kia actively participates in global industry initiatives to strengthen human rights, labor, and environmental standards across its supply chain and to create sustainable value, thereby maximizing the effectiveness and impact of its responsible sourcing due diligence approach.

Responsible Minerals Initiative (RMI)



As a member of the Responsible Minerals Initiative (RMI), Kia is committed to ensuring transparency in the responsible minerals and conflict minerals supply chain and practicing responsible mineral sourcing. The RMI provides various tools and information to help companies practice responsible mineral sourcing, and in particular, supports the verification of smelters and refiners' compliance with RMAP standards through the RMAP. Kia actively participates in RMI's working groups and collaborates with RMI's global network and expertise to closely analyze and respond to risks within the supply chain. These efforts aim to strengthen communication with external stakeholders, drive continuous improvement in responsible mineral sourcing, and contribute to building an ethical and sustainable supply chain.

※ RMAP Assessment Introduction

The flagship program of the RMI, the Responsible Minerals Assurance Process (RMAP) takes a unique approach to helping companies make informed choices about responsibly sourced minerals in their supply chains. Focusing on a "pinch point" (a point with relatively few actors) in the global metals supply chain, the RMAP uses an independent third-party assessment of smelter/refiner management systems and sourcing practices to validate conformance with RMAP standards. The assessment employs a risk-based approach to validate smelters' company-level management processes for responsible mineral procurement. The RMAP standards are developed to meet the requirements of the OECD Due Diligence Guidance, the Regulation (EU) 2017/821 of the European Parliament and the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act.

* Source: <http://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/>