Version 3.0



310 Pangyo-ro, Bundang-gu, Seongnam-si, Gyeonggi-do SK Chemicals



Document #: SK Chemicals-General Version #: 3.0 Issue Date: 2023/05/12 Regulation

## Establishment/Revision History

December 1, 2017	Established	Version 1.0
October 1, 2021 May 12, 2023	1st revision	Version 2.0
May 12. 2023	2nd revision	Version 3.0
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## Article 1 (Purpose)

The purpose of these 'Code of Ethics Practice Guidelines' (hereinafter referred to as 'Practice Guidelines') is to provide specific actions and value judgment standards necessary for SK Chemicals employees to properly understand and practice the intent of the Code of Ethics.

## Article 2 (Employee Conduct)

① Diligent Performance of Duties

Employees shall clearly recognize the authority and responsibilities assigned to them according to company policies and perform their duties according to the principles of diligence and trust.

- 2 Prohibition of Conflict of Interest
  - 1. Employees shall prioritize the company's interests in case of a conflict of interest related to their duties.
  - 2. Employees shall do their utmost to prevent activities or relationships that conflict with the company's interests.

<Examples of Conflict of Interest>

- Using company assets or internal management information for personal gain



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- Exercising undue influence on partner companies by leveraging one's position for personal requests or conveniences
- Engaging in secondary employment that significantly hinders diligent performance of duties
- Contracting or trading with the company directly or through a third party
- Holding shares or performing executive duties in partner companies that can be influenced through one's job.
- ③ Protection of Company Assets and Information
  - 1. Employees shall not use company assets for personal purposes or transfer or lease them to third parties without approval.
  - 2. Employees shall actively protect the company's trademarks, patents, copyrights, and other intellectual property rights.
  - 3. Employees shall immediately report to the company if a situation arises that may cause loss to the company or if there is a likelihood of loss and take measures to prevent and minimize the loss.
  - 4. Employees shall use the company's budget efficiently in accordance with its purpose and standards and record it according to accounting standards and procedures.
  - 5. Employees shall not use or provide undisclosed company information obtained through their work to third parties for personal gain.



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- 6. Employees shall not disclose or provide company information and trade secrets to internal or external parties without prior approval.
- 7. Confidential company information must be kept secure according to the information security policy, and the disclosure of company information to external parties must follow the prescribed procedures and obtain prior approval.
- ④ Prohibition of Receiving and Providing Bribes or Entertainment
  - Employees shall not provide bribes or entertainment to stakeholders to unfairly enjoy benefits related to their work.
  - 2. Employees shall not receive bribes, entertainment, or other personal conveniences from stakeholders such as partner companies.
  - 3. If bribes are received regardless of the recipient's intent, they must be returned immediately or reported to the company. However, for the purpose of maintaining a healthy relationship, reasonable levels of gifts or meals that are socially accepted can be exchanged with stakeholders, and detailed guidelines can be established and operated by the organization unit.
- (5) Mutual Respect Among Employees



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- Employees shall respect each other and maintain the basic courtesy and dignity required of SK employees in their workplace.
- 2. Unfair discrimination based on gender, academic background, origin, marital status, race, nationality, religion, etc., shall not be allowed.
- Any form of sexual harassment that could harm a healthy colleague relationship or working environment shall not be tolerated.

## Article 3 (Attitude Towards Customers)

- ① Customer-Centric Management
  - 1. Continuous efforts shall be made to provide products and services that customers need.
  - 2. Various customer opinions shall shall be respected and actively reflected in the company's management activities.

## Article 4 (Responsibility to Employees)

- ① Human-Oriented Management
  - 1. Employees' personalities shall be respected and they shall be treated fairly and reasonably according to their abilities and achievements.
  - 2. An environment that maximizes employees' voluntary and enthusiastic brain utilization (SUPEX) shall be created.



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- 3. Support shall be provided for employees' self-development activities and learning opportunities necessary for job performance shall be actively provided.
- 2 Employee Safety and Happiness
  - Systems for employee safety and health shall be established, and international standards, relevant laws, and internal regulations related to these shall be observed.
  - 2. Efforts shall be made to ensure employees can pursue happiness with their colleagues by demonstrating a spirit of challenge and creativity with mutual trust and pride.

#### Article 5 (Responsibility to Shareholders)

- ① Enhancing Corporate Value
  - 1. Corporate value shall be maximized through transparent and efficient management via continuous innovation, and the results shall be shared with shareholders.
- ② Protecting Shareholder Rights and Interests
  - Management data shall be prepared according to all applicable laws and standards, and relevant information shall be disclosed faithfully according to laws to protect shareholder interests.



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## Article 6 (Relationship with Business Partners)

- ① Co-Prosperous Management
  - Fair opportunities for transactions shall be given to
     partner companies, and no unfair acts leveraging a superior
     position shall be conducted while pursuing mutual benefits
     and co-development.
- ② Fair Competition with Competitors
  - A spirit of mutual respect shall be the basis for fair competition with competitor companies.
  - 2. Employees shall recognize that illegally obtaining or using competitors' trade secrets can cause significant damage to the company and shall not engage in such acts through illegal or unethical means.

## Article 7 (Role in Society)

- ① Role in Society and Environment
  - 1. Contributing to social development through zero-accident pursuit and environmentally friendly management.
  - 2. Actively participating in social contribution activities to ensure society as a whole can be happy.
  - 3. Complying with the laws of the countries where business is conducted and respecting local traditions and cultures.



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## Article 8 (Compliance with Laws)

- All management activities domestically and internationally shall be conducted in compliance practices.
- ② All transactions shall comply with fair trade-related laws and internal regulations and be conducted fairly according to the principle of free competition.
- Accounting information shall be accurately recorded according to related laws, corporate accounting standards, and internal regulations, and manipulation or false reporting of accounting information shall not be allowed.
- ④ Product quality and safety management shall meet related laws and customer requirements, and the performance and risks of products shall be accurately disclosed.
- Domestic and international laws and international agreements related to safety, health, and the environment shall be observed, and active participation in creating a safe working environment and environmental protection activities shall be encouraged.
- ⑤ International agreements and domestic and international laws related to anti-corruption shall be observed.
  - 1. According to the Act on Prohibition of Improper Solicitation and Provision/Receipt of Bribes, no improper solicitations shall be made to public officials, etc., in the performance



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of their duties.

- 2. According to the Act on Prohibition of Improper Solicitation and Provision/Receipt of Bribes, no bribes shall be provided or promised to public officials, etc.
- 3. International agreements and domestic and international laws related to anti-corruption (including bribery and money laundering), such as the OECD Anti-Bribery Convention, UN Convention against Corruption, U.S. Foreign Corrupt Practices Act, U.K. Bribery Act, and Korea's Act on Preventing Bribery of Foreign Public Officials in International Business Transactions, shall be observed.
- 4. Matters that may be interpreted as violations of anticorruption-related laws shall be handled in consultation with the legal or ethics management departments in advance, and decisions shall not be made based on arbitrary interpretation.
- ① Company donations and sponsorships shall be carried out according to related laws and within the range allowed by social norms, following prescribed procedures for approval. However, donations/sponsorships for political purposes are strictly prohibited.

#### Article 9 (Application of the Code of Ethics and Practice Guidelines)

① Subjects of Application and Compliance Obligations



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- 1. The Code of Ethics and Practice Guidelines apply to the company (including domestic and international investment companies with management rights) and employees (including part-time regular and contract employees). Stakeholders are also encouraged to understand and practice the Code of Ethics.
- 2. Employees are responsible for complying with the Code of Ethics and Practice Guidelines. In case of doubts about interpretation and application, employees should inquire and consult with their department heads or responsible departments and act according to the interpretation provided.
- 3. Employees shall sign and submit the Ethics Management Practice Pledge (Appendices 1, 2) annually and apply it to their work.
- ② Reporting and Protection of Whistleblowers on Practice Guideline

Violations Reporting and handling of violations of the Practice Guidelines shall follow the reporting and handling guidelines.

Supplementary Provisions

Article 1 (Effective Date)



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These Practice Guidelines shall take effect on December 1, 2017.

## Article 2 (Enforcement Rules)

Actions against violations of these Practice Guidelines shall follow company regulations.

Supplementary Provisions

## Article 1 (Effective Date)

These Practice Guidelines shall take effect on October 1, 2021.

Supplementary Provisions

## Article 1 (Effective Date)

These Practice Guidelines shall take effect on May 12, 2023.



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## Appendix 1. Ethics Management Practice Pledge (For Employees)

As a member of SK Chemicals, I promise to comply with the following items to gain the trust of customers, pursue co-development with partner companies, compete fairly with competitors, and fulfill responsibilities and obligations to shareholders and society.

- 1. I will comply with laws and social norms and perform my duties fairly and transparently.
- 2. I will familiarize myself with the company's Code of Ethics and Practice Guidelines and adhere to them in my work.
- 3. I will not cause physical or mental suffering or worsen the working environment for other members by exceeding the appropriate scope of work using my position or relationships within the company.
- 4. I will understand and practice the laws and regulations related to fair trade to ensure free and fair competition.
- 5. If I become aware of any unethical behavior or unfair trade practices by members or stakeholders during my work, I will report or consult with the organization's leader or the company's ethics management department following the prescribed procedures.
- 6. I will submit all requested materials and fully cooperate with investigations, maintaining strict confidentiality during the investigation.

I have fully understood the above items and pledge to faithfully implement them.



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## Appendix 2. Ethics Management Practice Pledge (For Leaders)

As a leader of SK Chemicals, I promise to comply with the following items to gain the trust of customers, pursue co-development with partner companies, compete fairly with competitors, and fulfill responsibilities and obligations to shareholders and society.

- 1. I will take the lead in complying with laws and social norms across all management activities and practice transparent management and fair trade.
- 2. I will familiarize myself with the company's Code of Ethics and Practice Guidelines and adhere to them in my management activities.
- 3. I will not cause physical or mental suffering or worsen the working environment for other members by exceeding the appropriate scope of work using my position or relationships within the company.
- 4. I will understand and practice the laws and regulations related to fair trade to ensure free and fair competition and pursue codevelopment with stakeholders.
- 5. I will actively L/H/C the practice of ethics management and fair trade by members, and take management responsibility for unethical behavior and unfair trade by members.
- 6. If I become aware of any unethical behavior or unfair trade practices by employees or if I receive such proposals from external stakeholders, I will immediately report and consult with the company's ethics management department.
- 7. I will submit all requested materials and fully cooperate with investigations, maintaining strict confidentiality during the investigation.



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I have fully understood the above items and pledge to faithfully implement them.