

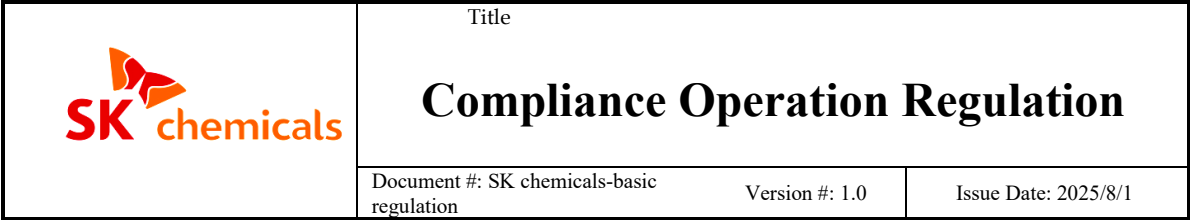
# Compliance Operation Regulation

**Version 1.0**





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


---




	Title	
	<h1>Compliance Operation Regulation</h1>	
	Document #: SK chemicals-basic regulation	Issue Date: 2025/8/1

	Title	
	<h1>Compliance Operation Regulation</h1>	
	Document #: SK chemicals-basic regulation	Issue Date: 2025/8/1


	Title	
	<h1>Compliance Operation Regulation</h1>	
	Document #: SK chemicals-basic regulation	Issue Date: 2025/8/1

	Title	
	<h1>Compliance Operation Regulation</h1>	
	Document #: SK chemicals-basic regulation	Issue Date: 2025/8/1

	Title	
	<h1>Compliance Operation Regulation</h1>	
	Document #: SK chemicals-basic regulation	Issue Date: 2025/8/1

### Establishment/Amendment History

[illegible]

	Title	
	Document #: SK chemicals-basic regulation	Version #: 1.0 Issue Date: 2025/8/1

# Compliance Operation Regulation

## Contents

Chapter 1: General Provisions	
Article 1 (Purpose) .....	4
Article 2 (Definitions) .....	4
Article 3 (Scope of Applicaiton) .....	5
Chapter 2: Implementation of Compliance Management	
Article 4 (Company’s Implementation of Compliance Management) .....	5
Article 5 (Employees’ Implementation of Compliance Management).....	6
Chapter 3 : Execution Organization	
Section 1 : Compliance Committee	
Article 6 (Composition and Operation of the Committee) .....	6
Article 7 (Roles and Authority of the Committee) .....	7
Section 2 : Compliance Headquarters and Functional Organizations	
Article 8 (Compliance Headquarters).....	7
Article 9 (Compliance Functional Organizations).....	8
Article 10 (Access to Information and Confidentiality) .....	8
Article 11 (Compliance Agents).....	9
Chapter 4: Risk Diagnosis and Response	
Article 12 (Inspection).....	9
Article 13 (Risk Response).....	10
Article 14 (Post-Management) .....	10
Chapter 5: Education	
Article 15 (Compliance Education) .....	11
Chapter 6: Sanctions and Rewards	
Article 16 (Sanctions) .....	12
Article 17 (Rewards) .....	12
Chapter 7: Supplementary Provisions	
Article 18 (Amendment).....	12
Article 19 (Enactment of Detailed Regulations) .....	12
Addendum .....	13

	Title	
	<b>Compliance Operation Regulation</b>	
	Document #: SK chemicals-basic regulation	Version #: 1.0 Issue Date: 2025/8/1

## Chapter 1: General Provisions


### Article 1 (Purpose)

The purpose of these regulations is to stipulate the specific implementation details, execution organization, and other particulars of the compliance program established and operated by SK Chemicals Co., Ltd. (“the Company”) to achieve sustainable growth and secure stakeholder trust through the practice of compliance management.

### Article 2 (Definitions)

The definitions of the key terms used herein are as follows. Terms not defined herein shall follow the relevant laws and the Company’s compliance control standards.

1. “Compliance Program” means a series of activities and tasks performed voluntarily by the Company and its employees to establish internal systems that enable compliance with laws and regulations, provide regular training, diagnose compliance risks in advance, and establish and implement preventive measures.
2. “Laws and Regulations” refer to the applicable laws of the countries where the Company and its subsidiaries are located, as well as company bylaws enacted by the Company or its subsidiaries.
3. “Compliance Risk” refers to any risk that may have or is likely to have a significant negative impact on the Company’s compliance management due to violations of laws and regulations by the Company or its employees.
4. “Compliance Headquarters” refers to the department that, under the direction and supervision of the Compliance Officer, is responsible for overseeing the establishment and operation of the Company’s compliance program, and supports and coordinates the compliance programs carried out by functional organizations.
5. “Compliance Functional Organizations” refer to departments responsible for implementing specific areas of the compliance program.
6. “Subsidiary” means any other company in which the Company holds more than 50% of the total issued shares or exercises dominant influence over its management.

	Title	
	Document #: SK chemicals-basic regulation	Version #: 1.0 Issue Date: 2025/8/1

### Article 3 (Scope of Application)

- ① These regulations apply to all employees belonging to the Company and its subsidiaries, and to all their work and related activities. Unless otherwise stipulated by (i) the applicable laws of the country where the Company or subsidiaries are located, (ii) the articles of incorporation, or (iii) compliance control standards, these regulations take precedence.
- ② To foster and spread a culture of compliance among stakeholders, the Company may support subsidiaries with compliance activities such as employee training, inspections, revision of internal regulations, and compliance pledges. Such support activities shall not hinder the independent management activities of subsidiaries.
- ③ During mergers and acquisitions, the Company shall conduct compliance risk assessments and due diligence of the target company. The Company shall apply its standards and procedures for legal risk assessment and validity evaluation as defined in its compliance control standards, and reflect the results in investment deliberations (such as M&A) according to the Company's PMS regulations. Depending on the scale, evaluations and due diligence may be entrusted to external experts.

## Chapter 2: Implementation of Compliance Management

### Article 4 (Company's Implementation of Compliance Management)

- ① The Company shall comply with laws and regulations and practice fair and transparent compliance management.
- ② The Company shall create systems and an environment where employees can voluntarily practice compliance management by:
  - i) Providing sufficient human and material resources for the execution of the compliance program,
  - ii) Regularly disseminating compliance management messages from top management, including the CEO,
  - iii) Conducting preventive activities such as compliance inspections, risk assessments, and training, and

	Title	
	<b>Compliance Operation Regulation</b>	
	Document #: SK chemicals-basic regulation	Version #: 1.0 Issue Date: 2025/8/1

iv) Ensuring the effective operation of a post-management system for responding to and correcting compliance risks.

## **Article 5 (Employees' Implementation of Compliance Management)**

- ① Employees shall comply with laws and regulations in the performance of their duties.
- ② If employees face situations where there is a possibility of violating laws or regulations, or have doubts about such violations, they shall consult the Compliance Headquarters or Compliance Functional Organizations before acting in accordance with their interpretation.
- ③ Employees shall neither issue nor follow work orders that violate laws or regulations. Employees who receive such orders, or recognize violations or compliance risks, shall immediately report them via the Company's ethics management website or to the Compliance Headquarters.
- ④ The identity of whistleblowers and the contents of their reports shall be kept confidential, whistleblowers shall be protected, and no one shall suffer disadvantage for making a report.

## **Chapter 3: Execution Organization**

### **Section 1: Compliance Committee**

#### **Article 6 (Composition and Operation of the Committee)**

- ① To deliberate, evaluate, and manage major compliance-related matters, respond effectively to issues arising in the implementation process, and facilitate cooperation between the compliance execution organization and related departments, the Company shall establish a Compliance Committee (the "Committee") under the CEO.
- ② The Committee shall be chaired by the CEO, with the Compliance Officer and heads of related departments (HR, Finance, SHE) and business divisions serving as ex officio members.

	Title	
	<h1 style="text-align: center;">Compliance Operation Regulation</h1>	
	Document #: SK chemicals-basic regulation	Version #: 1.0 Issue Date: 2025/8/1

- ③ Regular meetings of the Committee shall, in principle, be held at least twice a year and convened by the Chairperson. However, meetings may be convened as needed by the Chairperson or any ex officio member.

## Article 7 (Roles and Authority of the Committee)


- ① The Committee may deliberate and, if necessary, decide on matters related to the operation of the compliance program, company-wide risk issues, inspection results, countermeasures, and necessary improvements.
- ② The Committee may request reports from executives or heads of relevant departments of the Company or subsidiaries as necessary.
- ③ The Chairperson and members may summon executives of the Company or subsidiaries as temporary members or have them attend meetings to provide reports or answer questions related to agenda items.

## Section 2: Compliance Headquarters and Functional Organizations

### Article 8 (Compliance Headquarters)

The Company shall establish a Compliance Headquarters that oversees the overall compliance program and performs the following roles:

- ① Establish annual compliance program operation plans.
- ② Report the status and performance of the compliance program to the Compliance Officer and the Committee.
- ③ Coordinate and support the scope and functions of the Compliance Functional Organizations.
- ④ Monitor and disseminate information on compliance-related laws, policies, and regulations (including amendments) at least twice a year.
- ⑤ Develop and implement compliance training programs.
- ⑥ Monitor compliance risk factors and issues, conduct internal investigations, perform inspections, and support the establishment and implementation of improvement measures.

	Title	
	<h1>Compliance Operation Regulation</h1>	
	Document #: SK chemicals-basic regulation	Version #: 1.0 Issue Date: 2025/8/1

- ⑦ Plan compliance management messages from management and support internal and external announcements.

## Article 9 (Compliance Functional Organizations)

Departments with expertise in specific compliance program areas, such as legal affairs, intellectual property, information security, human resources and labor, accounting and taxation, safety and environment, and fair trade, shall serve as Compliance Functional Organizations. Each department head shall perform the following roles:

- ① Support the establishment of annual compliance program operation plans under Article 8.
- ② Implement the compliance program in their specialized field.
- ③ Report the status and performance of the compliance program to the Compliance Headquarters.
- ④ Monitor and disseminate laws, policies, and regulations (including amendments) in their specialized field.
- ⑤ Develop training programs in their specialized field, and establish, implement, evaluate, and improve detailed regulations under Article 19.
- ⑥ Share information on compliance risk factors and issues with the Compliance Headquarters and collaborate on countermeasures and post-management.
- ⑦ Support and execute other matters requested by the Compliance Headquarters.

## Article 10 (Access to Information and Confidentiality)

- ① The Compliance Headquarters and Functional Organizations may request relevant departments and employees to submit related materials or information, or respond to written inquiries or interviews, as necessary for implementing the compliance program. Departments and employees must cooperate faithfully.
- ② The Compliance Headquarters and Functional Organizations shall securely manage and store information and materials obtained or created in the course



	Title	
	<b>Compliance Operation Regulation</b>	
	Document #: SK chemicals-basic regulation	Version #: 1.0 Issue Date: 2025/8/1

of performing the compliance program, in accordance with the Company's security management regulations, and maintain strict confidentiality.


#### **Article 11 (Compliance Agents)**

- ① The Compliance Headquarters and Functional Organizations may appoint Compliance Agents to ensure efficient management and operation of the compliance program, including monitoring, training, and internal sharing of policy and regulatory trends.
- ② Compliance Agents shall be the heads of Functional Organizations under Article 9, but may also be designated from among the members of those organizations if necessary.

### **Chapter 4: Risk Diagnosis and Response**

#### **Article 12 (Inspection)**

- ① The Compliance Headquarters and Functional Organizations shall regularly inspect the Company's/subsidiaries' compliance program operation status, including the overall compliance status of employees.
- ② Special inspections may be conducted on specific matters considering regulatory trends, the likelihood of risk occurrence, severity of impact, or in cases of company establishment or acquisition.
- ③ Inspections shall be conducted according to inspection plans established by the Compliance Headquarters and Functional Organizations, and designated departments and employees shall cooperate faithfully.
- ④ The Compliance Headquarters and Functional Organizations shall analyze inspection results, establish improvement measures, and recommend their implementation. The head of the department receiving such recommendations shall inform the Compliance Headquarters whether the recommendations are adopted and, if so, the results of implementing the improvement measures.
- ⑤ The Compliance Headquarters may request support from relevant departments, including Compliance Functional Organizations, as deemed necessary for inspections.

	Title	
	<h1 style="text-align: center;">Compliance Operation Regulation</h1>	
	Document #: SK chemicals-basic regulation	Version #: 1.0 Issue Date: 2025/8/1


- ⑥ The Compliance Headquarters shall compile inspection results and report them to the Compliance Officer and the Committee.

### Article 13 (Risk Response)

- ① Employees who become aware of compliance risks must immediately notify the Compliance Headquarters (or, for subsidiaries without a compliance organization, the person with delegated authority under that company's approval regulations) and shall not participate in or assist in such violations.
- ② Upon recognizing a compliance risk, the Compliance Headquarters shall cooperate with the Compliance Functional Organizations and relevant departments to analyze risks and develop response plans through internal investigations, report the results to the Compliance Officer and, if necessary, the CEO, and inform the relevant department.
- ③ Departments receiving such results shall develop detailed measures to prevent and avoid recurrence of compliance risks, and report their implementation plans and status to the Compliance Headquarters.
- ④ The Compliance Headquarters shall disseminate the causes and prevention measures company-wide in an appropriate manner and may conduct related training in collaboration with relevant functional departments.
- ⑤ Subsidiaries without a compliance organization shall handle all tasks related to responding to compliance risks under the supervision of the person with delegated authority under that company's approval regulations. The Compliance Headquarters and Functional Organizations may collaborate with such subsidiaries to prevent risk escalation, develop prevention measures, and make recommendations for improvement.

### Article 14 (Post-Management)

- ① Following inspections under Article 12 and risk responses under Article 13, the Compliance Headquarters shall analyze and evaluate the causes, appropriateness of the response process, and effectiveness of recurrence prevention measures.

	Title	
	<h1>Compliance Operation Regulation</h1>	
	Document #: SK chemicals-basic regulation	Version #: 1.0 Issue Date: 2025/8/1

- ② If further improvement is deemed necessary, the Compliance Headquarters shall establish improvement tasks and instruct relevant departments to implement them.
- ③ The Compliance Headquarters may check from time to time whether the improvement tasks have been implemented.
- ④ If a violation of laws or regulations results in administrative sanctions such as warnings from authorities, the executive of the relevant organization or the Compliance Officer shall ensure that countermeasures are submitted as an agenda item to the Board of Directors and recorded in the Board minutes.

## Chapter 5: Education

### Article 15 (Compliance Education)

- ① The Compliance Headquarters and Functional Organizations shall conduct compliance training for all employees at least once every six months, provide compliance training at the time of hiring new employees, and may conduct special compliance training programs for departments with high legal risk exposure.
- ② The Compliance Headquarters shall support the Board of Directors in receiving advice or training on legal and regulatory changes from internal or external experts at least once every six months.
- ③ The training in paragraph 1 may be conducted via remote online education using information and communication media.
- ④ Employees shall faithfully complete the training according to the schedule set by the Compliance Headquarters and Functional Organizations.
- ⑤ The Compliance Headquarters shall manage company-wide training status, analyze results, and develop improvement measures, and may request the Compliance Functional Organizations to supplement improvement measures as necessary.
- ⑥ The Compliance Headquarters and Functional Organizations may operate a counseling system for employees who are highly exposed to compliance risks in the course of their work, separate from compliance training.

	Title	
	<b>Compliance Operation Regulation</b>	
	Document #: SK chemicals-basic regulation	Version #: 1.0 Issue Date: 2025/8/1

## Chapter 6: Sanctions and Rewards

### Article 16 (Sanctions)

- ① If an employee violates laws or regulations in connection with the Company's business, sanctions shall be imposed in accordance with the Company's relevant regulations.
- ② The type and criteria for sanctions shall follow relevant regulations such as the reward and punishment rules, and the Compliance Officer may recommend to the CEO disciplinary action under the Company's regulations and pursuit of civil or criminal liability under applicable laws.

### Article 17 (Rewards)

The Compliance Officer may recommend to the CEO appropriate rewards for employees who have contributed to preventing the Company's management losses through prompt reporting of violations or compliance risks, early detection and handling of risk factors, and establishment and implementation of appropriate recurrence prevention measures.

## Chapter 7: Supplementary Provisions

### Article 18 (Amendment)

These regulations may be amended with the approval of the CEO.

### Article 19 (Enactment of Detailed Regulations)

The Compliance Headquarters/Functional Organizations may establish detailed regulations, procedures, and guidelines to present specific implementation methods of these regulations and to ensure compliance with laws related to employees' work performance. The authority and procedures for enacting and revising such detailed regulations shall follow the Company's internal regulations such as the approval regulations and regulation management rules.

	Title	
	<b>Compliance Operation Regulation</b>	
	Document #: SK chemicals-basic regulation	Version #: 1.0 Issue Date: 2025/8/1

### **Addendum <August 1, 2025>**

#### **Article 1 (Effective Date)**

These regulations shall take effect on August 1, 2025.