

Code of ethics practice guidelines

Version 3.0

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SK chemicals*

	Title	
	<h1>Code of ethics practice guidelines</h1>	
	Document #: SK chemicals - General Regulations	Version #: 3.0 Issue Date: 2023/05/12

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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 the criteria for specific actions and value judgment necessary for SK chemicals’ employees to properly understand and practice the Company’s code of ethics.

Article 2 (Attitudes of employees)

① Diligent performance of duties

Employees must be fully aware of their rights and responsibilities in accordance with the Company’s policy and perform their duties in good faith and trust.

② Prohibition of conflict of interest

1. Employees must act by placing top priority on the Company's interests if any conflicts of interest with the Company arise during the performance of their duties.
2. Employees must do their best to prevent any act or relationship that may cause conflicts with the Company's interest.

<Examples of conflicts of interest>

- Using the Company's property or internal management information to obtain personal gains
- Abusing the business position as a means to exert unjust influence such as solicitation of any human resources management, request for provision of various advantages, etc. on the Company’s business partners or others
- Engaging in secondary jobs to such extent that it impedes their diligent performance of duties
- Making a contract or trading with the Company directly or through a third party
- Holding shares or performing the duties of the management of a partner company that can directly or indirectly exert influence through work, etc.

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③ Protection of the Company's assets and information

1. Employees must not use or transfer/lease the Company's assets to a third party personally without the Company's approval.
2. Employees must actively protect the Company's intellectual property rights such as trademarks, patents, and copyrights.
3. If a situation that causes or may cause damage to the Company occurs, employees must immediately report it to the Company and take actions to prevent and minimize such damage.
4. Employees must use the Company's budget efficiently according to the purpose and standards, and record such use in accordance with accounting standards and procedures.
5. Employees must not use the Company's undisclosed information learned in the course of performing their duties or provide it to a third party for personal gain.
6. Employees must not divulge or provide the Company's information and trade secrets internally and externally without prior approval.
7. The Company's confidential information must be kept secure in accordance with the information security policy, and prior approval must be obtained for the public disclosure of such information according to the established procedures.

④ Prohibition of offering or receiving money, entertainment, etc.

1. Employees must not offer money, entertainment, etc. to stakeholders for unjust and unfair gains in relation to their duties.
2. Employees must not receive money, entertainment or other personal advantages from stakeholders such as the Company's business partners.
3. If employees receive money or valuables against their will, they must return it without delay or report it to the Company.

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However, employees can give and receive valuables, such as gifts or meals, on a reasonable level within the scope generally accepted by social norms to and from stakeholders to maintain healthy mutual relationships. Detailed guidelines may be established and operated by each organizational unit.

⑤ Mutual respect among employees

1. Employees must respect each other regardless of their position, and maintain propriety and dignity as SK members.
2. Employees must not discriminate against others on the grounds of gender, educational background, birthplace, marital status, race, nationality, religion, etc.
3. Employees must not engage in any sexual harassment that undermines healthy co-worker relationships and work atmosphere.

Article 3 (Attitude toward customers)

① Customer-oriented management

1. The Company continuously strives to offer products and services customers need.
2. Customers' diverse opinions are respected and actively reflected in the Company's management activities.

② Customer information protection

1. Customer property and information are safely protected according to relevant laws and company rules.

Article 4 (Responsibilities to employees)

① Human-oriented management

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1. Employees are fairly and rationally treated according to their capabilities and performance, and their personalities are respected.
2. An environment for pursuing SUPEX must be created so that employees can voluntarily and willingly maximize the use of their brain.
3. The Company supports employees' self-development activities and actively provides learning opportunities necessary for performing their duties.

② Safety and happiness of employees

1. The Company reorganizes the system for the safety and health of employees and complies with related international standards, laws, and internal regulations.
2. The Company does its best to allow employees to pursue their happiness together with their colleagues by developing a spirit of challenge and creativity based on mutual trust and pride.

Article 5 (Responsibility to shareholders)

① Corporate value enhancement

1. The Company maximizes its corporate value with transparent and efficient management through continuous innovation, and shares the results with shareholders.

② Protection of shareholders' rights and interests

1. In order to protect the interests of shareholders, the Company prepares management data in accordance with all laws and standards, and faithfully discloses relevant information according to laws and regulations.

Article 6 (Relationship with business partners)

① Coexisting management

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1. The Company grants fair trade opportunities to its partner companies, does not engage in unjust acts using its superior position, and pursues mutual benefits and joint growth.

② Fair competition with competitors

1. The Company competes in good faith with competitors based on mutual respect.
2. Employees should be aware that illegally obtaining or using trade secrets of a competitor may cause serious damage to the Company, so they must not obtain or use trade secrets of a competitor in illegal or unethical ways.

Article 7 (Roles in society)

① Roles in society and environment

1. The Company contributes to social development through the pursuit of zero accidents and environment friendly management.
2. The Company actively participates in social contribution activities that promote happiness throughout society.
3. The Company complies with all laws and regulations of the country where its businesses are operating and respects the traditions and culture of the local community.

Article 8 (Compliance with laws)

- ① All domestic and overseas business activities must be performed in compliance with all laws and regulations of the relevant country while respecting its customs of transactions.
- ② All transactions must comply with laws and company rules related to fair trade,

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and must be performed fairly according to the principles of free competition.

- ③ Accounting information must be accurately recorded in accordance with relevant laws, corporate accounting standards and company rules, and must not be manipulated or falsely reported.
- ④ Product quality and safety management must meet relevant laws and customer requirements, and product functions and risks must be accurately disclosed.
- ⑤ The Company must comply with domestic and overseas laws and international agreements related to safety, health and the environment, and actively engage in activities to foster a safe working environment and protect the natural environment.
- ⑥ The Company must comply with international conventions and domestic and overseas laws related to anti-corruption.
 - 1. In accordance with the Improper Solicitation and Graft Act, employees must not make improper solicitations to public officials performing duties.
 - 2. In accordance with the Improper Solicitation and Graft Act, employees must not provide or promise to provide valuables to public officials.
 - 3. International conventions and domestic and foreign laws related to anti-corruption (including bribery and money laundering), such as the OECD Anti-Bribery Convention, the UN Convention against Corruption, the US Foreign Corrupt Practices Act, the UK Bribery Act, and the Anti-Bribery Act for Foreign Public Officials in Korean International Business Transactions must be complied with.
 - 4. Matters that may be interpreted as violations of laws and regulations related to anti-corruption must be handled through sufficient consultation in advance with the ethical management department, and decisions must not be made based on an arbitrary interpretation.

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- ⑦ The Company's donations and sponsorships must be made after obtaining approval according to the predetermined procedure within the scope permitted by relevant laws and social norms. However, donations/sponsorships for political purposes are strictly prohibited.

Article 9 (Application of the code of ethics practice guidelines)

① Application targets and compliance obligations

1. The code of ethics practice guidelines apply to the Company (including domestic and overseas investment companies with management rights) and employees (including part-time and full-time employees and contract workers). Also, stakeholders are recommended to understand and practice the code of ethics.
2. Employees are responsible for complying with the code of ethics practice guidelines, and if they have any questions on the interpretation and application thereof, they must consult with the head of their own department, or the department in charge and act according to such interpretation.
3. Employees must sign and submit the pledge to practice ethical management (Annexes 1 and 2) every year and apply it to their work.

② Reporting violations of the practice guidelines and protecting whistleblowers

Reporting and handling of violations of the practice guidelines must comply with the Report handling guidelines.

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Addendum

Article 1 (Enforcement date)

These practice guidelines are enforced from December 1, 2017.

Article 2 (Enforcement rules)

If these practice guidelines are violated, action will be taken in accordance with the company rules.

Addendum

Article 1 (Enforcement date)

These practice guidelines are enforced from October 1, 2021.

Addendum

Article 1 (Enforcement date)

These practice guidelines are enforced from May 12, 2023.

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Annex 1. Pledge to practice ethical management (for members)

In performing my duties as a member of SK chemicals, I promise to comply with the following in order to gain trust from customers, pursue joint development with partner companies, and compete fairly with competitors to fulfill my responsibilities and obligations to shareholders and society.

1. I will comply with laws and social norms, and conduct my work in a fair and transparent manner.
2. I will familiarize myself with the Company's code of ethics and the code of ethics practice guidelines, and comply with them during work.
3. I will not take advantage of my position or relationship in the Company to cause physical or mental pain to other members or deteriorate the work environment beyond the scope of my work.
4. For free and fair competition, I will familiarize myself with laws and company rules related to fair trade, and practice/comply with them.
5. If I become aware of an unethical act or unfair transaction by a member or stakeholder during work, I will report it and consult with the leader of the organization or the Company's ethical management department according to the predetermined procedure.
6. If an investigation into an unethical act or unfair transaction is conducted, I will do my best to cooperate with the investigation by submitting all the materials requested by the Company and keeping the contents of the investigation strictly confidential.

I have fully understood the contents of each paragraph above and pledge to faithfully implement them.

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Annex 2. Pledge to practice ethical management (for leaders)

In performing my duties as a leader of SK chemicals, I promise to comply with the following in order to gain trust from customers, pursue joint development with partners, and compete fairly with competitors to fulfill my responsibilities and obligations to shareholders and society.

1. I will take the lead in complying with laws and social norms throughout my management activities and practice transparent management and fair trade.
2. I will familiarize myself with the Company's code of ethics and code of ethics practice guidelines, and comply with them during management activities.
3. I will not take advantage of my position or relationship in the Company to cause physical or mental pain to other members or deteriorate the work environment beyond the scope of my work.
4. For free and fair competition, I will familiarize myself with laws and company rules related to fair trade, practice/comply with them, and pursue joint development with stakeholders.
5. I will actively perform L/H/C for the members' practice of ethical management and fair trade, and take management responsibility for any unethical act and unfair transaction committed by the members.
6. If I become aware of an employee's unethical act or unfair transaction, or if I receive a proposal for unethical act or unfair transaction from an external stakeholder, I will immediately report it to the Company's ethical management officer and receive counseling.
7. If an investigation into an unethical act or unfair transaction is conducted, I will do my best to cooperate with the investigation by submitting all the materials requested by the Company and keeping the contents of the investigation strictly confidential.

I have fully understood the contents of each paragraph above and pledge to faithfully implement them.