

Implementation Guidelines for Human Rights Management

CHAPTER 1 GENERAL PROVISIONS

Article 1 (Objectives)

SK chemicals (hereinafter the "Company") shall actively implement human rights management to protect and promote human rights so that the rights and values of stakeholders and employees are equally respected in the course of business activities, and at the same time prevent human rights violations caused by business operations and make efforts to mitigate the associated risks. For the implementation of human rights management, the Company shall comply with the international standards and guidelines such as the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the International Labor Organization's core conventions, and the OECD Due Diligence Guidance for Responsible Business Conduct.

Article 2 (Definitions)

The meanings of the terms used in these guidelines are as follows.

1. The term "human rights" means the dignity, value, freedom, and rights of human beings guaranteed by the Constitution and laws, or recognized by international human rights treaties and customary international laws that the Republic of Korea has joined and ratified.
2. The term "member" refers to executives and employees (including non-regular workers) who work for the Company.
3. The term "stakeholder" refers to a person directly or indirectly affected by the Company's management activities, such as members, business performance institutions, related institutions, business participating companies, or business contractors.
4. The term "human rights management" refers to preventing human rights violations by the Company and conducting human rights-friendly business activities. It means that the Company declares human rights management, fulfills its obligations to practice and assess, and provides relief procedures for victims of human rights violations.

Article 3 (Scope)

1. The Company's human rights management shall be subject to the provisions of these guidelines, except as otherwise specifically provided for in other laws, Articles of Incorporation, or regulations. If any of the matters covered in these guidelines conflict with the laws of the local country, the local laws and regulations shall prevail first, and

these guidelines may be revised and used by reflecting the laws and industry characteristics required in the country, and if necessary, a separate detailed policy can be established.

2. Subject to these guidelines include members of the Company (including executives and employees, non-regular workers), domestic and foreign production and sales corporations, subsidiaries and sub-subsidiaries, and executives and employees of joint ventures. In addition, members of the Company shall follow these guidelines when dealing with suppliers and sales/service organizations, and further encourage all stakeholders in business relationships to respect these guidelines for human rights management.

Article 4 (General Principles)

1. (Prohibition of child labor and protection measures for minors) Child labor is prohibited in principle, and in the case of minors under the age of 18 (including students, interns, practitioners, and apprentices), under no circumstances shall they engage in dangerous or harmful work, including night work and overtime work, and measures shall be taken to ensure education opportunities are not restricted.
2. (Discrimination in employment and work and compliance with working conditions) The Company shall not discriminate in recruitment, hiring, promotion, education, wages, welfare, etc. of any executive or employees on the grounds of gender, race, ethnicity, nationality, religion, disability, age, family status, social status, and political affiliation, etc. without any reasonable reason. The Company shall also provide equal opportunities for self-development and education based on abilities and qualifications, and evaluation and compensation shall be made according to fair standards.
3. (Humane treatment) The Company shall respect the privacy of all members, strictly protect privacy information, and take measures to prevent damage to their dignity as human beings by infringing on their physical and mental health at work.
4. (Prohibition of forced labor) The Company shall comply with the working hour standards set by labor-related laws and prevent involuntary work by coercion. The Company shall also improve working conditions so that work-life balance can be maintained and individual abilities can be fully demonstrated.
5. (Creating a safe working environment) The Company shall continuously strive to prevent safety accidents for our members, and provide an optimal work environment by creating a safe and clean working environment to protect and maintain the health of our members.
6. (Guarantee freedom of association and collective bargaining) The Company shall

guarantee freedom of association and collective bargaining, and provide sufficient communication opportunities for our members.

7. (Product/service safety guarantee) The Company shall strive to ensure that customers who use our products and services can use them safely and conveniently, and the Company shall respond quickly and accurately to customer needs and increase customer satisfaction.
8. (Information protection) The Company shall protect the privacy information of stakeholders, including customers, in accordance with national and local laws, and prepare and continuously improve various technical and physical measures to protect customer information collected in the course of business.
9. (Responsible supply chain management) The Company shall not engage in unfair or dishonest transactions by using our superior position, and strive to grow and coexist through fair and transparent transactions. The Company shall communicate and support business partners in cooperation and business relationships so that they can introduce and practice human rights and ethical management.
10. (Protection of human rights of residents) The Company shall be careful not to infringe on the human rights of local community members in the course of business activities, and protect the rights and freedoms of residents.
11. (Guarantee of environmental rights) The Company shall comply with domestic and foreign environmental laws and regulations, strive to protect the environment and prevent pollution, and encourage the spread of eco-friendly technologies and research and development to continuously improve environmental protection performance.
12. (Protection of shareholder rights) The Company shall provide necessary information to shareholders and investors in a timely, accurate, and fair manner in accordance with relevant laws, secure management transparency by disclosing accurate accounting data, and maintain the trust of shareholders and investors. In addition, the Company shall strive to enhance the value of shareholders and investors through rational decision-making and transparent management activities.
13. (Efforts for relief measures) The Company shall provide prompt and appropriate relief measures for human rights violations that occur in the course of business activities.

Article 5 (Establishment of Human Rights Management System)

1. In order to respect the human rights of its members and resolve risks, the Company shall establish an internal system necessary for human rights management, assess and improve human rights risks on a regular basis, and fully share the results with stakeholders.
2. The human rights management department of the Company shall implement the human rights risk management system according to the principle of good faith, periodically review

human rights management procedures, and revise the management system by actively reflecting social changes.

- ① Establishment of human rights management system
- ② Enactment of declaration of human rights management and public announcement
- ③ Assessment and evaluation of human rights risks
- ④ Improving human rights risks and implementing human rights relief procedures
- ⑤ Disclosure of implementation status of human rights management

CHAPTER 2 HUMAN RIGHTS MANAGEMENT SYSTEM

Article 6 (Representative Director)

1. The Representative Director shall announce the human rights management declaration to ensure the dignity and value of human beings in all business activities, and members shall use the declaration of human rights as the standard for human rights management behavior and value judgment and practice them.
2. The Representative Director shall establish a regular plan for the promotion of human rights management and manage and supervise it through a committee or management meeting in which decision-makers from major departments participate, and a working-level meeting organized by decision-makers of human rights management departments.

Article 7 (Human Rights Management Committee)

1. A human rights management committee (hereinafter referred to as the "Committee") may be established to efficiently promote human rights management, and the Committee shall review and deliberate on the following matters to protect and promote human rights of stakeholders, including members.
 - ① Matters concerning the enactment and amendment of the declaration of human rights management and the establishment of a plan
 - ② Matters concerning systems, policies, and regulations related to human rights management
 - ③ Implementation of human rights risk assessment and recommendations for action on the results
 - ④ Instruction to investigate cases of human rights violations and deliberation of relief measures
 - ⑤ Other matters deemed necessary for the protection of human rights

2. Organization Composition

- i. The Human Rights Management Committee shall comprise no more than six members, including one chairperson. The Committee shall appoint the representative director as the chairperson and one head of the department in charge of relief measures as ex officio. The chairperson shall convene and preside over meetings of the Committee.
- ii. The committee members shall include the heads of the management support division, corporate culture division, and legal affairs division. However, the chairperson may appoint them in case of unavoidable reasons such as vacancy, termination of appointment, etc.
- iii. The Committee may include external experts as advisory committee members in the decision-making process when necessary.

3. Organization Convening and Meeting Operations

- ① The convening and meetings of the Committee shall be divided into ordinary meetings and extraordinary meetings, and the results shall be reported to the ESG committee.
- ② The Committee shall hold ordinary meetings at least once a year.
- ③ In case the chairperson deems it necessary or if more than one-third of the incumbent members request it, extraordinary meetings shall be held.
- ④ The committee meeting shall be decided by the attendance of a majority of the incumbent members and the consent of a majority of the members present. In case of a tie, it shall be reassessed in one more vote. If the reassessment vote is also a tie, the proposed meeting shall be rejected.
- ⑤ When convening the Committee, the chairperson shall notify each member of the main matters including the date, place, and agenda of the meeting at least seven days before the meeting date. However, if there are urgent or unavoidable reasons, the notification may be made up to one day before.
- ⑥ The chairperson may decide by written consultation on matters that he or she judges that the content of the agenda is minor or that an in-person meeting/video conference deliberation would not be necessary. In this case, attendance in applying paragraph 4 shall be based on the submission of a written consultation form.

4. Listening to Opinion

If necessary, the chairperson may invite the parties to the meeting agenda or related persons

to attend the meeting to hear their opinions.

5. Exclusion of Members

- ① A committee member who has an interest in a specific agenda cannot exercise his or her right to vote on matters related to the agenda when deliberating.
- ② If a committee member is unable to perform his or her duties according to the provisions of paragraph 1, he or she shall not be included in the calculation of incumbent members under paragraph 3 of Article 7.

6. Prohibition of Leaking Secrets

Committee members and related parties attending the meeting of the Committee must not leak secrets they have learned in their duties.

Article 8 (Human Rights Management Department)

The Company shall have an organization in charge of human rights management to carry out related tasks. The tasks to be performed by the organization in charge of human rights management may be as follows.

1. Enactment and revision of declaration of human rights management
2. Establishment of human rights management action plan
3. Assessment of human rights risks
4. Matters related to the disclosure of human rights management activities and external communication
5. Other related tasks deemed necessary for the protection of human rights

Article 9 (Education and Diffusion)

1. The department in charge shall implement human rights management education and publicity for policy systems to build a culture of respect for human rights, and report human rights education and training plans and implementation results to the human rights management committee.
2. The Company shall conduct human rights management education for the purpose of inducing employees' understanding of human rights and improving their awareness, and delivering internal human rights management directions and action plans. The Company shall prevent human rights violations through human rights management education, and encourage them to actively report discovered cases of human rights violations and risks.
3. The Company shall make it possible to share information on human rights management declarations and action plans, human rights risk assessment procedures and results, etc.

not only within the Company, but also with suppliers, sales and service organizations, and other organizations in business relationships. The method of sharing shall be to use the optimal channel (voice, video, written, etc.) and method (Korean, English, etc.) through which members of the organization can conveniently access information related to human rights management.

Article 10 (Operation of Reporting Human Rights Violations)

1. The Company shall operate the following procedures for receiving and reporting human rights violations, including discrimination, working conditions, humanitarian treatment, forced and child labor, transactions with business partners, local community and environmental rights, and information leakage.
2. The department in charge of handling human rights violation reports shall investigate and review the report and if the report falls under any of the following subparagraphs, it shall not be submitted to the Committee, and the person making the report or the interested party shall be notified of the result and reason.
 - ① If it is clear that the contents of the report are not true or there is no objective evidence to support that it is true
 - ② If the investigation result does not fall under human rights violations or discriminatory acts
 - ③ If it is deemed that no separate relief measure is necessary, such as when damage has already been recovered
3. If the reported human rights violation is subject to disciplinary action by the Personnel Committee, or if it is a violation of the Code of Ethics practice guidelines, such as major unethical acts that employees should not do in relation to their duties, the reported contents can be transferred by designating the department in charge.
4. The Company shall operate a channel that can receive reports from employees and other people or groups (reporters) who have suffered human rights violations or are aware of human rights risks. When receiving a report of a violation of human rights, the relevant departments, etc. should discuss specific relief measures for the human rights violation report case in consideration of the characteristics of each reported case.
5. The Company shall refer to court precedents, regulations of the competent authority, past internal handling practices, and other industry practices for cases of human rights violations, etc., and seek the best relief measures with the support of the department in charge. In cases where human rights violations exert considerable influence on the freedom and rights

of victims or are highly likely to be transferred to corporate reputation and risks, the human rights management committee should discuss relief measures.

6. The Company shall prepare a plan to improve accessibility by providing various online and offline reporting systems such as phone, mail, and meeting.

Article 11 (Relief Measures for Human Rights Violations)

1. Relief may take various forms, such as monetary compensation, apology, recovery, rehabilitation, non-financial compensation, sanctions, or promises to prevent a recurrence. The process of relief procedures must follow relevant laws and regulations, and if there is an international guideline, it should be cited. In the absence of relevant standards or guidelines, relief measures actually applied in similar cases may be referred to.
2. When a human rights violation report is received, the Company shall put it on the agenda for deliberation or decision by the human rights management committee.
3. The Committee may recommend the following if it is recognized that human rights violations have occurred as a result of deliberation.
 - ① Suspension of human rights violations subject to investigation
 - ② Restoration, compensation for damages, apology, non-financial compensation and other necessary relief measures
 - ③ Sanctions against human rights violators, such as requests for audit, education orders, etc.
 - ④ Measures to prevent a recurrence
 - ⑤ Correction or improvement of systems, policies and practices
4. The Committee may express its opinion on the correction or improvement of systems, policies, and practices where it is deemed that there is a good reason even if it has not led to human rights violations as a result of deliberation.
5. The organization in charge of receiving recommendations pursuant to Paragraphs 1 and 2 shall share the Committee's results with the heads of each department and endeavor to respect and implement the recommendations throughout its management activities.

Article 12 (Protection Measures for Reporter)

The Company shall not disclose or report the privacy information of the complainant or facts that can be known to others, and shall keep confidential the details of the report, receipt, and notification, such as the victim, damage, relief procedure, and results. In addition, protective and necessary

measures shall be taken to prevent the person who reported human rights violations or human rights risks from being negatively affected by the report.

1. Prevention of adverse influence
2. Separation of work and space, granting leave, psychological counseling support, etc.
3. Obligation to prevent secondary damage and protect victims' right to work and study
4. Obligation to maintain the confidentiality of identity and privacy information of the person involved in the case

CHAPTER 3 ASSESSMENT OF HUMAN RIGHTS RISKS

Article 13 (Human Rights Risk Assessment System)

1. The Company shall conduct a regular and continuous assessment of negative impacts arising from business activities and actual and potential human rights risks that may cause negative impacts, either at the company level or for specific policies or projects.
2. The subject of human rights risk assessment includes risks that may arise to human rights in relation to business activities and products/services in the Company's business relationships (business partners, supply chain, etc.).
3. Human rights risk assessment shall be conducted by the department in charge of human rights management, and related data may be requested from each department for this purpose. If necessary, human rights risk assessment may be entrusted to an external independent agency. Detailed procedures and methods for assessing human rights risk may be implemented by establishing a separate plan depending on the case.
4. The Company shall develop and operate assessment and due diligence indicators that can assess human rights risks through consultation with stakeholders who may be negatively affected by the Company's activities by reflecting the basic principles of the Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidance for Responsible Business Conduct, and the Ministry of Justice Standard Guidelines for Corporate Human Rights Management (Draft).

Article 14 (Operation of Human Rights Risk Assessment System)

1. An assessment process shall be operated to check the status of human rights violations and the possibility of potential human rights risks for organizations included in the scope of application of the human rights declaration.

- ① Selection of assessment target
 - ② Written review
 - ③ Due diligence (third-party review if necessary)
 - ④ Preparation of improvement plan
2. It is recommended that assessment indicators and guidelines are provided to the assessment target for self-assessment, and if the assessment target is insufficient as a result of self-assessment, it is recommended to establish a self-improvement plan.
 3. Based on the results of the self-assessment, on-site due diligence can be carried out to confirm the risk in detail through internal human rights regulations and systems, interviews and on-site assessment. In addition, in order to secure the objectivity of the self-assessment and due diligence, a separate third-party audit may be conducted through an independent third-party organization, and for "high risk" and "unsuitable" discovered through self-assessment, due diligence, and third-party assessment, the Company may request immediate improvement or establishment of an improvement plan.
 4. The Company shall regularly review and revise human rights risk assessment indicators and processes so that it can accurately identify cases of human rights violations and operate the assessment process efficiently.

Article 15 (Measures to Mitigate and Improve Human Rights Risks)

1. The Company shall establish improvement measures and implementation plans for human rights risks derived from human rights risk assessment. The head office, domestic and overseas production and sales corporations, subsidiaries and sub-subsidiaries, suppliers, sales and service agents, and other organizations with business relationships that have been evaluated for human rights risk shall derive specific action plans to implement risk improvement measures.
2. The Company shall continuously monitor whether the person in charge of the organization that has been assessed for human rights risk is faithfully and smoothly implementing the mutually agreed improvement plan. The Company members shall regularly communicate in order to ensure that detailed tasks are implemented according to the schedule and to secure the expected output in a timely manner.

Article 16 (Disclosure and Reporting)

1. The Company shall report significant implications and important risks and improvement plans identified through human rights risk assessment to the Human Resources

Management Committee. Report data approved by the Committee, management meeting, and major decision-makers may be shared with the competent department to enhance the effectiveness of human rights management

2. The Company shall disclose human rights violation report cases, human rights risk assessment results, and information on risk improvement and mitigation measures using channels such as the website, integrated report, sustainability report, or separate human rights white paper, and when disclosing, the Company shall select channels that are easy to access and clearly understandable by members and other stakeholders.