

Code of Ethics

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Code of Ethics

Chapter 1: General Provisions

Article 1 (Purpose) Based on SK Management System's (SKMS) business philosophy, SK ecoengineering Co., Ltd. ("SKEE" or the "Company") creates value for employees, clients, shareholders, business partners and other stakeholders, while fulfilling a critical role in the nation's and society's economic progress, and contributing to global happiness. SKEE is committed to the highest standards of ethics, and to conducting its business operations openly, fairly and honestly. The Company is also committed to abiding by all applicable laws and regulations in the jurisdictions in which it conducts business, and being a good corporate citizen. These commitments are embodied in this Code of Ethics, which forms the foundation of SKEE's compliance program.

Article 2 (Scope of Application) The Code of Ethics applies to the company's domestic and foreign corporations and branches, subsidiaries, and all directors, executives and all employees including part-timer (hereinafter "Members") of the company, and stakeholders with whom the Company has business relationships are also encouraged to comply with this Code of Ethics.

Article 3 (Compliance and Responsibility) Companies and employees which Code of Ethics applied to must abide by the Code of Ethics and use it as a basis for judgment in various situations encountered during work. In addition, in case of violation of this Code of Ethics, the Member who violates this Code of Ethics may be subject to disciplinary action according to the relevant regulations and procedures.

Article 4 (Responsible Department) Responsible Department of this Code of Ethics is the ethical management department.

Chapter 2: Basic Ethics of Members

Members take pride and faithfully perform their duties in their position with the attitude representing the company.

Article 5 (Fair Performance of Business) The Members perform work fairly and transparently by clearly separating public and private affairs.

Article 5-1 (Money & Valuables and Entertainment) Regardless of whether it is related to work, in any case, money, entertainment, or personal convenience shall not be provided from or provided to interested parties.

Article 5-2 (Graft) Members shall not make or receive illegal solicitations in relation to their duties by himself or through a third party.

Article 5-3 (Conflict of Interest) Members must avoid situations in which their personal interests and the interests of the company may be impulsive. If the conflicting situation is unavoidable, Members should give priority to interest of the Company and client to the extent giving priority is legally allowable.

Article 5-4 (False Reporting) Members shall not purposefully hide, reduce, or exaggerate the truth in report which may result in wrongful decision by the management of the Company

Article 5-5 (Protection of Company Property and information) Members shall not embezzle or waste company assets and shall not leak business information and personal information of Members and stakeholders.

Article 6 (Respect for Members) Members should respect each other and create a corporate culture where they can work voluntarily and with enthusiasm.

Article 6-1 (Sexual Harassment and Bullying in Workplace) must not engage in any act (sexual harassment, bullying in workplace, etc.) that insults individual personality or harms the corporate culture.

Article 6-2 (Discrimination) Members should not discriminate against other Members on the basis of gender, educational background, region of origin, marriage, race, nationality, religion, disability, etc.

Article 6-3 (Safety of Members) The Company should maintain a system for the safety and health of the Members and maintains a safe work environment from occupational accidents and injuries, disasters, diseases and infections.

Chapter 3: Attitude for Client

By providing various values to customers and continuously satisfying customers, we gain trust from customers and ultimately develop together with customers.

Article 7 (Customer-oriented Management) Members respect the diversity of customer opinions and experiences and implement the Company's business activities based on such respect.

Article 8 (Protection of Customers' Personal Information and Trade Secrets) Member should thoroughly protect customers' personal information and trade secrets and Members should comply with relevant laws and regulations.

Article 9 (Enhancement of Customer Value) Members shall provide the highest quality products and services to our customers.

Chapter 4: Relationship with Business Partners

We create a fair and competitive business ecosystem with our business partners by complying with relevant laws in domestic and overseas including the Fair Trade Act, and lead mutual development through virtuous cycle cooperation based on this.

Article 10 (Anti-Trust) Members do not engage in acts that are likely to undermine fair competition, such as abusing our market dominance or abusing our trading position.

Article 11 (Bid Rigging or Price Fixing) Members do not engage in negotiations with competitors that affect prices or trade conditions or impede fair competition.

Article 12 (Money Laundering) Member do not engage in activities related to money laundering of customers, partners, business partners, other organizations and individuals.

Article 13 (Growth Together) Member must give fair trade opportunities to our suppliers and not engage in unfair practices using our superior position, and pursue mutual benefit and common development.

Section 5. Responsibility to Shareholders

We increase corporate value so that shareholder value can be created, and for this purpose, we enhance transparency and conduct efficient management.

Article 14 (Enhancement of Corporate Value) Members should maximize corporate value through efficient management through continuous innovation and share the results with shareholders.

Article 15 (Protection of Shareholder Rights) Members should practice transparent management centered on the board of directors and respect the fair demands and suggestions of shareholders.

Article 16 (Insider Trading) Members should not use or disclose important information about the company and stakeholders for personal gain and do our best to protect shareholder interests by complying with laws and regulation related to insider trading.

① Material information refers to information that may affect investment decisions, such as financial performance (profits, dividends, etc.) and mergers and acquisitions, that are not disclosed to the public.

② Members are strictly prohibited from trading securities based on undisclosed material information. Also, if you learn information about a new business, do not invest in assets located near the facility.

③ Members do not inform third parties of important information or recommend them to trade, such as transaction using such information.

Article 17 (Accurate Accounting and Recording) All records such as the Company's financial statements and publicly disclosed data should be prepared in accordance with accounting standards and other laws and standards and should be disclosed in good faith in accordance with relevant laws and regulations.

Section 6. Responsibility to Society

We do our best to grow together with society through the creation of social values and to conduct business in accordance with social norms.

Article 18 (Anti-Corruption) Members should strive for the development of a corruption-free and fair society by complying with the laws and international conventions related to anti-corruption in the country in which the Company operates.

① Members must not offer, promise or express intention to provide money or valuables to public officials, etc. performing their duties in accordance with the Improper Solicitation and Graft Act.

② In accordance with the Improper Solicitation and Graft Act, Member must not make or receive an improper solicitation from public officials, etc. who perform their duties.

③ Unless expressly permitted under the Company's Anti-Corruption Compliance Policy or other Company policies and procedures, Members must not promise, offer, or express bribes to foreign public officials in relation to international commerce. When a contract is concluded by selecting an overseas joint venture partner or agent, the prohibition of bribery to foreign public officials and the obligation to comply with related laws must be included in the contract.

Article 19 (Compliance with Laws) Member must comply with all laws and regulations of the country in which the Company operate, and strictly prohibit participation in criminal activities (fraud, embezzlement, obstruction of justice, etc.).

Article 20 (Human Rights) Members should comply with the labor laws and international standards related to human rights of the country where our business is located, protect the basic human rights of all stakeholders including customers, and do not discriminate with race, religion, or gender.

Article 21 (Safety and Health) Members should take the lead in building a safe and healthy society by systematically managing safety and health hazards and complying with relevant international standards, relevant laws and internal regulations.

Article 22 (Environmental) Members should practice eco-friendly management by minimizing environmental impact in all areas of our business and complying with relevant international standards, relevant laws and internal regulations.

Article 23 (Tax) Members should comply with the tax laws of the countries in which the Company operates and fulfill our tax obligations honestly and transparently.

Article 24 (Social Contribution) Members should actively participate in social contribution activities to promote the happiness of entire society.

Section 7. Implementing System for Ethical Management

Article 25 (Responsible Organization and its Roles) ① The Audit Committee or the Board of Directors decides on major policies for ethical management and directs and supervises ethical management tasks and systems.

② The organization in charge of ethical management establishes an ethical management system and periodically reports the results of work to the audit committee or the board of directors. In addition, in the event of a violation of the Code of Ethics, necessary measures are taken immediately, and the relevant information is disclosed in an appropriate manner to prevent recurrence.

Article 26 (Operation of Consulting and Reporting Center for Ethical Management) Members and all stakeholders must report to the Ethics Management Consulting and Reporting Center when they witness or become aware of violations of this Code of Ethics and the Company's policies and procedures.

■ Operation of Consulting and Reporting Center for Ethical Management

- Tel : 02-6324-5130
- Fax : 02-3700-8200
- E-mail : skec.ethics@sk.com
- Post : 6, Yulgok-ro, Jongno-gu, Seoul, SK ecoengineering HR team
- Internet : <https://ethics.sk.co.kr>
- Open Chatting for Cacao Talk(SNS) : Research ‘skecoplant 윤리경영’

Article 27 (Protection of Whistleblower) ① The Company maintains the confidentiality and anonymity of the report in accordance with the Whistleblower Protection Regulations and protects the identity of the whistleblower.

② The whistleblower may request the protection of his/her identity from the head of the department in charge of ethical management, and the head of the department in charge of ethical management may take necessary measures.

③ Retaliation against the whistleblower or any act that exposes the whistleblower's identity is prohibited, and disciplinary action against the Member who violates this will be taken in accordance with related regulations.

Article 28 (Training) The Company must improve the level of ethical management practice not only for its employees but also for its partner companies and provides trainings for the Members to enhance the level of understanding of the ethical regulations.

Article 29 (Pledge or Oath) Every year, Members pledge to read and understand the Code of Ethics and practice it in written (Annexed Form No. 1), and suppliers must pledge to practice ethical management at the time of contract.

Article 30 (Operation of Code of Ethics Management) ① The organization in charge of ethical management establishes and operates ethical management practice rules and ethical management practice guides so that members can properly understand and practice this Code of Ethics.

② For business partners that have a transaction or contract relationship with the Company, the business partners are encouraged to comply with the rules of conduct.

Addendum

1. These Rules shall come into effect on October 10, 2021.
2. Amendment to the Rules shall come into effect on December 14, 2021.
3. Amendment to the Rules shall come into effect on Sep 30, 2024.