

Rules for Practice of Ethical Management

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Rules for Practice of Ethical Management

Chapter 1 General Provisions

Article 1 (Purpose) The purpose of these Rules for Practice of Ethical Management is to rightly understand and practice the code of ethics by providing the behavioral standards to be abided by the members of SK ecoengineering Co., Ltd.

Article 2 (Definition of Terms) (1) Money and valuables: Cash, marketable security, gift, benefit of special discount and any other economic benefits

(2) Entertainment and hospitality: Benefits such as dining, drinking, leisure activities, etc.

(3) Convenience: Provision or support of anything other than money and valuables, entertainment and hospitality regarding facilities, transportation, accommodation, sightseeing, event, field trip and inspection, etc.

(4) Interested parties: All natural persons, legal persons and other organizations (state, local governments, public institutions, etc.) inside and outside the Company whose rights and interests are affected by the work-related acts or decision making of employees of the Company

(5) Family members: Spouse, blood relatives within cousin, in-laws within cousin

(6) Foreign government officials, etc.: Persons engaged in legislative, administrative or judicial work of any foreign government (including members of national assembly), employees of international organizations, persons performing public works of any foreign country including state-owned enterprises and public institutions

(7) A general case under social norms: It refers to any case of voluntary offering of money and valuables with genuineness, in which there is no possibility of bribery.

Article 3 (Scope of Application) These practical guidelines apply to the corporations, branches and subsidiaries in Korea and overseas of SK ecoengineering (hereinafter referred to as the “Company”) and all directors, officers and staff (hereinafter referred to as “members”) of the Company.

Article 4 (Managing Department) The managing department for these rules shall be the department in charge of ethical management.

Chapter 2 Prohibition of Receiving and Offering of Economic Benefits from/to Interested Parties

Article 5 (Receiving and Offering of Money and Valuables) Under no circumstances,

regardless of whether being related to business, a member may receive or offer any money and valuable from/to interested parties: Provided, that the same shall not apply to promotions and event souvenirs usually provided and any money and valuables publicly raised to help any members in difficult situation due to any illness or disaster.

Article 6 (Entertainment and Hospitality) Under no circumstances, regardless of whether being related to business, a member may receive or offer any entertainment and/or hospitality from/to interested parties.

Article 7 (Convenience) Under no circumstances, regardless of whether being related to business, a member may receive or offer any convenience from/to interested parties: Provided, that the same shall not apply to any transportation, accommodation or food indiscriminately provided by the host to the participants in any official event.

Article 8 (Other Economic Benefits) A member shall not request or accept offer of payment and guarantee for liabilities, money loan contract, lease or sales contract for real estate and personal properties to any interested party.

Article 9 (Acts of Family Members) Any act of receiving or offering economic benefits from/to any interested party by any family member of a member shall be regarded as an act of the member.

Chapter 3 Act Hurting Corporate Culture

Article 10 (Sexual Harassment) A member shall not conduct any speech and/or behavior that causes sexual humiliation between members or to any interested party.

Article 11 (Workplace Bullying) A member shall not abuse his/her position within the Company in order to obtain personal benefits. In addition, any act causing any mental anguish or physical pain between members or to any interested party or aggravating working environment shall be strictly prohibited.

Article 12 (Sharing Economic Benefits between Members) It is not allowed to loan money or share money and valuables received with the expectation of some reciprocity between members.

Chapter 4 Prohibition of Act in Conflict of Interest with Company

Article 13 (Private Use of Company Information) A member shall not conduct act such as taking any private profit using undisclosed Company information or provision of such information to any third party.

Article 14 (Investment in Subcontractor) A member shall not invest in shares or bonds of

subcontractors which may hinder fair performance of work in relation to duties: Provided, that the same shall not apply to the case of purchasing the shares of any listed and registered company in the stock exchange.

Article 15 (Joint Investment and Acquisition of Properties with Interested Party) A member shall not conduct any act of investment or acquisition of properties jointly with any interested party. Even if any property has been acquired in any other person's name, it shall be deemed that the relevant member has invested in or acquired the property if he/she practically owns it.

Article 16 (Transaction between a Member or his/her Family Member and Company) A member or his/her family shall not conduct any transaction with the Company: Provided, that the same shall not apply to the case of obtaining the prior approval of the Company.

Article 17 (Side Job and/or Concurrent Office) A member shall not have a side job at any other company or engage in any other business activities without the prior approval of the Company.

Chapter 5 Prohibition of Private Use of Company Assets and Information

Article 18 (Embezzlement and Outflow of Company Assets) A member shall not conduct any act of embezzlement or outflow of properties and information that cause loss of the Company's assets (including tangible assets and intangible assets such as intellectual property rights and trade secrets), and he/she shall not take any private advantage by using the Company's assets.

Article 19 (Leakage of Company Information) A member shall not leak or provide the business information and personal information of the members and interested parties.

Article 20 (Waste and Private Use of Company Expenses) In execution of the Company's funds, a member shall not cause occurrence of any unnecessary waste of budget, nor shall he/she use the Company expenses for private purpose.

Chapter 6 Prohibition of Acts in Violation of Principle of Duty of Good Faith of a Member

Article 21 (Improper Solicitation) A member shall not conduct or accept any improper solicitation including any act falling under any of the following subparagraphs to/from any interested party by himself/herself or via any third party:

(1) Any act affecting personnel affairs such as employment, promotion, relocation, salary,

welfare, training and personnel evaluation;

(2) Any act involved in bidding, selection of subcontractors, or determination of terms of any contract; or

(3) Any act of solicitation, good offices or instruction for any private advantage.

Article 22 (Unreasonable Performance of Duties) A member shall be prohibited from unreasonably performing his/her task for the purpose of providing advantage or disadvantage to any specific interested party by using the position in his/her duties.

Article 23 (Unethical Acts Harming Reputation of Company) A member shall not conduct an unethical act that may harm dignity of any individual and the Company.

Article 24 (Buildup of the sound workplace) Members shall build up and maintain the sound workplace by concentrating on the business matters away from each personal ones.

Chapter 7 Operation of General Provisions

Article 25 (Responsibilities and Obligations of Members) (1) A member shall perform his/her duties in a legitimate and ethical manner in compliance with the regulations and overall laws and rules.

(2) A member of position shall be responsible for active supporting and management to ensure that his/her subordinate members and any work-related interested parties properly understand and comply with the code of ethics, and shall set an example for others through faithful and responsible decision making and behavior.

(3) A member shall report any act in violation of the rules for practice of ethical management to the organization in charge of ethical management immediately after finding it.

(4) A member shall actively cooperate in providing relevant information and with the justification request from the organization in charge of ethical management at the time of any investigation on any unethical act by the organization in charge of ethical management.

Article 26 (Operation of Guide for Practice of Ethical Management) (1) The organization in charge of ethical management may establish and operate the ‘guide for practice of ethical management’ in order to present the criteria for ethical judgment and behavior of members.

Article 27 (Disciplinary Action) The Company may take disciplinary actions if any member has violated the code of ethics, rules for practice of ethical management, and guide for practice of ethical management and suspend him/her until final decision on the disciplinary action.

Addendum

1. These Rules shall come into effect on Oct 20, 2021.
2. Amendment to the rules shall come into effect on Dec 14, 2021
3. Amendment to the rules shall come into effect on Sep 30, 2024