

Manufacturing Code of Ethics

Established on September 1, 2022

Article 1 (Purpose)

Members of the SK Materials Co., Ltd. affiliates must have mutual respect for customers and business partners and ensure mutual growth through fair trade. To this end, the Manufacturing Code of Ethics has been drawn up as the standard for making decisions and judging behaviors in business activities. The Code of Ethics is not simply a means to control the unethical behaviors of individual members. It measures up to SK's philosophy on ethical management which seeks to enhance its ethical standards during the course of business to gain trust of stakeholders and achieve continuous growth and development.

Article 2 (Applicability)

This Code applies to the members of the SK Materials Co., Ltd. affiliates, that is, all members (including irregular workers and outsourced staff) who serve at SK Materials Co., Ltd, and its subsidiaries and affiliates (including overseas affiliates), irrespective as to where their place of work is located.

Article 3 (Fundamental Principles)

(1) Building a global competitive edge for quality

Strive to secure a global competitive edge for quality through customer-centric thinking and yield the best-in-class quality and prevent quality-related accidents by fundamentally exploring all stages of product development, manufacturing, shipment, use, and disposal.

(2) Keeping records and reports accurate

Strive to make complete and transparent records without any false facts to reflect the actual business status and details and report them in an honest and timely manner. Do not present any manipulated, destroyed, or distorted information for the interest of a certain individual or organization, and remain objective, unbiased, and honest in all aspects during the course of business.

(3) Maintaining independence in the investment decision

Before making an investment, thoroughly review the overall conditions of the potential investment opportunity, and the investment decision must give priority to minimizing the risk. Also, exercise caution to remain independent under reasonable standards.

(4) Protecting information and maintaining trade secrets in confidence

Strictly manage and protect the information of customers and business partners learned during the course of business and make best efforts to safeguard confidential information without sharing it with third parties. If you are improperly requested to provide or allow access to information from the inside or the outside of the Company, turn down the request, and make a continuous effort to enhance the level of technical and managerial measures to safeguard the information of customers and business partners.

(5) Reinforcing the global environmental safety management system

To comply with domestic and foreign laws and conventions associated with the environment, safety and health, and energy, and to prevent environmental accidents, strictly apply and faithfully implement internal management standards to all business activities. Provide education for members to understand and practice the environmental

safety management system and disclose environmental safety policies and management achievements to internal and external stakeholders.

(6) Building an eco-friendly production process

Introduce eco-friendly design to ensure efficient use of energy and water resources and thorough management of chemical substances and make continuous efforts to facilitate the reuse and recycling of wastewater and waste and reduce pollutant emissions.

(7) Practicing the climate change policy

Acknowledge that the climate crisis is a common issue that calls for the conservation of the earth's environment and make continuous efforts to increase the use of renewable energy, reduce GHG emissions, and build a low-carbon ecosystem to overcome the climate crisis.

(8) Implementing a safe workplace

To ensure the safety of the working environment, create a safety culture in which all employees take part, prevent serious accidents by continuing activities designed to promote the health of employees and improve factors affecting safety, and deliver an accident-free workplace. In addition, protect employees and local inhabitants from external risk factors (natural disasters, fires, infectious diseases, etc.) and maintain an emergency response system at all times to preserve business continuity.

(9) Building a partnership of mutual growth

Maintain a continuous cooperative system with customers/business partners and build an eco-friendly business relationship by sharing the environmental safety management system and quality control/analysis technology. Also, communicate with local inhabitants and contribute to the development of the local community.

Article 4 Compliance with Laws and International Conventions

SK members must perform their duties based on the spirit of supply for mutual growth and the principle of good faith and comply with associated domestic and foreign laws and regulations, including the Monopoly Regulation and Fair Trade Act, the Act on the Promotion of Mutually Beneficial Cooperation between Large Enterprises and Small And Medium Enterprises, the Fair Transactions in Subcontracting Act, the U.S. Foreign Corrupt Practices Act of 1977, 15 U.S.C. §§ 78-1 et seq., and the UK Bribery Act, and the Canadian Corruption of Foreign Public Officials Act. SK members must endorse and faithfully implement internationally accepted laws and international conventions, such as the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the 10 Principles of the UN Global Compact, and the UN Guiding Principles on Business and Human Rights.

Article 5 Matters on Reporting Violations and Protection of Whistleblowers

If a violation of the Code of Ethics occurs during the course of business, SK members must report it through the following channels to ensure that the conduct is addressed promptly, and the whistleblower will not be penalized for reasonable reports.

Website: <https://ethics.sk.co.kr/Report/OnlineReportIN>

Email: skmr-ethics@sk.com

Post: 22nd floor, Grand Seoul Tower 1, 33 Jong-ro, Jongno-gu, Seoul, Korea