

# **CODE OF ETHICS**

**July 2024**

**SK Planet Co., Ltd.**

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## 『Preamble』

Adopting SKMS as the basis of its corporate management, SK Planet Co., Ltd. (hereinafter referred to as the “Company”, ‘Company = I’) shall play an essential role in developing society and the economy by creating value for the Company’s customers, employees, shareholders, business partners (“BPs”) and other stakeholders. Furthermore, the Company shall aim to be a SUPEX company contributing to the human happiness.

The happiness that the Company pursues should be such that it is sustainable for the long-term and balanced relationship between itself and its stakeholders.

In addition, the Company shall respect the system of the free market economy, and seek fair competition in observance of business morality by improving the quality of its products and services, and thereby securing its competitive edge.

To this end, the Company shall enact and practice this Code of Ethics, as the basis for employees’ conduct and judgment, based on Our Value and SK-Way, “pursuing SUPEX via Human-Oriented Management”, of Management Perspective.

- The Company shall gain trust from its customers by ensuring consistent customer satisfaction, and ultimately transform ourselves into a corporate entity whose progress goes hand in hand with theirs.
- The Company shall create an environment in which its people can work willingly and voluntarily. The Company’s people shall contribute to the development of the Company and the creation of value for the stakeholders.
- The Company shall enhance its corporate value so as to create shareholder value, while increasing the level of both transparency and management efficiency toward this end.
- The Company shall provide fair opportunities to the Company’s BPs, assist them in enhancing their competitiveness, and seek joint development based on mutual trust.
- The Company shall contribute to the welfare of the community by engaging in social/cultural activities in addition to facilitating economic prosperity. Further, the Company shall practice management that abides by social norms and ethical standards.

## 『Articles of the Code of Ethics』

### 1. EMPLOYEE CONDUCT

#### 1.1 Sincere Execution of Work

1.1.1 All employees of the Company (the “Employees”) shall conduct their duties based on the principle of integrity, while clearly recognizing the scope of their authority and responsibility.

1.1.2 Employees shall not hold outside jobs, nor engage in any part-time job or any extra job which may affect their duties with the Company, except in cases where the Company has given prior approval for such job, in consideration of such job’s connection with the Employees’ duties with the Company.

#### 1.2 Maintenance of Dignity

- Being aware of that each Employee’s words and deeds may directly affect the Company’s integrity and reputation, Employees shall endeavor to fulfill their responsibilities and obligations as a member of the community.

#### 1.3 Promotion of Sound Corporate Culture

- Employees shall not engage in any action that undermines the establishment and development of sound interpersonal relationships in the workplace between superiors and inferiors, or among colleagues, including sexual harassment and coercion of personally burdensome wrongdoings. Further, Employees shall promote sound corporate culture by respecting each other in a spirit of mutual trust.

#### 1.4 Fair Execution of Work

1.4.1 Employees shall distinguish between Company business and personal affairs when performing work, and perform their assigned tasks fairly and transparently.

1.4.2 Employees shall not receive from, nor offer to, the Company’s stakeholders, money and other valuables, treats or favors.

- a. When Employees have unavoidably received money or other valuables, they shall notify the incident to their supervisor, report any progress to the Help Line and shall take the following steps:
  - 1) If possible, immediately return the money or valuables received;
  - 2) If it is impossible or reasonably difficult to return the items, contact the Help Line and follow the guidance of the Help Line.

- b. Money or valuables may be received by the Employees in the following circumstances:

1) PR or promotional event items:

If the items bear the logo or name of either the Company or the BPs and the value of them is reasonable, in accordance with prevailing social norms.

2) Monetary gifts of congratulation or condolence:

If the amount of the monetary gifts is socially acceptable, in the spirit of lending a helping hand.

- c. Employees shall not receive or offer treats or favors including any free golf rounding or other entertainments that are not permitted under the prevailing social norms except moderate business meals.
- d. Employees shall not receive treats or favors including any vehicles, venues, and services for department events or in-house clubs.
- e. Employees shall report to their supervisors when contacting any BPs.

1.4.3 Relevant Employee shall promptly report it to the Help Line in the event of any business deals between the Company or BPs and a family member or a relative of the Employee, to prevent any possible conflict of interest.

1.4.4 Employees shall not engage in any activity directly or through a third party where there is a conflict of interest between themselves and the Company.

Examples of conflict of interest are described in the sub-sections a and b below:

- a. Where an Employee has the power to influence the Company's work for personal gain, and the Employee's conduct or judgment can be influenced by:
  - 1) Transacting business with the Company, its competitors or BPs directly with the Employee or through a third party;
  - 2) Securing and/or maintaining employment in a business entity that has an interest in, or any form of business relationship with the Company, without the Company's approval;
  - 3) Receiving loan or a loan guarantee from, joint investment with, or a lease of real estate or tangible property from any BPs directly by the Employee or through a third party;
  - 4) Receiving compensation from any BPs directly by the Employee or through a third party;
  - 5) Possessing shares or bonds issued by any BPs directly by the Employee or through a third party (except where the Company has given prior approval).
- b. Where an Employee earns undue profits from using information acquired in the performance of his/her duties including the following examples:
  - 1) Acquisition of assets or securities of a business which the Company plans to purchase or lease directly by the Employee or through a third party; or
  - 2) Receipt of employment guarantee or employment recommendation for an Employee, or a third party, from the BPs, after providing the BPs with the advice based on Company information.

## 1.5 Protection of Corporate Assets and Information

1.5.1 Employees shall protect the Company's tangible and intangible assets, and use them in a fair manner.

- a. Employees shall proactively protect the Company's intellectual property rights, including trademark rights, patent rights and copyrights.
- b. In the event of the occurrence of actual loss to the Company or a possibility thereof, Employees shall immediately report such occurrence or possibility to the Company and take measures to prevent or minimize any loss to the Company.
- c. Employees shall make appropriate use of the Company budget, in accordance with the intended purpose of the budget and relevant rules and shall not divert the budget for personal gain.

1.5.2 Employees shall protect and properly manage the Company's information and trade secrets.

- a. Employees shall maintain the security of important confidential information, except as permitted by law or company internal regulations. Confidential information includes all non-public information that could be harmful to the company or its clients if disclosed to third parties, encompassing both confidential information provided by BP to the company and information provided by customers to the company. The obligation to preserve confidential information remains in effect even after termination, as reaffirmed by signing a confidentiality agreement upon departure
- b. Employees shall not use any confidential information of the Company obtained during his/her performance of duties for any personal purpose, or make any attempt to gain personal benefit by disclosing such information to a third party.
- c. Employees shall not disclose, internally or externally, the Company's information and trade secrets without prior approval, and shall fully cooperate in the safekeeping and reviewing of electronic documents transmitted outside the Company in accordance with the Company's information security policy.

## 2. RESPONSIBILITY FOR CUSTOMER

### 2.1 Customer-centered Business Management

- 2.1.1 The Company shall provide products and services that will satisfy customers' needs by the introduction of a proactive quality control system for promoting zero-defect products in the process of product development.
- 2.1.2 The Company shall use its best efforts to accurately understand customers' needs, accept customers' reasonable suggestions and requests, and keep the promises made to customers without fail.
- 2.1.3 The Company shall provide customers with accurate information in a timely manner,

so that customers can select the products and services that best suit their needs.

## 2.2 Protection of Customer Information

2.2.1 The Company shall abide by laws on customer information protection, and continue to review and improve work processes for the protection of customer information, including the introduction of customers' Privacy Impact Assessment.

2.2.2 The Company shall strive to protect customer information through the operation of optimized IT security systems and the retention of professional customer information managers.

2.2.3 The Company shall not use customer information for any purpose other than for the rightful business purpose of the Company, nor shall it offer such information to a third party except where such use or offer was permitted by the customer or allowed under the relevant laws.

## 2.3 Enhancement of Customer Value

- The Company shall maintain the quality of products and services that customers expect, and create an environment in which customers can use the products and services safely and beneficially, thereby using its best efforts to increase its customer value.

## 3. RESPONSIBILITY FOR EMPLOYEES

### 3.1 Safety and Welfare of Employees

3.1.1 The Company shall institute systems, and provide regular education and training that promote Employees' health and safety, and comply with relevant international standards, laws and internal regulations governing employee health and safety.

3.1.2 The Company shall exert its utmost efforts to encourage its Employees to present a spirit of challenge and creativity based on mutual trust and pride as members of Our Company, and help the Employees pursue happiness together with their colleagues.

## 4. RESPONSIBILITY FOR SHAREHOLDERS

### 4.1 Enhancement of Corporate Value

- The Company shall maximize corporate value through transparent and efficient business management as it continues to pursue management innovation, and shall share its profits with its shareholders.

### 4.2 Protection of Shareholder Rights

4.2.1 The Company shall practice transparent management centered on the operation of the Board of Directors, and respect the reasonable requests and proposals of shareholders.

4.2.2 The Company shall prepare disclosure documents including financial statements in



accordance with relevant laws, regulations and accounting standards, and disclose them fairly, accurately, completely and timely in accordance with the relevant laws.

## 5. RESPONSIBILITY FOR BUSINESS PARTNERS

### 5.1 Coexistence Management

- 5.1.1 The Company shall select appropriate BPs based on fair and reasonable criteria, and notify its BPs of the results of the evaluations made under the same standards on their business processes and product quality.
- 5.1.2 The Company shall not take improper advantage of its superior position, but shall rather pursue mutual benefit and joint mutual development.
- 5.1.3 The Company shall help its BPs enhance their competitiveness through rendering assistance in the areas of training, financial management, and R&D, and shall recognize the BPs as strategic partners that seek common value of customer happiness based on mutual trust.
- 5.1.4 The Company shall encourage its BPs to fulfill their own social responsibilities, including the promotion of workplace safety and respect for employees' human rights.

### 5.2 Protection of BPs' Information

- 5.2.1 The Company shall protect the information and trade secrets of its BPs, and shall not use such information for purposes other than for carrying out the Company's rightful business activities, unless otherwise agreed to by the BPs or allowed under the relevant laws.
- 5.2.2 The Company shall not acquire or use the BPs' or other companies' information or trade secrets in an illegal or improper manner.

## 6. RESPONSIBILITY FOR COMMUNITY

### 6.1 Promotion of Sound Culture and Compliance with the Laws

- 6.1.1 The Company shall contribute to improving the quality of people's lives and the human welfare by continuously pursuing technological innovations and business advancements that increase convenience and prosperity.
- 6.1.2 The Company shall comply with the relevant laws and regulations, including those related to the nature of its business activities and information security, in the regions where it operates. Additionally, the company shall respect community cultures and traditions, and comply with the relevant laws and regulations, and social norms of the regions where it conducts business.
- 6.1.3 The Company shall endeavor to create and promote a sound community culture by considering any adverse possible social or cultural problems that may arise from the provision of the Company's services where it conducts business.

## 6.2 Respect for Human Rights

6.2.1 The Company shall adhere to the Universal Declaration of Human Rights and international standards related to human rights

6.2.2 The Company shall not unduly discriminate against its Employees, customers and other stakeholders based on race, religion, sex or physical and mental impediments in any region where it conducts business.

6.2.3 The Company shall respect basic human rights in every region where it conducts business including protection of minors and customer privacy.

## 6.3 Eco-friendly Business Management

- The Company shall practice environment-friendly business management and abide by international standards and laws pertaining to environmental protection, and the Company's internal regulations.

## 6.4 Social Contribution Activities

- As a responsible corporate citizen in the community, the Company shall actively participate in social contribution activities including volunteer activities and disaster relief.

## 6.5 Maintenance of Political Neutrality

6.5.1 The Company shall respect each Employee's individual political rights and opinions, but shall disallow any Employee to use the Company's funds, human resources or facilities for any political purpose.

6.5.2 The Company shall not engage in any improper transactions with government officials, and shall abide by the laws and regulations in each nation where it conducts business.

## 7. APPLICATION OF CODE OF ETHICS

### 7.1 Scope of Application and Compliance Obligations

7.1.1 This Code of Ethics is applicable to the Company (including its domestic and foreign subsidiaries controlled by the Company) and all Employees of the Company. The Company shall encourage its stakeholders to understand and practice this Code of Ethics.

7.1.2 Employees have the obligation to comply with this Code of Ethics and to pledge their compliance to this Code of Ethics. If there are any questions related to interpreting or implementing this Code of Ethics, Employees should contact the Head of the Ethics Management Office to seek advice using the Help Line, etc.

7.1.3 Employees shall report any violation of this Code of Ethics to the Help Line.

7.1.4 Department Leaders shall be responsible for managing and supporting their Employees and stakeholders to correctly understand and comply with the company's Code of Ethics.

7.1.5 An Employee who has violated this Code of Ethics shall be disciplined in accordance with the relevant corporate by-laws.

## 7.2 Reports and Inquiries Related to the Ethics Management and Whistleblower Protection

7.2.1 The Company's Ethics Management Office shall establish and operate the Help Line channel such as an "Ethics Management Reporting Channel" or an "Ethics Counseling Center", on the Company's Internet homepage (<http://www.skplanet.com>),

7.2.2 The head of the Ethics Management Office shall further investigate inquiries and reports related to ethics management and take the following measures where it is deemed necessary.

- a. The head of the Ethics Management Office may transfer the matters to the Audit Team of affiliates or other relevant teams.
- b. Where it is deemed necessary that the inquiries and reports should be reviewed in detail, the Director in charge of Ethics Management shall handle the matters following the consultations with related teams.

7.2.3 The Company shall take the following measures when receiving inquiries or reports related to BPs.

- a. The Company may make favorable arrangements in handling the cases related to BPs after considering the importance and seriousness of the violation and receiving from the BPs a written pledge not to repeat the violations in ethics management.
- b. Notwithstanding Article 7.2.3.a above, the Company may take necessary measures including the restriction on transaction volume, or the cancellation of contracts with the BPs, in consideration of the seriousness of the violation and the effects of the violation on the Company and the community at large.

7.2.4 The Company shall strive to protect the status of the inquirer or whistleblower and encourage reports and inquiries related to the ethics management.

- a. The Company shall protect the status of the inquirer or whistleblower related to the ethics management (the "Whistleblower"), including the contents of any inquiries or reports, and shall strive to protect them from any disadvantageous treatment.
- b. Upon the disclosure of the identities of the Whistleblower, such Whistleblower may notify such disclosure to the head of the Ethics Management Office and ask for the protection of his/her status. In this case, the head of the Ethics Management Office shall take necessary measures including the transfer of the Whistleblower to another Team, in consultation with the head of the Human Resource Management Office.
- c. The Company's employees shall not take any action that may cause the identities of Whistleblowers to be disclosed, including an inquiry or investigation into the identities of the Whistleblowers.
- d. When a Whistleblower, who is involved in any acts of business ethics violation, makes an

inquiry about or reports such acts, his/her efforts to tell the truth shall be taken into account in punishing or taking a disciplinary action against him/her.

- e. The Company may reward parties that make reports and inquiries regarding the Company's ethics management, in cases where such reports have benefited the Company.

### 7.3 Code of Ethics Implementation Guidelines and Code of Conduct Guidelines

7.3.1 The Director in charge of Ethics Management may enact and enforce the Code of Ethics Implementation Guidelines as and when it is deemed necessary for its enforcement of this Code of Ethics.

7.3.2 The Team in charge of Ethics Management may recommend the enactment and enforcement of the Code of Conduct Guidelines in consideration of each Business Division ("BD")'s duties after consultation with the relevant BD.

#### <SUPPLEMENTARY PROVISIONS>

##### 1. Date of Enforcement

This Code of Ethics shall be in full force and effect from October 01, 2011.

#### <SUPPLEMENTARY PROVISIONS>

##### 1. Date of Enforcement

This Code of Ethics (amendment) shall be in full force and effect from the date of issuance. (July 24, 2024)