0104. Code of Ethics

Established on July 1, 2023

Chapter 1 General Provisions

Article 1 (Purpose)

Underpinned by SKMS (SK Management System) as corporate management foundation, SK Materials Co., Ltd. (hereinafter referred to as the "Company"), values to a variety of stakeholders, including customers, members, shareholders, business partners and the community, to play an essential role in fostering social and economic development and implementing corporate management that can contribute to the happiness of mankind.

Article 2 (Application)

- This code of ethics is applicable to the Company (including subsidiaries) and the members (including part time and contractual employees), and the Company and the members inform and recommend practicing this code of ethics to the Company's stakeholders.
- 2 Measures will be taken pursuant to the company rules in case of violating this code of ethics.
- ③ "Action plans for the code of ethics" will be established and managed in order to properly interpret and implement this code of ethics.

Chapter 2 Attitude Towards Customers

Article 3 (Respecting Customers)

- Diverse opinions of customers will be respected in good faith, and legitimate demands and rational proposals of customers will be reflected in the Company's management activities.
- ② Truthful and accurate information will be provided to the customers, information related to the customers will not be disclosed to others or used for other purposes, and the customers' property and honor will be protected.

Article 4 (Improving Customer Value)

- Efforts will be exerted continuously to identify the values needed by the customers through customercentered mind.
- ② All stages of product development, manufacturing, shipment, usage, and disposal will be explored to secure global quality competitiveness, and will obtain customer trust through timely provision of products and services.

Chapter 3 Responsibilities for the Members

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Article 5 (Respecting Members)

- Member will be respected, and the best working environment will be established to improve the members' quality of life.
- (2) Safe culture, participated by all employees, will be created for the health of all members and safe working conditions, serious accidents will be prevented through continuous health improvement activities and safety improvement activities, and accident-free workplace will be established.

Article 6 (Fair Treatment)

- ① Opportunities for employment, promotion, job transfer, training and remuneration, etc. will be provided fairly pursuant to principle and standards, without regards to race, nationality, age, gender, education, place of origin, disabilities and marriage status, etc.
- ② Clear standards for the members' goal and performance will be provided, and individuals and groups contributing to the performance will be provided with fair and rational rewards.

Article 7 (Talent Cultivation)

- Tasks will be given to the members to development the members' abilities by considering the members' talent and ability, and growth opportunities will be provided through continuous education.
- (2) Individual abilities and job performance will be improved through educational, technology development and training opportunities, and efforts will be exerted for health and high quality life.

Chapter 4 Responsibilities for the Shareholders

Article 8 (Protecting Shareholder Interests)

- (1) The Company will protect the interest of the shareholders and investors by continuous growth and development through transparent and efficient management.
- (2) The members will not interfere with the interest of the shareholders through acts of obtaining profits from improper stock transactions using inside information or disclosing inside information to the outside, etc.

Article 9 (Guaranteeing Shareholder Rights)

- The shareholders' right to know and to make proper demands and proposals will be respected, and they
 will be reflected in the Company's management activities.
- (2) Materials on overall management will be prepared according to relevant laws and standards, and the related information will be provided according to the relevant laws.

Chapter 5 Relationship with Business Partners

Article 10 (Equal Opportunities)

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- All qualified businesses will be provided with equal opportunities to participate in registration and selection of business partners (hereinafter referred to as the "BP").
- ② The BP registration and selection will be implemented in rational methods according to objective and fair criteria.

Article 11 (Fair Transaction Procedure)

- All transactions with the BP will be implemented fairly in a mutually equal position, all agreed transaction terms will be complied with, and proper opinions to improve and innovate the transactions will be properly reflected in the work.
- (2) All fair trade related laws will be complied with during transactions with the BP, and no improper actions will be taken by using the superior position.
- ③ When using the technologies or properties of BP, the approval of the other party will be obtained, and no information will be disclosed to the outside without a written consent.

Article 12 (Seeking Mutual Development)

- (1) Technology support and management guidance will be provided actively in order for the BPs to grow and to become competitive in the long-term, and will seek mutual interest and joint development.
- ② Mutual efforts will be exerted with the BPs to establish customs of clean transactions and maintain fair transactions.

Chapter 6 Roles for the Society

Article 13 (Contributing to Social Development)

- Members' participation in healthy social activities will be guaranteed, and contribution to society will be made through social and cultural activities.
- ② Company recognizes that the Company's social responsibilities begin with social volunteering, and the Company will participate actively in various social volunteer activities and cultural development projects, as long as the activities do not interfere with the budget and management activities.

Article 14 (Eco-Friendly Management)

- ① Domestic and international laws and treaties related to environment, safety, health and energy will be observed, and strict international management standards will be applied and implemented in all business activities to prevent environment safety accidents. Education will be conducted to understand and practice environment safety management system, and the environmental safety policy and management performance will be announced to all internal and external stakeholders.
- (2) Efficient use of energy and water resources, and strict management of chemical substances will be implemented by introducing eco-friendly design to prevent pollution, and continuous efforts will be exerted to encourage re-use of waste water, waste and recycling and to reduce pollutants.

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- ③ The Company recognizes the climate change crisis as problems of everyone in order to preserve the environment, and continuous efforts will be exerted to increase the use of renewable energy, reduction of greenhouse gas emission and establish low-carbon ecosystem to overcome the climate change crisis.
- ④ Efforts will be exerted to protect the community's environment and safety, and strictly implement prevention measures to avoid loss due to accidents or disasters, etc.

Addendum (July 1, 2023)

Article 1 (Effective Date) This code of ethics will be effective from July 1, 2023.