

SK innovation Ethics Counseling and Report Handling Procedures

1. General Matters of ethics counseling & report handling

1.1 Resolving questions regarding ethical matters

- 1) If executives and staff members have any questions about the interpretation or application of the *Code of Ethics, Practice Guideline* or *FAQ*, they shall ask them to the leader of the organization or the department in charge of ethical management or have counseling and follow their interpretation.
- 2) The leader of the organization shall resolve the matters asked by the executives and staff members under his/her control according to the standards and policies of the Company. If it is difficult to resolve the matters by himself/herself, the leader shall handle them through consultation with the department in charge of ethical management.
- 3) The department in charge of ethical management shall conduct counseling according to the procedures of "Ethics Counseling."

1.2 Reporting and handling of violations

- 1) An executive or a staff member who noticed violations of the *Code of Ethics, Practice Guideline* or *FAQ* shall report the case to the leader of the organization or the department in charge of ethical management.
- 2) If the leader of the organization receives a report about violations, he/she shall resolve it according to the standards and policies of the Company or through consultation with the department in charge of ethical management.
If the leader of the organization has solved the matter personally, it is necessary to inform the department in charge of ethical management of the result of the measures.
- 3) The department in charge of ethical management shall handle a reported matter according to the procedures of "Report Handling."

1.3 Installation and operation of ethics counseling & reporting channel

- 1) The department in charge of ethical management shall operate the counseling & reporting channel to facilitate easy counseling and reporting of ethical management for interested parties and systematic handling of the matters.
- 2) Counseling and reporting can be done through the following channels and all channels are available 24/7.
 - Online at: Integrated online report channel of the Group, available 24/7
(https://ethics.sk.co.kr/advice/report_kor.aspx)
 - E-mail: ethics.skinnovation@sk.com, available 24/7
 - Calling: 080-020-6262
 - Fax: 080-020-6272, available 24/7

- Mail: Person in charge of ethical management of Audit Room, available 24/7
SK Innovation Co., Ltd.
26, Jongno, Jongno-gu, Seoul, Republic of Korea

2. Ethics Counseling

2.1 Processing the applications for counseling

- 1) Ethics counseling shall be offered for the following inquiries.
 - The Company's standards and policies for ethical management
 - Interpretation of the *Code of Ethics*, *Practice Guideline* and *FAQ*
 - General knowledge regarding ethical management, etc.
- 2) Measures to be taken for simple customer complaints
 - Among the received matters, customer complaints shall be directed to the customer service department of the concerned business.
 - The customer service department shall take measures of the customer complaints and notify the department in charge of ethical management of the result of measures.
- 3) The contents of counseling shall be maintained and managed using a separate form.

2.2 Counseling

- 1) The department in charge of ethical management shall provide appropriate and consistent interpretation and guidelines for the matters of counseling according to the *Code of Ethics*, *Practice Guideline*, *FAQ* and the ethical management policies of the Company.
- 2) When it is necessary to ask counseling of the relevant department or when there is no established policy of the Company on the matters of counseling, it is required to establish policies of the Company through consultation with the related department and provide counseling.

2.3 Notification and follow-up management

- 1) The result of ethics counseling shall be notified to the counselee in an appropriate manner.
- 2) The department in charge of ethical management is required to prevent disclosure of the identification of the counselee or the contents of counseling against the will of the counselee.
- 3) The contents of counseling shall be maintained and managed using a separate form.

3. Report Handling

3.1 Acceptance of report

- 1) Reporting means providing information about violations of *Code of Ethics*, *Practice Guideline* or

FAQ by executive or a staff member.

- Dereliction of duty, Conflict of interest, Inappropriate usage of the Company's assets and information, Improper offer or receipt of gifts/ hospitality/etc., Violation of mutual respect between the members of the Company (discrimination, sexual harassment, verbal abuse, etc.), Distortion of management information, Violation of Fair trade and competition, Violation of policies on safety/ health/environment, Violation of Compliance, Violation of protecting personal information, and The company's other policies and working principle etc.
- 2) For fact check, the department in charge of ethical management shall receive the report based on the principle of 5W1H and secure related evidentiary materials as many as possible.
- Personal information of the Informant(including whistle-blower): Name, department, telephone number, etc.
 - Content of report: - Identify details based on the principle of 5W1H
 - Evidentiary materials, etc. that can support the content of the report
- 3) In case a report is received through a channel other than the integrated online report channel of the Group such as e-mail, Fax and mail, it shall be registered in the integrated online report channel of the Group.

3.2 Fact Verification

- 1) In principle, fact verification of a report shall be conducted only for a report submitted under the Informant(including whistle-blower)'s real name. However, fact verification can also be allowed to an anonymous report depending on circumstances in consideration of the character and materiality of the report.
- 2) The department in charge of ethical management shall conduct fact verification of the report.

3.3 Taking measures against violations

- 1) If violations are confirmed to be true upon the investigation results, measures shall be taken against the violators (executive, staff or a member partner company) under pertinent Company regulations.
- 2) If it is confirmed that a report has been made for sole personal purposes including libel, slander and falsehood, appropriate measures shall be taken against the involved Informant(including whistle-blower) according to relevant Company regulations.
- 3) If no violation is found, the case shall be concluded by the department in charge of ethical management.

3.4 Reporting and follow-up actions

- 1) If any disciplinary measures are needed, the case shall be reported to the person who has the

- approval right for the matter.
- 2) The result of the measure shall be notified to the Informant(including whistle-blower) in an appropriate manner.
 - 3) The result of the measure shall be concluded after registering it in the integrated online report channel of the Group.

4. Informant(including whistle-blower) Protection Policy

4.1 Protection policies

- 1) An Informant(including whistle-blower) should not suffer from retaliatory action in any form by other executives or department to which he/she belongs for having reported a possible violation or or submitting related statements or materials.
 - ① If an Informant(including whistle-blower) has received disadvantageous measures due to the report, he/she can request the department in charge of ethical management to rectify the disadvantages and take protective measures including transfer to another department.
 - ② If there is a request for corrective action and protection from an Informant(including whistle-blower), the department in charge of ethical management shall take measures to minimize the disadvantages of the Informant(including whistle-blower) and establish and implement measures to prevent recurrence of such an incident including sanctions against the person involved.
- 2) It is required to keep the identity of the Informant(including whistle-blower) and the contents of the report confidential to prevent them from being revealed against the Informant(including whistle-blower)'s will.
- 3) A person who cooperates with the investigation by submitting statements or materials during the process of fact verification of the report shall be protected in the the same way as that of the Informant(including whistle-blower).
- 4) A report made for solely personal purposes including libel, slander and falsehood shall not be protected.

4.2 Sanctions and reduction & exemption

- 1) If a person violates the "Informant(including whistle-blower) protection policies," measures shall be taken according to the Regulation.
 - A retaliatory action giving disadvantages to the Informant(including whistle-blower) reporting possible violation
 - Disclosure of identity of the Informant(including whistle-blower) or the contents of the report obtained officially or accidentally

- Tracking down the Informant(including whistle-blower) or instructing to track down the Informant(including whistle-blower)

2) If a person who was involved in an action violating the code of ethics, *Practice Guideline* or *FAQ* or an illegal action reports it voluntarily, sanctions against such an action can be reduced or exempted.