

# **SK networks**

## **ESG Policy and Practice Guidance**

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# Corporate Governance Charter

Established Date: Dec 22, 2020

Revised Date: Mar 29, 2022

As the foundation on which people could continue to pursue their happiness, SK networks ("company") should achieve permanent existence and development through sustained stability and growth. For this purpose, the people shall seek their own happiness together with the happiness of the company stakeholders.

All values are social when created for the sake of stakeholder happiness. It is through social value creation that economic values will increase and the trust relationship with stakeholders will be developed.

By offering value to customers and maintaining their satisfaction, the company will earn customer trust and ultimately step forward hand in hand with customers.

The company shall foster a fair, competitive business ecology with its business partners and, based on this, shall lead mutual development through collaborations of a virtuous circle.

Shareholder values shall be created incessantly leading to an increase of corporate value.

Environment protection, job creation, quality-of-life enhancement and contribution to local community are some of the diverse roles required by society and the company will assume those roles to grow along with society.

All the people shall make efforts to find harmony and balance of happiness among stakeholders and will consider the happiness of today and tomorrow at the same time so that achieves long-term sustainability. For this, the company set forth the Corporate Governance Charter aiming to establish, maintain and develop a sound governance structure.

## Chapter 1. Shareholders

### Article 1 (Shareholders' Rights)

- ① Shareholders shall have the basic rights as stated on Shareholders' Rights.
- ② Any matters that may bring significant changes to the company's existence and shareholders' rights shall be determined at the General Meeting of Shareholders to ensure the shareholder's rights to the maximum extent possible.

- ③ The company shall provide in advance information on the date, time, place and agenda of the General Meeting of Shareholders to shareholders. Date, time and place shall be determined to ensure that as many shareholders as possible can attend the Meeting.
- ④ Shareholders can propose an agenda in accordance with relevant laws and regulations including the Commercial Act, and can ask questions and request explanations regarding the agenda at the General Meeting of Shareholders.

#### **Article 2 (Fair Treatment of Shareholders)**

- ① Each shareholder shall have one vote for each common stock owned, and the inherent rights of shareholders shall not be infringed. In addition, voting right restrictions of certain shareholders shall be imposed in a limited manner as specified in relevant laws and regulations.
- ② The company shall provide information to shareholders at the right time, in a fair manner according to relevant laws and regulations.
- ③ Shareholders shall be protected from unfair inside transactions and self-dealing of other shareholders.

#### **Article 3 (Responsibilities of Shareholders)**

- ① Shareholders shall strive to exercise their voting rights proactively for the development of the company.
- ② Controlling shareholders shall exercise their voting rights in a lawful manner and act in the best interests of the company and shareholders.

### **Chapter 2. Board of Directors**

#### **Article 4 (Functions of the Board of Directors (“the Board”))**

- ① The Board shall have full authority in relation to management of the company, and shall make important managerial decisions and supervise the company directors' performance of duties.
- ② The Board can delegate authority to the Representative Director or committees of the Board as stipulated in relevant laws and regulations, Articles of Incorporation and Board of Directors Regulations.

#### **Article 5 (Composition of the Board)**

- ① The Board shall be composed so as to facilitate effective discussion and decision-making, and

shall be comprised of a sufficient number of directors to ensure that committees organized under the Board can operate.

- ② The Board shall have outside directors who can fulfill their function independently from management and controlling shareholders. The number of outside directors shall be not less than three, which will be a majority of the total number of directors.
- ③ People who are responsible for defamation of enterprise value or infringement of shareholder's equity interests shall not be appointed as a director.
- ④ Appointment of directors shall target competent people with expertise who can contribute substantially to the company management, and the directors' term of office shall be guaranteed unless special reasons do not allow it.
- ⑤ The Board shall be comprised of directors with diverse backgrounds.
- ⑥ An outside director shall be appointed as the Board's chairperson to represent the Board, separate from the Representative Director.
- ⑦ The company shall run the Outside Director Candidate Nomination Committee in which outside directors comprise a majority of the total number of committee members for fair candidate nomination, and an outside director candidate group shall be selected and maintained taking into account of expertise and diversity.

#### **Article 6 (Outside Directors)**

- ① Outside directors shall not have significant personal interests in the company and shall be able to make decisions independently from management and controlling shareholders.
- ② Outside directors shall refrain from having excessive concurrent titles to sincerely fulfill their duty.
- ③ The company should provide sufficient information required for outside directors to perform their responsibilities, and outside directors can request the company to provide information required to perform their responsibilities.
- ④ Outside directors can receive support from executives and working level employees of the company or external experts following the proper procedures, if necessary to perform their responsibilities, and the company shall support the incurring expenses thereby.
- ⑤ Meetings can be organized to invite only outside directors upon their request to enhance their management, supervision and support functions.
- ⑥ The company shall conduct training sessions, inside and outside the company, for outside directors to perform their responsibilities efficiently.

### **Article 7 (Operation of the Board)**

- ① Board meetings shall be held on a monthly basis, and extraordinary Board meetings can be held whenever necessary.
- ② The Board shall have the Board of Directors Regulations in place for facilitated Board operation which stipulates the rights, responsibilities, operation procedures, etc. of the Board.
- ③ The company shall record minutes for each Board meeting to have them kept and stored.
- ④ The company shall disclose details of individual director's Board meeting attendance rates and participation such as approval and disapproval on agenda items that are subject to public disclosure.
- ⑤ The Board will hold meetings in a way that all directors can participate in the voting process by means of remote communication with a two-way voice transfer system.

### **Article 8 (Committees of the Board)**

- ① The Board shall establish internal committees composed of an adequate number of members to perform specific functions and roles.
- ② At least the majority of members of the Board committees shall be outside directors.
- ③ Each committee's organization, operation and authority shall be stipulated in express provisions.

### **Article 9 (Duties of Directors)**

- ① Directors shall perform their responsibilities with the duty of care of a good manager. Directors shall make reasonable decisions based on sufficient information by investing adequate time and effort.
- ② Directors shall not exercise their authority for their own interest or that of any third party, and shall always seek to achieve results for the best interests of the company and its shareholders.
- ③ Directors shall not reveal or use for their own interest or that of any third party any confidential company information acquired in the course of performing their responsibilities.

### **Article 10 (Responsibilities of Directors)**

- ① Directors shall be held liable for damages caused by their violation of laws and regulations or Articles of Incorporation, or negligence of their responsibilities. Directors may also be held liable for damages to any third party in case of their willful acts of malice or gross negligence.
- ② Managerial judgment of directors shall be respected as long as they perform their responsibilities in a way considered to be in the best interests of the company through management of decision-

making process consisting of collection and careful, sufficient review of a considerable amount of reliable data and information followed by faithful, reasonable judgments.

- ③ The company can purchase liability insurance for the directors at its own expense in order to ensure effectiveness in claiming their accountability and recruit competent people as directors.

#### **Article 11 (Appraisal and Remuneration)**

Management activities of the leadership are subject to fair appraisal and the company shall disclose key leadership's remuneration details and remuneration standards according to the relevant laws and regulations. Remuneration of directors shall be executed within the limits approved at the General Meeting of Shareholders.

### **Chapter 3. Audit Systems**

#### **Article 12 (Internal Auditing Bodies)**

- ① The Audit Committee shall perform their duties according to relevant laws and regulations or Articles of Incorporation in addition to making deliberations and resolutions for other matters entrusted by the Board.
- ② The Audit Committee shall be composed in a way that outside directors account for 2/3 or more of the total members to ensure its independence, and one or more members should be an expert in accounting or finance as defined in the applicable laws to ensure its competency.
- ③ In principle, Audit Committee shall be held at least once a quarter and can be attended by the management, relevant executives and external auditors, if necessary.
- ④ The Audit Committee shall record minutes for every meeting.
- ⑤ The Audit Committee may access any information necessary for conducting audit activities and, if necessary, may request advice from outside institutions and experts at the expense of the company.
- ⑥ The Representative Director shall disclose the Audit Committee's key activities, as necessary, on business reports.
- ⑦ The Audit Committee members shall perform their responsibilities independently of management and controlling shareholders.

#### **Article 13 (External Auditor)**

- ① The company shall ensure that the external auditor maintain legal and substantial independence of the company, management and controlling shareholders.
- ② The company shall arrange the external auditor's attendance at the General Meeting of Shareholders

to provide explanations in case shareholders have questions regarding the audit report.

- ③ The company shall have the external auditor investigate whether there is any information going against audit results in regularly disclosed information and audited financial statements.
- ④ The company shall have the external auditor make efforts to identify any misconduct or unlawful acts committed by the company.
- ⑤ The company shall have the external auditor take account of the company's sustainability as required by relevant laws and regulations including the Act on External Audit of Stock Companies.
- ⑥ The company shall have the external auditor report to the Audit Committee any significant matters identified while performing external audit activities.

#### **Chapter 4. Stakeholders**

##### **Article 14 (Protection of Stakeholder Rights)**

- ① SK networks people are the main agents of the company's management activities and they shall seek their own happiness together with the happiness of the company stakeholders.
- ② The company shall respect the people's rights and strive to enhance their quality of life.
- ③ The company shall promote the establishment of fair market order through compliance with laws and regulations on fair trade and seek balanced development of the national economy.
- ④ In case stakeholders hold a concurrent title of shareholders, their rights as stakeholders and shareholders shall be protected and exercised, respectively.

##### **Article 15 (Stakeholder Participation in Management Monitoring)**

The company shall provide the stakeholders with information required for protecting their rights to the extent allowed by relevant laws and regulations, and third-party contracts.

#### **Chapter 5. Management Monitoring**

##### **Article 16 (Disclosure)**

- ① The company shall disclose matters that have or may have significant influence on the shareholders and stakeholders decision-making, in addition to disclosures required by relevant laws and regulations.
- ② The company shall adopt appropriate methods to provide explanations on its corporate governance through business reports, electronic disclosure system, official website, etc.
- ③ The company shall make disclosures in a timely and accurate manner when decisions are made



on important matters other than those subject to regular disclosure.

- ④ The company shall make efforts to create disclosures that can be easily understood and readily available to stakeholders.
- ⑤ The company shall designate a Disclosure Officer and establish an internal information delivery system through which the company's important information can be delivered fast to the Disclosure Officer.
- ⑥ The company's Representative Director and Disclosure Officer shall certify the accuracy and integrity of the financial reports.

**Article 17 (Code of Ethics)**

- ① The company shall establish and post the Code of Ethics.
- ② People of the company shall file reports according to procedures specified in relevant regulations in case they are requested to perform tasks that are in violation of the Code of Ethics or in conflict with company's interests.

## Code of Ethics

Established Date: Feb 1, 2007

Revised Date: Sep 1, 2018

All officers, directors, employees and temporary employees (each, a "Covered Person") of SK Networks and all of its Korean and non-Korean investment companies with management rights (collectively, the "Company") will embody SK Values by proactively and willfully pursuing the Super Excellent Level ("SUPEX") with assurance and passion for SK Group's management philosophy. To enable consistent growth and stability for Company, all Covered Persons will actively practice a management system that centers on the To-be Model to maximize performance and heighten satisfaction.

Such practice will create further value for clients, covered persons, shareholders and other interested parties, and fulfill a central role in socioeconomic development that ultimately contributes to society's wellbeing.

To serve such a purpose, the Company establishes the Code of Ethics ("the Code") to provide standards for practice and decision making, and all Covered Persons shall comply with the Code to conduct fair and transparent business management practices that secures the Company's place as a trusted and respected world-class enterprise.

### Article 1 (Client Service)

Covered Persons must consistently provide satisfactory services to earn the clients' trust and participate in their satisfactory experience.

- ① Covered Persons must prioritize client values to always think and act from a client's perspective.
- ② Covered Persons must provide clients with satisfactory and reliable products and services.
- ③ Covered Persons must respect various opinions from clients and actively reflect their opinion in the Company's management practices.
- ④ Covered Persons must safely protect client assets and information according to applicable laws and Company policy.

### **Article 2 (General Code of Ethics)**

Company and Covered persons must foster a benefitting corporate culture that encourages Covered Persons to work voluntarily, willingly, and with brain engagement (“VWBE”) without unnecessary conflicts and achieves both the Company and Covered Persons’ vision.

- ① Covered Persons must have pride and responsibility as members of the Company, and achieve sufficient understanding in as well as practice the SK Management System (“SKMS”).
- ② Covered Persons must maintain the reputation and integrity of the Company and themselves based on proper moral values.

### **Article 3 (Responsibility for Shareholders)**

To secure shareholder value, Covered Persons must raise corporate value by enhancing transparency and pursuing efficient business management.

- ① Covered Persons must pursue endless innovation to enable efficient business management and maximize corporate value, and share such results with shareholders.
- ② Covered Persons must conduct transparent management practices based on a board of directors, and respect valid requests and demands from shareholders.
- ③ Covered Persons must comply with all laws and standards when preparing management documents and reports, and disclose such materials accurately and truthfully in accordance with applicable laws to protect shareholder interests.

### **Article 4 (Relationship with Business Partners)**

Covered Persons must pursue mutual interests and advancement with business partners and compete fairly with competitor companies.

- ① Covered Persons must provide fair opportunities to business partners and build a mutually trusting partnership to secure a win-win management system.
- ② Covered Persons must compete fairly with competitors under the principles of free competition.

### **Article 5 (Role in Society)**

As active members of society, Covered Persons must conduct business activities that accord with social morals and standards of ethics to contribute to national and societal development, and actively put in effort to earn society’s trust.

- ① Covered Persons must comply with all laws of areas engaged in business and respect the local culture.
- ② Covered Persons must actively participate in eco-friendly business practices and philanthropic activities to contribute in raising society’s overall level of happiness.

- ③ Covered Persons must not unjustly discriminate against any interested parties of areas engaged in business, and must not use Company assets for political purposes or acknowledge any type of political activity.

**Article 6 (Code of Ethics Practice Guideline)**

The attached Code of Ethics Practice Guideline is enacted and enforced to enable all Covered Persons to properly interpret and practice the Code of Ethics, and the Code of Ethics Practice Guideline has the same force and effect as the Code of Ethics.

# Code of Ethics Practice Guideline

Established Date: Feb 1, 2007

Revised Date: Sep 1, 2018

## Chapter 1 General Principles

### Article 1 (Purpose)

The following Code of Ethics Practice Guideline ("Practice Guideline") serves to provide all officers, directors, employees and temporary employees (each, a "Covered Person") of SK Networks ("Company") with standards of practice and decision-making that assist in their proper understanding and application of the Code of Ethics.

### Article 2 (Application Principle)

- ① Covered Persons situated in an ethical conflict regarding their professional duties must decide and act based on the Code of Ethics and the following Practice Guideline.
- ② The following Practice Guideline provides only the minimum set of guidelines in respect of the awareness and common sense of Covered Persons. For issues not clearly defined in the Practice Guideline and require additional opinions for clarification, Covered Persons must consult with senior management or the Office of Ethics and act accordingly.

### Article 3 (Application)

The following Practice Guideline applies to all Covered Persons of SK Networks and Korean and non-Korean investment companies with management rights. Interested parties of the Company are recommended to understand and practice the terms outlined in this Code of Ethics.

## Chapter 2 Workplace Conduct

### Article 4 (Business Conduct and Integrity)

- ① Covered Persons must participate in the SK Management System ("SKMS") and share in the Company's goals and values to put their best efforts into given duties and execute the tasks by fair means. Covered Persons must comply with Company standards and all laws applicable to the task.
- ② Covered Persons must bear in mind that their words are directly tied to the company's credibility and reputation, and put their best efforts into fulfilling their duties and responsibilities as members of society.

### **Article 5 (Settlement of Conflicting Interests)**

- ① Covered Persons must put in effort to ensure that no action or relationship regarding business practices comes into conflict with the interests of the Company. In the case of conflicting interests, Covered Person must foremost prioritize Company interests and notify the Ethics Committee in the case of emerging violations.
- ② The following is a list of practices with conflicting interests that may give a Covered Person business leverage or have leverage on the Covered Person's business judgement or practice.
  1. Directly or through a third party signing a contract or conducting business with the Company
  2. Directly or through a third party making a transaction with a business competitor or partner
  3. Holding an additional position in an interested company without Company authorization
  4. Establishing a transactional relationship with partner company such as cash loan, joint investment, loan security, real estate, movable car lease, and the like
  5. Directly or through a third party receiving compensation from partner company
  6. Directly or through a third party acquiring shares or bonds from partner company (exception provided that Covered Person received company authorization)
  7. Family members or relatives of Covered Person conducting business with Company or partner company
  8. Using Company assets or management information to unfairly acquire private benefit
  9. Abusing business position to exert unfair leverage over partner company such as bribing for jobs and requesting special contributions
- ③ Article 5-2 above is a partial list of practices with conflicting interests. Covered Persons must make strict judgements in determining whether other practices aside from the examples listed above involve conflicting interests to comply with this Practice Guideline.

### **Article 6 (Protection of Company Asset and Information)**

Covered Persons must protect the Company's tangible and intangible assets and use them for legitimate business purposes.

- ① Protection of Asset
  1. Covered Persons must not use Company asset for a third party's profit or provide Company asset to third party without Company authorization.
  2. Covered Persons must not transfer and lend Company asset at a low price to themselves or a third party, or purchase and borrow personal or third party's asset for a high price with Company account.

3. In any event the Company may potentially incur immense loss, all Covered Persons must notify the Company immediately so that prompt measures can be taken to minimize loss.
  4. Covered Persons must not use the Company's account for personal use and only use it in accordance with the purpose and standards determined by the Company.
- ② Protection of Information
1. All Covered Persons must not use undisclosed information they have acquired for business purposes or provide such information to a third party to gain personal profit.
  2. All Covered Persons must not disclose or provide internally or externally Company information and trade secrets without prior authorization, and must fully cooperate with the storage and inspection of electronic documents sent out of the company based upon the Company's information security policy.
  3. All Covered Persons must strictly manage the Company's informational assets in accordance with security management rules.

#### **Article 7 (Gifts, Entertainment, and Contributions)**

- ① All Covered Persons must strictly distinguish business conduct from private matters and conduct fair and transparent business practices.
- ② All Covered Persons must neither receive nor provide any money, goods, entertainment, and other special contributions from business partners and interested parties for personal use.
- ③ However, Covered Persons may receive and provide gifts and entertainment considered reasonable within the provisions of Article 12 (Improper Solicitation and Graft Act) and social customs to maintain a mutually amicable relationship for business purposes, and detailed guidelines may be established and enforced by each organization under deliberation with the supervising department.

#### **Article 8 (Mutual Respect in Workplace)**

- ① All Covered Persons must respect their colleagues and maintain basic etiquette and integrity required in the workplace to eliminate disincentives and foster a healthy corporate environment.
- ② All Covered Persons must not discriminate one another for reasons of gender, education, region of origin, marital status, race, nationality, religion, and the like.
- ③ All Covered Persons must not commit any action of sexual harassment or personal leverage that may violate an individual's rights and impede the work environment.

### **Chapter 3 Compliance with Laws and Company Policy**

All Covered Persons must have full knowledge of Korean and non-Korean laws and Company policy and announcements applicable to the Company's business activities, and execute tasks in compliance with such regulations.

#### **Article 9 (Client Satisfaction and Protection of Client Information)**

- ① Covered Persons must put their best efforts into understanding client expectations and demands concerning quality, reliability and safety, and provide products and services that fulfill such needs.
- ② Covered Persons must provide accurate descriptions of product features and risks so that clients are able to make fully informed decisions, and must not make false or exaggerated advertisements.
- ③ Company must comply with laws regarding the protection of client information and Covered Persons handling client personal information must ensure safe protection of such client information. Unless client has agreed or permitted by the law, Covered Persons must not use client information for purposes other than for which it was provided or provide client information to a third party.

#### **Article 10 (Disclosure and Reporting of Business Information)**

- ① Accounting information must be accurately recorded and maintained according to accounting principles, applicable laws, and Company policy, and must not be misrepresented or concealed.
- ② Disclosure of business information to external interested parties must be transparent and fair according to applicable laws and Company policy.

#### **Article 11 (Fair Trade and Competition)**

- ① Covered Persons must accurately understand and comply with laws regarding fair trade and Company's free trade compliance program.
- ② For matters that could potentially be interpreted as legal violations of fair trade, Covered Persons must have sufficient discussions with departments supervising fair trade or legal affairs prior to execution.

#### **Article 12 (Prohibition of Improper solicitation and Graft)**

- ① Covered Persons must accurately understand and comply with the Improper Solicitation and Graft Act.
- ② For matters that could potentially be interpreted as violations of the above law, Covered Persons must discuss with the legal department prior to execution.



**Article 13 (Responsibility in Safety, Health, Environment)**

- ① Covered Persons must comply with Korean laws and international agreements regarding safety, health, and environment, and consistently pursue improvement in such matters.
- ② Covered Persons must comply with safety regulations to foster a safe work environment.
- ③ Covered Persons must recognize the significance of environmental issues and actively participate in environmental protection practices.

**Chapter 4 Enforcement of Practice Guideline**

**Article 14 (Responsibility)**

- ① All Covered Persons have a responsibility to comply with the Code of Ethics and Practice Guideline, and for any issues that require further clarification, Covered Persons must inquire and consult with senior management or Office of Ethics to act based on such further interpretations.
- ② Senior management has a responsibility to actively support and manage affiliated Covered Persons and business interested parties in accurately understanding and complying with the Company's Code of Ethics and Practice Guideline. Also, senior management must demonstrate truthful and responsible decision makings and practices in complying with the Code of Ethics and Practice Guideline to set an example for others.

**Article 15 (Reporting Violations and Protection of Informers)**

- ① Covered Persons who discover violations of the Code of Ethics and Practice Guideline must notify or report to senior management or the Office of Ethics for prompt resolution, and by doing so, actively protect the Company and Covered Persons from such violation.
- ② Identity of the Informer and contents of report will remain strictly confidential and Covered Persons will receive no penalties for reporting a violation under reasonable suspicion.
- ③ Covered Persons who cooperate with the investigation regarding reported violations will receive equal protection as the informer.
- ④ If Informer determines that there are risks of identity exposure or personal threat entailed in making a report or actually receive penalties from making the report, Informer may request protective measures from the Office of Ethics. The Office of Ethics will verify the veracity of such risks for prompt resolution. Office of Ethics must also impose disciplinary measures for persons concerned and establish and execute measures to prevent reoccurrence.
- ⑤ Covered Persons who violate regulations regarding the protection of Informers will receive disciplinary measures based on human resource regulations. (Retaliation, adverse action in employment, disclosure of informer's identity and report, orders for retaliation, etc.)

- ⑥ Informers who make significant contributions to the Company's interest through the report may receive rewards.
- ⑦ Consultation and Ethics Hotline are the following.
  - 1. Web: <http://ethics.sk.co.kr>
  - 2. Mail : SK Networks Internal Audit Team, 85, Cheonggyecheon-ro, Jongno-gu, Seoul, Republic of Korea (03190)

**Article 16 (Duty of Compliance and Pledge)**

- ① Covered Persons of SK Networks have a duty to comply with this Code of Ethics Practice Guideline and regularly pledge every year.
- ② The Company will take action against any violations of this Practice Guideline according to Company policy.

# Human Rights Policy

Established Date: Oct 1, 2021

SK networks defines the ultimate goal of all management activities to be 'employee happiness' and states clearly the need to pursue continuous happiness for both its stakeholders and employees. In particular, based on the principles required by international organizations related to human rights and labor, such as the United Nations, the "SK networks Human Rights Policy" has been enacted. We reflect the policy below in all our policies and activities related to human rights and labor.

## **01 SK networks respects the human rights of its employees.**

The company recognizes basic human rights inherent to all employees and strives to guarantee their human rights. If the company becomes aware of any disrespectful action, including but not limited to assault, violent language, sexual harassment, and workplace bullying, measures will be taken according to company regulations.

## **02 SK networks does not discriminate.**

The company shall neither apply different working conditions such as recruitment, wage, and promotion nor take any other action against its employees based on gender, age, nationality, race, religion, marriage, pregnancy, childbirth, etc., without any reasonable ground.

## **03 SK networks pays wages above the legal minimum in a timely manner.**

The company pays wages above the legal minimum according to labor relationship laws enforced in each country and provides wage slips accordingly. In addition, allowances are paid as required in case of any overtime labor including extended, nights and holidays.

## **04 SK networks prohibits forced labor.**

The company does not allow forced labor of its employees by means of violence, blackmailing, confinement, or other measures that restrain both their physical and mental freedom in an unjust manner. Also, the company prohibits holding one's original copy of identification recognized internationally so as to prevent any forced labor, and the freedom of retirement is guaranteed as well.

**05 SK networks complies with relevant regulations regarding working hours and paid leaves.**

The company complies with regulations regarding working hours, extended/nights/holidays, work breaks, and paid leaves stipulated in labor relations laws. Regular assessments are conducted to check the compliance status. In addition, measures are in place to grant off-time leaves if employees have worked overtime in excess of their working hours.

**06 SK networks does not hire underage workers.**

The company complies with the minimum employment age regulations specified by each country and operates a recruitment process to prevent hiring underage workers. In addition, we conduct regular inspections to check whether underage workers are hired or not. If such cases are identified, employees are taken off duties not only directly related to production but also involving moral or health-related hazards/risks, suspended from nighttime work, holiday work, and overtime work. Upon operating internship or apprentice programs, continuous verifications are performed to check if relevant laws and regulations in each country where the company operates are followed.

**07 SK networks guarantees freedom of association.**

The company guarantees rights of organization, collective bargaining, and collective action stipulated in labor relations laws and does not treat workers unfairly because of their labor union membership or activities. This is the freedom of association that guarantees both the freedom to participate or not in peaceful assemblies.

**08 SK networks operates on/off-line grievance settlement procedures.**

The company listens continuously to difficulties experienced by employees through ethical management reporting and in-house grievance counseling programs. If any grievance is found to be true, adequate measures are taken according to in-house policies, and a whistleblower protection policy is carried out, as necessary.

**09 SK networks conducts annual inspections on its performance in terms of human rights protection.**

The company conducts self-inspections every year to check if policies are operated properly following the UNGC(UN Global Compact) guidelines. Immediate measures are taken place if any deficiency is identified.

# Policy for Occupational Safety and Health

Established Date: May 2, 2022

SK networks recognizes the safety and health of diverse stakeholders, including customers, citizens, and employees\*, as the core value of our corporate management, based on which we are committed to reaching zero critical accidents by facilitating ESG management, putting it into action, and building a culture of safety and health at work.

1. The management continuously shows its will to ensure safety and health, and takes the lead in practicing, thereby motivating employees to voluntarily join and practice to settle a culture of safety and health.
2. We reflect the requirements of the relevant laws concerning occupational safety and health, build the systems that fit into each business site, set up a set of management standards, and make sure the compliance with them.
3. We identify risks at our business sites, and improve them to create a safe working environment, thereby preventing accident occurrence in an efficient manner.
4. We reflect changes in external and internal environments and our employees' opinions to refine our safety and health management system, thereby improving the effectiveness of the management.
5. We actively communicate with employees and train them to raise the awareness of the gravity of occupational safety and health, thereby practicing the culture of safety and health in our daily lives.

\* Employee: Employees of SK networks and suppliers

President & CEO of SK networks

Park Sang Kyu

# Supplier Code of Conduct

Established Date: Jun 15, 2021

Revised Date: Aug 1, 2022

The SK Networks Supplier Code of Conduct seeks to assist important business suppliers of SK Networks in ensuring business sustainability through corporate growth and social responsibility management based on this Code of Conduct. All SK Networks suppliers are advised to faithfully implement and comply with this Code of Conduct.

## **[Respect for Human Rights]**

### **1. Voluntary Labor**

The Suppliers must not use forced labor or sweated labor against workers' will. Also, for the recruitment of workers, employment contracts shall be prepared for in languages they can understand. Workers shall not be restricted to move around outside working hours and they should be able to resign from work freely if they wish to.

### **2. Prohibition of Child Labor**

The Suppliers are prohibited from hiring children. While it is possible to hire adolescents above 18 years of age, which is higher than the minimum age legally allowed for admission to employment,\* they should not be assigned to perform tasks harmful to their safety and health (including overtime and night shifts).

### **3. Working Hours**

The Suppliers should not have workers work beyond the maximum work hours stipulated by laws and regulations, and shall follow regulations on work breaks and holidays.

### **4. Wage and Benefits**

The Suppliers shall comply with laws related to wages and pay the legal minimum wage, overtime compensation, legally required benefits, etc. as required by law.

## **5. Humanitarian Treatment of Workers**

The Suppliers shall respect workers' human rights and shall not exercise inhumane treatment including sexual harassment, violence, coercion, and verbal abuse. The Suppliers should clearly establish and implement a disciplinary procedure in this regard.

## **6. No Discrimination**

The Suppliers should not discriminate workers in hiring, compensation, promotion, training opportunities, etc. based on race, age, gender, disability, etc.

## **7. Freedom of Association**

In accordance with local laws and regulations, the Suppliers should guarantee their workers freedom to organize labor unions or join a labor union to protect their individual and group interests.

### **[Safety/Health]**

#### **1. Industrial Safety**

The Suppliers shall identify risk factors beforehand and take preventive measures to remove those risk factors to promote the health and safety of executives and working level employees. For this, the Suppliers should establish a risk assessment and management system and conduct safety training and drill sessions.

#### **2. Prevention of Industrial Accidents and Diseases**

In order to prevent industrial accidents and their recurrence, the Suppliers should establish and run procedures and systems to support accident prevention, reporting, treatment/management, follow-up and return to workplace. The Suppliers should conduct regular safety inspections of all machinery and facilities and install protection devices, protective barriers, etc. for workers' safety, as necessary. Also, regular safety & health training sessions should be available to workers.

#### **3. Workplace Emergency Response**

The Suppliers should define emergencies that may occur in the workplace and establish response procedures for each emergency. Regular training and drills should be carried out for workers to become skilled in the established response procedures that are subject to continuous improvement.

#### **4. Communication on Health & Safety**

The Suppliers should provide their workers with adequate workplace safety and health information and education in relation to possible hazards at the workplace in their mother language or languages that can be understood by them.

#### **5. Workplace Environment**

The Suppliers should regularly measure harmful elements including hazardous chemicals, particles, and noises to which workers may be exposed and mobilize various control measures so that they are not exposed to such elements beyond the allowable level.

#### **6. Work Overload Management**

The Suppliers should improve workplace environment, implement job rotation and give enough work breaks to prevent injuries or musculoskeletal diseases that may happen to workers who handle heavy weight materials, work for long hours or are assigned to do repetitive work or work that uses up a lot of energy.

#### **7. Management of Staff Facilities**

The Suppliers should provide safe and clean facilities. If the workplace has dining areas, dormitory and bathrooms, they should be kept clean and safe. Also, all workplaces should be adequately equipped with emergency exits, cooling/heating facilities as well as ventilation facilities.

### **[Environmental Protection]**

#### **1. Compliance with Environment Related Laws and Regulations**

The Suppliers should obtain and maintain latest, legally required environmental certifications and comply with the obligations for operation and reporting.

#### **2. Energy Consumption and Greenhouse Gas Emission**

The Suppliers should track and document energy consumption and greenhouse gas emission to reduce corporate influence on the environment. The Suppliers should also seek to find measures that will lead to energy efficiency improvement as well as minimized energy consumption and greenhouse gas emission.

#### **3. Hazardous Material Management**



The Suppliers should identify all hazardous chemicals they handle and build/manage a safety management system for safe purchase, use and disposal of related materials.

#### **4. Air Pollution Control**

The Suppliers should monitor and control materials generated from industrial process that cause air pollution including volatile organic compounds, aerosols, corrosives, particles, ozone-depleting substances and combustion byproducts. These materials should be treated adequately according to relevant laws and regulations before discharge and continued monitoring should be performed for pollution reduction or prevention.

#### **5. Environment Pollution Protection and Resources Saving**

The Suppliers should treat all wastewater and waste materials generated from their business activities according to the relevant laws and regulations before discharge. The Suppliers should reduce the emission of wastewater and waste materials by improving processes that cause environmental pollution, raw material recycling, etc.

#### **6. Solid Waste**

The Suppliers should identify and control solid waste to reduce the amount of generated solid waste.

### **[Corporate Ethics]**

#### **1. Eradication of Unfair Practices**

The Suppliers should maintain integrity in their business activities.

- The Suppliers should not be involved in any kind of unlawful acts to accept bribes, make payments to authorities or offer gifts in addition to offering cash or other benefits for sales and other purposes.
- The Suppliers should put autonomous anti-corruption compliance into practice by making efforts to monitor and regulate unlawful acts.
- All transactions should be made transparent and subject to recording and management in compliance with the accounting act.
- No unfair practices should be exercised upon the Suppliers using a superior position.
- No concerted action of price increases, market division or output control should be taken in an aim to avoid competition.

## **2. Information Disclosure**

The Suppliers should truthfully disclose their corporate information including business achievements, and financial status pursuant to relevant laws and regulations.

## **3. Intellectual Property Protection**

The Suppliers should respect intellectual property rights and safely protect the information acquired in the process of transactions with SK Networks.

## **4. Fair Trade Compliance**

The Suppliers should comply with laws and regulations concerning fair trade. The Suppliers are banned from offering or accepting any means to take profits through unfair or inappropriate business transactions.

## **5. Identity Protection and Retaliation Prohibition**

The Suppliers should guarantee an environment in which workers can freely and efficiently submit complaints and inconveniences without a threat of retaliation or blackmailing.

## **6. Personal Information Protection**

The Suppliers should comply with the Personal Information Protection act when handling (storage, processing, transmission and sharing) personal information of all stakeholders (including executives, working level employees, supplier companies, clients and general consumers) who are related with business activities.

### **[Management System]**

#### **1. Corporate Willingness for Compliance**

The Suppliers should prepare a statement expressing their willingness to comply with corporate social responsibility, acquire the management's approval and display the statement at relevant workplaces in the local language.

#### **2. Obligations and Responsibility of the Management**

The Suppliers should establish systems and regulations for labor & human rights, safety & health, environment, and ethics. Next, appropriate management should be selected to be in charge of such systems and regulations. The management should carry out regular inspections for the operation of the management system.

### **3. Guideline Posting and Training**

The Suppliers should have education and training programs ready so that workers can view, understand and comply with this Guideline easily.

### **4. Feedback and Counseling**

The Suppliers should have appropriate procedures in place to collect feedback from employees regarding standards and conditions applicable to this Guideline and bring improvements in response to the feedback.

# ESG Guideline for Supply Chains

Established Date: Oct 13, 2021

## 1. Background

SK Networks (the Company) has established the ESG Guideline for Supply Chains for all partner companies (the Partners) to assist them in fulfilling corporate social responsibility and ensuring business sustainability. This Guideline is based on the SK Networks Supplier Code of Conduct and includes detailed action guidelines on labor & human rights, safety & health, environment, ethics & fair trade, and control system that partner companies should comply with. It is recommended that all partner companies shall reinforce their social responsibility management on the basis of the guidelines presented herein.

## 2. Scope of Application

SK Networks ESG Guideline for Supply Chains applies to the overall purchase process, including partner company selection & assessment, product & service purchase, and certification & qualification. It is recommended that all partner companies in purchase/buying relationships with SK Networks shall comply with the action guidelines specified herein.

## 3. Labor & Human Rights

### 3.1. Voluntary Labor

The Partners should prohibit involuntary labor such as forced labor or exploited labor against workers' will. Also, for the recruitment of workers, employment contracts shall be prepared in languages they can understand. Workers shall not be restricted from moving around outside working hours and they should be able to resign from work freely if they wish to.

[Action Guidelines]

- The Partners must provide a written employment contract to all workers at the phase of hiring that specifies working conditions, fees, deductibles, penalties, etc.
- Any violation specified in the employment contract or working conditions that involve forced labor, prison labor, excessive fee request, conditional employment upon debt burden, etc., shall be prohibited.

### 3.2. Prohibition of Child Labor

The Partners are prohibited from hiring children. While it is possible to hire adolescents above 18

years of age, which is higher than the minimum age legally allowed for admission to employment, they should not be assigned to perform tasks harmful to their safety and health (including overtime and night shifts).

[Action Guidelines]

- The Partners should not hire child workers in any case and should have a child labor prohibition policy documented and maintained in which the minimum age legally allowed for admission to employment is specified.
- An age verification procedure should be in place with government registry documents or certifications in which a worker's date of birth or age is indicated.

### 3.3. Working Hours

The Partners should not have workers work beyond the maximum work hours stipulated by laws and regulations, and shall follow regulations on work breaks and holidays. The Partners, in addition, should communicate with workers on overtime requirements and schedules before making overtime requests to the workers.

[Action Guidelines]

- The Partners should have an attendance record system in place to calculate working hours in hours and minutes that shall be recorded and controlled accordingly.
- Time records should be retained for all work-related company arrangements, including compulsory training sessions, meetings, and arrival/departure from work.

### 3.4. Wage and Benefits

The Partners should comply with laws related to wages and lawfully provide wage and benefits, including the legal minimum wage, overtime compensation, and legally required benefits to the workers. Also, the Partners should make efforts to have a labor environment and welfare & benefits system in place for improved quality of life.

[Action Guidelines]

- The Partners should comply with laws and systems in countries where they run their business and make wage payments on designated dates.
- The Partners should establish regulation on wage, social insurance, allowance, and welfare & benefits policies as well as policies and procedures regarding calculation scheme, payment dates, and payment methods.
- All overtime labor should be paid based on overtime allowance rates in accordance with relevant laws and regulations or employment contracts.

### 3.5. Humanitarian Treatment of Workers

The Partners should respect workers' human rights and should prohibit inhumane treatment,

including sexual harassment, violence, coercion, and verbal abuse. The Partners should clearly establish and implement a disciplinary procedure to ensure such humanitarian treatment of workers.

[Action Guidelines]

- The Partners should respect workers' private life and refrain from giving unnecessary work orders outside working hours.
- In collecting workers' personal information, advance notice should be given, and voluntary consent should be obtained.

### **3.6. No Discrimination**

The Partners should prohibit discrimination of workers in the process of recruitment and employment, including hiring, compensation, promotion, remuneration, access to training, task allocation, wage, and welfare & benefits based on race, age, gender, and disability. Discrimination of workers should also be banned in wage payment and welfare & benefits system operation.

[Action Guidelines]

- The Partners should establish policies and procedures that prohibit discrimination of workers in hiring, promotion, training, etc., based on gender, race, ethnicity, nationality, religion, disability, age, family structure, social status, political opinions, etc.
- The Partners should not require terms that are not required for work accomplishment at the time of recruitment and employment.

### **3.7. Freedom of Association**

In accordance with local laws and regulations, the Partners should guarantee their workers freedom to organize labor unions or join a labor union to protect their individual and group interests. Workers should be able to openly communicate with the management and share their thoughts and concerns about working conditions and business management practices without fear of discrimination, retaliation, threat, and harassment.

[Action Guidelines]

- The Partners should document and manage the records of workers' complaints and reports related to the freedom of association.
- In case a collective bargaining agreement is in effect, the Partners should exercise utmost good faith to comply with the collective bargaining right stipulations.

## **4. Safety & Health**

### **4.1. Industrial Safety**

The Partners should build a safe working environment to promote the health and safety of their workers so that risk factors are identified beforehand, and preventive measures are taken to remove those risk factors. Safety training programs should also be arranged to enhance workers' safety and

health. In addition, the Partners should protect all their workers from safety-related risks and control them appropriately.

[Action Guidelines]

- The Partners should be in compliance with laws and regulations related to workplace safety and workers' safety.
- Safety training and drill sessions should be conducted for all workers.
- It is recommended that the Partners acquire external certification for the safety management system (OHSAS18001, etc.)

#### **4.2. Prevention of Industrial Accidents and Diseases**

In order to prevent industrial accidents and diseases, the Partners should establish procedures and systems for reporting, management, tracking, and supporting. The procedures and systems should be notified to all the workers. In addition, the Partners should respond to industrial accidents and diseases appropriately by categorizing, recording the industrial accidents and diseases as well as taking necessary corrective measures.

[Action Guidelines]

- The Partners should establish a system that can measure the occurrence of industrial accidents or diseases.
- Regular safety inspection should be conducted for all machinery and facilities should and protective facilities such as protection devices and protective barriers should be installed.
- All legally required licenses regarding industrial accidents should be prepared, and all the requirements in local laws and regulations in relation to industrial accidents and disease management should be lawfully followed in the required timeline.
- Emergency response procedures should be documented appropriately.

#### **4.3. Workplace Emergency Response**

The Partners should define emergencies that may occur in the workplace and establish response procedures for each emergency. Reporting and response procedures in the event of emergencies should be prepared, and the procedures should be learned through education and training to minimize any damage.

[Action Guidelines]

- The established response procedures should be implemented by all the workers through regular education and training sessions, and the training outcomes should be continuously reviewed to improve the response procedures.
- Risk assessment and analysis should be performed for all potential emergency situations to prevent possible risks.

#### 4.4. Communication on Health & Safety

The Partners should provide their workers with adequate workplace safety and health information and education in relation to possible hazards at the workplace in their mother language or languages that can be understood by them. Safety and health information should be displayed inside workplace facilities to be noticed and accessed easily by workers. All workers should be given regular training before and during work hours, and a work environment should be created in a way that workers can raise any issues related to health and safety without fear of retaliation.

[Action Guidelines]

- The Partners should establish a communication policy and action processes for all matters related to safety and health that are presented in the SK Networks Partner Code of Conduct.
- Training programs should be conducted for all workers to promote their awareness of safety and health.

#### 4.5. Workplace Environment

The Partners should regularly measure harmful elements, including hazardous chemicals, particles, and noises to which workers may be exposed, and mobilize various control measures so that they are not exposed to such elements beyond the allowable level.

[Action Guidelines]

- The Partners should carry out workplace safety risk assessment on a regular basis to investigate whether workers are exposed to risks of accident.
- The Partners should provide their workers information on risks of accidents based on the assessment results and improve their workplace environment.

#### 4.6. Work Overload Management

The Partners should improve the workplace environment, implement job rotation and give enough work breaks to prevent injuries or musculoskeletal diseases that may happen to workers who handle heavyweight materials, work for long hours, or are assigned to do repetitive work or work that uses up a lot of energy.

[Action Guidelines]

- The Partners should identify tasks that require a lot of physical energy (heavyweight material handling, repetitive tasks, etc.) to develop and implement effective measures to remove or reduce such tasks.
- Hazards related to work overload should be actively removed through work environment measurement, and post-improvement evaluations should be continuously carried out as well.



#### **4.7. Management of Staff Facilities**

The Partners should provide safe and clean facilities. If the workplace has dining areas, dormitories, and bathrooms, they should be kept clean and safe. Also, all workplaces should be adequately equipped with emergency exits, cooling/heating facilities as well as ventilation facilities.

[Action Guidelines]

- The Partners should comply with all local legal requirements related to staff facility operation.
- Efficient staff facility management system should be established to guarantee a clean and safe environment for all workers and seek continuous staff facility improvement through this.

### **5. Environment**

#### **5.1. Compliance with Environment Related Laws and Regulations**

The Partners should obtain and maintain all relevant legally required environmental certifications and comply with the obligations for operation and reporting.

[Action Guidelines]

- The Partners should obtain legally required certifications for air discharge, wastewater treatment, dangerous goods storage/use, waste disposal, etc.
- Work procedures and management recording should be documented to be in compliance with reporting requirements.

#### **5.2. Energy Consumption and Greenhouse Gas Emission**

The Partners should track and document energy consumption and greenhouse gas emission to reduce corporate influence on the environment. The Partners should also seek to find measures that will lead to energy efficiency improvement as well as minimized energy consumption and greenhouse gas emission. It is also recommended to set up greenhouse gas reduction goals.

[Action Guidelines]

- The Partners should document and manage greenhouse gas emission and energy consumption resulting from the business operation and product/service use.
- The Partners should set up annual or long-term goals with quantified objectives for greenhouse gas reduction.

#### **5.3. Hazardous Material Management**

The Partners should identify all hazardous chemicals they handle and build/manage a safety management system for safe purchase, use, and disposal of related materials. The Partners should identify the use of all materials that can potentially pollute the environment when emitted and

comply with all relevant laws and regulations that prohibit or regulate the use and handling of certain materials.

[Action Guidelines]

- The Partners should establish a procedure to measure chemical components in the products and have the measurements documented.
- The Partners should identify types of materials for appropriate labeling (MSDS, warning signs, etc.) and management to ensure safe handling, transport, storage, use, recycling, or reuse/disposal of hazardous materials that may cause danger to the environment and consumers.
- The Partners should provide all workers with training on the use, handling, storage, and disposal of chemical materials.
- The Partners should separately store and transport hazardous materials in the workplace and have appropriate protection facilities in place.

#### **5.4. Air Pollution Control**

The Partners should monitor and control materials generated from industrial processes that cause air pollution, including volatile organic compounds, aerosols, corrosives, particles, ozone-depleting substances, and combustion byproducts. These materials should be treated adequately according to relevant laws, and regulations before discharge and continued monitoring should be performed for pollution reduction or prevention.

[Action Guidelines]

- The Partners should minimize emissions of ozone-depleting substances generated from the production process according to the Montreal Protocol and relevant regulations and have an effective management system.
- The Partners should monitor and control gas emissions in the air in addition to making efforts to minimize and monitor the emission by building a disposal facility for gas emissions in the air.

#### **5.5. Environment Pollution Protection and Resources Saving**

The Partners should treat all wastewater and waste materials generated from their business activities according to the relevant laws and regulations before discharge. The Partners should reduce the emission of wastewater and waste materials by improving processes that cause environmental pollution, raw material recycling, etc. The use of water, electricity, and fossil fuel should be reduced by increasing energy efficiency.

[Action Guidelines]

- The Partners should establish policies and procedures that deal with environmental protection, pollution prevention, waste reduction, and recycling according to relevant legal, regulatory, and control standards.
- The Partners should build a monitoring system for continuous management of resources used or waste generated in all workplaces and document the performances.
- It is recommended that the number of recycled materials should be increased continuously in comparison to the entire waste amount.

### 5.6. Solid Waste

The Partners should identify and control solid waste to reduce the amount of generated solid waste. The Partners should also establish lawful procedures for responsible waste disposal or recycling.

[Action Guidelines]

- The Partners should comply with laws and regulations relevant to waste handling (recycling/landfill).
- The Partners should make efforts to reduce the ratio of waste landfill and incineration and increase the ratio of recycling and reuse in the workplace.

## 6. Ethics & Fair Trade

### 6.1. Eradication of Unfair Practices

The Partners should maintain integrity in their business activities. The Partners should not be involved in any kind of unlawful acts to accept bribes, make payments to authorities, or offer gifts in addition to offering cash or other benefits for sales and other purposes. Also, the Partners should follow monitoring and relevant procedures to ensure compliance with anti-corruption laws.

[Action Guidelines]

- The Partners should put autonomous anti-corruption compliance into practice by making efforts to monitor and regulate unlawful acts.
- All transactions should be made transparent and subject to recording and management in compliance with the accounting act.
- No concerted action of price increases, market division, or output control should be taken in an aim to avoid competition.

### 6.2. Information Disclosure

The Partners should truthfully disclose their corporate information, including business achievements and financial status pursuant to relevant laws and regulations. All transactions should be made transparent. Information on achievements, management activities, ethical aspects regarding labor

practices, safety and health, and environment management should be disclosed according to the relevant laws to escalate corporate sustainability management.

[Action Guidelines]

- The Partners should have an internal control system in place to ensure information accuracy and establish a procedure for inspection, evaluation, and auditing to ensure information reliability.
- It is recommended to voluntarily disclose the environment management system and achievements on company websites and reports.

### **6.3. Intellectual Property Protection**

The Partners should respect intellectual property rights and have the responsibility to safely protect the information acquired in the process of transactions with SK Networks. While appropriate measures should be taken to protect intellectual property rights already in possession, regular monitoring should be performed to check if there is any infringement of intellectual property

[Action Guidelines]

- The Partners should build a program to protect client information (price, product supply, product components, etc.) as part of agreements made with the clients and 13 establish relevant company regulations.
- The Partners should build a program to review and protect intellectual property rights and establish relevant work procedure documents. Through the documents, information, and confidential matters of clients, allies, workers, and partners should be protected in accordance with the relevant laws and regulations.
- Internal IT regulations should include a clause for information protection.

### **6.4. Fair Trade Compliance**

The Partners should comply with laws and regulations concerning fair trade. The Partners are banned from offering or accepting any means to take profits through unfair or inappropriate business transactions. Company information disclosed to the public, including job ads, product information, company introduction, press release, etc., should be disclosed with accuracy.

[Action Guidelines]

- The Partners are banned from making an agreement with another business operator in terms of product or service price, supply, transaction region, transaction conditions, etc., in a way that competition is restricted unfairly.
- The Partners should not be engaged in activities such as unfair trade practices that may disrupt fair trade order, and any material breach of ethical regulations shall serve as a basis for trade suspension.

## 6.5. Identity Protection and Retaliation Prohibition

The Partners should guarantee an environment in which workers can freely and efficiently submit complaints and inconveniences without a threat of retaliation or blackmailing. A program or channel should be established to protect confidentiality, anonymity, and identity protection of partners and workers who submitted internal reports.

[Action Guidelines]

- The Partners should establish and provide a procedure and reporting channel through which workers can raise issues without fear of retaliation.
- As part of the reporting process, detailed procedures should be developed for informant identity protection.
- Workers should be trained annually regarding the use of the channel for reporting complaints and inconveniences. The content and achievements of the training should be documented accordingly.

## 6.6. Personal Information Protection

The Partners should comply with the Personal Information Protection Act and handle (storage, processing, transmission, and sharing) personal information of all stakeholders, including workers, allies, and consumers who are related to business activities of the Partners, in a fair and transparent manner.

[Action Guidelines]

- The Partners should collect and use personal information within the scope of the purpose of personal information collection/storage and retention period.
- In collecting workers' personal information, advance notice should be given, and voluntary consent should be obtained.
- An internal review and evaluation procedure should be established to ensure information accuracy, and the procedure should be managed in accordance with the relevant laws and regulations.

## 7. Management System

### 7.1. Corporate Willingness for Compliance

The Partners should prepare a statement expressing their willingness to comply with corporate social responsibility, acquire the management's approval and display the statement at relevant workplaces in the local language. Efforts should be made to comply with the SK Networks Supplier Code of Conduct, relevant laws and regulations, and customer requests. Further efforts should be continued for such compliance requirements through self-monitoring, etc.

[Action Guidelines]

- The Partners should review, analyze and implement legal requirements to manage their business activities.

- The Partners should review new and amended laws internally so as to prepare internal policies so that compliance can be achieved for legal changes.

## 7.2. Obligations and Responsibility of the Management

The Partners should establish systems and regulations for labor & human rights, safety & health, environment, and ethics. Next, appropriate management should be selected to be in charge of such systems and regulations. The management should carry out regular inspections for the operation of the management system.

[Action Guidelines]

- The Partners should delegate authority and responsibility to workers for the operation of the management system.
- The Partners should stipulate workers' obligations and responsibilities and establish procedures to monitor compliance with labor practices, human rights, safety & health, environment, and ethics & fair trade.
- The Partners should document and manage workers' obligations and responsibilities for each role, including workers' authority and accountability, training record, the effective date of qualification, etc.
- When effective certifications are attained for labor & human rights, safety & health, environment, and ethics & fair trade, the inspection requirement can be omitted accordingly (for example, environment/safety & health inspection can be skipped upon effective ISO 14001 and OHSAS certifications.)

## 7.3. Guideline Posting and Training

The Partners should have education and training programs ready so that workers can view, understand and comply with this Guideline easily.

[Action Guidelines]

- The Partners should run training programs for managers and staff so as to have policies, procedures, and improvement goals implemented and relevant legal and regulatory requirements in compliance.
- Most updated versions of training materials and records should be maintained, and annual training sessions should be provided to all workers.
- It is recommended that the willingness to implement social responsibility sought by this Guideline be shared internally and disclosed to the public.

## 7.4. Feedback and Counseling

The Partners should have appropriate procedures in place to collect feedback from employees regarding standards and conditions applicable to this Guideline and bring improvements in response

to the feedback. Also, SK Networks Buy One communication channel (<https://skbuyone.com>) is available for consultations about activities that may be in violation of this Guideline.

- The Partners should analyze feedbacks received through the Buy One channel and set up improvement action plans.
- The Partners should communicate to their workers on compliance requirements for SK Networks Supplier Code of Conduct, customer requests, and environment, safety, and health laws.
- The improvement plans and activities should be subject to continued management once set up.