

Anti-bribery and Anti-corruption

Compliance Regulations

Control No.	SKN Corporate Regulations–II–26
Department in charge	Audit Team, Audit Division
Enactment/amendment history	Enacted on July 9, 2025

Chapter 1. General Provisions

Article 1 (Purpose)

The purpose of these regulations is to set the fundamental principles and practice guidelines to ensure compliance with domestic and international anti-bribery and anti-corruption laws by SK networks (hereinafter referred to as the "Company"), and to foster an ethical and transparent corporate culture.

Article 2 (Scope of Application)

These regulations shall apply to (i) all employees of the Company, including permanent, contract, and temporary staff, across all domestic and overseas branches, offices, and subsidiaries (hereinafter referred to as "employees"), (ii) all individuals, corporations, and organizations conducting business with the Company, including but not limited to partner companies, intermediaries, agents, and consultants, and (iii) Employees shall guide and cooperate to ensure that the relevant third parties comply with these regulations when engaging in business with the Company.

Article 3 (Definitions)

The terms used in this regulation is defined as follows.

- ① "Corruption" refers to acts, such as bribery, coercion, and improper solicitation conducted for unjust gain.
- ② "Public official, etc." refers to any member of the legislative, executive, or judicial branches of government; officers and employees of public organizations or institutions established to perform public functions; candidates for public office; members of political parties performing public duties; individuals engaged in the work of international or public organizations

(such as the IMF, UN, World Bank, or WTO); officers and employees of state-owned enterprises; private individuals entrusted with public functions under the law; official government agents or consultants; and any other individual performing public roles in an official capacity on behalf of a specific country or region, including their spouses and direct family members. In Korea, this also includes officers and employees of educational foundations and journalists as prescribed under the Improper Solicitation and Graft Act.

- ③ "Gift" refers to goods provided without compensation, excluding money and food or beverages.
- ④ "Entertainment" refers to the provision of meals, alcoholic beverages, sports, or other leisure and cultural activities, whether in the form of covering expenses or offering intangible benefits.
- ⑤ "Agent" refers to agents, consultants, professional advisory firms, or experts (including legal, labor, accounting, and tax professionals) engaged by the Company to promote, demonstrate, or explain its products or services, to enter into or support the execution of contracts, or to conduct government-related affairs.
- ⑥ "Business counterparty" refers to any individual, corporation, or other entity engaging in or negotiating the sale or purchase of goods or services with the Company, including Agents.
- ⑦ "Money or other valuables" refers to any tangible or intangible economic benefit, including but not limited to cash, securities, real estate, goods, lodging vouchers, membership rights, tickets, discount coupons, invitations, passes, usage rights, use of Company facilities, meals, alcoholic beverages, entertainment, hospitality, convenience benefits such as transportation, lodging, or travel, as well as exemption from liabilities, job offers, and provision of interests.
- ⑧ "Improper business benefit" refers to any benefit obtained by the Company through illegitimate means in violation of applicable laws or generally accepted social norms, including but not limited to securing or maintaining contracts, acquiring bidding or sales opportunities, accessing confidential

competitor information, obtaining licenses or approvals, receiving reductions or exemptions in customs duties, taxes, or fines, or obtaining favorable outcomes in administrative or civil litigation.

- ⑨ "Donation" refers to any benefit or advantage provided in the form of monetary payments, loans, cash equivalents, gifts, services, promotional support, political campaign activities, or other means.

Unless otherwise defined herein, terms shall be interpreted in accordance with the definitions provided under relevant local anti-corruption laws of Korea and other countries.

Article 4 (Fundamental Principles and Regulatory Framework)

- ① Employees shall comply with the Criminal Act, the Act on the Aggravated Punishment of Specific Crimes, the Improper Solicitation and Graft Act, the Act on Combating Bribery of Foreign Public Officials in International Business Transactions, the Public Service Ethics Act, the Act on the Prevention of Corruption and the Establishment and Management of the Anti-Corruption and Civil Rights Commission, and other anti-corruption laws of the Republic of Korea in the course of performing their duties.
- ② Employees shall also comply with the US Foreign Corrupt Practices Act, the UK Bribery Act, the OECD Anti-Bribery Convention, the UN Convention Against Corruption, and all other applicable local anti-corruption laws and regulations in the countries or regions where the Company conducts business.
- ③ This regulation shall be interpreted and applied in harmony with the above-mentioned laws and regulations. In the event of any conflict, the applicable laws and regulations shall prevail.
- ④ The Company may establish subordinate rules and detailed standards under this regulation. Such rules and standards shall be consistent with this regulation, which shall take precedence in the event of any inconsistency.

Chapter 2. Prohibited Acts

Article 5 (Prohibition on the Receipt of Money or Other Valuables)

Employees shall not demand or receive Money or other valuables from, or cause a third party to provide them to, any individual, corporation, or organization for the purpose of obtaining an improper business benefit. Employees shall also not offer or promise to offer money or other valuables to any public official, etc., either directly or through a third party.

If an employee inevitably receives money or other valuables or a gift, the employee shall take the following measures, report the matter to their supervisor, and notify the Ethical Management Team of the circumstances.

- ① If return is feasible, the item shall be returned immediately.
- ② If return is impracticable due to spoilage, deterioration, or other unavoidable reasons:
 - The item shall be delivered to the Company's local volunteer group (or to Ethical Management Team at the head office).
 - The local volunteer group (or Ethical Management Team at the head office) shall donate the item to an affiliated organization or other recipient.

Article 6 (Permissible Exceptions)

Notwithstanding Article 5, employees may, by way of exception, provide economic benefits to a public official, etc., a business counterparty (including its staff), or a customer (including a client corporation) for the purpose of fostering amicable business relationships or pursuing legitimate business objectives. In such cases, the following principles and procedures must be strictly observed,

and the provision must not violate the laws of the relevant country or the policies and guidelines of the recipient's organization.

① In cases where money or other valuables are provided in connection with a congratulatory or condolence event, the following conditions must be met.

- If it is strictly necessary in order to follow local culture and customs
- If it complies with applicable laws and the internal rules of the recipient's organization.

② In cases where a gift or entertainment is provided, the following conditions must be met.

- If it complies with applicable laws and the internal rules of the recipient's organization
- If it is not outwardly inappropriate
- If the cost and frequency are reasonable

③ Provision of travel (business travel) shall be permitted only under the following conditions.

- If the travel is directly related to a business purpose, such as when a business counterparty is required to participate in training or education organized by the Company or a third party pursuant to the terms of a contract; in such cases, expenses shall be limited to the same scope as applied to employees of the Company
- If transportation, lodging, and meal expenses are paid directly to the service provider (e.g., hotel or travel agency)

④ In cases where a donation is made in good faith to a credible institution or organization, the following conditions must be met.

- If it is not intended to obtain an improper business benefit or exert undue influence

- If it complies with applicable laws and the internal rules of the recipient's organization
 - If the amount and frequency are appropriate and reasonable in light of local practices and culture
 - If it is not outwardly inappropriate
 - If post-donation monitoring is conducted to confirm that the donation or sponsorship is used for its intended purpose
- ⑤ All expenses incurred pursuant to Article 6 shall be recorded and maintained in the Company's accounting books and relevant documentation. Employees shall prepare accounting records and financial reports fairly and appropriately in accordance with applicable laws and regulations, and shall not, for any reason, record false or fabricated information or omit any information that must be recorded.

Article 7 (Prohibition of Facilitation Payments)

"Facilitation payment" refers to money or other valuables provided to a public official, etc. to expedite legitimate administrative processes that involve no discretionary authority on the part of the official (e.g., customs clearance, visa issuance, work permits, maintenance of public order, or provision of public services).

In principle, employees shall not make facilitation payments in any country. However, an exception may be made if the payment is necessary to prevent a threat to life or safety. In such cases, the employee shall immediately report the specific reasons and details to their next-level supervisor and the Audit Team. The Company shall ensure that any such payment is properly recorded in the accounting books.

Article 8 (Conflict of Interest)

① Employees shall make every effort to avoid any situation where their personal interests may unduly influence, or appear to influence, their business judgment or decision-making in the course of their duties (hereinafter referred to as a "conflict of interest"). Examples of problematic conflict of interest situations include, but are not limited to, the following.

1. The employee holds a significant ownership interest in a business counterparty

2. The employee serves as a director or other key executive of a business counterparty, or has a close personal relationship (e.g., family ties) with such an executive

3. The employee is engaged in financial or transactional relationships with a business counterparty, such as loans, joint investments, guarantees, or leases of real or personal property

4. The employee is in a position to influence hiring decisions involving relatives or individuals with whom they have a close personal relationship

5. Any other situation where the employee's or their relative's or family member's personal interests could result in direct or indirect disadvantages or undue influence on the Company

② If a conflict of interest becomes unavoidable despite the efforts described in Paragraph 1, the employee shall consult with their department head and be excluded from any related duties.

Article 9 (Mutual Respect)

① Employees shall treat their colleagues, superiors, subordinates, and business counterparties with mutual respect, maintain basic workplace etiquette and decorum, eliminate factors that undermine well-being, and help foster a healthy organizational culture.

- ② Employees shall not discriminate against others, including business counterparties, on the basis of grounds, including gender, educational background, place of origin, marital status, race, nationality, or religion.
- ③ Employees shall not engage in any act of sexual harassment or any behavior that imposes personal burdens on others, infringes upon individual rights, or disrupts the working environment.

Article 10 (Fair Trade and Competition)

- ① The Company shall establish and operate a fair trade compliance policy that sets forth the basic procedures and standards employees must follow to ensure compliance with the laws related to competition.
- ② Employees shall fully understand and comply with applicable fair trade laws and the operation regulations of the Company's Fair Trade Compliance Program (CP).

1. Prohibition of Cartels

Employees shall not participate in any agreement with competitors or other parties that may hinder fair competition. Specifically, employees shall not engage in unnecessary contact with business counterparties, share competitively sensitive information, or engage in any other conduct that could raise suspicions of cartel activity.

2. Prohibition of Private Monopolies and Exclusive Dealing

Employees shall not unfairly restrict or exclude competitors in relation to products or services where the Company holds a dominant market position, in violation of applicable laws.

3. Prohibition of Other Anti-competitive Practices

Employees shall not engage in transactions that hinder fair competition, including, but not limited to, circumventing resale price restrictions imposed on dealers, wholesalers, or distributors, or imposing unfair conditions on such transactions.

- ③ If any matter may reasonably be interpreted as a potential violation of fair trade laws or regulations, employees shall consult in advance with the

department in charge of fair trade or legal affairs.

Article 11 (Protection of Company Assets and Information)

① Employees shall protect the Company's tangible and intangible assets and use them in an appropriate manner.

② Asset Protection

1. Employees shall not use Company assets for their own or a third party's benefit, or provide them to a third party, without the Company's prior approval.

2. Employees shall not transfer or lease Company assets to themselves or a third party at an unfairly low price, nor purchase or borrow assets on behalf of the Company from themselves or a third party at an unfairly high price.

3. If a situation arises or is likely to arise that may cause significant loss to the Company, employees shall report it immediately and take proper measures to minimize the loss.

4. Employees shall not use the Company's budget for personal purposes and shall use it in accordance with the intended purposes and standards set by the Company.

③ Information Security

1. Employees shall not use or disclose undisclosed Company information obtained in the course of their duties for personal gain or provide such information to any third party.

2. Employees shall not leak or share Company information or trade secrets with internal or external parties without prior approval. They shall also cooperate fully with the Company's data security policies regarding the storage and inspection of electronic documents sent outside the Company.

3. Employees shall strictly manage the Company's information assets under the applicable data security regulations.

Article 12 (Pursuit of Customer Satisfaction and Protection of Customer Information)

- ① Employees shall make every effort to understand customers' expectations and demands regarding product quality, reliability, and safety, and shall provide products and services that meet those expectations.
- ② Employees shall accurately inform customers of the performance and potential risks of the Company's products to enable rational decision-making and shall not engage in any false or exaggerated advertising.
- ③ The Company shall comply with laws and regulations related to the protection of customer information, and employees who handle customers' personal information shall safeguard such information securely under the applicable laws, Company policies, and internal regulations. Customer information shall not be used for any purpose other than that for which it was collected, nor shall it be disclosed to any third party, unless the customer has given consent or such use or disclosure is permitted by law.

Article 13 (Responsibility for Safety, Health, and Environment)

- ① Employees shall comply with all applicable domestic and international laws and regulations, as well as international conventions related to safety, health, and the environment, and shall pursue continuous improvement in these areas.
 - ② Employees shall comply with safety rules to help create and maintain a safe working environment.
 - ③ Employees shall recognize the importance of environmental issues and actively participate in environmental protection activities.
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Chapter 3. Anti-corruption by Business Counterparties

Article 14 (Due Diligence and Support for Business Counterparties)

- ① The Company may, when deemed necessary prior to entering into a contract with a business counterparty, conduct compliance due diligence to assess the

counterparty's adherence to anti-corruption standards and this regulation. In such cases, the responsible employees shall evaluate the compliance risk of the business counterparty and may take appropriate measures to prevent corruption.

- ② When deemed necessary, the Company may provide anti-corruption training and relevant information to business counterparties and offer support to help them understand and comply with this regulation.

Article 15 (Inclusion of Contractual Provisions)

- ① The Company shall include in contracts with business counterparties a clause requiring compliance with this regulation (i) if required under the laws or de facto or legally binding policies of the relevant jurisdiction, or (ii) if not legally required, the Company may nonetheless request that such a clause be included.
 - ② If a business counterparty engages in business activities in violation of this regulation or applicable laws, the Company may take appropriate measures, including termination of the contract.
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Chapter 4. Training and Monitoring

Article 16 (Training)

- ① The Company shall provide necessary anti-corruption training to ensure that employees fully understand and comply with this regulation.
- ② Employees shall faithfully attend anti-corruption training sessions conducted by the Company.
- ③ If employees have any questions regarding the content of anti-corruption training, they shall contact the department in charge of ethical management, which shall provide appropriate operational support and guidance.

Article 17 (Audit)

- ① The Company may conduct regular or ad hoc audits or investigations to verify whether employees are complying with this regulation.
 - ② Employees shall actively cooperate with such audits and investigations.
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Chapter 5. Reporting and Handling of Violations

Article 18 (Reporting of Violations)

- ① If employees become aware of any actual, suspected, or potential violation of anti-corruption laws or this regulation, they shall immediately report the matter to their department head or Audit Team. In doing so, employees may use the Company's internal reporting system (e.g., SK Ethical Management Report Channel, postal mail, etc.) as designated by the Company.
- ② If a department head receives a report from a subordinate employee, the matter shall be promptly referred to the Audit Team without delay.
- ③ The Company and its employees shall strictly maintain the confidentiality of all reported matters and the identity of the whistleblower, and shall not impose any disadvantage or retaliation as a result of the report.

Article 19 (Handling of Violations)

- ① If an act of bribery or corruption by an employee is identified, the Company shall conduct a strict investigation in accordance with applicable regulations and take measures. The results shall be disclosed to members of the organization.
- ② Any employee who violates domestic or international anti-corruption laws or this regulation in the course of performing their duties, or refuses to cooperate with an investigation related to such violation, shall be subject to

the Company's internal disciplinary procedures pursuant to the rules of employment.

- ③ If an employee is held civilly or criminally liable for a violation of anti-corruption laws, the Company shall bear no obligation to provide any support or assistance to the employee, including legal indemnification or reimbursement of fines.

Supplementary Provisions

Article 1 (Enforcement)

This regulation is enacted and comes into effect as of July 9, 2025.

Article 2 (Interpretation)

In cases where a matter is not stipulated in this regulation or where the provisions are unclear and it is difficult to determine whether a violation has occurred, the matter shall be subject to interpretation by Audit Team.