

Revision Date	2025.12.23	SK Gas Partner Code of Conduct
Revision No.	0	

Establishment & Revision History

0	Full Revision	2025.12.23
Revision No.	Revised Pages & Contents	Revision Date

SK Gas Partner Code of Conduct

SK Gas is striving to grow together with our partners. All business partners that working with SK Gas must comply with the following requirements and strive to satisfy our company and our customers. SK Gas respects the diversity of our partners, and the application of this Code may be implemented on a differential and phased basis, taking into account the partner's organizational size, industry characteristics, and realistic conditions.

I. Human Rights

Partners shall guarantee dignity and fundamental rights for all types of workers and protect labor and human rights at a level that meets international standards. This must be applied without discrimination to all workers, including temporary workers, migrant workers, student interns, and dispatched workers, and legal and institutional measures must be sought to ensure fair working conditions and the protection of rights.

1. Prohibition of Discrimination

Discrimination refers to unfair distinction, exclusion, or preference in employment and occupational opportunities and treatment based on a worker's personal characteristics or social status. Partners shall prohibit all forms of discrimination and establish measures to guarantee fairness.

A. Normative Basis

- Equal Remuneration Convention, 1951 (ILO Convention No. 100)
- Discrimination (Employment and Occupation) Recommendation, 1958 (ILO Recommendation No. 111)
- International Covenant on Civil and Political Rights (ICCPR)
- International Covenant on Economic, Social and Cultural Rights (ICESCR)

B. Implementation Principles

- Partners shall evaluate workers fairly based solely on performance, skills, experience, and job requirements during the processes of recruitment, hiring, placement, training, compensation, and promotion.
- Partners shall prohibit direct or indirect discrimination in all employment-related processes based on any status or its intersectionality, such as age, disability, gender identity, sexual orientation, ethnicity, race, nationality, religion, socioeconomic background, caste, marital or family status, pregnancy, union membership, or political opinion.
- Partners shall establish appropriate measures to practice equity and inclusion and continuously implement them.
- Partners shall provide equal pay for work of equal value.

2. Prohibition of Child Labor

"Child" refers to any person under the age of 18, and "child labor" refers to work performed by a child of that age that is not legally permitted. Partners shall not employ children under the age of 15 and must prevent child labor in accordance with ILO conventions and relevant laws.

A. Normative Basis

- UN Convention on the Rights of the Child
- Minimum Age Convention, 1973 (ILO Convention No. 138)
- Worst Forms of Child Labour Convention, 1999 (ILO Convention No. 182)

B. Implementation Principles

- Partners shall only employ workers who are at least 15 years of age and shall comply with higher age standards if they are required by local laws or compulsory education requirements.
- Partners shall establish procedures to verify the age of job applicants.
- Partners shall comply with national laws and international labor standards

- regarding young workers under the age of 18.
- Partners shall ensure that workers performing hazardous work or night shifts are at least 18 years of age.

3. Prohibition of Forced Labor

Forced labor refers to all work and services extracted from any person under the threat of any penalty or coercion and for which the worker has not offered themselves voluntarily. Partners shall prohibit forced labor for all workers and establish policies and procedures to guarantee workers' freedom of employment and resignation.

A. Normative Basis

- Forced Labour Convention, 1930 (ILO Convention No. 29)
- Protocol of 2014 to the Forced Labour Convention, 1930 (Protocol to ILO Convention No. 29)
- Abolition of Forced Labour Convention, 1957 (ILO Convention No. 105)
- International Covenant on Civil and Political Rights (ICCPR)

B. Implementation Principles

- Partners shall ensure that all work is performed voluntarily and must not tolerate any form of forced labor.
- Partners shall clearly explain working conditions and terms of employment to workers and shall not change working conditions without consent.
- Partners shall ensure that workers are free to terminate their employment contracts after a reasonable notice period.
- In cases where employment is facilitated through third parties (such as agency services or labor dispatch), partners shall fulfill their responsibilities to ensure that those agencies comply with forced labor laws and international standards.

4. Compliance with Working Hours

Partners shall clearly define standard working hours in accordance with local laws and collective agreements. Overtime work must be requested based on reasonable standards and appropriate compensation, only with the voluntary consent of the workers.

A. Normative Basis

- International Covenant on Economic, Social and Cultural Rights (ICESCR)

B. Implementation Principles

- Partners shall clearly specify standard working hours in employment contracts, which must comply with local labor laws and collective agreements.
- Partners shall permit overtime only under exceptional circumstances to meet unavoidable short-term business demands and must obtain the voluntary consent of the workers and pay additional compensation as stipulated by law.
- Partners shall guarantee all workers at least 24 consecutive hours of rest every seven days.
- Partners shall ensure that, except in unavoidable exceptional circumstances, total working hours over a seven-day period do not exceed 60 hours.

5. Prohibition of Workplace Harassment

Harassment refers to a range of unacceptable behaviors, practices, or threats that intentionally cause or are likely to cause physical, psychological, sexual, or economic harm. All workers must be protected from harassment, and partners shall prevent harassment and establish procedures for victim remedy.

A. Normative Basis

- International Covenant on Economic, Social and Cultural Rights (ICESCR)

B. Implementation Principles

- Partners shall treat all workers with dignity and respect, and must prohibit all forms of harassment, including verbal, physical, and psychological harassment, intimidation, violence, discrimination, and economic exploitation.
- Partners shall not tolerate or ignore harassment when it occurs and must take immediate action.
- Partners shall protect reporters from retaliation or disadvantage and establish internal grievance procedures that allow anonymous reporting.
- Partners shall establish policies and procedures to prevent harassment and explain them thoroughly to workers.

6. Prohibition of Sexual Harassment and Sexual Violence in the Workplace

Sexual harassment and sexual violence are gender-based violence and harassment that violate a worker's dignity and labor rights. Accordingly, partners shall prevent gender-based violence and harassment and establish effective measures to protect victims and prevent recurrence.

A. Normative Basis

- International Covenant on Economic, Social and Cultural Rights (ICESCR)
- UN Convention on the Elimination of All Forms of Discrimination against Women (UN CEDAW)

B. Implementation Principles

- Partners shall prohibit all forms of sexual harassment and sexual violence, including verbal, physical, and visual sexual harassment and sexual abuse.
- Partners shall investigate sexual harassment and sexual violence cases swiftly and thoroughly and protect victims from retaliation or any disadvantage.
- Partners shall regularly conduct sexual harassment prevention training for workers and managers.
- Partners shall maintain continuous monitoring and management to prevent

abuse of power and gender-based discrimination within the organization.

7. Freedom of Association and Collective Bargaining

Workers have the right to establish or join organizations of their own choosing without any distinction and without prior authorization. Partners shall not hinder or interfere with the exercise of these rights and shall not take disadvantageous actions against worker representatives recognized by law.

A. Normative Basis

- Freedom of Association and Protection of the Right to Organise Convention, 1948 (ILO Convention No. 87)
- Right to Organise and Collective Bargaining Convention, 1949 (ILO Convention No. 98)
- Collective Bargaining Convention, 1981 (ILO Convention No. 154)

B. Implementation Principles

- Partners shall guarantee the right of workers to freely establish or join trade unions.
- Partners shall not engage in any form of interference, obstruction, threat, or retaliation during the process of workers exercising their right to organize and engage in collective bargaining.
- Partners shall not discriminate against or disadvantage workers based on their union membership or activities.
- Partners shall protect the rights and duties of legally recognized worker representatives.

8. Industrial Safety and Health

Partners shall identify and minimize inherent hazards in the working environment within a

reasonably practicable scope at all workplaces to prevent accidents and injuries related to or occurring during the course of work.

A. Normative Basis

- International Covenant on Economic, Social and Cultural Rights (ICESCR)

B. Implementation Principles

- Partners shall establish measures to ensure that all workers can perform their duties in a safe and hygienic environment.
- Partners shall proactively identify and implement measures to prevent risk factors related to fire, electrical safety, chemical handling, and storage.
- Partners shall provide protective equipment and comply with management standards to minimize exposure to hazardous materials in the workplace.
- Partners shall regularly provide occupational safety and health training in a language that workers can understand.

9. Protection of Local Residents

Partners shall protect the rights of local residents across their business operations and supply chain. They must sustainably manage resources on which the community relies and guarantee community rights through cooperation and communication.

A. Normative Basis

- International Covenant on Civil and Political Rights (ICCPR)
- International Covenant on Economic, Social and Cultural Rights (ICESCR)
- United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)

B. Implementation Principles

- Partners shall regularly communicate with local communities and stakeholders, and maintain a collaborative approach to managing environmental, social, and human rights impacts.

- Partners shall prevent potential nuisances and harmful impacts on residential areas near their operations and take appropriate measures to minimize and mitigate them when unavoidable.

II. Environment

Partners shall not exert negative environmental impacts throughout all stages of their business activities and must establish and implement goals for continuous improvement. Furthermore, partners shall comply with environment-related laws and international norms and spread environmental protection and improvement activities across the entire supply chain.

1. Prevention and Management of Air Pollution

"Air pollution" refers to negative environmental and social impacts caused by the emission of greenhouse gases and regulated air pollutants. Partners shall establish reduction targets, constantly monitor emissions, and manage emissions occurring across their entire supply chain.

A. Normative Basis

- Montreal Protocol on Substances that Deplete the Ozone Layer under the Vienna Convention for the Protection of the Ozone Layer
- Article 6, Paragraph 1 of the International Covenant on Civil and Political Rights (ICCPR)
- Articles 11 and 12 of the International Covenant on Economic, Social and Cultural Rights (ICESCR)

B. Implementation Principles

- Partners shall establish and implement greenhouse gas reduction targets.
- Partners shall measure and monitor greenhouse gas emissions and disclose the

results.

2. Hazardous Materials Management

"Hazardous chemical substances" refer to substances whose use, import, or export is restricted or prohibited under local laws or international norms. Partners shall comply with relevant regulatory requirements, including registration, licensing, labeling, disposal, and Prior Informed Consent (PIC) procedures for such substances.

A. Normative Basis

- Minamata Convention on Mercury
- Stockholm Convention on Persistent Organic Pollutants (POPs)
- Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade
- Article 6, Paragraph 1 of the International Covenant on Civil and Political Rights (ICCPR)
- Articles 11 and 12 of the International Covenant on Economic, Social and Cultural Rights (ICESCR)

B. Implementation Principles

- Partners shall not handle chemical substances whose use, import, or export is prohibited under local laws or international norms.
- Partners shall conduct safety management and inspection activities for hazardous chemical substances.
- Partners shall measure emissions of hazardous chemical substances.
- Partners shall establish and implement procedures for the safe handling, use, and disposal of hazardous chemical substances.

3. Prevention of Water Pollution and Protection of Water Resources

"Water pollution" refers to negative impacts on water resources and ecosystems caused by water use, wastewater discharge, and other pollutant discharge at workplaces. Partners shall measure water consumption and take measures to conserve water resources and improve water quality.

A. Normative Basis

- United Nations Convention on the Law of the Sea (UNCLOS)
- Protocol of 1978 Relating to the International Convention for the Prevention of Pollution from Ships, 1973 (MARPOL)
- Article 6, Paragraph 1 of the International Covenant on Civil and Political Rights (ICCPR)
- Articles 11 and 12 of the International Covenant on Economic, Social and Cultural Rights (ICESCR)

B. Implementation Principles

- Partners shall comprehensively evaluate the impact of workplace water consumption and wastewater discharge on water resources and ecosystems.
- Partners shall measure water consumption.

4. Prevention and Management of Soil Contamination

"Soil contamination" refers to situations where land and groundwater are contaminated due to oil and chemical spills, improper waste disposal, etc. Partners shall establish preventive procedures to prevent oil and chemical spills, and develop and implement safe storage, handling, and disposal procedures.

A. Normative Basis

- Stockholm Convention on Persistent Organic Pollutants (POPs)
- Article 6, Paragraph 1 of the International Covenant on Civil and Political Rights (ICCPR)

- Articles 11 and 12 of the International Covenant on Economic, Social and Cultural Rights (ICESCR)

B. Implementation Principles

- Partners shall strive to prevent environmental contamination caused by oil and chemical substances.
- Partners shall store and handle oil and chemical substances safely and comply with relevant management standards.
- Partners shall respond swiftly and take environmental restoration measures in the event of a contamination accident.
- Partners shall continuously conduct training and inspections to prevent the recurrence of contamination accidents.

5. Safe Management and Disposal of Waste

"Hazardous waste" must be classified, stored, transported, and disposed of in an environmentally sound manner. Partners shall comply with relevant regulations, such as the Basel Convention, to prohibit illegal import/export and unauthorized dumping of hazardous waste and must utilize qualified and reliable institutions when consigning disposal.

A. Normative Basis

- Minamata Convention on Mercury
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal
- Article 6, Paragraph 1 of the International Covenant on Civil and Political Rights (ICCPR)
- Articles 11 and 12 of the International Covenant on Economic, Social and Cultural Rights (ICESCR)

B. Implementation Principles

- Partners shall strive to reduce waste generation and expand reuse and recycling.
- Partners shall safely classify, store, and dispose of waste.
- Partners shall continuously track waste discharge and recycling status.

6. Biodiversity and Ecosystem Conservation

"Biodiversity conservation" refers to protecting habitats and genetic diversity and minimizing negative impacts on ecosystems. Partners shall prohibit illegal trade in endangered wild fauna and flora and must not conduct business activities in World Heritage sites and legally protected areas.

A. Normative Basis

- Convention on Biological Diversity, 1992
- Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)
- Convention Concerning the Protection of the World Cultural and Natural Heritage
- Convention on Wetlands of International Importance especially as Waterfowl Habitat (Ramsar Convention)
- Article 6, Paragraph 1 of the International Covenant on Civil and Political Rights (ICCPR)
- Articles 11 and 12 of the International Covenant on Economic, Social and Cultural Rights (ICESCR)

B. Implementation Principles

- Partners shall not illegally trade, import, or export endangered species (species listed under CITES).
- Partners shall not operate business activities in UNESCO World Heritage sites or wetlands designated under the Ramsar Convention.
- Partners shall not operate business activities in Key Biodiversity Areas (KBAs) or UNESCO Biosphere Reserves.

III. Ethics

Partners shall prioritize ethics and responsibility in all business activities to prevent corruption and guarantee fair competition. In addition, partners shall respect human rights and the environment through responsible sourcing in accordance with international norms and build reliable partnerships.

1. Anti-Corruption

"Corruption" includes all acts of seeking unfair profits through bribery, offering improper benefits, or abusing influence. Partners shall prevent acts of corruption across their overall business activities and ensure transparency and fairness.

A. Normative Basis

- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions
- OECD Guidelines for Multinational Enterprises
- Responsible Business Alliance (RBA) Code of Conduct (2024) D. Ethics: (1) Business Integrity, (2) No Improper Advantage, (3) Disclosure of Information

B. Implementation Principles

- Partners shall operate policies that prohibit corruption.
- Partners shall not directly or indirectly promise, offer, or receive bribes or other assets of value for the purpose of obtaining or retaining business opportunities or securing improper advantages.
- Partners shall accurately record and preserve all company transactions, expenditures, and decisions.
- Partners shall establish and operate monitoring and related procedures to comply with legal regulations related to anti-corruption.

2. Fair Competition

"Fair competition" means that companies compete honestly and reasonably under equal conditions. Partners shall respect fair trade order based on the principle of free competition and comply with fair trade-related laws and regulations.

A. Normative Basis

- OECD Guidelines for Multinational Enterprises
- Responsible Business Alliance (RBA) Code of Conduct (2024) D. Ethics: (5) Fair Business, Advertising and Competition

B. Implementation Principles

- Partners shall establish and operate procedures to comply with fair competition laws and regulations.
- Partners shall execute all procedures, such as pricing, bidding, and transaction processes, in a fair and reasonable manner.
- Partners shall not exert unfair influence by providing financial or non-financial benefits or abusing their dominant market position.
- Partners shall prevent conflicts of interest and maintain business relationships with trustworthy companies.

3. Privacy

Partners shall collect and process workers' personal information in a fair and lawful manner and protect the rights of workers who are data subjects. Furthermore, partners shall respect workers' privacy and refrain from surveillance or monitoring unrelated to work.

A. Normative Basis

- International Covenant on Civil and Political Rights (ICCPR)

B. Implementation Principles

- Partners shall clearly define procedures for collecting, storing, processing, transmitting, and sharing personal information, and continuously monitor compliance with relevant laws and international standards.
- Partners shall collect workers' personal information only to the minimum extent necessary, and shall not collect information unrelated to the performance of duties.
- Partners shall respect workers' privacy and prohibit surveillance and monitoring activities that are not directly related to work.
- When introducing surveillance equipment (such as CCTV or electronic access control systems), partners shall consult in advance with trade unions or worker representatives and clearly guide the purpose of installation and operational standards.

IV. Management System

1. Management System

Partners shall establish a management system to comply with this Code, related laws, and customer requirements. The management system aims to identify and mitigate operational risks related to this Code, measure performance, and continuously improve the enterprise's environmental and social responsibilities.

A. Normative Basis

- OECD Guidelines for Multinational Enterprises
- Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (ILO Tripartite Declaration)
- Responsible Business Alliance (RBA) Code of Conduct (2024) E. Management System

B. Implementation Principles

- Partners shall adopt and operate a management system that encompasses the contents of this Code.
- Partners shall establish and operate an organizational structure to implement the management system.
- Partners shall periodically identify operational risks related to the contents of this Code and establish responsive measures through continuous communication with customers.
- Partners shall provide workers with training on policies and related laws.