Ethical Management

Governance

Ethical Management Policy

SK Gas has established a Code of Ethics and implemented an Anti-Bribery Management System as the basis for decision-making across all management activities and business operations. This policy applies to all employees, including management, contract, and dispatched employees, across all domestic and overseas business sites. In addition, each subsidiary has established and operates its own Code of Ethics based on the same principles.

Additionally, SK Gas has established a Partner Code of Conduct and Guidelines for security service providers and business partners & contractors. These guidelines apply to all security service providers and business partners & contractors, extending SK Gas's ethical management standards across its partner network. In particular, security service providers comply with a separate code of ethics. Compliance is reviewed at least once a year.

The Code of Ethics consists of fundamental employee ethics, compliance with laws and management policies, and operational guidelines. It is supported by supplementary regulations and guidelines, including the counseling and reporting system, budget and expense standards, leader FAQs, and the Ethics Pledge. The Anti-Bribery Management System defines authorities and procedures related to anti-bribery and anti-corruption. Procurement management regulations and related procedures establish ethical standards and evaluation criteria for business partners & contractors.

[Anti-Bribery Management System Certificate]

Ethical Management System

Centered on the Audit Committee, the independent internal audit department systematically manages ethical management risks.

Audit Committee

The Audit Committee reviews and approves the internal audit department's audit plans. It also oversees audits of internal accounting management and corporate financial activities while monitoring ethical management performance, plans, and results. The Committee's key operational results are regularly reported to the Board of Directors. The Committee also appoints, dismisses, and evaluates the head of the internal audit department to ensure the independence and effectiveness of internal audits.

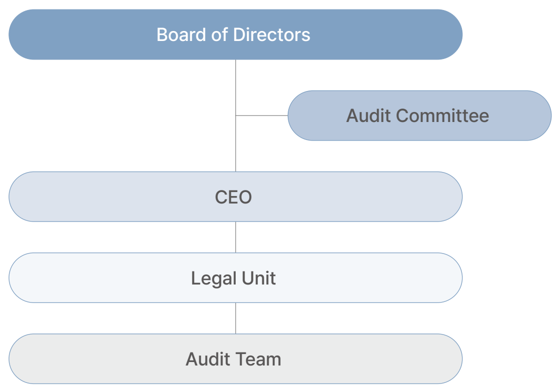
CEO

The CEO manages and monitors ethics and compliance risks under the enterprise-wide risk management system. The system consists of prevention, detection, and response processes. At the beginning of each year, the CEO reports anti-bribery and ethical management performance and plans to the Audit Committee through the head of the internal audit department. Progress is also reported on a quarterly basis.

Audit Team

To enhance ethical management, the Audit Team conducts ethics training and ethical management surveys for employees. It also supports the Audit Committee as the organization's audit function.

[Ethical Management Organization]



[Key Responsibilities of the Audit Team]

1. Conduct anti-corruption and compliance reviews, including internal audits and self-monitoring systems
2. Provide ethics training and workshops for all employees, including those at subsidiaries
3. Conduct ethical management surveys for both internal employees and business partners & contractors
4. Receive and handle consultations and reports related to ethical management and internal control issues
5. Obtain and maintain ISO 37001 (Anti-Bribery Management System) certification