

Ethical Management

Strategy

Ethics Training

Online and Offline Training

SK Gas provides annual ethics training to all employees, including those at domestic and overseas subsidiaries, as well as management, regular, contract, part-time, and dispatched employees. The program covers sexual harassment prevention, workplace bullying prevention, prevention of abusive conduct, improper financial transactions with business partners, conflicts of interest, dual employment, and the proper use of company assets.

In 2025, all 867 employees (100%), including those at subsidiaries, completed the ethics training and signed the Ethics Pledge. Newly appointed team leaders also received training on ethical management standards, the Improper Solicitation and Graft Act, and the counseling and reporting system. The training emphasized the transparent management of expenses and budgets.

[Online and Offline Training Content for Employees (Including Contract, Part-Time, Dispatched, etc.)]

Category	Topic	Details
All Employees	Fundamental Ethics for Employees	Training on practice standards related to concurrent employment, compliance with working hours, and respect for human dignity
	Improper Use of Company Assets	Training on the proper use of company expenses and budgets
	Respect Toward External Partners & Contractors	Training on the prevention of abusive conduct and mutual respect
For Leaders	Compliance with Regulations	Training on the ethical management system, ethical management FAQs for leaders, and the Improper Solicitation and Graft Act
For Executives	Respect for Human Rights in the Workplace	Training on the role of managers in ethical management and the prevention of workplace sexual harassment and bullying

Workshop Training

SK Gas holds annual Ethical Practice Workshops led by executives at the office level. In 2025, a total of 818 participants, including employees from domestic and overseas subsidiaries, attended the workshop. The workshop addressed work negligence and dual employment as common topics. Leaders and employees discussed case studies based on the key findings of the 2024 Ethical Management Survey, including mutual respect, false reporting, and financial misconduct risk management.

[2025 Ethical Practice Workshop Training Status]

Category	Implementation Results (by Session)			Remarks (Implementation Period)
	Target	Conducted	Completion Rate	
SK Gas	48	48	100%	6/30~8/1
Subsidiaries	26	26	100%	
Total	74	74	100%	

[Overview of On/Offline and Workshop Training]

Category	Details		Unit	2023	2024	2025
Training Hours per Person	General Ethics Training ¹⁾			3.9	4.5	4.7
	Sexual Harassment & Workplace Bullying Prevention Training ²⁾		Hours	2.7	2.4	2.4
	Total			6.6	6.9	7.1
Training Participants ³⁾	SK Gas	Regular	Persons	573/574	604/604	611/611
		Contract		48/48	38/38	40/40
	Subtotal			621/622	642/642	653/653
	Subsidiaries	Regular		221/223	230/230	196/196
		Contract		21/21	20/20	18/18
		Subtotal		242/244	250/250	214/214
	Total			863/866	892/892	867/867
Training Participation Rate		%	99.7	100	100	

1) Information security and personal data protection training are included; accordingly, the 2023~2024 data have been restated.

2) Sexual harassment and workplace bullying prevention training figures represent the performance for SK Gas and its domestic subsidiaries.

3) Performance for management and dispatched employees is included in the regular employee figures, and performance for part-time employees is included in the contract employee figures.

Ethical Management Support for Business Partners & Contractors

To promote ethical management among employees and business partners & contractors, SK Gas communicates its Partner Code of Conduct covering ESG, ethics, and human rights. As part of the procurement contract process, business partners are required to submit an Ethics Pledge reflecting the company's anti-corruption policy. In addition, the company collects Ethics Pledges annually through its procurement IT system. It also provides guidelines on fair trade, ethical management, and holiday ethics practices. Through its annual Ethical Management Survey, SK Gas supports ethical management among partners & contractors by updating and sharing guidance on holiday gift policies, whistleblower protection, reporting channels, improper bidding cases, and the Partner Code of Conduct.

Ethics Training Program for Business Partners & Contractors

Since April 2025, SK Gas has provided ethics training programs for business partners & contractors to promote a culture of anti-corruption and ethical management. The company provides training content through its business platforms (e-LPG and withus), enabling partners & contractors to complete ethics training.

[Status of Ethical Training Programs for Partners & Contractors]

Category	Training Topic	Course Title
1	Importance of Ethical Management	Ethics Training Prologue
2	Integrity in Job Performance	It Takes Two to Make a Sound
3		Help Me, Ethics!
4	Prevention of Abusive Conduct	Trust Dad Just Once
5		Still Stuck with Frustrating Abusive Conduct?
6		Don't Use "We're Family" as an Excuse
7	Ethics Reporting Guide	The Wise Reporting Life

Ethical Management

Risk Management

Anti-Bribery Management System

SK Gas has established and operates an Anti-Bribery Management System based on ISO 37001, the international standard for anti-bribery management systems. The system covers anti-bribery prevention, detection, and response across LPG import, storage, and supply operations. Since obtaining the certification, SK Gas has maintained its certification through annual surveillance audits. In 2023, SK Gas completed certification audits across 40 departments, assessing compliance with 31 certification requirements. As a result, the certification was renewed for an additional three years. SK Gas continues to strengthen its anti-bribery management system through policy implementation, ethics training, and reporting mechanisms. The system identifies and mitigates bribery risks across the organization and is regularly reviewed by the CEO and the Audit Committee.

1) Conducted anti-corruption risk assessments at all domestic business sites (headquarters, Ulsan/Pyeongtaek Terminals, Central/Eastern/Western regions), implemented improvement plans for identified issues, and performed regular monitoring.

[Internal Audit Status for the Past 3 Years]

Year	Audit Scope (Corruption Risk)	Company-Wide Organization									
		Domestic LPG Business		Import, Trading		LNG/Power Generation Business		Management Support		Technical Support	
		Audit	Key Points	Audit	Key Points	Audit	Key Points	Audit	Key Points	Audit	Key Points
2023	1. Company-wide cost audit 2. On-site procurement audit 3. IT information security audit	○	Cost	○	Cost	○	Cost	○	Cost, Procurement (IT), Security (IT)	○	Cost, Procurement (R&D Center)
2024	1. Company-wide cost audit 2. Company-wide investment management audit 3. Company-wide receivables (other receivables) audit 4. G.Hub (lubricant storage business)) audit	○	Cost, Investment, Receivables	○	Cost, Investment, Receivables	○	Cost, Investment, Receivables	○	Cost, Investment, Receivables	○	Cost, Investment, Receivables
2025	1. Company-wide cost audit 2. Procurement audit 3. Trading operations audit 4. DEP (Dangjin Eco Power) funds, procurement, and cost audit	○	Cost, Procurement	○	All areas, Cost	○	Cost, Procurement	○	Cost, Procurement	○	Cost, Procurement

Internal Audit

Internal Audit Policy

SK Gas conducts at least one regular audit of each business unit every three years. All employees sign an annual Ethics Pledge, and regular audits verify compliance with both the Code of Ethics and the pledge. The internal audit department develops a three-year audit plan based on risk assessments, ethical management surveys, and external diagnostic results. The plan includes annual compliance audits of cost management and biennial audits of procurement and receivables management.

In 2025, internal audits covered cost management, procurement, trading operations, and DEP (Dangjin Eco Power). In 2026, the audit plan includes cost management, EV refueling station receivables, follow-up audits of previous audit findings, and ongoing audits of subsidiaries, including SKA, SKGU, and DEP. In addition, the SK Group Autonomous Responsibility Management Support Team conducts regular anti-corruption diagnostics across all business units.

Reporting and Monitoring of Audit Results

Audit results are reported quarterly to the CEO and the Audit Committee. Additional reports are provided as needed for special audits. Action plans are provided to the relevant departments for identified issues, and implementation is continuously monitored.

[Major Audit Activities and Reporting Status for the Past 3 Years]

Category	Audit Scope (Corruption Risk)	Remarks	Reporting
2023	Cost Compliance	Regular audit	Reporting to the CEO and Audit Committee completed
	IT/R&D Center procurement process	Overall procurement	
	Company-wide management diagnosis (FY2022) follow-up audit	Follow-up audit of SK Group audit	
	Funds, HR, and operating asset management	Follow-up audit by internal audit	
2024	Cost Compliance	Regular audit	Reporting to the CEO and Audit Committee completed
	Investment company management audit	Regular audit	
	Other receivables management audit	Regular audit	
	G.Hub operations audit	Regular audit	
2025	IT/R&D Center procurement process, operating asset management, etc.	Follow-up audit by internal audit	Reporting to the CEO and Audit Committee completed
	Cost Compliance	Regular audit	
	Procurement adequacy audit	Audit based on SK Group audit results	
	Trading/subsidiary (SKGI) operations audit	Regular audit	
	Subsidiary (DEP) funds/procurement/cost audit	Regular audit	
	Investment companies/other receivables/G.Hub audit, etc.	Follow-up audit by internal audit	

Ethical Management

Risk Management

Ethics Consultation and Reporting System

SK Gas operates a consultation and reporting system to address violations related to anti-corruption and fair trade. Stakeholders may report misconduct anonymously or by name through the company's website, phone, mail, or email. The Compliance and Ethics Team operates a dedicated consultation and reporting center to receive and handle reports.

The operating rules define reporting procedures and whistleblower protection measures. The SK Group Autonomous Responsibility Management Support Team oversees the system to ensure fairness and transparency. In 2025, a total of 13 reports were received. Of these, four were dismissed after preliminary review, five were referred to the relevant departments, one underwent a full investigation and follow-up, and three remain under investigation. The company also operates an ethics bulletin board featuring FAQ and Q&A sections to improve accessibility and strengthen preventive efforts.

[Ethics Consultation and Reporting Status]

Category		Unit	2023	2024	2025
Reports Received (by Reporter)	Employees	Cases	1	1	5
	Partners & Contractors	Cases	3	0	1
	Customers	Cases	4	3	2
	Others	Cases	1	4	5
Handling Results	Investigation (Audit)	Cases	1	1	4
	Transferred to Relevant Department	Cases	1	4	5
	Others (Dismissals, etc.)	Cases	7	3	4

Ethical Management Survey

SK Gas conducts an annual Ethical Management Survey of all employees, including those at subsidiaries, to assess ethical awareness and practice. In 2025, 714 of 863 employees (83%), including those at subsidiaries, participated in the survey. The survey recorded an average ethical management practice score of 3.94 out of 5.00, comparable to the SK Group average. The survey identified report handling and follow-up actions as areas for improvement. In cooperation with the Corporate Culture Unit, SK Gas plans to enhance the credibility of reporting channels and improve the transparency and fairness of investigation and disciplinary procedures.

At the end of each year, the company also conducts an anonymous survey of construction and service partners & contractors to assess SK Gas employees' compliance with ethical management, and shares the results with relevant departments to heighten awareness of ethical management. Subsidiaries also participate in the survey, and the results are reflected in each subsidiary's self-regulation review and internal audit activities.

Metrics & Targets

Ethical Management Goals

SK Gas has established three ethical management and anti-corruption goals: zero cases of corruption and bribery resulting in criminal penalties, zero disciplinary actions for ethical violations, and five hours of ethics training per employee annually. Through these efforts, the company seeks to foster a fair, transparent, and corruption-free society. To achieve these goals, the company focuses on four areas: enhancing external evaluation standards, promoting an ethical culture, expanding system implementation, and improving consultation and reporting channels.

[2026 Ethical Management Goals]

Key Task	Details
Enhancing External Evaluation Levels	• Evaluation under the group's ethical management measurement system • Support for establishing subsidiaries' ethical management • Evaluation of ESG corporate ethics areas (MSCI, KCGS)
Spreading an Ethical Culture	• Planning/operating proper procurement ethics training • Ethics training utilizing external expert instructors (including respect for individuals and financial ethics) • Online ethics training and workshops • Activities to improve the ethical practice organizational culture • Ethical management survey for employees and partners & contractors
Disseminating Systems	• Renewal of ISO 37001 certification • Anti-bribery self-inspection (IT system upgrade))
Improving Counseling and Reporting Channels	• Improving reporting channels, conducting appropriate report investigations, and providing channel guidance (company-wide notice) • Promoting the use of the AI-based ethics Q&A chatbot