

BP(Business Partner) Pledge of Ethics Practice

The company / I will comply with the following rules regarding unethical acts and will accept the responsibilities that arise in case of violation in business transactions (including current transactions and all transactions that will be executed in accordance with contracts signed, and the same shall apply hereinafter).

1. The company / I state and guarantee that (i) there has been no violation of relevant laws and commercial practices or, in particular, the following unethical acts (hereinafter referred to as “unethical behavior”) in the past business relationship with you (excluding cases where the sanctions period has expired after being sanctioned for unethical behavior), (ii) in conducting future transactions (including all current transactions with you and all transactions under future contracts with you) the company / I pledge to prevent violation of related laws and commercial practices or unethical behavior. In addition, the company / I promise (iii) that we will not engage in any unethical behavior that adversely affects business ethics and reliability in our transactions with third parties.
 - A. Provision of money, valuables, entertainment, hospitality, and other monetary/non-monetary benefits to employees of this company and executives and employees of affiliates within the corporate group (SK) to which you belong. Specific types of unethical behavior related to the provision of benefits include, but are not limited to, the following:
 - ① Acts of entertainment and hospitality that violate social norms
 - ② Acts of providing money, securities, or other goods without reasonable grounds
 - ③ Forgiveness of debts or repayment of debts to third parties, untypical movables/real estate transactions*
 - * A transaction in which the transaction price is determined at an amount significantly different from the normal market price without justifiable grounds, or untypical movables and real estate transaction equivalent thereto
 - B. Unfair practices such as collusion of bids with similar companies or competitors.
 - C. Deliberately misrepresenting or omitting important information in connection with the contract.
 - D. Other acts that constitute criminal offenses against this company or employees of this company.
2. We will cooperate when a request for cooperation in investigating unethical behavior is made, including requests for relevant documents (including documents and financial data necessary to investigate unethical behavior).
3. When unethical behavior occurs (including ex post discovery of unethical behavior related to past transactions with you), information about the occurrence of unethical behavior by you/our company and the specific details of the unethical behavior (hereinafter “information on unethical behavior”) to you and all affiliates within the corporate group (SK) to which you belong (hereinafter referred to as “affiliates for sharing information on unethical behavior”) agree to be notified. The company / I confirm that this notification and the resulting sharing of information on unethical behavior does not constitute a breach of your confidentiality obligations nor constitute an infringement of our/our trade secrets.
4. The company / I agree that this company and affiliates for sharing information on unethical behavior, for our unethical behavior(including our publicly known unethical behavior that occurred in connection with other companies and transactions with third parties), can subject the company to sanctions (which can include denial of contract renewal, restriction on new contracts; but in the case of the company that is a direct party to the transaction in which the unethical act occurs, the sanction is not limited to this and reasonable sanctions corresponding to the unethical conduct can apply) in business transactions (including, but not limited to, participation in future bids). We confirm that we will not file any complaints against this company or the other unethical behavior notification recipient companies that accuses civil or criminal liability.

Year Month Date

Company Name :

Business Registration :

SK siltron Co., Ltd.

CEO :

(Sign)