

Code of Ethics

March 2023

SK Siltron CSS, LLC

Introduction

SK Siltron CSS, LLC (“CSS” or the “company”) practices corporate management with SKMS as its cornerstone to create value for its stakeholders such as the customers, members, shareholders, and business partners, seeking to play a key role in social and economic development and to contribute to the happiness of mankind. To this end, the Code of Ethics (“Code”) is the standard for decisions and actions in all management activities.

This Code defines the most central principles and rules to which CSS adheres and with which all employees, officers, and directors (“members”) must comply. Any conduct prohibited by this Code is also prohibited for any individual or entity working on the company’s behalf. The Code is not exhaustive and does not cover all ethical issues that may arise. It is complemented by other internal policies and procedures, which together outline CSS’ expectations about the conduct of every member. Everyone must regularly inform themselves about all policies and procedures concerning their area of operations. If you are unable to find guidance for a particular circumstance in either the Code or the subsidiary policies, you should consult with your manager or Richard Park, CSS’ head of compliance. When it is not possible to seek guidance in a timely fashion, you are expected to act responsibly, ethically, and with integrity.

Ch. 1 General ethical principles

1. Loyalty to the company

- 1) We take pride in the company and work diligently to represent the company well.
- 2) We perform our duties fairly and in accordance with all related laws, regulations, and company policies.
- 3) We increase efficiency through active cooperation and healthy communication between peers and related departments.
- 4) We understand the company's vision and strive to secure the necessary competencies to achieve it.
- 5) We record and report all information in a timely, complete, and accurate manner.

2. Conflicts of interest

- 1) We clearly distinguish public and private matters and fully and transparently address actual or apparent conflicts of interest between personal and private interests, and carry out duties with transparency and fairness.
- 2) We do not receive or request anything that may interfere with carrying out our duties fairly.
- 3) We do not use the property of the company for personal benefit and will protect the confidentiality, information, and intellectual property of the company.
- 4) We do our job properly in our given position and fulfill the duty of care as a good manager.

3. Creating a healthy corporate culture

- 1) We establish a corporate culture where there is enthusiasm, self-motivation, and mutual respect between members.
- 2) Holding high ethical values, we always strive to maintain the dignity of the individual and the honor of the company.

Ch. 2 Compliance with laws

1. Compliance and cooperation

- 1) All business activities in the U.S. and abroad shall be carried out in accordance with the laws and regulations of the respective countries and in respect to the customs of the trade.
- 2) We cooperate fully with any inquiries by regulatory or enforcement authorities and only provide timely, complete, understandable, truthful, and accurate information to the government.

2. Bribery and money laundering

- 1) We do not, on our own or through others, request, accept, offer or grant any advantage or anything of value in order to obtain or retain an undue or improper business advantage, regardless of whether the other party to the transaction is an individual, a company, or a government official or agency, both in the U.S. and abroad.
- 2) We do not engage in bribery or corruption of any kind, whether official or commercial.
- 3) We do not, either on our own or with or through others, engage in money laundering, or conduct business with any person or entity involved in money laundering, terrorism, or criminal activities of any kind, and we do not in any circumstances engage or become involved in, finance or support financially, or otherwise sponsor, facilitate, or assist any terrorist person, activity, organization, or any party designated as a foreign terrorist organization or an organization that assists or provides support to a foreign terrorist organization.

3. Trade controls

- 1) We do not, on our own or with or through others, act or fail to act in any way intended to break or avoid laws, rules, or regulations of any jurisdiction in which we operate regarding the import and export of goods or information or economic sanctions.

- 2) We do not knowingly participate in any practice designed to circumvent or evade any trade control, including import/export duties, economic sanctions, and licensing obligations, nor do we allow, assist, or encourage anyone else to engage in conduct that would circumvent or evade any trade control.
- 3) We do not knowingly engage in transactions with parties subject to economic sanctions or embargoes unless we have a license to do so.
- 4) We verify and document the identity of end purchasers, and any additional information required, for all sales, whether made directly or through a third party.

Ch.3 Responsibility to customers

1. Customer respect

- 1) We treat our customers with a faithful and sincere attitude, respect the diverse opinions of our customers, and actively reflect them in our management activities.
- 2) We provide truthful and accurate information to the customer, and respond promptly and accurately to the legitimate needs of the customer.
- 3) Customer information is kept confidential and we do not share information outside of the company or use it for other purposes without prior approval of the customer.

2. Creation of customer value

- 1) We provide customers with reasonable prices and top quality products and services through innovation and creativity, and gain trust by continuing to satisfy the customers.
- 2) We recognize that the customer's development is our development and constantly strive to find the value that our customers need.

Ch. 4 Responsibility to each other

1. Mutual respect

- 1) We treat each other as an independent person with mutual trust and respect.

- 2) We strive to create a working environment that improves the quality of life for our members.
- 3) We take ensure the health and safety of members. In particular, separate safety measures will be prepared for workplaces with risk factors.
- 4) We protect the privacy rights of members.
- 5) We do not require particular religious or political activities, and we respect each individual's religious and political will. Offensive or explicit displays of individual religious or political preference (such as signs, buttons, or clothing) is prohibited in the workplace.

2. Fair treatment

- 1) We do not discriminate on the basis of race, nationality, ethnicity, religion, age, gender or sexual orientation, area of origin, disability, veteran status, or marital status in employment, promotion, job transition, training, and compensation.
- 2) We establish evaluation criteria for hiring and advancement based on qualities, abilities, and achievements, and evaluate fairly to encourage self-development of members and ensure fair compensation.

3. Promoting creativity

- 1) We actively support the development of members' abilities and cultivate that development for long-term success.
- 2) We create an atmosphere for members to freely express ideas or difficulties and to make suggestions.
- 3) We do not tolerate discrimination, disparagement, harassment, sexual harassment, or any form of coercion inside the company, and we provide procedures for the protection and redress of such actions.

Ch. 5 Responsibility to shareholders

1. Creation of shareholder value

- 1) We raise corporate value by sustaining growth as a healthy company through rational business development and efficient management, to create shareholder value.
- 2) We respect the shareholders' right to know and legitimate demands and suggestions, and actively reflect them on the company's management activities.

2. Protection of shareholder interests

- 1) We protect the interests of the shareholders by preparing data on the overall management in accordance with all laws and standards and by disclosing related information in accordance with the laws.
- 2) Members do not infringe on the interests of shareholders by sharing internal information outside the company or using undisclosed internal information of the company to engage in insider trading or other prohibited activities.
- 3) We maintain an adequate and uniform system of accounting in keeping with current accounting standards, including a system of internal financial controls and complete, accurate, and fair books and records, and prohibit off-book accounting.

Ch. 6 Relationship with business partners

1. Pursuit of free competition

- 1) According to the principle of free competition, we respect the order of market economy in all parts of the world, and secure customer trust through the quality of goods and services.
- 2) We deal fairly with honest talent, not unduly violating the interests of competitors, customers, suppliers, and business partners or abusing their weaknesses.

- 3) We acquire all information of competitors in a legitimate way that is not subject to social criticism and use it properly.
- 4) We do not take unfair advantage of anyone through manipulation, concealment, abuse of confidential information, misrepresentation of material facts, or any other unfair practice.
- 5) We do not engage in any concerted action, informal talks, or agreements with anyone that are intended to unfairly restrict competition or may have the effect of doing so.
- 6) All activities to secure competitive advantage should be carried out in compliance with applicable anti-trust and competition laws, and if there is a risk of violation, we immediately report it.
- 7) Business partners, including vendors, suppliers, resellers, agents, consultants, partners, and any other party with which CSS interacts for business purposes (with the exception of customers) – shall be selected only on the basis of price, quality, reputation, reliability, technological standard, product suitability, and certification and licensing and only after appropriate due diligence has been completed.
- 8) In no circumstances shall personal relationships or interests be factors selecting a third party or for giving a third party more favorable terms. Advice or recommendations given by us to customers, suppliers, government officials, or others must not be motivated by personal advantages or relationships.
- 9) Equal opportunities are given for all companies that satisfy the specific qualifications to register and participate as a partner company.

2. Fair Transaction Procedures

- 1) All transactions with partner companies shall be fair, mutually equal, adhere to the agreed terms of trade, and reflect opinions for the improvement and innovation of transactions, as appropriate to the business.

- 2) When using the technology or assets of a partner company, we must obtain the approval of the company, and information shall not be leaked to the outside without approval on documentation.

3. Pursuing mutual growth

- 1) Through technical support and management guidance, we actively support the long- term cooperation of partner companies so that they can grow in competitiveness and pursue mutual benefits and common growth.
- 2) We will make mutual efforts with our partner companies to create a clean trade climate and maintain fair trade order.

Ch. 7 Role in society

1. Social Contribution Activities

- 1) Along with contribution to economic development, we contribute to society through social and cultural activities.
- 2) We adhere to the laws and social norms of the regions where the business operates, and respect the traditions and cultures of local communities.
- 3) We do not contribute to political campaigns.
- 4) We engage in charitable contributions based on need, merit, and value to our communities, and not to curry favor or secure an unfair or undue advantage.

2. Eco-Friendly Management

- 1) We comply with all laws and regulations related to environmental protection, and pursue business activities that combat climate change and promote energy conservation, resource protection, and other activities to protect the environment.
- 2) We secure and operate pollution control facilities and employee necessary personnel to prevent environmental pollution.

- 3) We try our best to protect the environment and safety of the community and take measures to prevent damage from accidents.

Ch. 8 Reporting a concern, discipline, and cooperation

1. Reporting

- 1) CSS is committed to the highest possible standards of ethical, moral, and legal business conduct. In conjunction with this commitment, all members must report concerns of wrongdoing in relation to business activities, such as actions that may violate any law, regulation, rule, or CSS policy (including this Code).
- 2) Members are also required to report any suspected misconduct, even where not covered specifically by CSS policy, that may lead to incorrect financial reporting, that raises significant ethical concerns; or that otherwise amount to serious improper conduct, even if it does not rise to the level of a violation of law, regulation, or rule.

2. Non-retaliation

- 1) All good faith reports can be made without fear of retaliation to a manager, human resources, legal, a trusted member of management, or you can send a report anonymously to css.ethics@sksiltron.com.
- 2) We take all reports of alleged violations seriously, but reporting malicious or knowingly false allegations may result in disciplinary action, up to and including termination.
- 3) We will not tolerate any retaliation against any individual based on knowledge or suspicion that the individual has reported a concern either through the email hotline or directly to human resources, legal, or management, or cooperated with any investigation of potential misconduct.

3. Discipline

- 1) Violations of any law, regulation, rule, or CSS policy or procedures can have serious repercussions on the company as a whole, and may result in disciplinary action, up to and including financial penalties (such as denial of a bonus or fines) and termination of employment.

- 2) CSS reserves the right to report any such violations to appropriate law enforcement or regulatory authorities, which may result in civil or criminal penalties for members involved in illicit conduct.

4. Cooperation

- 1) In addition to the duty to bring all compliance and ethics concerns forward, all members are required to cooperate in both internal and external investigations of potential misconduct within CSS or involving CSS' partners.
- 2) Members should immediately bring any inquiry by enforcement authorities about any aspect of CSS' business to the attention of Legal and await instructions before responding. While awaiting instructions, all documents and communications relevant to the law enforcement inquiry must be preserved.