

# Code of Ethics Implementation Guidelines

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## OBJECTIVES

These Rules (the "Rules") are set forth to specify the terms of the operation of the Help Line of SK Telecom Co., Ltd (the "Company").

## OPERATIONS AND REPORTING

- The Company's Ethics Management Team shall establish and operate the online Help Line on the Company's Internet homepage (<http://www.sktelecom.com>).
- The Company's stakeholders, including employees, may make an inquiry or report to the Ethics Management Team regarding matters related to ethics management by visitation to the Ethics Management Team, or by telephone, fax, mail or email posted at the online Help Line.

## HANDLING PROCEDURES

The head of the Ethics Management Team shall take the following measures when receiving inquiries or reports related to ethics management:

- a. Where it is deemed necessary to further investigate inquiries and reports, the head of the Ethics Management Team may transfer the matters to the Audit Team or other relevant teams; and
- b. Where it is deemed necessary that the inquires and reports should be reviewed in detail, the Director in charge of Ethics Management shall handle the matters following consultation with related teams.

The head of the Ethics Management Team shall record inquires and reports related to the Code of Ethics in the order of date of receipt, and safeguard and maintain them together with relevant documents.

## REPORTS AND INQUIRES RELATED TO BUSINESS PARTNERS(“BPS”)

### 1. Human-centered Management

- The Company shall respect each Employee’s individuality and treat them fairly and reasonably, in accordance with their capability and performance.
- The Company shall create a SUPEX Quest environment in order to help Employees maximize their brain engagement willingly and voluntarily.
- The Company shall support the self development of the Employees and actively provide the Employees with education opportunities necessary for the execution and completion of duties.

## WHISTLEBLOWER PROTECTION

- The Company shall protect the status of the inquirer or whistleblower related to the ethics management (the “Whistleblower”), including the contents of any inquires or reports, and shall not cause them any disadvantage.
- Upon the disclosure of the identities of the Whistleblower, such Whistleblower may notify such disclosure to the head of the Ethics Management Team and ask for the protection of his/her status. In this case, the head of the Ethics Management Team may take necessary measures including the transfer of the Whistleblower to another Team, in consultation with the head of the Human Resource Management Team.

- The Company's employees shall not take any action that may cause the identities of Whistleblowers to be disclosed, including an inquiry or investigation into the identities of the Whistleblowers.
- Where the Whistleblower is involved in wrongdoing, but makes an inquiry or report on such wrongdoing, the Company may extenuate the circumstances in punishing, or taking disciplinary action against, the Whistleblower.

## REWARDS

The Company may reward parties that make reports and inquiries regarding the Company's ethics management, in cases where such reports have benefited the Company.

## OTHERS

The matters related to the operation of the Help Line that are not specified in these Rules shall be reviewed and determined by the Director in charge of Ethics Management following consultation with related teams.

### (SUPPLEMENTARY PROVISIONS)

#### 1. Date of Enforcement

These Rules shall be in full force and effect from August 27, 2008.