Form **8937**

(December 2017)
Department of the Treasury
Internal Revenue Service

Report of Organizational Actions Affecting Basis of Securities

► See separate instructions.

OMB No. 1545-0123

Part I Reporting Issuer						
1 Issuer's name		2 Issuer's employer identification number (EIN)				
SK Telecom Co., Ltd.		N/A				
3 Name of contact for additional information	4 Telephone No. of contact	N/A 5 Email address of contact				
Investor Relations	+82-2-6100-2114	skt.ir@sk.com				
6 Number and street (or P.O. box if mail is not	delivered to street address) of contact	7 City, town, or post office, state, and ZIP code of contact				
CK T T						
SK T-Tower 65, Eulji-ro, Jung-gu 8 Date of action	9 Classification and description	Seoul 04539, Korea				
	o olassinoation and description					
October 28, 2021	Common Stock and American Depositary	Shares of SK Telecom Co., Ltd.				
10 CUSIP number 11 Serial number		13 Account number(s)				
78440P108 (ADS) KR7017670001						
14 Describe the organizational action and, if a	ch additional statements if needed. See bac	ik of form for additional questions. net which shareholders' ownership is measured for				
the action The Board of Directors of S	SK Telecom Co. Ltd. (the "Company") declare	d a 5-to-1 stock split of the Company's common				
	at the Company's extraordinary general meeting	ng of shareholders on October 12, 2021, Each				
		hare of common stock held. The record date for				
the stock split is October 27, 2021.						
The exchange ratio of ADSs for shares of con	nmon stock was adjusted to account for the st	ock split such that the outstanding number of				
split, each ADS represented five-ninths of one	stock split, each ADS represented one-ninth	of one share of common stock, and after the stock				
sping eductives represented tive-fillings of one	s state of common stock.					
45 December 1971 1971						
Describe the quantitative effect of the organisms of all hasis	anizational action on the basis of the security in th	e hands of a U.S. taxpayer as an adjustment per				
common stock immediately prior to the stock	solit among the shares of common stock rock	ortion of their tax basis in their original shares of sived in the stock split. Each share of common				
stock held by a shareholder immediately after	the stock split should be equal to 20% of the	hasis of the corresponding share of common				
stock held by that shareholder immediately be		successful and some sponding share of common				
The basis of each ADS in the hands of a share	eholder remains unchanged.					
		181				
16 Describe the calculation of the change in b	pasis and the data that supports the calculation, s	uch as the market values of securities and the				
valuation dates A shareholder's basis i	n each share of new common stock owned im	mediately after the stock split should be equal to				
one fifth (20%) of their basis in the correspond	ding share of common stock held immediately	before the stock split.				
A shareholder's basis in an ADS should not of	hange, because no new ADSs were issued in c	connection with the steel cult luctural the				
exchange ratio for shares was adjusted to acc	count for the effect of the stock split on the unc	derlying common stock				
exchange ratio for shares was adjusted to account for the effect of the stock split on the underlying common stock.						

Cat. No. 37752P

Form	8937 (1	12-20	017)				Page 2
Pai	rt II	C	Organizational Action (continued	d)			
17	List t	he a	applicable Internal Revenue Code section	on(s) and subsection(s) upon which the tax	treatmer	nt is based I	→ 305(a), 307(a)
							4 61
	17.71						
_							
18	Can a	anvi	resulting loss be recognized? No. T	he stock split is a non-taxable distributi	on of sta	ok and ac	a requite no logo about directly
			<u>140.1</u>	The Stock Split is a non-taxable distributi	on or sic	ick allu, as	a result, no loss should result.
		_					
-							
1							
			9				
45							
							N.
10	Drovi	do o	any other information access to in				
19 For a	char	obol	der whose reportable taxable year is	ement the adjustment, such as the reporta the calendar year, the reportable taxab	bie tax ye	ear ►	
rui a	Silait	enoi	der whose reportable taxable year is	the calendar year, the reportable taxab	ie year is	2021.	
							1.
-							
	Lle	day	populities of positive I dealers that I have				
	bel	lief, i	t is true, correct, and complete. Declaration	amined this return, including accompanying sch of preparer (other than officer) is based on all info	edules and ormation o	d statements, f which prepa	and to the best of my knowledge and arer has any knowledge.
Sign			A				
Here		gnatu	ire Daedug	Jeong	Date ▶	10.	Dec, 2021
	Del	nt ···		0	T 5	VD -6 =:	
D-:			our name ► Dae Dug Jeong Print/Type preparer's name	Preparer's signature	Title ► Date	VP of Fina	DTIN
Paid			NI - Landau and Maria		2310		Check if self-employed
	oare		Firm's name	And the particular to the second seco	19,200,000		Firm's EIN
use	Onl	У	Firm's address ▶				Phone no.
Send	Form			to: Department of the Treasury, Internal R	levenue S	Service, Ogo	

Form **8937**

(December 2017)
Department of the Treasury
Internal Revenue Service

Report of Organizational Actions Affecting Basis of Securities

► See separate instructions.

OMB No. 1545-0123

Part I Reporting Issuer				
1 Issuer's name	2 Issuer's employer identification number (EIN)			
SK Telecom Co., Ltd.		N/A		
3 Name of contact for additional information	N/A 5 Email address of contact			
	4 Telephone No. of contact			
Investor Relations	+82-2-6100-2114	skt.ir@sk.com		
6 Number and street (or P.O. box if mail is not	delivered to street address) of contact	7 City, town, or post office, state, and ZIP code of contact		
SK T-Tower 65, Eulji-ro, Jung-gu		Seoul 04539, Korea		
8 Date of action	9 Classification and description			
November 29, 2021	Common Stock			
10 CUSIP number 11 Serial number(s		13 Account number(s)		
KR701767000				
	h additional statements if needed. See b			
14 Describe the organizational action and, if a	pplicable, the date of the action or the date ac	gainst which shareholders' ownership is measured for		
the action On November 29, 2021, in c	connection with a taxable distribution of co	mmon stock of SK Square Co., Ltd., which was		
spun-off from the issuer as of November 1, 20				
consolidated such that the shareholders as of				
each Common Share held immediately before	the reverse stock split, with cash paid in lie	eu of fractional shares.		
15 Describe the guartitative effect of the				
15 Describe the quantitative effect of the organ	nizational action on the basis of the security in	the hands of a U.S. taxpayer as an adjustment per		
converted into 0.6073625 Common Share. As	ch Common Share held immediately prior t	o the reverse stock split automatically		
		ares held immediately after the reverse stock split,		
including any fractional shares in lieu of which	cash was received. Shareholders that acc	ruired different blocks of Common Shares at		
		f their adjusted basis among the Common Shares.		
-				
16 Describe the calculation of the change in ba	asis and the data that supports the calculation	, such as the market values of securities and the		
	eholder's aggregate basis in all Common S			
and after the reverse stock split should not cha	ange as a result of the reverse stock split.	except to the extent of cash received in liqu of		
		cks of Common Shares at different prices or times		
consult their own tax advisors regarding the al				
	-			
	4			
The state of the s				

Form 89	37 (12-	-2017)					Page
Part	П	Organizational Action (continued	d)				
							7
17 Li	ist the	applicable Internal Revenue Code section	on(s) and subsection(s) upon which	ch the tax treatme	nt is based	>	
		358(a)(1), 358(b)(1), 354(a)(1)					
-							
) [
1							
18 C	an any	y resulting loss be recognized? ► The r	everse stock split is intended t	a ha tracted as a	roconitalia	ation for U.S.	adamat in a sure
tay nur	noses	s. Accordingly, except with respect to	cash received in lique of a fract	ional chara as dia	recapitaliz	ation for U.S. I	ederai income
recogni	izo an	y gain or loss for U.S. federal income	tay purposes as a result of the	ional snare as dis	cussea be	iow, a snarenc	ider will not
recogni	ize all	y gain or loss for 0.5. federal income	tax purposes as a result of the	reverse stock sp	it.		
In gono	ral a	charabalder that receives each in lieu	of a fractional Comment Chan				
hotwoo	n the	shareholder that receives cash in lieu	or a fractional Common Share	will recognize ga	in or loss e	equal to the dif	ference
		amount of cash received in lieu of the					
		stock split Common Shares that is allo					
		ares were held as a capital asset and t					
		an one year as of the date of the revers	se stock split. The deductibility	y of capital losses	by individ	luals and corp	orations is
subject	to III	nitations.					
-							
		W 10 W 10					
		any other information necessary to imple					
For a sh	nareh	older whose reportable taxable year is	the calendar year, the reportal	ole taxable year is	2021.		
-			7		-		
140							
	Unde	r penalties of perjury, I declare that I have exa	amined this return, including accomp	anying schedules an	d statements	, and to the best	of my knowledge and
	belief	, it is true, correct, and complete. Declaration of	of preparer (other than officer) is base	d on all information of	f which prep	arer has any knov	vledge.
Sign		D /					
Here	Signa	ature > /aedry	Jeons	Date ▶	10	Dec,	2021
			0	Date	- , ,	,	
	Print	your name ► Dae Dug Jeong		Title ▶	VP of Fin	ance	
Doid		Print/Type preparer's name	Preparer's signature	Date	VE OF FIL		PTIN
Paid						Check if self-employed	
Prepa		Firm's name					
Use C	nly	Firm's address	THE THE PROPERTY AND ADDRESS OF THE PROPERTY AND ADDRESS OF THE PARTY A	17.00		Firm's EIN ▶	
Send Fo	rm 89	37 (including accompanying statements)	to: Department of the Tressum:	Internal Dayanus 6	Sension O-	Phone no.	0054
		- (g 2000 inputying statements)	Department of the Heastly,	miterial nevertue 3	Jei vice, Ug	uell. UI 04201-	UU34

Form **8937**

(December 2017) Department of the Treasury Internal Revenue Service

Report of Organizational Actions Affecting Basis of Securities

► See separate instructions.

OMB No. 1545-0123

Part I Reporting	Issuer				
1 Issuer's name			2 Issuer's employer identification number (EIN)		
SK Telecom Co., Ltd.	×			N/A	
3 Name of contact for add	ditional information	4 Telephor	ne No. of contact	5 Email address of contact	
				100 4300500000000000000000000000000000000	
Investor Relations			+82-2-6100-2114	skt.ir@sk.com	
6 Number and street (or F	P.O. box if mail is not	delivered to	street address) of contact	7 City, town, or post office, state, and ZIP code of contact	
SK T-Tower 65, Eulji-ro, J	ung-gu			Seoul 04539, Korea	
8 Date of action		9 Clas	sification and description		
Neverbar 20, 2024					
November 30, 2021 10 CUSIP number	11 Serial number(s		n Depositary Shares 12 Ticker symbol	12 Account number(a)	
10 COCH Hamber	Ti Genariamber(9)	12 Hicker Symbol	13 Account number(s)	
78440P306			SKM		
	onal Action Attac	h additiona		e back of form for additional questions.	
14 Describe the organiza	tional action and, if a	pplicable, the	e date of the action or the date	e against which shareholders' ownership is measured for	
the action ► On Nov	ember 30, 2021, in o	connection v	with a taxable distribution of	common stock of SK Square Co., Ltd., which was	
spun-off from the issuer as	s of November 1, 20	21, the outs	tanding American Depositar	y Shares of the issuer (the "ADSs") were consolidated	
such that the shareholders	s as of the record da	te of Noven	nber 30, 2021 received 0.607	3625 ADS in exchange for each ADS held immediately	
before the reverse stock s					
				,	
					
15 Describe the quantitat	ive effect of the orga	nizational ac	tion on the basis of the securi	ty in the hands of a U.S. taxpayer as an adjustment per	
share or as a percenta	age of old basis ► Ea	ch ADS held	d immediately prior to the re	verse stock split automatically converted into	
0.6073625 of an ADS. As a	result, shareholder	s must alloc	ate their aggregate tax basis	s in their ADSs held immediately prior to	
				including any fractional ADSs in lieu of which	
				rices or times should consult their own tax advisors	
regarding the allocation of	their adjusted basis	s among the	ADSs.		
16 Describe the calculation	on of the change in b	asis and the	data that supports the calcula	tion, such as the market values of securities and the	
				f the issuer held immediately before	
and after the reverse stock	split should not ch	ange as a re	esult of the reverse stock sol	lit, except to the extent of cash received in lieu of	
				locks of ADSs at different prices or times should	
			their adjusted basis among		
			2		

Form 893	7 (12-2	2017)				Page 2
Part I		Organizational Action (continue	d)			
17 Lis	st the	applicable Internal Revenue Code secti	on(s) and subsection(s) upon wh	ich the tax tr	eatment is based ▶	
368(a)(1)(E), 3	358(a)(1), 358(b)(1), 354(a)(1)	20 - 20 - 20 - 20 - 20 - 20 - 20 - 20 -	7.		
-						
Name of the second						
-						
10 0						
		resulting loss be recognized? ► The				
		. Accordingly, except with respect to				ow, a shareholder will not
recogni	ze any	y gain or loss for U.S. federal income	tax purposes as a result of the	reverse sto	ock split.	
		alamahad dan Alam ana sissa a a ala isa tisa				
		shareholder that receives cash in lieu				
		sh received in lieu of the fractional Al				
		ble to the fractional ADS. Such gain o				
		s holding period in its pre-reverse sto			of the date of the r	everse stock split.
The ded	uctib	ility of capital losses by individuals a	nd corporations is subject to li	mitations.		
			The same of calling of the same of the sam			
-						
40 Dr.	ovido	any other information passages, to imp	lamant the andiversant even as t	lle e u e e e ul e le l		
		any other information necessary to imp		COLING TO STATE OF THE STATE OF		
For a Sn	areno	older whose reportable taxable year is	s the calendar year, the reporta	ible taxable	year is 2021.	
¥						
-						
-						
-						
			<u> </u>			
-						
40						
				4		
-						
	Unda	n namelika af nami na Laladana da di la				
	belief.	r penalties of perjury, I declare that I have ex, it is true, correct, and complete. Declaration	of preparer (other than officer) is bas	panying sched ed on all inforr	ules and statements, nation of which prepa	and to the best of my knowledge and rer has any knowledge.
Sign		_	-			
Here		Deadus	Tears		10	N== 1
ricic	Signa	ture / /aeaag	Deong		Date ►	Dec, 2021
	2000	U			and the same and	
	Print	your name ► Dae Dug Jeong	Drongraria gianatura		Title ► VP of Fina	
Paid		Print/Type preparer's name	Preparer's signature		Date	Check if PTIN
Prepa	rer					self-employed
Use O	nly	Firm's name	and the second second control of the second	ed his constitution and in		Firm's EIN ▶
0 :-		Firm's address ▶	2			Phone no.
Send Fo	rm 89	37 (including accompanying statements	i) to: Department of the Treasury	, Internal Rev	enue Service, Ogo	len, UT 84201-0054