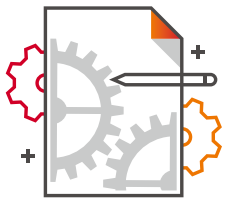


SK hynix Sustainability Guidelines

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Please send enquiries regarding the integrated sustainability policies of SK hynix to sustainability@skhynix.com.

Declaration of Sustainability Management



Even in a rapidly evolving business environment, SK hynix, based on its business operation principle, SKHM (SK Management System), strives to bring happiness to all stakeholders including customers, employees, shareholders, local communities, and suppliers, and to contribute to economic growth and happiness of humanity. SK hynix has established SK hynix Sustainability Guidelines in order to grow into a sustainable company. We hereby declare that our employees, subsidiaries, subcontractors, suppliers, and J/V employees will comply with SK hynix Sustainability Guidelines.

In addition, with 'Universal Declaration of Human Rights' SK hynix supports and respects various global organizations' human rights and labor protection standards, including OECD Guidelines, 10 Principles of the UN Global Compact, UN Convention on the Rights of Children and ILO. Furthermore, SK hynix is a pioneer company in complying with globally accepted policies such as California Transparency in Supply Chain Act and the UK Modern Slavery Act¹.

Also, as a member of RBA² (formerly known as EICC³), SK hynix observes RBA Code of Conduct. SK hynix employees are in compliance with applicable legal standards in the places where it operates its business.

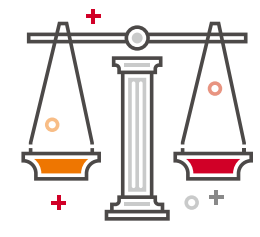


¹ 1 Refer to Attachments for Detailed Process

² Responsible Business Alliance

³ Electronic Industry Citizenship Coalition

Declaration of Ethics Management



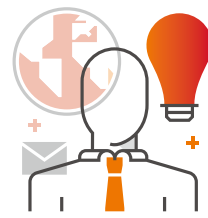
SK hynix recognizes that the ethical management is a generational responsibility. We conduct work in an ethical and lawful manner to establish an order of fair trade and to build a clean and transparent corporate culture to fulfill our social responsibilities.

1. All business operations are to comply with the regulations and customs of the country and global society based on an ethical value system.
2. Root out antitrust and anticorruption by firmly establishing an order of trade that is transparent and fair.
3. Integrate ethical operations as a corporate culture and spread the culture to suppliers.
4. Allocate an organization solely in charge of ethics management. Build a system of practice and continuously improve on it.
5. Publicize the declaration to stakeholders so they may effectively comply with it.



<http://www.skhynix.com/kor/sv/ethicsManage.jsp>

Human Rights and Labor Policy



SK hynix respects human dignity and value of our employees that belong to all our business sites or suppliers. Based on humanism, we do our best to maintain or improve on a good work environment where every employee can pursue happiness. To achieve this, we will comply with the labor relations regulations and customer demands in the country or region where our business sites are located and improve on aspects deemed necessary. In addition, SK hynix declares that this policy is a basic obligation which all employees and employees of all our business dealings must comply with.

1. Respect human rights

All employees are respected as humans. All acts that violate human rights are to be prevented with the utmost effort.

2. Freely chosen employment

We will not force any work that goes against the free will of employees regarding mental or physical constraints such as forced, bonded (including debt bondage) labor, slavery or human trafficking to hire or maintain employment, and employees shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. SK hynix does not hold government-issued identification, passports or work permits to labor as a warrant for employment. In addition, employees have no restrictions in access to toilets, drinking

water, rest facilities, outside medical facilities and entering plant/dorm. All suppliers including contractors or workforce providers engaged in business with SK hynix must comply with this policy.

3. Prohibition of child labor

We do not hire children under 15 (if the term “child” refers to any person under the age of 15, or under the minimum age based on country-determined, we comply with all laws and regulations in the country) and all suppliers that contract with SK hynix must comply with this rule as well. To do so, all business sites in Korea and abroad as well as suppliers must observe strict employment procedures including reviewing ages of newcomers and no child labor of any form will be tolerated.

4. Young workers

Employees under 18 years of age (includes students, interns, trainees and apprentices) are to be hired in compliance with the regulations of the relevant country and region. Also, employees under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Furthermore, the wages for a young employee should be identical to a new employee that conducts at least similar tasks.

5. Work hours

Regarding regular work hours and overtime, SK hynix complies with stricter standards than the global standard or regulations of labor relations in the relevant country. If overtime occurs, overtime pay is provided to the employee in accordance with the standards of the labor relations of the relevant country or area. Employees shall be allowed at least one day off every seven days. In addition, all suppliers trading with SK hynix are to comply with the same rule.

6. Remuneration

Remuneration for employees is to exceed the minimum level stipulated by the labor relations regulations of the relevant country or area.

7. Prohibition of discrimination

SK hynix prohibits unfair discrimination in employment based on gender, race, nationality, ethnicity, religion and other factors. The same goes for working conditions such as remuneration or promotions.

8. Freedom of association

SK hynix warrants employees the freedom of association and right of collective bargaining in compliance with the labor relations regulations of the relevant country or region. No disadvantages are imposed for reasons such as signing up for a labor union, acting in one or forming one as well.

9. Responsible delivery of minerals

SK hynix recognizes any violation of human rights or environmental pollution that occurs while extracting minerals as a major issue. In line with this recognition, we do not use any minerals directly or indirectly extracted from the Democratic Republic of the Congo or its neighboring countries such as 3TG or cobalt. To stay informed, we conduct fact-finding operations on the mineral's origin and supply chain. We publicize our information from fact-finding to customers upon request.

10. Protect information of stakeholders

SK hynix conducts all business transactions in a transparent manner. To achieve this, we must conduct training regarding information protection such as 'Contract to Prohibit Occupation Change' or 'Declaration to Protect Information'.

Safety and Health Policy



1. SK hynix establishes a business place in which its members are healthy and safe through defining safety and health management as its core value and establishing standards that exceed regulations.
2. SK hynix improves its safety and health standards through continuously reforming and upgrading its system for the safe operation of equipment.
3. SK hynix creates working conditions to help its members and employees of cooperative companies, and detects risks in advance and eliminates them.

1. Occupational safety

Worker potential for exposure to safety hazards (e.g., chemical, electrical and other energy sources, fire, vehicles, and fall hazards) are to be identified and assessed, and controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lock-out/tag-out), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards. Reasonable steps must also be taken to remove pregnant women/nursing mothers from working condition with high hazards, remove or reduce any workplace health and safety risks to

pregnant women and nursing mothers including those associated with their work assignments, as well as include reasonable accommodations for nursing mothers.

2. Emergency preparedness

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property.

3. Occupational injury and illness

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness including provisions to: encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.

4. Industrial hygiene

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled according to the hierarchy of controls. Potential hazards are to be eliminated or controlled through proper design, engineering and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment. Protective programs shall include educational materials about the risks associated with these hazards.

5. Physically demanding work

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

6. Machine safeguarding

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

7. Sanitation, food, and housing

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Participant or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

8. Health and safety communication

Participant shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards.. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise safety concerns.

Environment Policy



- 1. SK hynix reduces environmental effects as much as possible by implementing eco-friendly designs that consider all processes, effectively using resources and introducing the best pollution preventive facilities.
- 2. SK hynix protects the environment of its business places and regional societies through transparently disclosing information about harmful chemicals and systematically managing those substances.

1. Environmental permits and reporting

All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

2. Pollution prevention and resource reduction

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals and virgin forest products, is to be conserved or by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling or other means.

3. Hazardous substances

Chemicals and other materials posing a hazard to humans or the environment are to be identified, labelled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

4. Solid waste

SK hynix shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous)

5. Air emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, routinely monitored, controlled and treated as required prior to discharge. Participant shall conduct routine monitoring of the performance of its air emission control systems.

6. Materials restrictions

SK hynix is to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

7. Water management

SK hynix shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Participant shall conduct routine monitoring of the

performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

8. Energy consumption and greenhouse gas emissions

Energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions are to be tracked and documented, at the facility and/or corporate level. Participants are to look for cost- effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.




BCP Policy Statement

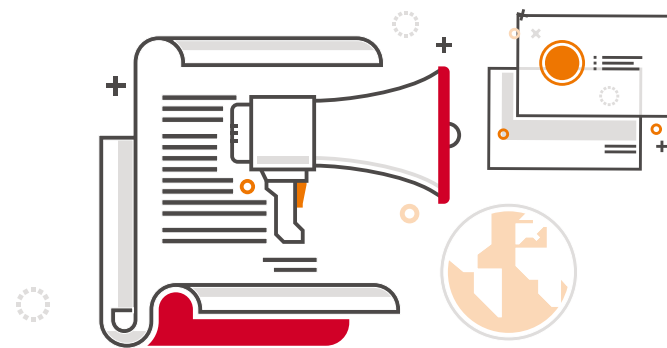


SK hynix has adopted and practices Business Continuity Plans that are built upon Globally accepted standard - ISO 22301
SK hynix and its constituents shall comply with this policy and carry out their respective roles and duties specified in Business Continuity Plans.

- 1. In the event of disaster, SK hynix utilizes all available resources in its business recovery in order to minimize the possibility of our clients’ business disruption.
- 2. SK hynix reviews The Business Continuity Plans annually, through periodic assessment of risk factors and their likely impacts.
- 3. SK hynix incorporates relevant regulatory requirements, legal and contractual obligations, and the interests of related parties. (especially SK hynix’s clients)
- 4. SK hynix performs periodic drills and tests based on various scenarios, as a means of mitigating risks that threaten continuity of SK hynix and to strengthen resilience.

 ⁴ Business Continuity Planning

5. SK hynix promotes a resilience culture throughout the company by providing continuous education and training to all personnel.
6. SK hynix maintains industry-leading Business Continuity Program through periodic reviews and improvements based on international standards (ISO 22301).
7. SK hynix releases Business Continuity Policy, mission and objectives to public and conducts periodic reviews.



Business Continuity Planning Management Policy
(SK hynix Policy: S2-Strategy Planning-005)
Emergency Preparedness Policy(SK hynix Policy: S2-SHE-107)

Tax Strategy*



SK hynix operates globally with subsidiaries in 12 countries. As a global leader in the semiconductor industry, we are dedicated to providing products with state-of-the-art technology that connect the world and make people's lives better.

Since our business can have a critical impact on the economy and society, we are deeply aware of our social responsibility in relation to tax. We meet our social duty voluntarily by completing our tax compliance requirements on time in each and every country we operate in. We comply with taxation regulations, not only because we are obliged to, but also because we believe that as a part of society, it is our self-imposed duty to grow responsibly alongside it. To achieve our duty in relation to taxation, we aim to:

- Understand and comply with tax laws, including the legislator's spirit and intention of tax legislation
- Recognize an appropriate amount of tax to each and every tax jurisdiction we operate in, based on value creation
- Prepare, submit and retain pertinent tax information in required forms on time, as required by tax laws and tax authorities
- Employ appropriately qualified and trained tax professionals, whom have knowledge and an understanding of our business
- Utilize professional tax advisers when intricate, uncertain or significant tax issues require specialized knowledge

1. Approach to tax risk management and governance

We have established policies and processes in place that are designed to ensure the integrity of our tax filings and all other tax compliance obligations worldwide. Our internal tax management team aims to deliver to the highest standards to effectively manage tax risk. Our aim to be compliant with tax laws helps to protect us against the impact that taxation risk may have on our future value creation.

1) Ensuring Global Compliance

We aim to abide by the compliance principles of each country where our business operates in. We aim to perform all our tax compliance duties including reporting and making tax payments in accordance with local tax laws as well as submitting relevant documents and data to tax authorities when required.

2) Transparent Trade

We have established a Transfer Pricing policy based on the ‘arm’s length principle’ that is generally accepted by all jurisdictions who abide by OECD principles and we strive to pay the proper amount of tax in each and every tax jurisdiction where income is generated.

Our finance division headquarter are responsible for the administration, preparation, revision and approval of our Transfer Pricing policy. The Global Head of Tax / Accounting presents any material revisions to the Transfer Pricing policy to the Audit / Compliance Committee of the Board on a quarterly basis.

3) Preparation of BEPS Documentation

In accordance with OECD’s (Organization for Economic Co-operation and Development) BEPS (Base Erosion and Profit Shifting) action plan, a considerable number of jurisdictions have promulgated revised tax laws. We understand the intent and context of the BEPS action plan and strive to comply with it by establishing updated policies and processes in line with these revised laws. We also aim to be compliant with our global Country by Country Reporting requirements.

2. Our attitude towards tax planning

We do not engage in any aggressive tax planning, including the use of tax havens. We strive to work tax efficiently as part of our overall business strategy, aiming to create the most value possible, whilst contributing to society. As part of our overall business strategy, we will consider a range of tax outcomes to a potential transaction as long as they support an underlying commercial rationale, support our value creation and ultimately our contribution to society. We work towards satisfying the interests of stakeholders such as society, employees and shareholders etc. by legitimate means with advice from professional tax advisers where necessary. Our intercompany transactions are performed based on the arm’s length principle, which is periodically updated in consideration of change in our business environment. We view our social responsibility highly and strive not to impair trust between society and ourselves with regard to tax planning.

3. The level of tax risk we are prepared to accept

We endeavor to comply with the tax laws in each jurisdiction in which we operate. However, we acknowledge that the elimination of all tax risk is impractical to the complexity of tax legislation and differences in interpretation that may arise. However, the Group is committed to the identification and monitoring of relevant significant tax risks. In these circumstances we will seek the guidance of professional tax advisors. In addition international tax laws are frequently revised and new laws added, therefore we seek to remain aware of these and act appropriately.

Our policies and governance focus on monitoring and identifying uncertain tax issues at the earliest possible moment. Where any tax law is unclear or subject to interpretation and this would have a significant business impact, we will engage with external tax advisers to ensure we remain compliant in all our operations and to ensure appropriate discussions and disclosure to tax authorities where applicable.

4. Our approach to dealings with tax authorities

Our engagement with Tax Authorities is an important and essential part of our taxation related activities. We aim for our engagement, with Tax Authorities, to be transparent, honest and professional. We believe that such an approach will enable us to mitigate or clear uncertainty in the most efficient way possible. Upon the request of Tax Authorities, we aim to provide relevant information through local accounting manager under control of global head of tax & accounting in a timely manner. We are also prepared to invest considerable efforts to reach an agreement with Tax Authorities when each party has a different point of view.



* Our published tax strategy applies to the SK hynix Group, including SK hynix UK Limited and is relevant for all UK taxes and duties. It has been satisfies Schedule 19 of the UK Finance Act 2016 in respect of the period ending 31 December 2018.

Corporate Security Policy



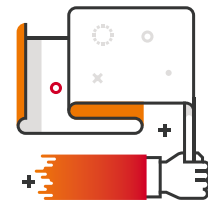
SK hynix seeks to pursue the sustainable corporate growth by establishing a security culture based on voluntary participation, bearing in mind that that its tangible and intangible assets as well as its key personnel and the industrial property are the source of corporate competitiveness and the industrial security campaign can therefore contribute not only to the future course of corporate development but to protecting the national interests as well.

- 1. To contribute to reinforcing the core competence and raising competitiveness by protecting tangible and intangible assets that include core technologies and the key personnel.
- 2. To observe the relevant laws and regulations governing industrial security, not to mention, to participate in the campaign protecting the business secrets of the partners and the trade connections.
- 3. To raise the security awareness of executives and staff members through education and a publicity campaign making efforts to establish a security environment.
- 4. To set up an organization unit with the relevant personnel assigned to, taking exclusive responsibility of industrial security activities, and to construct a systematically organized system with emphasis given to continuous management for enhancement.
- 5. To have the implementation of such policy diagnosed by an independent external specialist and use the results in promoting a corporate campaign for industrial security.



<http://www.skhynix.com/kor/support/induSecurity.jsp>

Antitrust Policy



SK hynix and its subsidiaries are committed to competing ethically, and complying with the spirit and letter of all applicable antitrust laws and regulations in the countries where it operates. No person – either employees or others acting on SK hynix’s behalf – is permitted to violate these laws or deviate from applicable antitrust laws and regulations.

1. Definition

A “Competitor” is a party who is or reasonably could be offering any products or services that compete with those offered by SK hynix. The term includes any individual connected to the competitor, such as its officers, directors, employees, agents, and vendors. In some cases, where a company is reasonably perceived by customers as a potential market entrant, it should be treated as though it were an existing competitor.

An “agreement” may take form of explicit understandings, either verbal or written. Also informal agreements, even unspoken ones, are often treated the same as formal agreements. Thus, a wink, nod, handshake, or any other indication of assent could be enough to infer an agreement for antitrust purposes.

2. Antitrust laws in general

Antitrust laws aim to promote competition, protect consumers, and prevent companies from unreasonably harming competition. Thus,

antitrust laws make it illegal for two or more parties to unreasonably restrain trade. Antitrust laws also prohibit a company from illegally monopolizing a market or attempting to do so.

This antitrust guideline (“Guidelines”) is intended to identify the key areas in which employees need to be cautious and aware of antitrust concerns. SK hynix employee is obligated to understand and comply with the Guidelines. In the event any antitrust issue arises, he/she must consult with or report such issue to Global Compliance Team without delay.

3. Agreements that unreasonably restrain competition

Antitrust laws prohibit two or more parties from agreeing to unreasonably restrain trade. The risk of antitrust violation is particularly high when the parties to the agreement are competitors. For example, antitrust laws forbid agreements between competitors to fix prices, reduce output, bid rigging, allocate markets or customers, or boycott a particular person or group.

An agreement between competitors raise serious antitrust concerns and creates a high risk of antitrust violation. However, even certain agreements between SK hynix and its suppliers or customers have the potential to violate the antitrust laws.

Reaching a formal agreement is not necessary for an antitrust violation to occur. For example an attempt to fix prices with a competitor may be unlawful, even if the attempt ultimately proves to be unsuccessful. Also even mere attendance at a meeting where competitors engage in an illegal discussion may imply acquiescence and make a nonparticipant responsible and subject to the same penalty as the active participants in the discussion. In such event, the participant must immediately leave the meeting and report it to Global Compliance Team.

Vertical agreement made with suppliers or clients can also be an antitrust violation. Before a contract is signed, be sure to contact Global Compliance Team if there are antitrust questions or concerns.

4. Information sharing

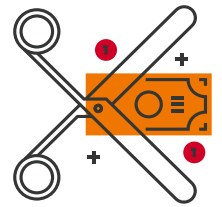
Antitrust laws prohibit competitors from sharing, directly or indirectly competitively sensitive information, including information on marketing, research and development, pricing, costs, profit margins, and capacity.

5. Violation of antitrust laws

Violation of antitrust laws is a serious matter and can result in criminal or civil penalties against SK hynix and the individual involved in the violation, as well as harm to the company's reputation. Employees, officers, directors, or others involved in a violation will be subject to discipline, up to and including termination.

All employees have a duty to report violations or suspicious circumstances that might indicate a possible violation of law or this Guidelines to Global Compliance Team. Employees MUST report all suspicious conduct and must not delay such a report. Often reports of suspicions, made early enough, will allow the company to intervene in a timely manner to prevent an actual violation from occurring.

Anticorruption Policy



SK hynix and its subsidiaries are committed to competing ethically and complying with all anti-corruption laws in the countries where it does business. Neither employees nor others acting on SK hynix's behalf is permitted to offer, accept, request, promise, or pay a bribe or to make any improper payment to further SK hynix's business.

Violation of any anti-corruption laws such as the U.S. Foreign Corrupt Practices Act, UK Bribery Act, or South Korea's Act on Combating Bribery of Foreign Public Officials in International Business Transactions can lead to fines and imprisonment for individuals and severe financial penalties and losses of business for SK hynix. This Anti-corruption policy ("Anti-Corruption Policy") contains important information to help employees comply with anti-corruption laws and to prevent, detect, and respond to anti-corruption issues should they arise.

Essentials of anti-corruption policy

1. Acceptance or provision of bribes

SK hynix's employees or agents acting on behalf of SK hynix must never offer, authorize, promise, demand, accept or promise to accept a bribe or anything of value or take any corrupt action on SK hynix's behalf.

2. Hosting & gifts for government entities & officials

Employees may appropriately provide hosting or gifts to government entities or officials while performing their duties for SK hynix provided that they are not exchanged for an improper purpose. Before providing hosting or gifts to government entities or officials, employees must ensure that the hosting or gift meets the minimum standards set forth in the Code and obtain written preapproval from Ethics Management Team.

3. Facilitation payments

A facilitation payment is a payment made to a government official in accordance with local custom for the purpose of securing or expediting a routine, nondiscretionary government action. Employees or others acting on SK hynix’s behalf are not permitted to make facilitation payments. Making payments to relatives, friends, or colleagues of a government official to improperly influence the individual with whom the recipient is affiliated is a type of corruption and is prohibited.

4. Charitable contributions

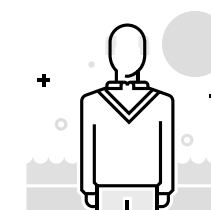
Charitable contributions that help SK hynix generate goodwill and give back to the communities where it operates can also present corruption risks. All charitable contributions made by SK hynix must be preapproved by Ethics Management Team, in accordance with SK hynix’s Code.

SK hynix shall also comply with the Company’s policies related to retention of third parties, new market entry such as joint ventures, mergers and acquisitions, record keeping, and any other policies and internal rules. Employees, officers, or directors involved in a violation of anti-corruption laws or this Anti-Corruption Policy will be subject to discipline by SK hynix, up to and including termination of employment.

Individuals may also incur criminal or civil penalties imposed by government authorities. All employees have a duty to identify anti-corruption violations in their area of responsibility, and to report violations or suspicious circumstances to their manager or the Ethics Management Team that might indicate a possible violation of law or this Anti-Corruption Policy. SK hynix is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicions or concerns that an actual or potential bribery or other corruption offence has taken place.

Version 1.0 of this document was published on April 1, 2019.

Supplier Code of Conduct



Every partner working with SK hynix should comply with the requirements indicated below and be qualified as a Global Company and exert their highest effort to satisfy SK hynix and its customers.

1. Labor & human rights

Suppliers shall establish a workplace devoid of illegal discrimination and harassment in terms of labor practices, and are committed to treat workers humanely without unreasonable restrictions or inhumane and harsh treatments. This applies to all workers including temporary, migrant, student, contract, direct employees and any other type of workers. All work must be voluntary and any form of forced labor including slavery or trafficking of persons shall be prohibited. All workers must be of age, and child labor is prohibited. Working hours should not exceed 60 hours per week, including overtime, and workers should be allowed at least one day off every seven days. Worker compensation shall comply with minimum wage, and there is to be no harsh and inhumane treatment, discrimination or confinement. Suppliers shall respect the rights of all workers to join trade unions of their own choosing.

2. Safety & health

Suppliers shall remove all risk factors and take preventive actions to maintain industrial safety, and worker health is to be protected

by providing appropriate personal protective equipment to workers in order to avoid exposure to safety hazards. Emergency plans and response procedures shall be implemented to minimize damage and procedures and systems must be established to manage industrial accidents and occupational illness. Workers are to be provided with cleanly maintained facilities and exposure to hazards of physically demanding tasks shall be prevented in advance. Production and other machinery shall be evaluated for safety hazards. Workers shall also be provided with clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories are to be maintained to be clean and safe.

3. Environmental

Suppliers shall comply with environmental permits, approvals and reporting requirements while abiding by the environmental/quality requirements of SK hynix. Suppliers shall adhere to applicable laws regarding solid waste, wastewater, air pollutants and site boundary noise to prevent environmental pollution and reduce use of resource. Suppliers are to comply with all applicable laws, regulations, and customer requirements regarding prohibition or restriction of specific substances in products. Suppliers shall also make continuous efforts to prevent contamination of storm water runoff and minimize energy consumption and greenhouse gas emissions.

4. Ethics

All Suppliers are to uphold the highest standards of integrity in all business transactions by pursuing fair business and competition and ensuring full compliance with laws related to business activities while respecting business practices. Suppliers shall follow the Fair Trade Compliance System to ensure all business transactions adhere to the law and shall operate programs that ensure the confidentiality, anonymity and

protection of Supplier and employee whistleblowers while prohibiting retaliation. All business dealings should be transparently performed and all activities carried out to gain an improper advantage shall be prohibited. Appropriate means shall be taken to respect and safeguard intellectual property rights, standards of fair business, customer information and personal information. This shall be the foundation of the contribution made for the sustainability of the local community.

5. Responsible sourcing minerals

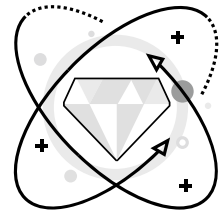
Suppliers shall clearly identify the source and chain of raw materials and minerals distributed to the entire Supply chain, and shall assure that the minerals in products they manufacture do not directly or indirectly finance or benefit armed groups that are the perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country (Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia, Angola, the Central African Republic).

6. Management system

Suppliers shall adopt and establish a management system that adheres to the relevant laws and this Code, and the content states that the following shall be managed: 1) Commitment to compliance and clear identification of corporate responsibilities, 2) applicable laws and codes, 3) recognition of customer requirements and monitoring, 4) environmental, health and safety, labor practices, and ethical risk evaluation and management related to operations, 5) targets and performance evaluations, 6) programs for training managers and workers, 7) corrective action process, 8) worker feedback and participation, 9) regular evaluations to ensure regulatory compliance and conformity to company requirements. The requirements of this Code shall be shared to Suppliers to be followed.



Conflict Minerals Policy

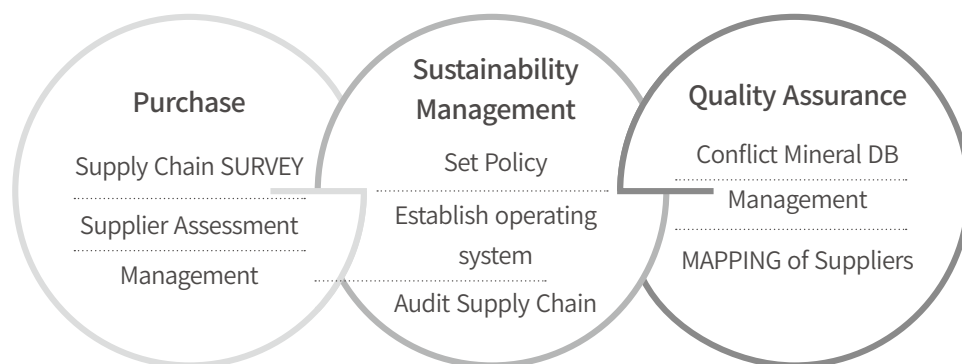


SK hynix is sympathetic to the social significance of limiting the use of conflict minerals. Accordingly, we systematically respond to the use of conflict minerals in the product production process. We, SK hynix, define "conflict mineral" as 3TG minerals such as gold-tungsten, tin, tantalum, etc., which are illegally mined in the Democratic Republic of the Congo (DRC) or neighboring countries and we have established a conflict mineral management process.

SK hynix continuously strives to gain a better understanding about the use state of supply chain conflict minerals and will constantly make every effort to expand the CFS certification* of smelters within the cooperative firm supply chain.

1. Operating system of conflict minerals

SK hynix is establishing and operating a conflict mineral management operation process based on cooperation between purchase, continuous business and quality control groups.



2. Fact-finding Process

STEP1 Target Selection

- Research information of mineral based on data from product BOM (Bill of Material)
- Distinguish suppliers that pose a conflict mineral threat



STEP2 Fact-finding

- Build written audit plan for target suppliers
- Announce written audit and request material
- Review material



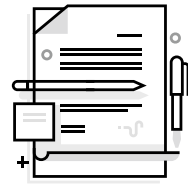
STEP3 Improvement Management

- Demand improvement from CFS non-certified smelters
- Submit mission and improvement plan of supply chain
- Monitor improvement status



* Conflict-Free Smelter Certification: Certification for smelters not using conflict minerals

Slavery and Human Trafficking Statement



On January 1, 2012, the California Transparency in Supply Chains Act of 2010 (SB 657) went into effect in the State of California. The Act requires manufacturers and retailers to disclose their efforts to prevent possible slavery and human trafficking in their supply chains. The U.K. Modern Slavery Act of 2015 requires similar disclosures. The purpose is to allow the customers to make more informed decisions about the products they buy and the companies they support.

SK hynix, along with its subsidiaries, is committed to respecting and supporting human rights globally within our own organization and within our supply chains. All members of supply chains have a duty to comply with SK hynix Supplier Code of Conduct as well as the RBA Code of Conduct and labor laws of all countries and regions where they operate.

1. Our Business, organizational structure, and supply chains

SK hynix became the first in Korea to complete the pilot production of 16 Kb SRAM in 1984. Since then, SK hynix has been taking the lead in driving technological development by introducing innovative semiconductor products that are the world's first, smallest and fastest. SK hynix has four production sites – Icheon and Cheongju in Korea as well as in Wuxi and Chongqing in China – and sales subsidiaries in ten countries, including the U.S., the U.K., Germany, Singapore, Hong

Kong, India, Japan, Taiwan and China. SK hynix also operates four R&D offices in Italy, the US, Taiwan and Belarus. More information regarding SK hynix's structure and values can be found in our Sustainability Report on our website.

Our suppliers provide us with goods, including production equipment, materials, and components, as well as services that are used in semiconductor production.

2. Verification of product supply chains

SK hynix communicates with major suppliers in order to ensure their compliance with the RBA Code of Conduct and has the procedure to verify whether they comply with the RBA Code of Conduct. The verification is conducted by both SK hynix and a third party. SK hynix also requires the suppliers to adopt and establish a management system that adheres to SK hynix Supplier Code of Conduct. This Code requires compliance with all applicable laws, including that all work must be voluntary and any form of forced labor including slavery or human trafficking of persons shall be prohibited.

3. Supplier audits

SK hynix or a professional organization designated by SK hynix may visit suppliers to ensure that suppliers are operating in full compliance with SK hynix Supplier Code of Conduct. SK hynix or a third party professional organization announces audits to the supplier.

4. Certification of compliance with laws

All organizations that may design, market, manufacture or provide goods and services that are used to produce goods of SK hynix are required to comply with all applicable laws, including provisions directed at preventing slavery or human trafficking.

5. Internal accountability

SK hynix or a third-party professional organization may designate the deadline and the level of corrective actions when a supplier violates SK hynix Code of Conduct or the RBA Code of Conduct.

6. Training

SK hynix currently provides employees and managers who have direct responsibility for supply chain management with training on human rights, including slavery and human trafficking.

7. Statement approval

This statement has been made pursuant to Section 54(1) of the UK Modern Slavery Act and the California Transparency in Supply Chains Act of 2010 (SB 657), for the financial year ending December 31, 2019.

This statement has been approved by the Board of Directors of SK hynix UK Limited on March 20, 2019.



Lee Ho-Sang
Director of SK hynix UK Office and
BOD Chairman of SK hynix UK Office
March 20, 2019

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