

Company Name SK Hynix
Industry ICT (Own operations and Supply Chain)
Overall Score 23.6 out of 100

Theme Score	Out of	For Theme
2.3	10	A. Governance and Policies
5.4	25	B. Embedding Respect and Human Rights Due Diligence
5.0	20	C. Remedies and Grievance Mechanisms
6.1	25	D. Performance: Company Human Rights Practices
4.7	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: General HRs commitment: The Human Rights policy states that 'we pledge to respect human rights in all our actions and decisions based on this policy'. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to the UNGPs • Not Met: Commitment to the OECD Guidelines for Multinational Enterprises: The Company's Sustainability Guidelines indicates: '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'. However, although the Sustainability guidelines contain some of the Company's policies, this piece of evidence is not included in these specific policy text. This indicator only considers formal policy documents/text under CHRB's revised approach. The Human Rights policy states that it 'advocates the following declarations, standards and initiatives: [...] OECD Guidelines for Multinational Enterprises'. However, 'advocate' is not considered a formal commitment to the initiative according to CHRB wording criteria. This datapoint was previously assessed as Met based on the Company's 2020 Sustainability Report which CHRB no longer considers a suitable source for policy statements. [Human Rights and Labour Rights Policy, 11/2021: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net]
A.1.2.a	Commitment to respect the human rights of workers: ILO	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Company has a commitment to the ILO Core: The Human Rights and Labor Policy 'advocates the following declarations, standards, and initiatives. (...) ILO Fundamental Principles and Rights at Work'. However, 'advocates' is not

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	Declaration on Fundamental Principles and Rights at Work		<p>considered a formal statement of commitment according to CHRB wording criteria. [Human Rights and Labour Rights Policy, 11/2021: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net]</p> <ul style="list-style-type: none"> • Not Met: Company has a explicit commitment to All four ILO Core: The Company Human Rights and Labour Rights policy lists all four ILO commitment. With respect to freedom of association and collective bargaining, it states: 'Freedom of association and collective bargaining rights are guaranteed based on labor laws and regulations of individual countries and regions, and employees must not be treated unfavorably or discriminated against on the grounds of joining or forming a labor union or participating in related activities'. However, it is not clear whether it is committed to respect these rights in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'are guaranteed based on labor laws and regulations of individual countries and regions'. [Human Rights and Labour Rights Policy, 11/2021: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company expect suppliers to commit to ILO Core • Not Met: Company explicitly list All four ILO for suppliers: The Company's Supplier Code of Conduct covers non-discrimination, forced and child labour, of association, freedom to join the labour union. However, there is no mention to Collective Bargaining. The Company's suppliers are required to abide by the HR Policy. However, as indicated above, it is not clear whether the Company requires to seek alternative mechanisms in those locations where the exercise of these rights are restricted under local law. [Suppliers Code of Conduct Guidelines, N/A: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] & [Sustainability Guidelines, 03/2019: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to respect H&S of workers: The Safety, Health Environment Policy states: 'Adopt safety and health management as core value and establish industry-leading standards to establish a safe and healthy working environment for staff members. Enhance the safety and health level based on continuous innovation on and system advancement for a safe operation of the overall production process. Create a healthy working environment for staff members of both SK Hynix and business partners, and detect and resolve risks and hazards'. [Safety Health & Environment Policy on web, 19/01/2022: skhynix.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: According to its Human Rights Policy: 'Regular working hours, overtime hours, break time, and holidays are determined in alignment with the more stringent of either international standards or local labor laws and regulations of the country or region in which the workplace is located. Overtime shifts require the voluntary agreement of workers and the payment of overtime allowances pursuant to local labor laws and regulations of each country or region'. However, no evidence found of references to standard weekly hours or the Company explicitly committing to respect ILO conventions on working hours. [Human Rights and Labour Rights Policy, 11/2021: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: The Company states in its Supplier Code of Conduct: 'Suppliers shall remove all risks for industrial safety and take necessary preventive measures accordingly. As for industrial hygiene, they shall provide appropriate individual protective gears for employees to prevent the exposure to risk factors. In addition, they shall acquire all safety and health approvals as a basic step, set up an emergency plan and response procedures to minimize damage, and establish a procedure and system to manage industrial disaster and occupational disease. Suppliers shall keep the places for work clean, pre-emptively control the risks of manual labor, evaluate and remove the hazards related to pregnant women, and production and other facilities. In addition, they shall provide employees with clean restrooms, drinking water, and clean cooking, storage and cafeteria facilities. And employee dormitories shall be kept clean and safe'. [Suppliers Code of Conduct Guidelines, N/A: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Supplier Code of Conduct indicates suppliers shall comply with: 'compliance to the weekly 52 work-hour limit'. However, according to CHRB standards, suppliers are expected to commit to the ILO conventions on labour standards on working hours or the company has a public expectation that its

Indicator Code	Indicator name	Score (out of 2)	Explanation
			suppliers shall not require workers to work more than 48 hours in a regular work week or 60 hours including overtime. [Supplier Code of Conduct, 03/2021: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net]
A.1.3.a.ICT	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (ICT)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Responsible mineral sourcing: The Responsible Minerals policy states that 'SK hynix recognizes that the violation of human rights such as labor exploitation alongside ecosystem damage and environmental pollution that occur in the process of sourcing minerals from conflict-affected and high-risk areas are serious matters and is fully committed to eradicating them. SK hynix, in line with the OECD due diligence guidance, tracks and manages its entire supply chain in a transparent manner to ensure responsible purchasing of minerals.' [Responsible Minerals Policy on web, N/A: sustainability.skhynix.com] • Met: Based on OECD Guidance: It also indicates: 'SK hynix recognizes that the violation of human rights such as labor exploitation alongside ecosystem damage and environmental pollution that occur in the process of sourcing minerals from conflict-affected and high-risk areas are serious matters and is fully committed to eradicating them. SK hynix, in line with the OECD due diligence guidance, tracks and manages its entire supply chain in a transparent manner to ensure responsible purchasing of minerals.' [Responsible Minerals Policy on web, N/A: sustainability.skhynix.com] • Met: Requires suppliers to commit to responsible mineral sourcing: It indicates: 'Suppliers shall clearly define the sources of minerals that are distributed in the supply chain, such as tantalum, tin, tungsten, gold, cobalt, etc., based on the OECD guideline or equivalently recognized inspection framework, and guarantee that mineral mining for products and equipment is conducted legally and humanely.' [Supplier Code of Conduct, 03/2021: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commits to follow OECD Guidance for all minerals: The Responsible Minerals Policy indicates 'SK Hynix aims to responsibly procure all minerals used in the production of semiconductors in accordance with the OECD Due Diligence Guidance'. However, as stated above, 'based on' is not considered a formal statement of commitment according to CHRB wording criteria. [Responsible Minerals Policy on web, N/A: sustainability.skhynix.com] • Not Met: Suppliers expected to make similar requirements of their suppliers: It indicates: 'Suppliers shall clearly define the sources of minerals that are distributed in the supply chain, such as tantalum, tin, tungsten, gold, cobalt, etc., based on the OECD guideline or equivalently recognized inspection framework, and guarantee that mineral mining for products and equipment is conducted legally and humanely'. However, it is not clear this commitment covers all minerals. In addition, 'based on' is not considered a formal statement of commitment according to CHRB wording criteria. [Supplier Code of Conduct, 03/2021: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net]
A.1.3.b.ICT	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (ICT)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Women's rights: The Company states that 'We respect and protect the human rights of the socially disadvantaged as defined by the United Nations Universal Declaration of Human Rights (UDHR). In particular, we fulfill our responsibilities and obligations to respect and protect the rights of vulnerable groups, including children, women, people with disabilities, and migrant workers, based on the ILO Declaration on Fundamental Principles and Rights at Work.' [Human Rights and Labour Policy, 06/2022: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] • Met: Children's rights: See above. [Human Rights and Labour Policy, 06/2022: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] • Met: Migrant worker's rights: See above. [Human Rights and Labour Policy, 06/2022: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] • Met: Expects suppliers to respect at least one of these rights: The Company further states that 'This Policy illustrates the basic obligations that should be fulfilled by our employees, suppliers, joint ventures, and others who engage in transactions with us. Our suppliers are required to conform to the Supplier Code of Conduct and Guidelines in addition to this Policy' [Human Rights and Labour Policy, 06/2022: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: CEDAW/Women's Empowerment Principles • Not Met: Child Rights Convention/Business Principles: The Company's Sustainability Guidelines indicates: 'In addition, with 'Universal Declaration of

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			<p>Human Rights' SK Hynix supports and respects various global organizations' human rights and labor protection standards, including (...) UN Convention on the Rights of Children'. It also states that 'We hereby declare that our employees, subsidiaries, subcontractors, suppliers, and J/V employees will comply with SK Hynix Sustainability Guidelines'. However, although the Sustainability guidelines contain some of the Company's policies, this piece of evidence is not included in these specific policies. This indicator only considers formal policy documents/text under CHRB's revised approach. [Sustainability Guidelines, 03/2019: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net]</p> <ul style="list-style-type: none"> • Not Met: Convention on migrant workers • Not Met: Expecting suppliers to respect these rights: The Company's Sustainability Guidelines indicates: 'In addition, with 'Universal Declaration of Human Rights' SK Hynix supports and respects various global organizations' human rights and labor protection standards, including (...) UN Convention on the Rights of Children'. It also states that 'We hereby declare that our (...) suppliers, and J/V employees will comply with SK Hynix Sustainability Guidelines'. However, although the Sustainability guidelines contain some of the Company's policies, this piece of evidence is not included in these specific policy text. This indicator only considers formal policy documents/text under CHRB's revised approach. [Sustainability Guidelines, 03/2019: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net]
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: The Company commits to remedy: The Company's grievance procedures include: 'When a human rights violation is reported, remediation is discussed after investigating and reviewing the related details'. However, no publicly available policy statement found committing it to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to. [Human Rights and Labour Rights Policy, 11/2021: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] • Not Met: Company expect suppliers to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives • Not Met: Work with suppliers to remedy impact
A.1.5	Commitment to respect the rights of human rights defenders	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Zero tolerance attacks on HRs Defenders (HRDs): The Company indicates that 'We respect individuals, organizations, and social institutions taking action to protect human rights and freedom (hereinafter referred to as "human rights advocates"). We are aware of dire difficulties that human rights advocates around the world face in their activities to promote human rights and firmly stand against all forms of threats, intimidation, retaliation, and physical and psychological attacks against them'. [Human Rights and Labour Rights Policy, 11/2021: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] • Met: Company expect suppliers to make this commitment: The Human Rights and Labour Policy states that 'This Policy illustrates the basic obligations that should be fulfilled by our employees, suppliers, joint ventures, and others who engage in transactions with us. Our suppliers are required to conform to the Supplier Code of Conduct and Guidelines in addition to this Policy.' Furthermore, the Supplier Code of Conduct states that ' throughout the business process, suppliers shall not commit any act that threatens human rights advocates.' [Human Rights and Labour Policy, 06/2022: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] & [SK hynix Suppliers Code of Conduct v.2.4, 2022: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Work with HRD to create safe and enabling environment: The Company states in its Human Rights and Labour Policy that 'We also work hand-in-hand with human rights advocates in an effort to build a safe civil society.' [Human Rights and Labour Policy, 06/2022: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net]

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Board level responsibility for HRs: The Company states that 'We strive to realize human rights management and ensure respect for human dignity and the protection of human rights in every aspect of our business operation. Our human rights governance comprises of the Board of Directors, executive management, and relevant organizational units. The Board of Directors and the Sustainability Committee, which is a committee under the Board of Directors, serve as the highest decision-making body regarding human rights. The CEO receives reports about human rights issues, makes decisions on the salient human rights issues, and reviews our related performance.' [Human Rights Report 2021, 2021: skhynix.com] • Not Met: Describe HR expertise of Board member <p>Score 2</p> <ul style="list-style-type: none"> • Met: Speeches/letters by Board members or CEO: The two Co-CEOs made a statement fully devoted to the Company's human rights commitments. [Human Rights Report 2021, 2021: skhynix.com]
A.2.2	Board responsibility	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board/Committee review HRs strategy • Not Met: Examples/trends re HR discussion in the last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Incentives for at least one board member • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board process to review bussiness model and strategy • Not Met: Describe frequency and triggers for reviewing <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a • Met: Senior responsibility for HR implementation and decision making: The Company indicates that 'At SK hynix, the ESG Management Committee, which is chaired by the CEO and composed of executives from each relevant department, is the supreme decision-making body, in charge of distributing personnel and resources about major ESG elements including human rights.' [Human Rights Report 2022, 2022: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How it assigns Day-to-day responsibility: The Company also states that 'In terms of day-to-day level of responsibility, various departments such as Corporate Culture and Procurement, perform tasks in their respective areas.' [Human Rights Report 2022, 2022: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Day-to-day resources and expertise allocation in own ops: The Company further elaborates that 'ESG Strategy Department actively identifies salient human rights areas and conducts human rights impact assessments. The HR department is responsible for compliance with labor standards and related regulations, revision, and management. The Talent Growth department is responsible for empowering members and improving organizational culture. The Employee Relations department is responsible for creating a positive working relationship between labor union and management and also supporting labor unions. The Industrial Security department is in charge of information security, such as personal information protection.' [Human Rights Report 2022, 2022: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] • Met: Resources and expertise allocation in the supply chain: The Company further states that 'The Procurement Strategy department is involved in supply chain activities, and the Safety, Health and Environment department is involved in occupational safety and health. The Legal department conducts human rights risk assessment on worksites based on RBA regulation.' [Human Rights Report 2022, 2022: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net]
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Senior manager incentives for human rights • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: HR risks is integrated as part of enterprise risk system: Although the Company indicates: 'We currently operate a wide range of management consultative bodies to efficiently handle complex risks that require collaboration with each managing department. We manage the non-financial areas as well as those classified as financial risks on a company-wide level in an integrated manner through the ESG Committee, BCP (Business Continuity Plan) Committee, and internal control CoE' and also mentions 'HRMS for comprehensive ESG risk management', it is not clear how Human Rights are included and integrated in the enterprise risk management. Nothing further found in latest revision. [Sustainability Report 2019, 2019: d36ae2cxt9mcr.cloudfront.net] & [2020 Sustainability Report, 07/2020: skhynix.com] • Not Met: Provides an example <p>Score 2</p> <ul style="list-style-type: none"> • Met: Audit Ctte or independent risk assessment: The Company indicates on its Sustainability report that 'We have established a process for inspecting human rights and labor issues, and we regularly assess the risks associated with those issues and make corrections as needed. Importantly, we conduct a human rights impact assessment at our business sites both inside and outside Korea, identifying the potential for human rights issues to occur at each location. The 2021 human rights impact assessment covered our operations in Korea (Icheon and Cheongju sites) and China (Wuxi and Chongqing sites), and Hitech, a joint venture. High risk factors were not in present in our Icheon, Cheongju, Wuxi, and Chongqing sites, but some high-risk factors were found in Hitech, confirming the need for human rights risk management. We identified about 120 improvement tasks across all sites, and 40 short-term tasks were 100% completed.' [Sustainability Report 2022, 2022: skhynix.com]
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a • Met: Communicates its policy to all workers in own operations: The Company indicates that 'our people receive human rights training as part of our effort to mitigate human rights risks. In addition, it says 'employees complete a training course that is mandatory companywide'. [Sustainability Report 2022, 2022: skhynix.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder • Not Met: How policy commitments are made accessible to audience: The Company indicates the declaration of its Ethics Management to its stakeholders in order to assure compliance. However, no further details found. [Sustainability Report 2021, 2021: skhynix.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Meets ILO requirement for suppliers on A.1.2.a • Not Met: Steps to communicate policy commitments to supply chain • Met: Requires suppliers to communicate policy requirements: The Code of Suppliers Conduct states that 'Suppliers shall not only make effort to comply with the Code, but also require other companies in the downstream supply chain to comply with it as well.' [SK hynix Suppliers Code of Conduct v.2.4, 2022: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: The Company states that 'We implemented the Supplier Code of Conduct to effectively manage social and environmental risks in relation to our suppliers and made it mandatory to abide by the standard contract forms.' [Human Rights Report 2021, 2021: skhynix.com] • Not Met: Company requires suppliers to cascade down to their suppliers
B.1.5	Training on Human Rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Scores at least 1 on A.1.2.a • Met: How workers are trained on HR policy commitments: The company indicates 'our people receive human rights training as part of our effort to mitigate human rights related risks. Employees complete a training course that is mandatory companywide and additionally are offered the human rights program run by the UN Global Compact Network Korea via an online platform.' [Sustainability Report 2022, 2022: skhynix.com] • Met: Trains relevant managers including procurement: The 2022 Human Rights report indicates that 'SK hynix provides human rights education to all members, including procurement managers, through its human rights management training materials of SK Group's education platform, mySUNI. Onsite ESG assessment is conducted in collaboration with the ESG Strategy department and external specialized organizations, and the procurement managers participate in the assessment procedure to take training on ESG risk management, including human rights and supply chain.' [Human Rights Report 2022, 2022: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet company's HR commitment • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Scores at least 1 on A.1.2.a • Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company states that Validated Audit Process covers 100% of its own operation, which includes labour and human rights audit. In addition, the Company discloses the ratio of the issues identified and the ratio of the risks improved. In its 2020 Sustainability Report, the Company discloses it 'manages labor and human rights risks throughout its supply chain based on the RBA VAP (Validated Audit Process). ESG Consulting includes standards for key aspects of the RBA code and domestic laws and provides consultation to our suppliers in managing the risks associated with human rights and labor practice (including safety, health and environment) in the supply chain'. [2020 Sustainability Report, 07/2020: skhynix.com] & [Sustainability Report 2019, 2019: d36ae2cxt9mcr.cloudfront.net] • Met: Proportion of supply chain monitored: The Company states in its 2022 Human Rights report that 'SK hynix conducted an ESG online self-assessment about human rights/labor items on 923 out of 1,032 suppliers in 2021 and monitored about 89% of the entire group of suppliers. Among the monitored suppliers, high-risk or critical suppliers, SK hynix is conducting on-site assessment, and workers of the suppliers are participating in the on-site assessment and corrective action process' [Human Rights Report 2022, 2022: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] • Not Met: Describe how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Describes corrective action process • Met: Disclose findings and number of corrective action: The Company states that in 2018, 'plans were established to improve overtime, extra training hours for OT and probation period and follow-up process was taken to ensure its compliance.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			We also conducted interviews and inspections of suppliers operating within our company, and corrective measures were taken against RBA training, and ethics training'. [2020 Sustainability Report, 07/2020: skhynix.com] & [Sustainability Report 2019, 2019: d36ae2cxt9mcr.cloudfront.net]
B.1.7	Engaging and terminating business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: HR affects selection of suppliers • Not Met: HR affects on-going supplier relationships Score 2 <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights • Not Met: Working with suppliers to meet HR requirements
B.1.8	Approach to engagement with affected stakeholders	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The Company indicates that it 'organizes key stakeholders into six groups in consideration of accountability, influence, dependence, and interest. We actively communicate with stakeholders through various channels to identify issues of interest and needs, and share our responses.' A table shows the list of stakeholders which includes workers and local communities and the channels used to communicate/engage with them. [Sustainability Report 2022, 2022: skhynix.com] • Met: Discloses stakeholders that HRs may be affected: The Company states that 'Our stakeholders concerning human rights include our employees, our suppliers, local communities, the government and NGOs, etc.' [Human Rights Report 2021, 2021: skhynix.com] • Met: Provides two examples of engagement with stakeholders: The Company describes examples of stakeholder engagement in its 2022 Sustainability Report. It states that 'The management at suppliers must also take interest and make efforts for their employee safety levels to rise. To this end, we established the safety meeting for suppliers in 2021. The Manufacturing/Technology chief oversees these safety meetings, and the supplier CEOs are invited to attend. They provide training on actual accident case studies and potential accident scenarios, and they end with all participants declaring their firm commitment to employee safety.' A second example is describes as 'SK hynix established the Communication & Consensus Planning Group (CCPG) in August 2021 to improve the organizational culture by innovating intracompany communication. Employees throughout the company who wanted to take part in the CCPG were brought together, and seventy-two of them were selected to be members. The selections were made in consideration of having balanced representation with respect to employee age, gender, rank, and organizational unit.' [Sustainability Report 2022, 2022: skhynix.com] Score 2 <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues • Not Met: Describe how views influenced company's HR approach

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Identifying risks in own operations: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. Additional documents or its content have not been found in publicly available sources. • Met: Identifying risks through relevant business relationships: The Company states within its Supply Chain Risk Management system: 'SK Hynix is carrying out risk identification and analysis focused on sustainability issues and global trends as well as social and environmental factors of local community. In particular, we identify the overall risk level based on stakeholders' demands (customers' compliance with the CSR codes, pledge for compliance, domestic/overseas regulatory changes, materiality assessment, etc.), consultation and due diligence'. In addition, the Company discloses its key risk factors and level, which includes Compliance with labour human rights laws among suppliers . [Sustainability Report 2019, 2019: d36ae2cxt9mcr.cloudfront.net] Score 2 <ul style="list-style-type: none"> • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts • Not Met: Triggered by new circumstances • Not Met: Describes risks identified

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.2	Assessing human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describe process for assessment of HR risks and discloses salient HR issues: The Company states in its Human Rights Report 2021 that 'We perform HRIA at all our business sites to systematically review our policies, procedures, and programs concerning human rights issues, identify potential human rights issues of individual business sites, and come up with improvement measures. HRIA is performed as self-assessment based on the checklist developed in-house. We held prior presentations to ensure the participants' understanding of this assessment. The checklist, developed based on domestic and international human rights standards and guidelines¹), comprises of 133 indicators in 10 sectors and is designed to review policies, procedures, and programs of individual business sites to advance human rights management. In 2021, domestic business sites 2), overseas business sites 3), and joint ventures in the manufacturing sector (Hitech Semiconductor, etc.) 4) were assessed. The assessment results were analyzed and improvement tasks were defined for each business site.' [Human Rights Report 2021, 2021: skhynix.com] • Met: How process applies to supply chain: The Company states that 'SK hynix has an assessment system in place for (1) identifying the overall ESG risk factors (covering the labor and human rights areas), both potential and real, threatening the SK hynix supply chain, and (2) mitigating or improving these factors. The supply chain ESG assessment covers five key focus areas (Labor & Human Rights, Health & Safety, the Environment, Ethics, and Management System) and consists of a checklist for 131 indices. We established an online platform for carrying out the self-diagnosis activities, in response to the special circumstances posed by COVID-19 and considering the convenience of supplier companies.' The company goes on to describe the procedure. [Human Rights Report 2022, 2022: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] • Met: Public disclosure of the results of HR assessment: The Company published the results of its HRIA in its 2021 Human Rights report. [Human Rights Report 2021, 2021: skhynix.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets all requirements under score 1 • Not Met: How it involved affected stakeholders in the assessment
B.2.3	Integrating and acting on human rights risks and impact assessments	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Action Plans to mitigate risks: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. This indicator looks for evidence of risk-based approach action plans to broadly mitigate salient risks faced by the Company. Current evidence seems to refer to compliance monitoring corrective plans. • Not Met: Description of how global system applies to supply chain • Not Met: Example of actions decided on at least 1 salient HR issues <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: System for tracking or monitor if actions taken are effective: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. • Not Met: Lessons learnt from checking system effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company 'has an anonymous bulletin in our intranet where employees can report human rights issues. We encourage victims or witnesses to immediately report any issues through the bulletin, and when issues are identified, we take appropriate actions under relevant regulations after conducting investigations'. [2020 Sustainability Report, 07/2020: skhynix.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Channel is available in all appropriate languages and workers aware: The online service is offered in the local languages of the corresponding regions in which we operate in addition to Korean, English, and Chinese. [Sustainability Report 2021, 2021: skhynix.com] • Met: Describe how workers in the supply chain have access to grievance mechanism: The Company states in its 2022 Human Rights Report that 'all stakeholders of SK hynix, including its suppliers, can access the SK Ethics Hotline through the website. Through the reporting system, they can report various grievances, including fraud or abuse of power in the company.' In its 2021 Human Rights report the Company further states that 'We are equipped with channels for reporting human rights violations. We operate an intranet bulletin that guarantees anonymity while offering ethical management counseling for and receiving related reports from external and internal stakeholders both online and offline. The online service is offered in the local languages of the corresponding regions in which we operate in addition to Korean, English, and Chinese.' [Human Rights Report 2021, 2021: skhynix.com] & [Human Rights Report 2022, 2022: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] • Not Met: Expect Suppliers to convey expectation to their own suppliers: The Company states: '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.' However, it is not clear whether Human Rights concerns are included in the programs mentioned. [2020 Sustainability Report, 07/2020: skhynix.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Company operates 'online and offline communication channels to ensure that our stakeholders can freely report on ethics-related issues and receive consultations.' Local communities are listed as stakeholders. [2020 Sustainability Report, 07/2020: skhynix.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages and stakeholder awareness: As above. The company indicates 'The online service is offered in the local languages of the corresponding regions in which we operate in addition to Korean, English, and Chinese.' [Human Rights and Labour Rights Policy, 11/2021: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] • Met: Communities access mechanism direct or through suppliers: The Company states in its 2022 Human Rights Report that 'all stakeholders of SK hynix, including its suppliers, can access the SK Ethics Hotline through the website. Through the reporting system, they can report various grievances, including fraud or abuse of power in the company.' The Company further states that 'We are equipped with channels for reporting human rights violations. We operate an intranet bulletin that guarantees anonymity while offering ethical management counseling for and receiving related reports from external and internal stakeholders both online and offline. The online service is offered in the local languages of the corresponding regions in which we operate in addition to Korean, English, and Chinese.' [Human Rights Report 2021, 2021: skhynix.com] & [Human Rights Report 2022, 2022: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] • Not Met: Expect supplier to convey expectation to their own suppliers
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engages users to create or assess system: Although the company provide a table with key stakeholders, it is unclear how the company engages with users to create or assess the grievance mechanism system. [Sustainability Report 2022, 2022: skhynix.com] • Not Met: Examples (at least two) of how they do this

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Response timescales and how complainants will be informed • Not Met: Describe support (technical, financial, etc) available for equal access by complainants <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Escalation to senior/independent level: The company indicates 'Among the matters reported, those that are materially illegal or improper shall be escalated and reported to the CEO in accordance with our internal regulations.' However, it is not clear if escalation is an option to the complainant [Human Rights and Labour Rights Policy, 11/2021: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net]
C.5	Prohibition of retaliation for raising complaints or concerns	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: The Company indicates that 'The informant(s) will not be subject to unfavorable status or discrimination due to filing a report' and also that 'We ensure that whistleblowers are not exposed to retaliation such as discrimination in terms of status and working conditions and emphasize that revealing whistleblowers'. [Human Rights Report 2021, 2021: skhynix.com] • Met: Practical measures to prevent retaliation: See above. The Company states that operates it 'the informant protection program, which guarantees the anonymity of all informants, to prevent retaliation, such as disadvantages in relation to status or discrimination in work conditions. We clearly state that disclosure of the identity of informants is a cause for serious disciplinary action. In 2019, we imposed stricter disciplines in the confirmed unethical practice cases in order to establish an upright ethical management culture, and thereby enhanced employees' awareness about this matter'. [2020 Sustainability Report, 07/2020: skhynix.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Complainants not asked to waive rights: The company state 'our reporting and grievance process neither requires the waiver of legal rights nor impedes the access to judicial or non-judicial procedures, and in the event it is required, we actively cooperate with non-judicial relief procedures of government agencies.' [Human Rights and Labour Rights Policy, 11/2021: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] • Not Met: Company does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes how remedy has been provided: The company state 'When a human rights violation is reported, remediation is discussed after investigating and reviewing the related details. We make sure to keep all information related to the reported incident and whistleblower confidential and to protect the whistleblower from any possible retaliation.' No further information found on how the company provided remedy. [Human Rights and Labour Rights Policy, 11/2021: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] • Not Met: Says how it would provide remedy for victims if no adverse impact identified <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Changes to systems, processes and practices to stop similar impact • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Number grievances filed, addressed or resolved and outcome achieved: On its Sustainability Report, the Company reports on the number of 'Ethical Grievance Status' and how they have been resolved for the past three reporting periods. The numbers include grievances on discrimination, harassment and unethical conduct for example. [Sustainability Report 2022, 2022: skhynix.com] • Not Met: How lessons from mechanism improve management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.a	Living wage (in own production or manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Pays living wage or sets target date: The Company indicates 'We set wages at a level that exceeds the minimum wage required by law in the countries in which we operate and pay them on the present date with a salary slip. We pursue to provide a living wage. We assess their performance and capacity based on fair criteria and offer rewards accordingly. We also operate procedures through which our employees can state their intention to appeal if they find the results of such assessment and rewards unsatisfactory. • Not Met: Describes how living wage determined <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Paying living wage • Not Met: Definition of living wage reviewed with unions
D.4.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Discloses living wage requirements in supplier code or contracts • Not Met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.4.2	Aligning purchasing decisions with human rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Avoids business model pressure on HRs (purchasing practices): The Company states that 'SK hynix recognizes that price policies, short-term demands, or related business activities that are difficult for suppliers to accept can shift the burden of human rights violations such as excessive working hours, worsening wages and benefits. Therefore, we have established our own payment terms so that small and medium-sized suppliers, especially those who are vulnerable to these factors, can receive cash payments within 10 days.' [Human Rights Report 2022, 2022: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] • Met: Practices adopted to pay suppliers in line with agreed timeframes: See above. [Human Rights Report 2022, 2022: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] • Not Met: Review own operations to mitigate negative impact <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices
D.4.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields) <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.4.a	Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Does not use child labour: The Company states that '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'. [Human Rights and Labour Rights Policy, 11/2021: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] & [Human Rights Report 2021, 2021: skhynix.com] Met: Age verification of workers recruited: In its Human rights Policy, the Company discloses that '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'. [Human Rights and Labour Rights Policy, 11/2021: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] <p>Score 2</p> <ul style="list-style-type: none"> Met: Remediation if children identified: The Company indicates 'Our guidelines instruct that any child workers detected must be moved to a safe place and provided with a medical check-up and compulsory education, with their livelihoods supported until they reach the legal working age.' [Human Rights Report 2021, 2021: skhynix.com]
D.4.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Child Labour rules in codes or contracts: The Company discloses in its Supplier Code of Conduct that 'all workers must be of age, and child labor is prohibited.' [Supplier Code of Conduct, 03/2021: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] Met: How working with suppliers on child labour: The Company discloses on its Human Rights Report that 'we continually monitor our suppliers in relation to child labor and conduct regular inspections to avoid using conflict minerals mined with child labor. When hiring young workers under 18 for apprenticeship, etc., we make sure to comply with all labor laws and regulations and exempt them from tasks that may compromise their health and safety, night shifts, and overtime shifts. Our training and labor contract form for young workers conforms to all legal requirements and clearly specify all employment condition.' [Human Rights Report 2021, 2021: skhynix.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Assessment of number affected by child labour in supply chain: The Company states that 'SK hynix checks for violations of child labor by its suppliers through ESG assessment, and as a result of self-assessment and on-site assessment conducted between 2021 and 2022 there was no supplier that has a negative human rights impact due to child labor.' [Human Rights Report 2022, 2022: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] Not Met: Analysis of trends in progress made
D.4.5.a	Prohibition of forced labour: Recruitment fees and costs (in own production or manufacturing operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Job seekers and workers do not pay recruitment fee: The Human Rights report 2022 states that 'SK hynix pays all expenses without imposing any debts, including recruitment fees, to workers during the hiring process [...]' The 2021 report also indicates that 'we highlight that all costs incurred in the process of recruiting workers from overseas must be assumed by the employer and that no commissions must be charged to such workers.' [Human Rights Report 2022, 2022: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] Met: Commits to fully reimbursing if they have paid: The Company indicates that 'SK hynix pays all expenses without imposing any debts, including recruitment fees, to workers during the hiring process, and in principle, it is mandatory to repay them fully if the recruitment fees are occurring.' [Human Rights Report 2021, 2021: skhynix.com] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Debt and fees rules in codes or contracts: The Supplier code states that 'suppliers shall not receive monetary fees from job seekers or employees for any hiring. If a supplier does receive monetary fees or impose expenses to employees in connection with a hiring, the Supplier shall return such fees or expenses.' [SK hynix Suppliers Code of Conduct v.2.4, 2022: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] • Not Met: How working with suppliers on debt & fees <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made
D.4.5.c	Prohibition of forced labour: Wage practices (in own production or manufacturing operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Pays workers in full and on time: The Company indicates that 'SK hynix pays salaries to workers along with a a payslip on the date set by the company regulations, and the total amount of payments [...]' [Human Rights Report 2022, 2022: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] • Met: Payslips show any legitimate deductions: The Company also adds that 'the total amount of payments, legal deductions, and actual paymentst are listed on the payslip'. [Human Rights Report 2022, 2022: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.4.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Requirement for suppliers to pay workers in full and on time in codes or contracts • Not Met: How working with supply chain to pay workers regularly and on time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.4.5.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Does not retain documents or restrict movement: The Company state 'We do not force labor against our employees' will by means of physical or emotional restraint including the imposition of commissions for joining or maintaining employment at our company, bonded labor, slavery, and human trafficking. We do not keep personal documents of workers, such as ID cards, passports, and work permits issued by the government, on the grounds of employment. We do not restrict our employees' freedom of bodily movement, including the use of restrooms and staff lounges, outside healthcare facilities, factories, and dormitories. All our suppliers, contractors, and workforce recruitment agencies must conform to these requirements.' [Human Rights and Labour Rights Policy, 11/2021: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.4.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Free movement rules in codes or contracts: The supplier guideline states that 'supplier shall not restrict the movement of workers and their access to basic liberties' and also that 'upon hiring, supplier shall not withhold the worker's government issued identification and personal documentation originals'. [Suppliers Code of Conduct Guidelines, N/A: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] • Not Met: How working with suppliers on free movement <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: SK Hynix warrants employees the freedom of association and right of collective bargaining in compliance with the labour relations regulations of the relevant country or region. No disadvantages are imposed for reasons such as signing up for a labour union, acting in one or forming one as well. However, no further information found on commitment to non intimidation and/or retaliation. [Human Rights and Labour Rights Policy, 11/2021: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] • Not Met: Discloses % total direct operations covered by collective CB agreements <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: FoA & CB rules in codes or contracts: The Supplier Code of Conduct states that 'They shall comply with the followings: Compliance to the working age regulation including the ban on child labor, compliance with the weekly 60 work-hour limit (including overtime) or in case a stricter regulation applies in the country where the Supplier is located, the regulation of the relevant country, provision of at least 1 day off for every 7 days, compliance to the minimum wage defined by law, ban on pay cut as a disciplinary measure, humane treatment of employees and ban on discrimination, ban on harsh treatment, freedom of association, freedom to join the labor union and collective bargaining.' The Company further elaborates in its Supplier Guidelines that 'Controlling or attempting to control a trade union by incentives or threats shall be prohibited'. [SK hynix Suppliers Code of Conduct v.2.4, 2022: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] & [Suppliers Code of Conduct Guidelines, N/A: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] • Not Met: How working with suppliers on FoA and CB <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress
D.4.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of manufacturing operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes process to identify H&S risks and impacts: SK hynix periodically holds the SHE Management Committee to make fast and accurate decisions to ensure a safe working environment for all employees and suppliers. We also integrated the safety and health management system(ISO 45001 / KOSHA 18001) and the process safety management to the SHE Management System. Through the SHE Management System, we monitor and improve factors that lead to safety and health issues and evaluate the company s integrated level of safety, health, and environment. ' [Sustainability Report 2021, 2021: skhynix.com] • Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: The Company discloses its injury rate. In 2020, this rate was 0.54. [Sustainability Report 2021, 2021: skhynix.com] • Met: Discloses Fatalities for last reporting period: The company report no fatalities for the last reporting period [Sustainability Report 2021, 2021: skhynix.com] • Met: Occupational disease rate for last reporting period: The Company reports its occupational disease rate as 0.011. [Sustainability Report 2022, 2022: skhynix.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Set targets for H&S performance • Not Met: Met targets or explain why not or what is doing to improve management systems
D.4.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: The company indicates in its Supplier Code of Conduct 'Worker health is to be protected by providing appropriate personal protective equipment to workers in order to avoid exposure to safety hazards...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.' [Supplier Code of Conduct, 03/2021: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period: The Company discloses its injury rate. In 2021, this rate was 0.09. [Sustainability Report 2022, 2022: skhynix.com] • Met: Fatalities disclosures for lasting reporting period: The Company reports no fatalities for its suppliers for the past three reporting periods. [Sustainability Report 2022, 2022: skhynix.com] • Not Met: Occupational disease rates for the last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provide analysis of trends in progress made
D.4.8.a	Women's rights (in own production or manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Process to stop harassment and violence against women [Sustainability Report 2019, 2019: d36ae2cxt9mcr.cloudfront.net] & [2020 Sustainability Report, 07/2020: skhynix.com] • Met: Working conditions take account of gender: The Company indicates 'SK hynix offers generous support to women who are about to give birth or those who are caring for infants and has expanded the family-friendly programs to allow women employees to maintain a healthy work-life balance [...]. For pregnant employees, the special days off have been expanded from three (one paid and two without pay) to five days (all paid), and the company covers the medical expenses for infertility treatment, including non-paid support. Employees who are about to give birth now receive a congratulatory gift package that includes special blankets to block electromagnetic radiation, cream to prevent stretch marks, and swaddles for infants. The shortened workhour schedule that used to be applicable during part of the woman's pregnancy now covers the entire pregnancy period...[.]' [Sustainability Report 2022, 2022: skhynix.com] • Not Met: Measures and steps to address gender pay gap at all levels of employment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap
D.4.8.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Women's rights in codes or contracts: The Company states in its Supplier Code: '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'. However, no further evidences found in relation to women's rights. [Supplier Code of Conduct, 03/2021: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] • Not Met: How working with suppliers on women's rights <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provide analysis of trends in progress made
D.4.9.a	Working hours (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Respects max hours, min breaks and rest periods in its own operations: Although the Company indicates: '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', there is no specific mention to international standard on working hours. [Sustainability Guidelines, 03/2019: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] • Not Met: Assesses ability to comply with its commitments when allocating work/targets <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How it implements and checks this in its operations

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.9.b	Working hours (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Working hours in codes or contracts: The Company states in its Supplier Code of Conduct that working hours should not exceed 60 hours per week, including overtime, and workers should be allowed at least one day off every seven days. However, no evidence found of references to standard weekly hours or the Company explicitly committing to respect ILO conventions on working hours and/or if incorporate these commitments into supplier code and contract. [Supplier Code of Conduct, 03/2021: mis-prod-koce-homepage-cdn-01-blob-ep.azureedge.net] Not Met: How working with suppliers on working hours Score 2 <ul style="list-style-type: none"> Not Met: Assessment of number affected by excessive working hours Not Met: Provide analysis of trends in progress made
D.4.10.a	Responsible mineral sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Due diligence in accordance with OECD Guidance in supplier contracts Met: Works with smelters/refiners and suppliers to build capacity: SK hynix also provides consulting and training to suppliers to raise awareness of responsible minerals sourcing. As of December 2021, there were a total of 227 3TG smelters, and the RMAP certification rate was 100%. [Sustainability Report 2022, 2022: skhynix.com] Score 2 <ul style="list-style-type: none"> Not Met: Contractual requirement to disclosure smelter/refiner information Not Met: Contractual requirement covers all minerals
D.4.10.b	Responsible mineral sourcing: Risk identification and responses in mineral supply chain	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Risk identification and disclosure in line with OECD Guidance Not Met: Identification of smelter/refiners and OECD Guidance Score 2 <ul style="list-style-type: none"> Met: Discloses smelters/refiners judged in line with OECD Guidance: The Company reports that '1049 suppliers signed the pledge for responsible mineral sourcing (as of June 2022) and a total of 227 smelters (100% RMAP certified).' [Sustainability Report 2022, 2022: skhynix.com] Not Met: Risk identification and disclosure covers all minerals
D.4.10.c	Reporting on responsible sourcing of minerals	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Describes mineral risk management plan for supply chain Met: Monitoring, tracking and whether better risk prevention/mitigation over time: The Company reports 'Since we do not purchase and procure all minerals used for semiconductor manufacturing directly from mines but source them through suppliers, we transparently track and manage the entire supply chain under our policy based on the OECD Due Diligence Guidance¹) for responsible minerals sourcing. SK hynix requires raw material suppliers to sign a "pledge to use responsible minerals" to ensure that they will not purchase minerals from conflict-affected and high-risk areas. To ensure compliance, we use the Conflict Minerals Reporting Template (CMRT) provided by the Responsible Minerals Initiative (RMI)²) to verify information on our mineral supply chain on a regular basis. If a supplier provides information that is different from the facts or does not take measures to improve the identified risks, we regard it as non-compliance and suspend the transaction.' [Sustainability Report 2022, 2022: skhynix.com] Score 2 <ul style="list-style-type: none"> Not Met: Disclose better risk prevention/mitigation over time Not Met: Suppliers and stakeholders engaged in risk management strategy Not Met: Risk management and response processes cover all minerals

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 19.82 out of 80 points scored in themes A-D has been applied to produce a score of 4.96 out of 20 points for theme E.

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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