

Anti-Corruption Policy

“Corruption” means bribery, extortion, fraud, deception, collusion, cartels, abuse of power, embezzlement, trading in influence, money-laundering and other similar activities.

Purpose

The purpose of this policy is to ensure that KOSSCO (“the Company”) has appropriate systems and procedures in place to prevent bribery and corruption.

The Company has introduced this policy to supplement its commitment to the Code of Conduct and Business Principles that has been distributed internally to ensure that appropriate ethical conduct is applied across the group's activities throughout the world. This policy is designed to ensure that each part of the Company applies appropriate steps to comply with the Company's ethical standards and the law.

This policy and Code of Conduct should form part of the induction of new colleagues and business partners.

Responsibilities:

- A. The board of directors are responsible for the effective design, implementation and operation of the anticorruption policy. The board shall ensure that management is aware of and accepts the policy, and that it is embedded in the corporate culture.
- B. The Chief Executive's statement of personal support for the anti-corruption policy shall be published on the Company's website.
- C. The Chief Executive shall be responsible for ensuring that systems are in place to prevent corruption. The Director of Internal Audit shall be provided with sufficient authority to monitor all policy activities, and shall have direct and prompt access to the Chief Executive and to the Audit Committee.
- D. The Company has implemented a code of conduct with an anti-corruption element, and shall continue to publicize the code internally and publish the code on its website.
- E. The Company shall take steps to ensure that its financial controls minimize the risk of the Company committing a corrupt act against a business partner, individual or organization, or of any corrupt act being committed against the Company by a business partner, individual or organization.
- F. The Company's audit committee shall carry out an annual internal review of the anti-corruption policy, regularly monitor its effectiveness and shall make appropriate recommendations to the board concerning revisions to the policy and other necessary action as appropriate in the light of this review.
- G. The risk of bribery and corruption and shall be reviewed by the Group Risk Committee on a regular basis. The Group Risk Committee shall assess the risk of corruption in the Company's business and review whether its procedures and controls are adequate to minimize those risks. The Group Risk Committee shall report to the Audit Committee.



Brian (H.Y.) CHOI
Chief Executive Officer