The following pages contain the detailed scoring for your company based on public information.

The following table represents a summary of your scores:

<table>
<thead>
<tr>
<th>Topic</th>
<th>Number of questions</th>
<th>% score based on public information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leadership, Governance and Organisation</td>
<td>10</td>
<td>15%</td>
</tr>
<tr>
<td>Risk Management</td>
<td>7</td>
<td>0%</td>
</tr>
<tr>
<td>Company Policy and Codes</td>
<td>12</td>
<td>37.5%</td>
</tr>
<tr>
<td>Training</td>
<td>5</td>
<td>30%</td>
</tr>
<tr>
<td>Personnel and Helplines</td>
<td>7</td>
<td>0%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>41</strong></td>
<td><strong>18.3%</strong></td>
</tr>
</tbody>
</table>
A1:
Does the company publish a statement from the Chief Executive Officer or the Chair of the Board supporting the ethics and anti-corruption agenda of the company?

Score:
1

Comments:
Based on public information, there is evidence that the company publishes a statement from the Chairman and CEO focusing on the company’s integrity and transparency credo. However, anti-corruption is not explicitly mentioned in the statement and no further statements were found. The company therefore scores 1.

References:
Public:
A Message from the Chairman:

‘The Doosan Credo encompasses our philosophy about people and business which we have developed for over a hundred years. By putting the Credo into action, we now prepare for the next hundred years to come.

As global economic environments and social paradigms are changing at a rapid pace, it is ever more important to emphasize corporate integrity, transparency, respect for our customers, fair business practices with our partners, and commitment to the development of our communities. The Doosan Code of Conduct is firmly anchored in the Doosan Credo and is designed to serve as the guiding principles for all of us at Doosan Corporation and its subsidiaries worldwide. All of us should keep the values in the Code of Conduct close to our hearts and follow the Code at all times. In today’s world, even one person’s misconduct can have a significant negative impact on the reputation and credibility of our company, which many have built over the course of our long history. In this regard, it is essential that all of us understand and comply with our Code of Conduct. In addition, if you are aware of a violation of the Code of Conduct or applicable laws, it is your obligation to speak up or, where allowed under applicable laws, make a report through our whistleblowing systems. It is everyone’s duty to protect Doosan’s integrity, which is indispensable to realizing our
vision for the future as well as carrying out our social responsibility.

Thank you for embracing the Code of Conduct and making it a part of your life at Doosan. With our commitment to thinking about and doing what is right, I have no doubt that we will be successful in building a proud Doosan which will enhance the quality and value of our world for many generations to come.

Chairman and CEO of the Doosan Group

Yongmaan Park


TI also notes:

Company Website:

‘Welcome to Doosan DST!
Since being founded in 1973 as a private defense company, Doosan DST (Defense Systems & Technology) has grown into one of Korea’s leading manufacturers of armored vehicles and air defense systems.

We have recently completed the development of the world-class K21 infantry fighting vehicle, which are currently being mass-produced, accelerating the development and production of advanced weapon systems including state-of-the-art high precision equipment like the inertial navigation system mounted in space launch vehicles.

All members of Doosan DST feel proud of their contributions to national security and the improvement of Korea’s defense capabilities, and they are doing their utmost to fulfill their duties with the spirit of ownership. Concentrating our efforts on continued management innovation and technology development, we aim to join the ranks of the world’s top 10 leaders in land systems.

We look forward to your continued support for and interest in our initiatives.
Thank you very much.
CEO, Doosan DST Co., Ltd
Um Hang-seok’

A2:

Does the company's Chief Executive Officer or the Chair of the Board demonstrate a strong personal, external facing commitment to the ethics and anti-corruption agenda of the company?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the Chief Executive Officer or the Chair of the Board demonstrates a strong personal, external facing commitment to the ethics and anti-corruption agenda of the company.

References:

Public:
NA
A3:

Does the company’s Chief Executive Officer demonstrate a strong personal, internal-facing commitment to the ethics and anti-corruption agenda of the company, actively promoting the ethics and anti-corruption agenda at all levels of the company structure?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company’s Chief Executive Officer demonstrates a strong personal, internal-facing commitment to the ethics and anti-corruption agenda of the company, actively promoting the ethics and anti-corruption agenda at all levels of the company structure.

References:

Public:
NA
A4:
Does the company publish a statement of values or principles representing high standards of business conduct, including honesty, trust, transparency, openness, integrity and accountability?

Score:

1

Comments:
Based on public information, there is evidence that the company publishes a statement of values or principles representing high standards of business conduct. However, this statement falls short of the range sought by the question. The company therefore scores 1

References:
Public:
Company website:

Company Website, Doosan Code of Conduct:
‘Respect, Teamwork and Openness : Our people are at the heart of our growth and success. We recognize individual differences and treat each other with respect. We understand “Inhwa” as teamwork in the truest sense based on fairness, openness and camaraderie.

• Fairness, transparent criteria and sound principles guide how we hire, evaluate, develop, and promote our people.
• We create and foster an environment of open communication where everyone is encouraged to share reasoned ideas and good-faith opinions.
• We pursue solid teamwork based on fairness and warmth. We treat one another in accordance with fair and equitable standards and principles.’

‘Integrity and Transparency
Integrity and Transparency : Integrity and transparency must be applied to every aspect of Doosan’s organization and business.

• We must not, directly or indirectly, offer, give, promise to give, receive, agree to receive, or request improper financial or other advantage (including gifts, meals, and entertainment) in our dealings with public officials and individuals in the private sector.
• We must ensure the integrity and accuracy of our business and financial records, consistent with applicable laws, accounting principles and our supplementary policies.
• We must provide material information to our investors in a truthful, reliable and timely manner consistent with applicable laws.’


Doosan CSR Report (2013), Doosan Credo, p. 10:
‘Core Values
Doosan’s people are our greatest asset and the key to our future. They are at the heart of all our achievements. Our continued and distinguished success will only be possible through developing and cultivating our talent. Our people possess great capacity, willingness and drive to contribute to the Company. They are relentless in enhancing their skills and capabilities. They embrace our Core Values and demonstrate these beliefs and principles in their daily behaviors. Cultivating people is our highest priority and a shared responsibility. Attracting and recruiting the right talent, who understand and embrace our values, will be the foundation for developing our people. We believe people develop and grow through performance at work and we give them the authority and responsibility that best match their capabilities. Through experience, people develop to their maximum potential.
Fair and immediate feedback and recognition are offered as we believe this is central to self-development. Our people are given the opportunity to develop their strengths and address areas for improvement. As a result, Doosan people are proud of who they are and respected as business professionals.

Integrity and transparency are fundamental Doosan strengths. We make profit by creating value through fair and transparent activities. We acknowledge our mistakes and keep our promises. We never compromise our principles.

Inhwa best expresses who we are and provides us with a unique competitive edge. We define Inhwa as teamwork in the truest sense of the word, grounded upon fairness and camaraderie.

By carefully following these virtues we have created One Doosan; a collective strength built on the contribution of a wide diversity of individuals. Inhwa means we maximize our organizational strength and potential through true teamwork built on defined, transparent rules of fair play. Selfish rivalries between individuals or departments have no place at Doosan and discrimination of any kind is not tolerated.’

A5: Does the company belong to one or more national or international initiatives that promote anti-corruption or business ethics with a significant focus on anti-corruption?

Score: 1

Comments: Based on public information, there is evidence that Doosan Global, of which the Company is a subsidiary, is a member of the UN Global Compact, but it is unclear how this is implemented throughout the subsidiaries. The company is also a member of the KDIA, but its anti-corruption focus remains unclear. The company therefore scores 1.

References:

Public:
Doosan CSR Report (2013), p. 84:
‘UN Global Compact
Since joining the UN Global Compact in 2014, Doosan Corporation abides by the UN Global Compact’s ten principles in the areas of human rights, labour, the environment and anti-corruption. We reflect global standards for sustainability management and stand firmly on our will to carry out social responsible management, to carry out our social responsibility and our role as a global sustainability management corporate leader representing Korea.’

Korea Defense Industry Association, Members:
https://www.kdia.or.kr/eng/4/1/memCondition.do?page=3&conditions1=&conditions2=&conditions3=&words=

Korean Defense Industry Association, About us:
‘Business Promotion Activities
To establish and recommend policies for the promotion of the Korean defense industry.
To arrange periodic and occasional gatherings of representatives from both the government and industries to discuss matters related to the promotion of the defense industry.'
To research and recommend implementation and the changes of laws & regulations concerned with the defense industry as deemed necessary.

To compile and publish the laws & regulations concerned with the defense industry.

To take measures to solve the difficulties and recommendations of the industry members.

To arbitrate the conflicts of interests among the members.

To support the protection of classified information.

To arbitrate the conflicts of interests among the members.

To develop and recommend the systems related to the defense procurement contracts among the government and firms.

To recommend and allot funds for promoting the defense industry.

To provide administrative supports to the exemption from the military service for technicians and skilled laborers.

https://www.kdia.or.kr/eng/1/3/1/view.do
A6:
Has the company appointed a Board committee or individual Board member with overall corporate responsibility for its ethics and anti-corruption agenda?

Score:

0

Comments:

Based on public information, there is evidence that the CSR committee is responsible for the sustainability management. However, it is not clear whether it also has overall responsibility for the ethics and anti-corruption agenda of the company.

References:

Public:
TI notes:
Doosan CSR Report (2013), p. 20:
CSR Committee
Composition of the CSR Committee
Doosan Corp established a CSR Committee in December 2013 to reinforce the transparency and responsibility of sustainability management. The CSR Committee meets twice a year for discussions about sustainability management issues, and decides on the direction of operation. The CSR committee operates around the chairman, and consists of representatives from each organization and executives in charge of six areas: human rights and labor, environment, customer and product management, risk management, fair trade, and corporate community involvement. To strengthen the practicability of CSR activities, the CSR committee operates cross-structurally; executives from each area build the CSR program, establish standards for the area they are in charge of, and share them with representatives from each organization who manage the organizational sustainability management issues and conduct improvement agendas.
Operation of the CSR Committee
Doosan Corp established a sustainability management system in March 2013 and builds an internal sustainability management operation system. CSR Committee delegated the authorities to CSR team as CSR executive office, which plans and manages all activities on sustainability management and reports on the operations.

DOOSAN DST 21/12/14
HTTP://WWW.DOOSANDST.COM/KR/MAIN.DO
HTTP://WWW.DOOSANDST.COM/EN/MAIN.DO
During the CSR Committee held in December 2013, the committee discussed Doosan Corp’s sustainability management system and strategy direction, the external global evaluation response plan and expansion of employee awareness of sustainability management. It conducted assessments on each organization based on the group protocol for sustainability management level assessment, and voluntarily established improvement plans based on the results. Every year, Doosan Corp proceeds to enhance the level of sustainability management through this process.

Future Plans
During the CSR committee planned for July 2014, the committee will conduct final approval on the publishing of the CSR Report through the materiality test and review of each issue. It will publicly announce Doosan Corp’s will for sustainability management through membership of UNGC and active support for international initiatives. In late 2014, the committee plans to consider to expand our sustainability management system to our overseas business sites, and review CSR performance in this year and direction of CSR operation in after year.
A7:
Has the company appointed a person at a senior level within the company to have responsibility for implementing the company’s ethics and anti-corruption agenda, and who has a direct reporting line to the Board?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has appointed a person at a senior level within the company to have responsibility for implementing the company’s ethics and anti-corruption agenda.

References:
Public:
NA
A8:
Is there regular Board level monitoring and review of the performance of the company’s ethics and anti-corruption agenda?

Score:

0

Comments:
Based on public information, there is no readily available evidence that there is regular Board level monitoring and review of the performance of the company’s ethics and anti-corruption agenda.

References:
Public:
NA
A8(a):
Is there a formal, clear, written plan in place on which the review of the ethics and anti-corruption agenda by the Board or senior management is based, and evidence of improvement plans being implemented when issues are identified?

Score:
0

Comments:
Based on public information, there is no readily available evidence that there is a formal, clear, written plan in place on which the review of the ethics and anti-corruption agenda by the Board or senior management is based, and no evidence of improvement plans being implemented when issues are identified.

References:
Public:
NA
A9:
Does the company have a formal process for review and where appropriate update its policies and practices in response to actual or alleged instances of corruption?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a formal process for review and where appropriate updates its policies and practices in response to actual or alleged instances of corruption.

References:
Public:
TI notes:
Doosan CSR Report (2013), p.52:
‘Anti-corruption and fair competition, which have been emphasized since the Enron scandal, are now at the heart of business operation and CSR. They have taken place beyond voluntary compliance, but are used as a standard for countries and governmental agencies for evaluating a company. With global business expansion, and importance of networks between companies being emphasized, ethical management is an issue extended to the company’s area of influence, including its suppliers. In Korea, besides economic democratization, shared growth and relationships with subcontractors are vigorously discussed, and social demands, including the government’s fair trade laws and subcontracting laws, are increasing.

Future Action:
Doosan Corporation is strengthening its anti-corruption, CP, supply chain CSR activities more than ever.
● Development guidelines for anti-corruption of suppliers and education encouragement
● Establishment of a supplier selection process considering fair competition in purchasing policy and CSR
• Operation and promotion of CSR in supply chain’
A9(a):
Does the company have a formal anti-corruption risk assessment procedure implemented enterprise-wide?

Score:

0

Comments:
Based on public information, there is limited readily available evidence that the company has a formal anti-corruption risk assessment procedure. TI notes that the company assesses corruption as part of the general risks but has not seen further evidence of a formal anti-corruption risk assessment.

References:
Public:
TI notes:
Doosan CSR Report (2013), p.23:
(p. 83):

‘Anti-corruption G4-SO3 Total number and percentage of operations assessed for risks related to corruption and the significant risks identified ● 23, 54, 55 6.6.1-6.6.2, 6.6.3 ●

G4-SO4 Communication and training on anti-corruption policies and procedures ● 54, 55, 66 6.6.1-6.6.2, 6.6.3, 6.6.6 ●

G4-SO5 Confirmed incidents of corruption and actions taken ● 1 Case 6.6.1-6.6.2, 6.6.3’

A10:
Does the company have a formal anti-corruption risk assessment procedure for assessing proposed business decisions, with clear requirements on the circumstances under which such a procedure should be applied?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a formal anti-corruption risk assessment procedure for assessing proposed business decisions.

References:
Public:
NA
A11:

Does the company conduct due diligence that minimises corruption risk when selecting or reappointing its agents?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company conducts due diligence that minimises corruption risk when selecting or reappointing its agents.

References:

Public:
NA
A12:
Does the company have contractual rights and processes for the behaviour, monitoring, control, and audit of agents with respect to countering corruption?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has contractual rights and processes for the behaviour, monitoring, control, and audit of agents with respect to countering corruption.

References:
Public:
NA
A13:
Does the company make clear to contractors, sub-contractors, and suppliers, through policy and contractual terms, its stance on bribery and corruption and the consequences of breaches to this stance?

Score:
0

Comments:
Based on public information, there is insufficient evidence that the company makes clear to contractors, sub-contractors, and suppliers, through policy and contractual terms, its stance on bribery and corruption and the consequences of breaches to this stance.

References:
Public:
TI notes:
Doosan CSR Report (2013), p.52:
‘Anti-corruption and fair competition, which have been emphasized since the Enron scandal, are now at the heart of business operation and CSR. They have taken place beyond voluntary compliance, but are used as a standard for countries and governmental agencies for evaluating a company. With global business expansion, and importance of networks between companies being emphasized, ethical management is an issue extended to the company’s area of influence, including its suppliers. In Korea, besides economic democratization, shared growth and relationships with subcontractors are vigorously discussed, and social demands, including the government’s fair trade laws and subcontracting laws, are increasing.

Based on the firm’s integral value, ‘Doosan takes honesty and transparency as fundamental strengths, and we make fair profits. We acknowledge our mistakes and keep our promises.’ Doosan Corporation conducts ethical and mutually beneficial management based on its group’s core values.

- Establishment of ‘Virtuous Circle Partnership’ system that makes possible shared growth with suppliers
- Fair trade based on guidelines for selecting and managing suppliers such as advisable agreement guidelines between large corporations and small and
medium businesses for win-win partnerships.

- Transparent and fair company activities complying to global standards, based on the compliance program
- Realization of the company’s social responsibilities, and increasing competitiveness through Inhwa, our customer-oriented management philosophy; transparent management and innovation.

Doosan Corporation achieves transparency management through ethical management and compliance programs (CP), and also continues its supportive activities for shared-growth

- Support Shared Growth: Support strengthening competitiveness, financial support, joint overseas expansion, reinforcing communication
- Conducting Fair Selection and Evaluations for Suppliers
- Compliance Program
- Operation and Establishment of Code of Conduct

Future Action:

Doosan Corporation is strengthening its anti-corruption, CP, supply chain CSR activities more than ever.

- Development guidelines for anti-corruption of suppliers and education encouragement
- Establishment of a supplier selection process considering fair competition in purchasing policy and CSR
- Operation and promotion of CSR in supply chain’

A13(a):
Does the company explicitly address the corruption risks associated with offset contracting?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company explicitly addresses the corruption risks associated with offset contracting.

References:
Public:
NA
A13(b):

Does the company conduct due diligence that minimises corruption risk when selecting its offset partners and offset brokers?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company conducts due diligence that minimises corruption risk when selecting its offset partners and offset brokers.

References:

Public:
NA
A15:
Does the company have an anti-corruption policy that prohibits corruption in its various forms?

Score:

1

Comments:
Based on public information, there is some evidence that the company has an anti-corruption policy. However, its scope is unclear and it does not address all forms of corruption. The company therefore scores 1.

References:
Public:
Company Website, Doosan Code of Conduct:
‘Integrity and Transparency
Integrity and Transparency : Integrity and transparency must be applied to every aspect of Doosan’s organization and business.
• We must not, directly or indirectly, offer, give, promise to give, receive, agree to receive, or request improper financial or other advantage (including gifts, meals, and entertainment) in our dealings with public officials and individuals in the private sector.
• We must ensure the integrity and accuracy of our business and financial records, consistent with applicable laws, accounting principles and our supplementary policies.
• We must provide material information to our investors in a truthful, reliable and timely manner consistent with applicable laws.
• We must not act in any manner that creates, or appears to create, a conflict between Doosan’s interests and our personal interests. We must not engage in any activities, including activities outside of our employment, which may undermine Doosan’s interests and reputation.
• We must not use, or provide to someone else, inside, non-public information of Doosan for personal or someone else’s benefit. We must not trade, or facilitate another person’s trade, in Doosan’s, or any other company’s, securities based on any inside, non-public information.
• We must safeguard Doosan’s assets from loss, damage, theft, misuse and abuse.
• Doosan’s assets may be used only for proper business purposes and for the benefit of the Company.
• We must protect Doosan’s confidential or proprietary information and must not share it with any third party without the Company’s permission.
• We must safeguard the security and confidentiality of personal information in Doosan’s possession in accordance with applicable laws.

A16:
Is the anti-corruption policy explicitly one of zero tolerance?

Score:
0

Comments:
Based on public information, there is no readily available evidence of a zero-tolerance anti-corruption policy.

References:
Public:
NA
A17: Is the company's anti-corruption policy easily accessible to Board members, employees, contracted staff and any other organisations acting with or on behalf of the company?

Score: 2

Comments: Based on public information, there is evidence that the parent company Code of Conduct is easily accessible to Board members, employees and third parties. This is available in Korean and English.

References:
Public:
Company Website, Doosan Code of Conduct:
A17(a):
Is the company’s anti-corruption policy easily understandable and clear to Board members, employees and third parties?

Score:

0

Comments:
Based on public information, there is insufficient evidence that the company’s anti-corruption policy is easily understandable. TI notes that the information available is limited and it is therefore not possible to assess the policy in full.

References:
Public:
TI notes:
Company Website, Doosan Code of Conduct:
A18:

Does the anti-corruption policy explicitly apply to all employees and members of the Board?

Score:

2

Comments:

Based on public information, there is evidence that the Code of Conduct applies to all directors, officers, and employees.

References:

Public:
Company Website, Doosan Code of Conduct:
'The Doosan Code of Conduct (the “Code”) applies to all directors, officers, and employees (“employees”) of Doosan Corporation and its subsidiaries and affiliates (collectively, “Doosan” and individually, the “Company”). Third parties working with Doosan are also encouraged to comply with the Code.

This Code is intended to provide a broad ethical framework for guiding employees’ conduct. It is not meant to encompass all possible situations we may encounter. Thus, each Company will provide supplementary policies aimed at providing guidance in specific areas, which can be found on the Company’s intranet or obtained from the Company’s Legal Department.

All employees are responsible for understanding and complying with the Code and applicable supplementary policies. They are also expected to comply with all applicable laws. To the extent any provision of this Code or supplementary policies conflict with applicable laws, the latter shall take precedence’

A20:
Does the company have a policy on potential conflicts of interest, and does it apply to both employees and board members?

Score:

0

Comments:

Based on public information, there is insufficient evidence that the company has a policy on potential conflicts of interest.

References:

Public:
TI notes:
Company Website, Doosan Code of Conduct:
‘Integrity and Transparency
Integrity and Transparency : Integrity and transparency must be applied to every aspect of Doosan’s organization and business.
• We must not, directly or indirectly, offer, give, promise to give, receive, agree to receive, or request improper financial or other advantage (including gifts, meals, and entertainment) in our dealings with public officials and individuals in the private sector.
• We must ensure the integrity and accuracy of our business and financial records, consistent with applicable laws, accounting principles and our supplementary policies.
• We must provide material information to our investors in a truthful, reliable and timely manner consistent with applicable laws.
• We must not act in any manner that creates, or appears to create, a conflict between Doosan’s interests and our personal interests. We must not engage in any activities, including activities outside of our employment, which may undermine Doosan’s interests and reputation.
• We must not use, or provide to someone else, inside, non-public information of Doosan for personal or someone else’s benefit. We must not trade, or facilitate another person’s trade, in Doosan’s, or any other company’s, securities based on any inside, non-public information.
• We must safeguard Doosan’s assets from loss, damage, theft, misuse and abuse.
• Doosan’s assets may be used only for proper business purposes and for the benefit of the Company.
• We must protect Doosan’s confidential or proprietary information and must not share it with any third party without the Company’s permission.
• We must safeguard the security and confidentiality of personal information in Doosan’s possession in accordance with applicable laws.’
A21:
Does the company have a policy for the giving and receipt of gifts to ensure that such transactions are bona fide and not a subterfuge for bribery?

Score:
2

Comments:
Based on public information, there is evidence that the company has a policy for the giving and receipt of gifts. TI notes that the company prohibits the giving or receipt of gifts.

References:
Public:
Company Website, Doosan Code of Conduct:
‘Integrity and Transparency
Integrity and Transparency : Integrity and transparency must be applied to every aspect of Doosan’s organization and business.
• We must not, directly or indirectly, offer, give, promise to give, receive, agree to receive, or request improper financial or other advantage (including gifts, meals, and entertainment) in our dealings with public officials and individuals in the private sector.
• We must ensure the integrity and accuracy of our business and financial records, consistent with applicable laws, accounting principles and our supplementary policies.
• We must provide material information to our investors in a truthful, reliable and timely manner consistent with applicable laws.
• We must not act in any manner that creates, or appears to create, a conflict between Doosan’s interests and our personal interests. We must not engage in any activities, including activities outside of our employment, which may undermine Doosan’s interests and reputation.
• We must not use, or provide to someone else, inside, non-public information of Doosan for personal or someone else’s benefit. We must not trade, or facilitate another person’s trade, in Doosan’s, or any other company’s, securities based on any inside, non-public information.
• We must safeguard Doosan’s assets from loss, damage, theft, misuse and abuse.
• Doosan’s assets may be used only for proper business purposes and for the benefit of the
Company.

- We must protect Doosan’s confidential or proprietary information and must not share it with any third party without the Company’s permission.
- We must safeguard the security and confidentiality of personal information in Doosan’s possession in accordance with applicable laws.’

A22:
Does the company’s anti-corruption policy include a statement on the giving and receipt of hospitality that ensures that such transactions are bona fide and not a subterfuge for bribery?

Score:

2

Comments:
Based on public information, there is evidence of a statement on the giving and receipt of hospitality (meals and entertainment). TI notes that the company prohibits the giving or receipt of hospitality.

References:
Public:
Company Website, Doosan Code of Conduct:
‘Integrity and Transparency
Integrity and Transparency: Integrity and transparency must be applied to every aspect of Doosan’s organization and business.
• We must not, directly or indirectly, offer, give, promise to give, receive, agree to receive, or request improper financial or other advantage (including gifts, meals, and entertainment) in our dealings with public officials and individuals in the private sector.
• We must ensure the integrity and accuracy of our business and financial records, consistent with applicable laws, accounting principles and our supplementary policies.
• We must provide material information to our investors in a truthful, reliable and timely manner consistent with applicable laws.
• We must not act in any manner that creates, or appears to create, a conflict between Doosan’s interests and our personal interests. We must not engage in any activities, including activities outside of our employment, which may undermine Doosan’s interests and reputation.
• We must not use, or provide to someone else, inside, non-public information of Doosan for personal or someone else’s benefit. We must not trade, or facilitate another person’s trade, in Doosan’s, or any other company’s, securities based on any inside, non-public information.
• We must safeguard Doosan’s assets from loss, damage, theft, misuse and abuse.
• Doosan’s assets may be used only for proper business purposes and for the benefit of the Company.
• We must protect Doosan’s confidential or proprietary information and must not share it with any third party without the Company’s permission.
• We must safeguard the security and confidentiality of personal information in Doosan’s possession in accordance with applicable laws.’

A23:
Does the company have a policy that explicitly prohibits facilitation payments?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a policy that explicitly prohibits facilitation payments.

References:
Public:
NA
A24:
Does the company prohibit political contributions, or regulate such contributions in order to prevent undue influence or other corrupt intent? Does the company record and publicly disclose all political contributions?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company prohibits political contributions, or regulates such contributions in order to prevent undue influence or other corrupt intent.

References:
Public:
NA
A25:
Does the company have a clear policy on engagement in lobbying activities, in order to prevent undue influence or other corrupt intent, and discloses the issues on which the company lobbies?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has a clear policy on engagement in lobbying activities, in order to prevent undue influence or other corrupt intent, or discloses the issues on which the company lobbies.

References:
Public:
NA
A25(a):
Does the company prohibit charitable contributions, or regulate such contributions in order to prevent undue influence or other corrupt intent?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company prohibits charitable contributions, or regulates such contributions in order to prevent undue influence or other corrupt intent.

References:

Public:
NA
A26:

Does the company provide written guidance to help Board members and employees understand and implement the firm’s ethics and anti-corruption agenda?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company provides written guidance to help Board members and employees understand and implement the firm’s ethics and anti-corruption agenda.

References:
Public: NA
A27:
Does the company have a training programme that explicitly covers anti-corruption?

Score:

2

Comments:
Based on public information, there is evidence that the company has a training programme that explicitly covers anti-corruption.

References:
Public:
Doosan CSR Report (2013), p. 83:
‘Anti-corruption G4-SO3 Total number and percentage of operations assessed for risks related to corruption and the significant risks identified ● 23, 54, 55 6.6.1-6.6.2, 6.6.3 ●
G4-SO4 Communication and training on anti-corruption policies and procedures ● 54, 55, 66 6.6.1-6.6.2, 6.6.3, 6.6.6 ●
G4-SO5 Confirmed incidents of corruption and actions taken ● 1 Case 6.6.1-6.6.2, 6.6.3’
A28:
Is anti-corruption training provided in all countries where the company operates or has company sites?

Score:

1

Comments:
Based on public information, there is evidence that the company provides ethics training to employees. However, evidence does not suggest that this training is available in all countries where the company operates, with the company having planed to provide training overseas in 2014. The company therefore scores 1.

References:
Public:
Doosan CSR Report (2013), p. 57:
‘Ethical Management Activities
Ethical Management Education
In order to enhance employee’s awareness of ethical management, Doosan Corporation conducted ethics management education introducing Doosan Corporation’s ethics management policies, violation cases, and requests for practice through collective training, new/experienced/transferred employee training, and specialized training for vulnerable division employees to a total of 2,353 employees in 2013. Henceforth, Doosan Corporation will conduct training as needed whenever an organization or situation needing continuous ethical management training arises; and in 2014, it plans to expand ethical management training to its suppliers and companies overseas.’
A29: Does the company provide targeted anti-corruption training to members of the Board?

Score: 0

Comments: Based on public information, there is no readily available evidence that the company provides targeted anti-corruption training to members of the Board.

References: Public: NA
A30:
Does the company provide tailored ethics and anti-corruption training for employees in sensitive positions?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company provides tailored ethics and anti-corruption training for employees in sensitive positions.

References:
Public:
NA
A31:
Does the company have a clear and formal process by which employees declare conflicts of interest?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a clear and formal process by which employees declare conflicts of interest.

References:
Public:
NA
A32: Is the company explicit in its commitment to apply disciplinary procedures to employees, Directors and Board members found to have engaged in corrupt activities?

Score: 0

Comments: Based on public information, there is no readily available evidence that the company is explicit in its commitment to apply disciplinary procedures to employees, Directors and Board members found to have engaged in corrupt activities.

References:
Public: NA
A33:
Does the company have multiple, well-publicised channels that are easily accessible and secure, to guarantee confidentiality or anonymity where requested by the employee (e.g. web, phone, in person), to report concerns or instances of suspected corrupt activity?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has multiple, well-publicised channels that are easily accessible and secure, to guarantee confidentiality or anonymity where requested by the employee (e.g. web, phone, in person), to report concerns or instances of suspected corrupt activity.

References:
Public: NA
A33(a):
Are the whistleblowing channels available to all employees in all geographies?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has whistleblowing channels.

References:
Public:
NA
A33(b):
Does the company have formal and comprehensive mechanisms to assure itself that whistleblowing by employees is not deterred, and that whistleblowers are treated supportively?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has formal and comprehensive mechanisms to assure itself that whistleblowing by employees is not deterred, and that whistleblowers are treated supportively.

References:
Public:
NA
A34:
Does the company have well-publicised resources available to all employees where help and advice can be sought on corruption-related issues?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has well-publicised resources available to all employees where help and advice can be sought on corruption-related issues.

References:
Public:
NA
A35:
Is there a commitment to non-retaliation for bona fide reporting of corruption?

Score:

0

Comments:
Based on public information, there is no readily available evidence that there is a commitment to non-retaliation for bona fide reporting of corruption.

References:
Public:
NA
Information Sources:

Company website:
http://www.doosandst.com/kr/main.do

Doosan Code of Conduct:

CSR Reports: