FINAL ASSESSMENT

KOREA AEROSPACE INDUSTRIES, LTD.

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

The following table represents a summary of your scores:

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<th>Topic</th>
<th>Number of questions</th>
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<td>Leadership, Governance and Organisation</td>
<td>10</td>
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<td>Risk Management</td>
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<td>Company Policy and Codes</td>
<td>12</td>
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<td>Training</td>
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</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:

0

Comments:
Based on public information, there is no readily available evidence that the company publishes a statement from the Chief Executive Officer or the Chair of the Board supporting the ethics and anti-corruption agenda of the company.

References:
Public:
NA
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 demonstrate 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:

0

Comments:
Based on public information, there is no readily available evidence that the company publishes a statement of values or principles representing high standards of business conduct, including honesty, trust, transparency, openness, integrity, and accountability.

References:
Public:
TI notes:
Company Website:
http://www.koreaaero.com/english/company/mission02.asp
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:

0

Comments:
Based on public information, there is no readily available evidence that the company belongs to one or more national or international initiatives that promote anti-corruption or business ethics with a significant focus on anti-corruption.

References:
Public:
NA
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 no readily available evidence that the company has appointed a Board committee or individual Board member with overall corporate responsibility for its ethics and anti-corruption agenda.

References:
Public:
NA
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, or 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:
NA
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 no readily available evidence that the company has a formal anti-corruption risk assessment procedure implemented enterprise-wide.

References:
Public:
NA
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 no readily available 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. TI notes that the company expects to share high ethical standards with its suppliers.

References:
Public:
TI notes:
Ethics Code, p.2:
'02. SUPPLIER COMMON COEXISTENCE
RESPECT EACH OTHER AND CONDUCT TRANSACTIONS IN FAIR AND HONEST MANNER UNDER THE PRINCIPLE OF COMMON COEXISTENCE WITH THE SUPPLIERS.
1 BESTOW OPPORTUNITY TO ALL QUALIFIED COMPANIES TO PARTICIPATE IN THE TRANSACTION.
2 SELECT SUPPLIERS OBJECTIVELY IN A RATIONAL MANNER ACCORDING TO FAIR DETERMINATION STANDARDS.
3 INAPPROPRIATE ACTS IN ANY SHAPE OR FORM AND EXERCISING INFLUENCES DEPENDED ON HIGHER POSITIONING ARE PROHIBITED.
4 PURSUE COMMON GROWTH THROUGH ALL AVAILABLE ASSISTANCE NEEDED FOR COMPETITIVENESS STRENGTHENING OF THE SUPPLIER.'
http://www.koreaaero.com/english/company/ethical_management.asp
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:
TI notes:
Jane’s 360 website: Iraq orders South Korean FA-50 trainer and light fighter aircraft
'However, in May it was revealed that these talks had stalled following a counter-bid by KAI for its FA-50, which was being offered by South Korea through the countertrade of crude oil. With Iraq being the world's 12th largest oil producer and South Korea the world's 5th largest importer of oil, this deal obviously proved to be highly beneficial to both parties.'

Financial Times website: South Korea Aims to Become Defence Powerhouse
South Korea signed an industrial cooperation agreement with the Philippines, involving Korea Aerospace Industries.
http://www.ft.com/cms/s/0/66a9a33a-42ea-11e3-8350-00144feabdc0.html
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:
See references for A13(a)
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 evidence that the company has a policy on corruption. However, it is not a clear statement and it is not explicit on all the forms that such corruption might take. The company therefore scores 1.

References:
Public:
TI notes:
Ethics code, p.3:

'04. FAIR JOB EXECUTION
EXECUTE JOBS HONESTLY, FAIRLY AND FAITHFULLY AND MAINTAIN SOUND AND CLEAN ORGANIZATION.

1 NO USING OF ASSETS, FACILITIES, SUB-MATERIALS OF THE COMPANY FOR PERSONAL REASONS AND WHEN EXECUTING TASKS, ALWAYS THINK OF THE COMPANY PROFITS FIRST THEN ACT.

2 NO INAPPROPRIATE BEHAVIORS SUCH AS DIRECT/INDIRECT TRANSFER OF MONEY AND OTHER GOODS, PRIVILEGES, ADVANTAGES AND ENTERTAINMENT TO AND FROM CONCERNED PARTIES ARE PERMITTED.

3 PARTICIPATING IN ANTI-SOCIAL ACTS THAT THREATEN THE ORDER OR SAFETY OF THE SOCIETY OR SOCIAL AND ECONOMIC ACTIVITIES OPPOSED TO COMPANY GAINS ARE NOT PERMITTED.'

http://www.koreaaero.com/english/company/ethical_management.asp
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:
TI notes:
Ethics code, p.3:
‘1 NO USING OF ASSETS, FACILITIES, SUB-MATERIALS OF THE COMPANY FOR PERSONAL REASONS AND WHEN EXECUTING TASKS, ALWAYS THINK OF THE COMPANY PROFITS FIRST THEN ACT.

2 NO INAPPROPRIATE BEHAVIORS SUCH AS DIRECT/INDIRECT TRANSFER OF MONEY AND OTHER GOODS, PRIVILEGES, ADVANTAGES AND ENTERTAINMENT TO AND FROM CONCERNED PARTIES ARE PERMITTED.’

http://www.koreaaero.com/english/company/ethical_management.asp
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 company has an Ethics Code that is easily accessible to Board members, employees and third parties. The Code is available in English and Korean.

References:

Public:
Ethics code, p.3:

'04. FAIR JOB EXECUTION
EXECUTE JOBS HONESTLY, FAIRLY AND FAITHFULLY AND MAINTAIN SOUND AND CLEAN ORGANIZATION.

1 NO USING OF ASSETS, FACILITIES, SUB-MATERIALS OF THE COMPANY FOR PERSONAL REASONS AND WHEN EXECUTING TASKS, ALWAYS THINK OF THE COMPANY PROFITS FIRST THEN ACT.

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3 PARTICIPATING IN ANTI-SOCIAL ACTS THAT THREATEN THE ORDER OR SAFETY OF THE SOCIETY OR SOCIAL AND ECONOMIC ACTIVITIES OPPOSED TO COMPANY GAINS ARE NOT PERMITTED.'

http://www.koreaaero.com/english/company/ethical_management.asp
A17(a):

Is the company’s anti-corruption policy easily understandable and clear to Board members, employees and third parties?

Score:

1

Comments:

Based on public information, there is evidence that the company’s Ethics Code is somewhat understandable. However, the Ethics Code does not describe company policies in detail and is not written in clearly comprehensible language. The company therefore scores 1.

References:

Ethics code, p.3:

’04. FAIR JOB EXECUTION

EXECUTE JOBS HONESTLY, FAIRLY AND FAITHFULLY AND MAINTAIN SOUND AND CLEAN ORGANIZATION.

1 NO USING OF ASSETS, FACILITIES, SUB-MATERIALS OF THE COMPANY FOR PERSONAL REASONS AND WHEN EXECUTING TASKS, ALWAYS THINK OF THE COMPANY PROFITS FIRST THEN ACT.

2 NO INAPPROPRIATE BEHAVIORS SUCH AS DIRECT/INDIRECT TRANSFER OF MONEY AND OTHER GOODS, PRIVILEGES, ADVANTAGES AND ENTERTAINMENT TO AND FROM CONCERNED PARTIES ARE PERMITTED.

3 PARTICIPATING IN ANTI-SOCIAL ACTS THAT THREATEN THE ORDER OR SAFETY OF THE SOCIETY OR SOCIAL AND ECONOMIC ACTIVITIES OPPOSED TO COMPANY GAINS ARE NOT PERMITTED.’

http://www.koreaaero.com/english/company/ethical_management.asp
A18:
Does the anti-corruption policy explicitly apply to all employees and members of the Board?

Score:
1

Comments:
Based on public information, there is evidence that the company's Ethics Code applies to all employees. However, there is no evidence that the Ethics Code also applies to Board members. The company therefore scores 1.

References:
Public:
Ethics Code, p.5:
'SUPPLEMENTAL PROVISIONS
01. ENFORCED DATE  HEREIN ETHICS CODE IS ENFORCED BEGINNING ON APRIL 6, 2004.
02. APPLIED SUBJECTS  HEREIN ETHICS CODE IS APPLICABLE TO THE COMPANY AND ALL COMPANY EMPLOYEES AND INFORM SUPPLIERS DEALING WITH THE COMPANY OF APPLICABLE CONTENTS THEN INDUCE ACTIVE PARTICIPATION.
03. EMPLOYEES' PRACTICAL GUIDE  INSTITUTE AND OPERATE A SEPARATE „ETHICS PRACTICAL GUIDE„ TO BE COMPLIED WITH BY ALL EMPLOYEES IN AN EFFORT TO THOROUGHLY PRACTICE THE ETHICS CODE.'

http://www.koreaaero.com/english/company/ethical_management.asp
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 no readily available evidence that the company has a policy on potential conflicts of interest.

References:

Public:

TI notes:

Ethics code, p.3:

‘1 NO USING OF ASSETS, FACILITIES, SUB-MATERIALS OF THE COMPANY FOR PERSONAL REASONS AND WHEN EXECUTING TASKS, ALWAYS THINK OF THE COMPANY PROFITS FIRST THEN ACT.’

http://www.koreaaero.com/english/company/ethical_management.asp
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:

1

Comments:
Based on public information, there is some evidence that the company has a policy for the giving and receipt of gifts to ensure that such transactions are bona fide and not a subterfuge for bribery. The company states that inappropriate behaviours, such as the transfer of money, goods, privileges, advantages and entertainment to and from concerned parties, is not permitted. However, there is no evidence that the company sets upper limits for gift exchange and/or the requirement for senior management authorisation if a value threshold is exceeded. The company therefore scores 1.

References:
Public:
Ethics code, p.3:
'04. FAIR JOB EXECUTION
EXECUTE JOBS HONESTLY, FAIRLY AND FAITHFULLY AND MAINTAIN SOUND AND CLEAN ORGANIZATION.
1 NO USING OF ASSETS, FACILITIES, SUB-MATERIALS OF THE COMPANY FOR PERSONAL REASONS AND WHEN EXECUTING TASKS, ALWAYS THINK OF THE COMPANY PROFITS FIRST THEN ACT.
2 NO INAPPROPRIATE BEHAVIORS SUCH AS DIRECT/INDIRECT TRANSFER OF MONEY AND OTHER GOODS, PRIVILEGES, ADVANTAGES AND ENTERTAINMENT TO AND FROM CONCERNED PARTIES ARE PERMITTED.
3 PARTICIPATING IN ANTI-SOCIAL ACTS THAT THREATEN THE ORDER OR SAFETY OF THE SOCIETY OR SOCIAL AND ECONOMIC ACTIVITIES OPPOSED TO COMPANY GAINS ARE NOT PERMITTED.'
http://www.koreaaero.com/english/company/ethical_management.asp
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:

1

Comments:

Based on public information, there is some evidence that the company has a policy for the giving and receipt of hospitality, to ensure that such transactions are bona fide and not a subterfuge for bribery. The company states that inappropriate behaviours, such as the transfer of money, goods, privileges, advantages and entertainment to and from concerned parties, is not permitted. However, there is no evidence that the company sets upper limits for hospitality exchange and/or the requirement for senior management authorisation if a value threshold is exceeded. The company therefore scores 1.

References:

Public:
Ethics code, p.3:

'04. FAIR JOB EXECUTION
EXECUTE JOBS HONESTLY, FAIRLY AND FAITHFULLY AND MAINTAIN SOUND AND CLEAN ORGANIZATION.
1 NO USING OF ASSETS, FACILITIES, SUB-MATERIALS OF THE COMPANY FOR PERSONAL REASONS AND WHEN EXECUTING TASKS, ALWAYS THINK OF THE COMPANY PROFITS FIRST THEN ACT.
2 NO INAPPROPRIATE BEHAVIORS SUCH AS DIRECT/INDIRECT TRANSFER OF MONEY AND OTHER GOODS, PRIVILEGES, ADVANTAGES AND ENTERTAINMENT TO AND FROM CONCERNED PARTIES ARE PERMITTED.
3 PARTICIPATING IN ANTI-SOCIAL ACTS THAT THREATEN THE ORDER OR SAFETY OF THE SOCIETY OR SOCIAL AND ECONOMIC ACTIVITIES OPPOSED TO COMPANY GAINS ARE NOT PERMITTED.'

http://www.koreaaero.com/english/company/ethical_management.asp
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:

2

Comments:
Based on public information, there is evidence that the company prohibits political contributions in order to prevent undue influence or other corrupt intent.

References:

Public:

Ethics Code, p.4:

‘10. POLITICAL ACTIVITY RELATIONS
ALL EMPLOYEES MAY NOT INTERVENE IN POLITICS AS A KOREAN AEROSPACE EMPLOYEE STATUS.

1 RESPECT INDIVIDUAL’S RIGHT TO VOTE AND POLITICAL OPINIONS, BUT TAKE CAUTION TO NOT BE MISSTAKEN FOR THE VIEWS OF THE COMPANY.

2 UNLAWFUL CONTRIBUTIONS OR EXPENDITURES TO ELECTION CANDIDATES, PARTIES AND POLITICAL COMMITTEES WHETHER DIRECTLY OR INDIRECTLY ARE NOT PERMITTED.

3 NO POLITICAL ACTIVITIES ARE PERMITTED WITHIN THE COMPANY SHALL NOT USE GROUPS, MANPOWER AND PROPERTIES OF THE COMPANY FOR POLITICAL REASONS.’

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. TI notes that political activities are not permitted within the company, but it is unclear if this includes lobbying activities.

References:
Public:

TI notes:

Ethics Code, p.4:

‘ALL EMPLOYEES MAY NOT INTERVENE IN POLITICS AS A KOREAN AEROSPACE EMPLOYEE STATUS.’

‘3 NO POLITICAL ACTIVITIES ARE PERMITTED WITHIN THE COMPANY SHALL NOT USE GROUPS, MANPOWER AND PROPERTIES OF THE COMPANY FOR POLITICAL REASONS.’

http://www.koreaero.com/english/company/ethical_management.asp
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:
1

Comments:
Based on public information there is evidence that the company provides written guidance to help employees understand and implement the firm’s ethics and anti-corruption agenda. However, this guidance cannot be assessed as it is not publicly available. The company therefore scores 1.

References:
Public:
Ethics Code, p.5:
'SUPPLEMENTAL PROVISIONS

01. ENFORCED DATE  HEREIN ETHICS CODE IS ENFORCED BEGINNING ON APRIL 6, 2004.

02. APPLIED SUBJECTS  HEREIN ETHICS CODE IS APPLICABLE TO THE COMPANY AND ALL COMPANY EMPLOYEES AND INFORM SUPPLIERS DEALING WITH THE COMPANY OF APPLICABLE CONTENTS THEN INDUCE ACTIVE PARTICIPATION.

03. EMPLOYEES’ PRACTICAL GUIDE  INSTITUTE AND OPERATE A SEPARATE 「ETHICS PRACTICAL GUIDE」 TO BE COMPLIED WITH BY ALL EMPLOYEES IN AN EFFORT TO THOROUGHLY PRACTICE THE ETHICS CODE.'

http://www.koreaaero.com/english/company/ethical_management.asp
A27:
Does the company have a training programme that explicitly covers anti-corruption?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has a training programme that explicitly covers anti-corruption.

References:
Public: NA
A28:
Is anti-corruption training provided in all countries where the company operates or has company sites?

Score:
0

Comments:
Based on public information, there is no readily available evidence that anti-corruption training is provided in all countries where the company operates or has company sites.

References:
Public:
NA
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:

1

Comments:
Based on public information, there is evidence that the company is committed to apply disciplinary procedures to employees found to have engaged in corrupt activities. However, it is unclear if this commitment applies to Directors and Board members. The company therefore scores 1.

References:
Public:
Ethics Code, p.5:
'Chapter 6
Ethics code compliance obligation
All employees are to comply with the ethics code and the executives and supervisors and responsible for overseeing that affiliated employees comply with the ethics code.
1 In the event that ethics code violation occurs prevent recurrences through examination of causes and education.
2 All employees are obligated to faithfully comply with the ethics code and accountable for applicable actions such as disciplinary actions when violating the ethics code.
3 When coerced into violating the ethics code or recognized such acts, report to the department head or applicable executive or the audit department and doubtful acts should be conferred with department head or an executive in advance then assume proper measures.'
http://www.koreaero.com/english/company/ethical_management.asp
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:

1

Comments:
Based on public information, there is evidence that the company has multiple channels to report concerns or instances of suspected corrupt activity. However, there is no evidence that the company offers independent whistleblowing channels or channels that allow for anonymity. The company therefore scores 1.

References:
Public:
Ethics Code, p.5:
'CHAPTER 6
ETHICS CODE COMPLIANCE OBLIGATION
ALL EMPLOYEES ARE TO COMPLY WITH THE ETHICS CODE AND THE EXECUTIVES AND SUPERVISORS AND RESPONSIBLE FOR OVERSEEING THAT AFFILIATED EMPLOYEES COMPLY WITH THE ETHICS CODE.
1 IN THE EVENT THAT ETHICS CODE VIOLATION OCCURS PREVENT RECURRANCES THROUGH EXAMINATION OF CAUSES AND EDUCATION.
2 ALL EMPLOYEES ARE OBLIGATED TO FAITHFULLY COMPLY WITH THE ETHICS CODE AND ACCOUNTABLE FOR APPLICABLE ACTIONS SUCH AS DISCIPLINARY ACTIONS WHEN VIOLATING THE ETHICS CODE.
3 WHEN COERCED INTO VIOLATING THE ETHICS CODE OR RECOGNIZED SUCH ACTS, REPORT TO THE DEPARTMENT HEAD OR APPLICABLE EXECUTIVE OR THE AUDIT DEPARTMENT AND DOUBTFUL ACTS SHOULD BE CONFERRED WITH DEPARTMENT HEAD OR AN EXECUTIVE IN ADVANCE THEN ASSUME PROPER MEASURES.'
http://www.koreaaero.com/english/company/ethical_management.asp
A33(a):

Are the whistleblowing channels available to all employees in all geographies?

Score:

1

Comments:

Based on public information, there is evidence that across geographies, all employees have access to at least one whistleblowing channel, a department head. However, there is no evidence that across geographies, all employees have access to more than one reporting channel. The company therefore scores 1.

References:

Public:
Ethics Code, p.5:
'CHAPTER 6
ETHICS CODE COMPLIANCE OBLIGATION
ALL EMPLOYEES ARE TO COMPLY WITH THE ETHICS CODE AND THE EXECUTIVES AND SUPERVISORS AND RESPONSIBLE FOR OVERSEEING THAT AFFILIATED EMPLOYEES COMPLY WITH THE ETHICS CODE.
1 IN THE EVENT THAT ETHICS CODE VIOLATION OCCURS PREVENT RECURRENCES THROUGH EXAMINATION OF CAUSES AND EDUCATION.
2 ALL EMPLOYEES ARE OBLIGATED TO FAITHFULLY COMPLY WITH THE ETHICS CODE AND ACCOUNTABLE FOR APPLICABLE ACTIONS SUCH AS DISCIPLINARY ACTIONS WHEN VIOLATING THE ETHICS CODE.
3 WHEN COERCED INTO VIOLATING THE ETHICS CODE OR RECOGNIZED SUCH ACTS, REPORT TO THE DEPARTMENT HEAD OR APPLICABLE EXECUTIVE OR THE AUDIT DEPARTMENT AND DOUBTFUL ACTS SHOULD BE CONFERRED WITH DEPARTMENT HEAD OR AN EXECUTIVE IN ADVANCE THEN ASSUME PROPER MEASURES.'
http://www.koreaaero.com/english/company/ethical_management.asp
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, or 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 resources available to all employees where help and advice can be sought on corruption-related issues.

References:
Public:
TI notes:
Ethics Code, p.5:
'T 3 WHEN COERCED INTO VIOLATING THE ETHICS CODE OR RECOGNIZED SUCH ACTS, REPORT TO THE DEPARTMENT HEAD OR APPLICABLE EXECUTIVE OR THE AUDIT DEPARTMENT AND DOUBTFUL ACTS SHOULD BE CONFERRED WITH DEPARTMENT HEAD OR AN EXECUTIVE IN ADVANCE THEN ASSUME PROPER MEASURES.'

http://www.koreaero.com/english/company/ethical_management.asp
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.koreaaero.com/ [Korean]
http://www.koreaaero.com/english/ [English]

Ethics Code (date not known):
http://www.koreaaero.com/english/company/ethical_management.asp [English]