

COMPANY NAME:	KCCDFI MUTUAL BENEFIT ASSOCIATION INC		COMPANY STRUCTURE: MUTUAL BENEFIT ASSOCIATION	
FINANCIAL YEAR END	2018			
SECTOR	Mi MBA			
PENALTY			Y/N	Reference/ Source document
A. Rights of shareholders				
A.1	Basic shareholder rights			
A.1.1(P)	Did the company fail or neglect to offer equal treatment for share repurchases to all shareholders?	OECD Principle II (A)	N/A	This is not applicable. KCCDFI MBA is a non stock non profit association
A.2	Shareholders, including institutional shareholders, should			
A.3	Right to participate effectively in and vote in general		N	
A.3.1(P)	Did the company include any additional and unannounced agenda item into the notice of AGM/EGM?	OECD Principle II (C) 2	N	2019 Notice of AGMM and Minutes. There were no additional and unannounced agenda item in the notice of AGM.
A.4	Capital structures and arrangements that enable certain shareholders to obtain a degree of control disproportionate to their equity ownership should be disclosed.			
Did the company fail to disclose the existence of:				
A.4.1(P)	Shareholders agreement?	OECD Principle II (D)	N	KCCDFI MBA is a non-stock non profit association owned by member, there is no shareholders agreement.
A.4.2(P)	Voting cap?		N	DEFAULT ITEM

A.4.3(P)	Multiple voting rights?		N	DEFAULT ITEM
			N/A	This is not applicable to KCCDFI MBA.
B. Equitable treatment of shareholders				
B.1	Insider trading and abusive self-dealing should be prohibited.			
B.1.1(P)	Has there been any conviction of insider trading involving directors/commissioners, management and employees in the past three years?	<p>OECD Principle III: The Equitable Treatment of Shareholders (B) Insider trading and abusive dealing should be prohibited.</p> <p>ICGN 3.5 Employee share dealing Companies should have clear rules regarding any trading by directors and employees in the company's own securities. Among other issues, these must seek to ensure individuals do not benefit from knowledge which is not generally available to the market.</p> <p>ICGN 8.5 Shareholder rights of action ... Minority shareholders should be afforded protection and remedies against abusive or oppressive conduct.</p>	N	There have been no conviction of insider trading involving directors/commissioners, management and employees.
B.2	Protecting minority shareholders from abusive action			
B.2.1(P)	Has there been any cases of non compliance with the laws,	OECD Principle III	N	KCCDFI MBA has no cases of non compliance with the laws, rules
C. Role of stakeholders				
C.1	The rights of stakeholders that are established by law or through mutual agreements are to be respected.			
C.1.1(P)	Have there been any violations of any laws pertaining to labour/employment/ consumer/insolvency/ commercial/competition or environmental issues?	<p>OECD Principle IV (A) The rights of stakeholders that are established by law or through mutual agreements are to be respected.</p>	N	KCCDFI MBA has no violations of any laws pertaining to labor/employment/consumer/ insolvency/commercial/competition or environmental issues.
C.2	Where stakeholders participate in the corporate			
C.2.1(P)	Has the company faced any sanctions by regulators for failure to make announcements within the requisite time period for material events?	<p>OECD Principle IV (B) Where stakeholders participate in the corporate governance process, they should have access to relevant, sufficient and reliable information on a timely and regular basis.</p>	N	KCCDFI MBA has not faced any sanctions by regulators for failure to make announcements within the requisite time period for material events

D. Disclosure and transparency				
D.1 Sanctions from regulator on financial reports				
D.1.1(P)	Did the company receive a "qualified opinion" in its external audit report?	OECD Principle V: Disclosure and Transparency (B) Information should be prepared and disclosed in accordance with high quality standards of accounting and financial and non-financial disclosures. (C) An annual audit should be conducted by an independent, competent and qualified, auditor in order to provide an external and objective assurance to the board and shareholders that the financial statements fairly represent the financial position and performance of the company in all material respects. (D) External auditors should be accountable to the shareholders and owe a duty to the company to exercise due professional care in the conduct of the audit. ICGN 6.2 Annual audit The annual audit carried out on behalf of shareholders is an essential part of the checks and balances required at a company. It should provide an independent and objective opinion that the financial statements fairly represent the financial position and performance of the company in all material respects, give a true and fair view of the affairs of the company and are in compliance with applicable laws and regulations.	N	2019 Audited Financial Statements
D.1.2(P)	Did the company receive an "adverse opinion" in its external audit report?	ICGN 7.3 Affirmation of financial statements <i>The board of directors and the appropriate officers of the company should affirm at least annually that the financial statements are prepared in accordance with applicable laws and regulations.</i>	N	2019 Audited Financial Statements
D.1.3(P)	Did the company receive a "disclaimer opinion" in its external audit report?		N	2019 Audited Financial Statements
D.1.4(P)	Has the company in the past year revised its financial statements?		N	KCCDFI MBA in the past year, has not revised its financial statements
E. Responsibilities of the Board				
E.1 Compliance with listing rules, regulations and applicable				
E.1.1(P)	Is there any evidence that the company has not complied with applicable laws and regulations?	OECD Principle VI (D)	N/A	
E.1.2(P)	Have there been any instances where non-executive directors/commissioner have resigned?	UK CODE (JUNE 2010)	N	There has been no instance a directors/commissioner have resigned
E.2 Board Appraisal				
E.2.1(P)	Does the Company have any independent non-executive directors?	OECD Principle V	N	2019 Annual Report page 23 under shows the Profiles of Board
E.2.2(P)	Did the company fail to identify who are the independent non-executive directors?	ICGN 2.4 Composition and structure of the board	N	2019 Annual Report, page 23 Profile of Independent Trustees
E.3 External Audit				
E.3.1(P)	Is any of the directors or senior management a former employee or director of the company?	OECD Principle V	N	There is no director or senior management a former employee or
E.4 Board structure and composition				
E.4.1 (P)	Is any of the directors a former CEO of the company in the past year?		N	Based on the Board of Trustee Profile, there is no director who is a