

COMPANY NAME:	KCCDFI MUTUAL BENEFIT ASSOCIATION INC		COMPANY STRUCTURE: MUTUAL BENEFIT ASSOCIATION	
FINANCIAL YEAR END	2019			
SECTOR	Mi MBA			
D. Disclosure and Transparency			Y/N	Reference/ Source document
D.1	Transparent ownership structure			
D.1.1	Does the information on shareholdings reveal the identity of beneficial owners, holding 5% shareholding or more?	OECD Principle V: Disclosure and Transparency (A) Disclosure should include, but not limited to, material information on: (3) Major share ownership and voting rights, including group structures, intra-group relations, ownership data, and beneficial ownership. ICGN 7.6 Disclosure of ownership ... the disclosure should include a description of the relationship of the company to other companies in the corporate group, data on major shareholders and any other information necessary for a proper understanding of the company's relationship with its public shareholders.	N/A	
D.1.2	Does the company disclose the direct and indirect (deemed) shareholdings of major and/or substantial shareholders?		N/A	
D.1.3	Does the company disclose the direct and indirect (deemed) shareholdings of directors (commissioners)?		N/A	
D.1.4	Does the company disclose the direct and indirect (deemed) shareholdings of senior management?		N/A	
D.1.5	Does the company disclose details of the parent/holding company, subsidiaries, associates, joint ventures and special purpose enterprises/ vehicles (SPEs)/ (SPVs)?		N/A	

D.2	Quality of Annual Report			
	<i>Does the company's annual report disclose the following items:</i>			
D.2.1	Key risks	"OECD Principle V (A): (1) The financial and operating results of the company; (2) Company objectives, including ethics, environment, and other public policy commitments; (3) Major share ownership and voting rights, including group structures, intra-group relations, ownership data, beneficial ownership; (4) Remuneration policy for members of the board and key executives, including their qualifications, the selection process, other company directorships and whether they are regarded as independent by the board; (6) Foreseeable risk factors, including risk management system; (7) Issues regarding employees and other stakeholders; (8) Governance structure and policies, in particular, the content of any corporate governance code or policy and the process by which it is implemented.	Y	2019 Annual Report page 69-72, disclose all the risk that the association may encounter such as Insurance Risk, Credit and Concentration Risks/Investment Risk, Market Risks, and Liquidity Risks
D.2.2	Corporate objectives		Y	2019 Annual Report page 4, discloses our corporate objectives.
D.2.3	Financial performance indicators		Y	2019 Annual Report page 8-9 under Operations and Financial Highlights
D.2.4	Non-financial performance indicators		Y	2019 Annual Report under Stakeholders interest is member satisfaction .
D.2.5	Dividend policy		ICGN 2.4 Composition and structure of the board ICGN 2.4.1 Skills and experience	N/A

D.2.6	Details of whistle-blowing policy	ICGN 2.4.3 Independence	Y	2019 Annual Report , shows Anti Corruption Program and Whistleblowing Policy.
D.2.7	Biographical details (at least age, qualifications, date of first appointment, relevant experience, and any other directorships of listed companies) of directors/commissioners	ICGN 5.0 Remuneration ICGN 5.4 Transparency UK Corporate Governance Code (2010) A.1.2 - the number of meetings of the board and those committees and individual attendance by directors.	Y	2019 Annual Report under BOT Profiles shows the biographical details of BOT.
D.2.8	Training and/or continuing education programme attended by each director/commissioner	CLSA-ACGA (2010) CG Watch 2010 - Appendix 2 (I) CG rules and practices (19) Disclose the exact remuneration of individual directors.	Y	2019 Annual Report , shows training n programme attended by each director.
D.2.9	Number of board of directors/commissioners meetings held during the year		Y	2019 Annual Report ,shows the number of meetings held during the year.
D.2.10	Attendance details of each director/commissioner in respect of meetings held		Y	2019 Annual Report
D.2.11	Details of remuneration of each member of the board of directors/commissioners		Y	2019 Annual Report
Corporate Governance Confirmation Statement				
D.2.12	Does the Annual Report contain a statement confirming the company's full compliance with the code of corporate governance and where there is non-compliance, identify and explain reasons for each such issue?	OECD PRINCIPLE V (A) (8) UK CODE (JUNE 2010): Listing Rules 9.8.6 R (for UK incorporated companies) and 9.8.7 R (for overseas incorporated companies) state that in the case of a company that has a Premium listing of equity shares, the following items must be included in its Annual Report and accounts: a statement of how the listed company has applied the Main Principles set out in the UK CG Code, in a manner that would enable shareholders to evaluate how the principles have been applied; a statement as to whether the listed company has complied throughout the accounting period with all relevant provisions set out in the UK CG Code; or not complied throughout the accounting period with all relevant provisions set out in the UK CG Code, and if so, setting out: (i) those provisions, if any, it has not complied with; (ii) in the case of provisions whose requirements are of a continuing nature, the period within which, if any, it did not comply with some or all of those provisions; and (iii) the company's reasons for non-compliance. ASX CODE:	Y	2019 Annual Report
D.3. Disclosure of related party transactions (RPT)				
D.3.1	Does the company disclose its policy covering the review and approval of material/significant RPTs?		Y	2019 Annual Report

D.3.2	Does the company disclose the name of the related party and relationship for each material/significant RPT?	Y	2019 Annual Report
D.3.3	Does the company disclose the nature and value for each material/significant RPT?	Y	2019 Annual Report

D.4 Directors and commissioners dealings in shares of the company				
D.4.1	Does the company disclose trading in the company's shares by insiders?	<p>OECD Principle V (A): (3) Major share ownership and voting rights</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.</p> <p>ICGN 5.5 Share ownership Every company should have and disclose a policy concerning ownership of shares of the company by senior managers and executive directors with the objective of aligning the interests of these key executives with those of shareholders.</p>	N/A	KCCDFI MBA is a non stock non profit association.

D.5 External auditor and Auditor Report				
D.5.1	Are audit fees disclosed?	<p>OECD Principle V (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.</p>	Y	2019 Annual Report page 16 on External Auditor, discloses the audit fees paid to the external auditor.
	<i>Where the same audit firm is engaged for both audit and non-audit services.</i>			
D.5.2	Are the non-audit fees disclosed?	<p>OECD Principle V (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.</p> <p>ICGN 6.5 Ethical standards (Audit) The auditors should observe high-quality auditing and ethical standards. To limit the possible risk of possible conflicts of interest, non-audit services and fees paid to auditors for non-audit services should be both approved in advance by the audit committee and disclosed in the Annual Report.</p>	N/A	We don't have any non- audit fees for 2019.
D.5.3	Does the non-audit fee exceed the audit fees?		N/A	We don't have any non- audit fees for 2019.

D.6 Medium of communications			
Does the company use the following modes of communication?			

D.6.1	Quarterly reporting	OECD Principle V (E): Channels for disseminating information should provide for equal, timely and cost-efficient access to relevant information by users.	Y	KCCDFI MBA Website Homepage
D.6.2	Company website	ICGN 7.1 Transparent and open communication Every company should aspire to transparent and open communication about its aims, its challenges, its achievements and its failures.	Y	KCCDFI MBA is our company website
D.6.3	Analyst's briefing		N/A	-
D.6.4	Media briefings /press conferences	ICGN 7.2 Timely disclosure Companies should disclose relevant and material information concerning themselves on a timely basis, in particular meeting market guidelines where they exist, so as to allow investors to make informed decisions about the acquisition, ownership obligations and rights, and sales of shares.	Y	2019 Annual Report page 17 under Transparency and Disclosures, discloses the medium of communication used by the Association thru leaflets, facebook page, website etc.

D.7 Timely filing/release of annual/financial reports				
D.7.1	Are the audited annual financial report /statement released within 120 days from the financial year end?	OECD Principle V (C) OECD Principle V (E) OECD Principle V-(A).	N	It was not possible, because of business and work interruption due to COVID 19.
D.7.2	Is the annual report released within 120 days from the financial year end?	ICGN 7.2 Timely disclosure ICGN 7.3 Affirmation of financial statements	N	It was not possible, because of business and work interruption due to COVID 19.
D.7.3	Is the true and fairness/fair representation of the annual financial statement/reports affirmed by the board of directors/commissioners and/or the relevant officers of the company?	The board of directors and the corporate officers of the company should affirm at least annually the accuracy of the company's financial statements or financial accounts.	Y	2019 Annual Report page 16 External Auditor states the Quilab and Garsuta gave an unqualified opinion on KCCDFI MBA Audited FS and it was affirmed by the BOT during its meeting June 10, 2020

D.8 Company website				
<i>Does the company have a website disclosing up-to-date information on the following:</i>				
D.8.1	Business operations	OECD Principle V (A)	Y	KCCDFI MBA Website Homepage
D.8.2	Financial statements/reports (current and prior years)	OECD Principle V (E)	Y	KCCDFI MBA Website under Corporate Governance Menu, shows the FS of current and prior years.
D.8.3	Materials provided in briefings to analysts and media	ICGN 7.1 Transparent and open communication	Y	KCCDFI MBA Website
D.8.4	Shareholding structure	ICGN 7.2 Timely disclosure	N/A	Not Applicable because we are a non stock non profit association.
D.8.5	Group corporate structure		Y	KCCDFI MBA Website under ABOUT is the ORGANIZATION CHART
D.8.6	Downloadable annual report		Y	KCCDFI MBA Website under Corporate Governance Menu shows the Annual Reports
D.8.7	Notice of AGM and/or EGM		Y	KCCDFI MBA Website under News Menu shows the Notice of AGM.

D.8.8	Minutes of AGM and/or EGM		Y	KCCDFI MBA Website under Corporate Governance Menu.
D.8.9	Company's constitution (company's by-laws, memorandum and articles of association)		Y	KCCDFI MBA Website under Corporate Governance Menu.

D.9 Investor relations				
D.9.1	Does the company disclose the contact details (e.g. telephone, fax, and email) of the officer / office responsible for investor relations?	ICGN 7.1 Transparent and open communication	N/A	-