

Disclosure Control Policy

2009. 8. 31

Samsung Electronics Co., Ltd.

Disclosure Control Policy

Chapter 1. General Provisions

Article 1. (Objectives)

The objective of this policy is to ensure that the disclosure of information about the Company is accurate, complete, fair and timely in accordance with applicable legal requirements, and to establish disclosure-related responsibilities and procedures, and guidelines on managing disclosure information in order to prevent improper transaction by officers and employees.

Article 2. (Scope of Application)

Matters with respect to disclosure practices and the management of disclosure information shall be determined by this policy except otherwise stipulated in applicable laws, regulations, and the articles of incorporation.

Article 3. (Definitions)

- ① "Disclosure information" means matters that can influence investors' decision to invest in the Company's management and assets, and refers to the disclosures and related information stipulated in relevant laws such as as the Capital Market and Investment Service Act (hereinafter "Act") and Enforcement Decree (hereinafter "Decree), and the Financial Services Commission's (hereinafter "FSC") Regulations on Securities Issuances and Disclosure (hereinafter "Issuance and Disclosure Regulations"), and the Korea Exchange's (hereinafter "KRX") Regulations on Securities Market Disclosure (hereinafter "Disclosure Regulations).
- ② "Disclosure Document" means the documents (including electronic documents) and attachments submitted for the issuance of disclosure information.
- ③ "Disclosure Control Policy" means the Company's internal

management of disclosure information in accordance with set procedures.

- ④ "Disclosure Control Team" refers to the CEO, disclosure officer, and disclosure team responsible for the development, collection, and review of disclosure information and the preparation and approval of disclosure documents, as well as the department involved in issuing disclosure information in accordance with this policy.
- ⑤ "Disclosure Officer" refers to the individual appointed by the CEO to coordinate the Company's disclosure duties, and is registered at the KRX as a disclosure officer in accordance with Article 88, Paragraph 1 of the Disclosure Regulations.
- ⑥ "Disclosure Team" refers to the team responsible for the Company's disclosure duties in accordance with the Company's policies on work duty and office organization. The disclosure team should have more than two "Disclosure Officers" registered at the KRX in accordance with Article 88, Paragraph 2 of the Disclosure Regulations.
- ⑦ "Business Department" refers to the department responsible for duties related to the development of the Company's disclosure information.
- ⑧ "Regular Disclosure" means the reporting of the Company's overall performance including business and financial status and management results to the FSC or KRX in the form of a business report, semi-annual report, or quarterly report in accordance with Articles 159, 160, 165 of the Act, Articles 168 and 170 of the Decree, Article 4-3 of the Issuance and Disclosure Regulations, and Article 21 of the Disclosure Regulations.
- ⑨ "Timely Disclosure" means the disclosure of important management matters, and refers to the report or disclosure of facts or decisions related to the Company's management activities that may influence investment decisions, in accordance with Article 7 of the Disclosure Regulations.
- ⑩ "Fair Disclosure" means disclosing information to general investors through the KRX at the same time as (or before) providing information to selected individuals in the case that the Company provides information that is not subject to mandatory disclosure as stipulated in

applicable laws to selected individuals, or provides information to selected individuals before the disclosure date.

⑪ "Inquired Disclosure" means disclosure in response to an inquiry from the KRX asking the Company to clarify rumors or media reports, or disclose the possession of material information in accordance with Article 12 of the Disclosure Regulations.

⑫ "Voluntary Disclosure" means disclosing the following information through the KRX in accordance with Article 28 of the Disclosure Regulations and Article 8 of the enforcement decree: Information other than those stipulated in Article 9 that the Company considers will have a great influence on the Company's management, assets, and investors' investment decisions; and information not subject to mandatory disclosure but the Company deems should be disclosed.

⑬ "Securities Issue Disclosure and Report of Material Matters" means reporting matters related to the Company's organizational changes such as securities subscription offer and offer for sales, and company merger, split-off or business transfer to the FSC in accordance with Articles 119, 121, 123, 130 and 161 of the Act, Articles 120, 122, 137 and 171 of the Decree, and Articles 2-4, 2-6, 2-14, 2-17, 4-5, 5-8, 5-10 and 5-15 of the Issuance and Disclosure Regulations.

⑭ "Earnings Release" means presenting the Company's business performance and outlook covering sales and operating profit to investors.

⑮ The terms used in this Policy shall have the meaning as defined in related laws and regulations, unless otherwise defined in this Policy.

Chapter 2. Basic Authority and Responsibility of the Disclosure Control Team

Article 4 (CEO)

The CEO shall be responsible for matters related to the disclosure control policy.

Article 5 (Disclosure Officer)

① The disclosure officer shall be appointed by the CEO.

- ② The disclosure officer shall be in charge of designing and operating the disclosure control system.
- ③ The disclosure officer may discuss with relevant departments in carrying out his/her duty, and can seek the advice of outside professionals.

Article 6 (Disclosure Team)

- ① The disclosure team shall include disclosure officers with expertise on disclosure duties. More than two disclosure officers should be registered at the KRX in accordance with Article 88, Paragraph 2 of the Disclosure Regulations.
- ② The disclosure team shall be commanded by the disclosure officer.
- ③ The disclosure team shall be comprised of two departments – one in charge of regular disclosures, and the other in charge of timely disclosure and other non-regular disclosures. The finance department responsible for preparing and submitting disclosure documents shall be in charge of regular disclosures, and non-regular disclosures such as timely disclosure, fair disclosure, inquired disclosure and voluntary disclosure shall be covered by the IR department.

Article 7 (Business Department)

- ① In the case that matters should be or are expected to be disclosed, and when disclosed information should be or are expected to be revoked or revised, each business department shall provide related information to the disclosure team in a timely manner.
- ② When delivering the information stated in Paragraph 1, details and reference documents should be forwarded to the disclosure team.

Chapter 3 Disclosure Controls and Procedures

Section 1 Regular Disclosure

Article 8 (Regular Disclosure)

- ① The Company shall prepare regular disclosure documents and submit them to the FSC and KRX within the disclosure deadline.
- ② Disclosure control and procedures of regular disclosures shall be in compliance with the Company's 「Internal Accounting Control Regulations」 .

Section 2 Timely Disclosure

Article 9 (Timely Disclosure)

The Company shall prepare timely disclosure documents and present them to the KRX within the disclosure deadline.

Article 10 (Business Department)

- ① In the case that matters should be or are expected to be disclosed in a timely fashion, and when timely disclosures should be or are expected to be revoked or revised, each business department shall immediately provide information to the disclosure team.
- ② Business departments should immediately respond to requests to supplement the information stated in Paragraph 1 or submit additional documents.

However, in the case of matters that a business department considers requires confidentiality, the department may discuss the issue with the disclosure team.

Article 11 (Disclosure Team)

- ① In the case that the disclosure team receives information on matters subject to timely disclosure, the team shall review whether the matter is subject to disclosure and may request the relevant business department to supplement the information or submit additional data.
- ② In the case that the disclosure team discovers that the matter stated in Paragraph 1 is subject to timely disclosure, the team shall prepare a timely disclosure document and report it to the head of the disclosure team and disclose the matter in accordance with procedures stipulated in applicable laws after acquiring the approval

of the disclosure officer. Also, even with matters that are not subject to timely disclosure, the team should report the review results to the disclosure officer. However, in the case that the disclosure officer is unable to review and approve the issue, his/her duties may be delegated to the head of the disclosure team, in which case should be reported to the the disclosure officer.

- ③ The disclosure team shall review whether a timely disclosure constitutes disclosure of large-scale inside trading as stipulated in Article 11, Paragraph 2 of the Monopoly Regulations and Fair Trade Act.

Article 12 (Disclosure Officer)

The disclosure officer shall review whether the review results and disclosure documents stated in Article 11, Paragraph 2 are appropriately prepared, and shall approve the disclosure. However, when the disclosure officer is unavailable, the head of the disclosure team may approve the disclosure, in which case the disclosure officer should be notified of the matter.

Article 13 (Post-Disclosure Review)

- ① After a timely disclosure is issued, the disclosure team and the business department involved shall immediately review the appropriateness of the disclosure.
- ② In the case that omissions or errors are found, corrective disclosure and other necessary measures should be taken.

Section 3 Fair Disclosure

Article 14 (Fair Disclosure)

The Company shall prepare fair disclosure documents and present it to the KRX within the disclosure deadline.

Article 15 (Ban on Selective Disclosure)

Fair disclosure information providers (referring to individuals described in

Article 15, Paragraph 2 of the Disclosure Regulations) should not selectively provide fair disclosure material to those privy to fair disclosure information (referring to individuals described in Article 15, Paragraph 3 of the Disclosure Regulations) before the disclosure is issued.

Article 16 (Points to Consider)

- ① When issuing a fair disclosure, the name and contact information of the person in charge of the disclosure should be clearly stated so that investors can easily make inquiries in regard to the fair disclosure issued.
- ② Under the request of the KRX, the Company shall disclose a summary of the fair disclosure and the Company's website address on the KRX and also post the summarized version and original text of the disclosure on the Company's website.

Article 17 (Mutatis Mutandis)

Articles 10, 12 and 13 shall apply mutatis mutandis to fair disclosure policies. In this case, "timely disclosure" shall be replaced with "fair disclosure".

Section 4 Inquired Disclosure

Article 18 (Inquired Disclosure)

The Company shall prepare inquired disclosure documents and present them to the KRX within the disclosure deadline.

Article 19 (Disclosure Team)

- ① On receiving the KRX's request for inquired disclosure, the disclosure team shall immediately look into whether the information is correct and whether it can be deemed material information, and prepare disclosure documents which should be approved by the disclosure official. However, in the case that the disclosure officer is unable to approve the documents, his/her duties may be delegated to the head of the disclosure team, in which case should

be reported to the the disclosure officer.

- ② The disclosure team may request business departments to submit documents or state their opinion to clarify whether the information is correct and whether it can be deemed material information, and in this case business departments should accept such requests. However, in the case of matters that a business department considers requires confidentiality, the department may discuss the issue with the disclosure team.
- ③ In the case that the disclosure team responds to an inquired disclosure by disclosing that the matter in question is under a decision-making process, (hereinafter "pending disclosure"), the team shall identify finalized matters or progresses made with regard to the pending disclosure and issue a re-disclosure within one month of the pending disclosure date. However, in the case that it is not possible to make a re-disclosure, the re-disclosure deadline shall be disclosed.

Article 20 (Mutatis Mutandis)

Articles 12 and 13 shall apply mutatis mutandis to inquired disclosure policies.

In Articles 12 and 13, "timely disclosure" shall be replaced with "inquired disclosure, and "the review results and disclosure documents stated in Article 11, Paragraph 2" shall be replaced with "the clarifications and disclosure documents stated in Article 19, Paragraph 1".

Section 5 Voluntary Disclosure

Article 21 (Voluntary Disclosure)

The Company shall prepare voluntary disclosure documents and present them to the KRX within the disclosure deadline.

Article 22 (Decision to issue Voluntary Disclosure and the Collection of Information)

- ① In the case that the disclosure team decides that a matter should

be voluntarily disclosed, or when voluntary disclosures should be or are expected to be revoked or revised, the team may request business departments to submit information or documents.

- ② In the case that a matter should be voluntarily disclosed, when voluntary disclosures should be or are expected to be revoked or revised, or when a business department receives the disclosure team's request for related information or documents in accordance with the above Paragraph 1, the business department should immediately send the information or documents in writing to the disclosure team in accordance with the methods stipulated in Article 7, Paragraph 2.
- ③ Business departments should immediately respond to requests to supplement the information stated in the above Paragraph 2 or submit additional documents. However, in the case of matters that a business department considers requires confidentiality, the department may discuss the issue with the disclosure team.

Article 23 (Mutatis Mutandis)

Articles 11, 12 and 13 shall apply mutatis mutandis to voluntary disclosure policies.

In this case, "timely disclosure" shall be replaced with "voluntary disclosure", "review whether the matter is subject to disclosure" in Article 11, Paragraph 1 shall be replaced with "review whether a disclosure is necessary", "is subject to timely disclosure" in Article 11, Paragraph 2 shall be replaced with "requires disclosure", and "matters that are not subject to timely disclosure" in the same Paragraph shall be replaced with "matters that do not require disclosure".

Section 6 Securities Issue Disclosure and Report of Material Issues

Article 24 (Securities Issue Disclosure and Report of Material Issues)

The Company shall prepare documents on securities issue disclosure and report of material issues and present them to the FSC within the

disclosure deadline.

Article 25 (Preparation of Plans)

In the case that securities issue disclosure or report of material matters stipulated in Article 161, Paragraphs 1, 6, and 8 of the Act should be or are expected to take place, the disclosure team shall check the matters to be disclosed and the disclosure schedule, and prepare plans for securities issue disclosure and report of material issues.

Article 26 (Mutatis Mutandis)

Report of Material Issues discussed in Article 161, Paragraph 1, Subparagraphs 1, 5 and 9 of the Act shall apply *mutatis mutandis* to Paragraphs 10 and 13. In this case, "timely disclosure" and "timely disclosure documents" shall be replaced with "report of material matters" and "documents reporting material matters", respectively.

Chapter 4 Information and Communication

Article 27 (Information Collection, Maintenance, and Management)

- ① In order to ensure the accuracy, completeness, fairness and timeliness of disclosure information, each disclosure control team shall collect, maintain and manage external and internal information related to their duties, and supporting information.
- ② The disclosure officer may give necessary orders to facilitate the collection, maintenance, management and use of the information stated in Paragraph 1.

Article 28 (Communication)

In discharging his/her disclosure duties, the disclosure officer shall make efforts to facilitate open exchange of information and communication between the disclosure control team and employees

Chapter 5 Assessment and Management of Disclosure Risks

Article 29 (Management of Disclosure Risks)

The disclosure officer shall ensure that various disclosure risks that may adversely affect the accuracy, completeness, fairness and timeliness of disclosure information can be identified and managed in a timely and consistent manner.

Article 30 (Business Department)

If a business department discovers actual or potential disclosure risks while executing its duties, the department shall immediately report this to the disclosure team and take necessary measures to prevent disclosure risks.

Article 31 (Disclosure Team)

- ① The disclosure team shall be in charge of identifying and managing disclosure risks across the company.
- ② The disclosure team shall ensure that disclosure risk factors are consistently identified and managed.
- ③ The disclosure team shall classify major disclosure risks that may have a significant influence on the Company and ensure that they are adequately identified and managed.

Chapter 6 Monitoring

Section 1 Routine Monitoring

Article 32 (Routine Monitoring)

- ① Business departments and the disclosure team shall conduct routine monitoring to ensure that disclosure-related duties are performed in compliance with disclosure control policies, and take necessary measures so that weaknesses can be corrected and improved in a timely manner. The disclosure team shall also routinely check changes in operations such as personnel changes.

- ② The following requests can be made as part of routine monitoring:
Approval of documents; submission of reference materials; interview with employees related to disclosure information; statement of opinion by the accounting or auditing team.

Section 2 Operational Status Assessment

Article 33 (Assessment Responsibilities and Schedule)

- ① The disclosure officer shall assess the disclosure control policy operation status.
- ② The assessment shall be performed after the end of each business year and before the business report is submitted.

Article 34 (Procedure)

- ① When an operational assessment is performed in accordance with the regulations set forth in Article 33, each business department shall submit a report on the department's operational status to the disclosure team.
- ② The disclosure team shall perform an operational assessment of the Company's disclosure control policy based on the reports submitted by business departments and report the assessment results to the disclosure officer.
- ③ Based on the results reported by the disclosure team, the disclosure officer shall assess the Company's operation of its disclosure control policy.

Article 35 (Assessment Method and Considerations)

To assess the Company's operation of its disclosure control policy, the disclosure officer may use various assessment methods including interviews with those involved in the disclosure process including the preparation and forwarding of information, review of related documents, and gathering opinions from outside experts.

Article 36 (Use of Operational Assessment Results)

The disclosure officer shall take adequate measures to improve the weaknesses that were discovered through the assessment of the Company's operation of its disclosure control policy.

Chapter 7 Ban on Improper Transaction

Article 37 (General Rules)

The Company's officers and employees should not use previously undisclosed material information stipulated in Article 174, Paragraph 1 of the Act (hereinafter "previously undisclosed material information") for the sales and transaction of certain securities stipulated in Article 172, Paragraph 1 of the Act (hereinafter "certain securities"), or inform any other person of the information.

Article 38 (Management of Undisclosed Material Information)

- ① Officers and employees should not disclose the Company's previously undisclosed material information.
However, should there be a need to share previously undisclosed material information with transaction counter-parties, legal proxies, or outside auditors, only the minimum necessary information should be provided.
- ② In the case that officers or employees inadvertently disclosed previously undisclosed material information, the disclosure team should be notified immediately.
- ③ On receiving the notification stated in the above paragraph 2, the disclosure team should report the details to the disclosure officer and undertake adequate action such as issuing a fair disclosure.

Article 39 (Reimbursement of Short-term Trading Gains)

- ① In the case that officers and the following employees gain profit by selling certain securities within six months of acquisition, or acquiring certain securities within six months of sales, the profit should be reimbursed to the Company in accordance with regulations set forth in Article 172 of the Act.

1. Employees engaged in developing, revising, implementing, and disclosing matters subject to report of material issues as stated in Article 3, Paragraph 13
 2. Employees engaged in the fields of finance, accounting, planning, and R&D
- ② In the case the Company's shareholder (refers to individuals in possession of depository receipts and equity securities as well as those in possession of corporate securities. The same meaning shall apply in this paragraph.) requests officers and employees to reimburse profit gained from short-term transaction, the disclosure team shall report the request to the disclosure officer.
- ③ Within two months of receiving the request stated in the above paragraph 2, the disclosure officer should undertake adequate measures to have the officer or employee concerned to make a reimbursement, such as making a legal claim for reimbursement.
- ④ The disclosure officer should ensure that the following is immediately posted on the Company's website for two years starting from the date of the Securities & Futures Commission's (hereinafter "SFC") notification of gain on short term trading.
- However, this shall not apply if the officer or employee has reimbursed the short term trading gains.
1. The position held by the person liable for reimbursement of short term trading gains
 2. Amount of short term trading gains
(refers to the sum of gains earned by each officer, employee, or major shareholder)
 3. The date on which the SFC notified that short term trading gains were realized
 4. The Company's plans to claim reimbursement of gains from short term trading
 5. The Company's shareholders (refers to individuals in possession of depository receipts and equity securities as well as those in possession of corporate securities. The same meaning shall apply in this paragraph.) may request the Company to claim reimbursement of gains from short-term transaction, which means that shareholders may file the reimbursement claim in subrogation of the Company if

the Company does not file a claim within two months of receiving a request.

Chapter 8 Other Disclosure Controls

Section 1 Contact with the Media including Dissemination of Media Releases

Article 40 (Dissemination of Media Releases)

- ① In principal, the public relations department shall be in charge of disseminating media releases.
- ② Each business department should forward media release materials to the public relations department before providing the materials to the press. In the case of media releases related to matters subject to disclosure, the public relations department should consult with the disclosure team before disseminating the materials.
- ③ If the information released to the media falls under matters subject to fair disclosure stated in Article 14, the disclosure team should prepare fair disclosure documents and issue a fair disclosure in accordance with regulations set forth in Articles 16 and 17.

Article 41 (Opinion Gathering)

If necessary, the disclosure team may gather the opinion of officers, employees, or outside experts with professional knowledge on information offered to the press.

Article 42 (Review of Media Reports)

The business department which prepared the media release and the public relations department should conduct a review of media reports, and report any factual errors to the disclosure team and take necessary action.

Article 43 (Media Interviews)

- ① In principal, the public relations department shall be in charge of media interview related matters.
- ② When receiving a request for media interviews, the public relations department should accept the interview request after consulting with the disclosure team, if deemed necessary.
- ③ The public relations team should review media reports, and report any factual errors to the disclosure team and take necessary action.

Section 2 Market Rumors

Article 44 (Market Rumors)

- ① If deemed necessary, the disclosure team should check whether market rumors are consistent with undisclosed material information by gathering opinions from related business departments, and may take necessary action such as issuing a disclosure.
- ② Even in cases when market rumors are inconsistent with undisclosed material information, the disclosure team should establish and conduct necessary measures when it is deemed that the rumors may have an adverse effect on the Company.

Article 45 (Request for Information)

- ① If the disclosure officer receives request for information disclosure from shareholders and stakeholders, the disclosure officer should look into the legality of the request and decide whether to provide the information.
- ② If the disclosure officer decides to provide information in accordance with the process set forth in the above Paragraph 1, the disclosure officer may seek the advice of the legal department or outside legal experts on whether the information could affect investment decisions and share price. If the information is subject to fair disclosure or may affect investment decision or share price, the disclosure officer should take necessary measures to ensure that the information is disclosed to the general public at the same time (or before) the information is provided to the individual requesting the information.

Article 46 (IR Presentation)

When an IR presentation is held, the business department in charge shall inform the date and venue of the presentation and provide the handout materials in advance so that they can be disclosed to general investors.

Article 47 (Providing Information through the Company Website)

Among the information disclosed as a material issue, the disclosure team shall immediately post information that is deemed useful to investors in making investment decisions on the Company's website to facilitate general investors' accessibility and convenience.

Chapter 9 Addenda

Article 48 (Education)

- ① The disclosure officer should draw up and implement education plans to ensure that the Company's officers and employees fully understand disclosure control policies and effectively carry out their duties. In particular, the disclosure team shall undergo professional education.
- ② The disclosure team should take necessary measures such as launching education programs to ensure that matters related to disclosure control policies can be communicated to officers and employees..

Article 49 (Discipline)

An officer or employee who violates this policy and causes significant damage to the Company may face disciplinary action as stipulated in the Company's relevant regulations.

Article 50 (Amendment and Repeal of Policy)

The CEO shall have the right to amend and repeal the provisions of

this Policy

Appendix

This policy shall take effect as of September 1, 2009.