

ANTI-CORRUPTION SCHEME

OF BEC GROUP

Amidst the era of rapidly developed digital technology, domestic and international economic conditions and society have been affected by this change, especially “Digital TV Industry”, the very first industry that has been affected. Although BEC Group, one of Digital TV Operators, has been also affected by such change, we have continued to commit ourselves to conduct the business on the basis of Good Corporate Governance and Code of Business Conduct with an emphasis on integrity, transparency and accountability. In addition, our stand point has also focused on anti-corruption of all forms, playing an important role as the significant foundation in creating all stakeholders’ confidence and reliability.

BEC Group has established and documented the anti-corruption policy and practices by determining the objectives, roles and responsibilities, practical guidelines, implementation requirements, as well as punishment procedure as appeared in the 2014 Corporate Social Responsibility Report of BEC Group, Pages 26-33, to ensure employees’ understanding and to be used as an operational guideline in accordance with the corporate anti-corruption policy for prevention, detection and response to any corrupt acts. In addition, BEC Group has also included the anti-corruption issue in the BEC Group Code of Conduct, Page 9, under the Topic “Anti-corruption” stating that “Directors, executives and all employees should have conscious mind against the dishonesty and corruption, and the internal control system has been also established to prevent all kinds of corruptions, extortion, taking and/or giving bribe and incentive of any kind, except traditional giving or business entertainment, trade discount, and/or corporate sale promotion. For any anti-corruption training organized by the Company, employees are expected to regularly attend the said training to enhance their knowledge and understanding,

as well as participate in testing their understanding on corruption. Furthermore, the Company has also included the issue of accepting gifts and business entertainment in the Code of Conduct as the guideline for employees’ practice in the same direction to ensure all directors, executives and employees that the Company would strictly concern on the anti-corruption.

In order to prepare ourselves to participate in Thailand’s Private Sector Collective Action Coalition Against Corruption (CAC), the CAC working group meeting was held on 25 October 2019 to consider the draft of anti-corruption policy (revision) and other policies and practices in line with the anti-corruption measures such as political support policy, charitable donation policy, sponsorship policy, policy on giving & taking gifts and entertainment and other expenses. These policies are being drafted prior to being proposed to the Audit Committee and the Board of Directors for consideration, then, proposed to the Chairman of the Board for approval and enforcement.

Furthermore, BEC Group signed the Memorandum of Cooperation and Collective Action made among Office of The National Anti-Corruption Commission, organizations, associations, foundations, communication agencies, and entertainment industry sector to build zero tolerance society (2018-2020) on 28 May 2018 by reporting news & information and raising awareness of zero tolerance society as well as publicizing the anti-corruption operations by NACC, for the benefits of society as a whole. As one of activities under the Memorandum of Cooperation and Collective Action of 22 organizations, we also attended the NACC Meeting No. 1/2562 on 31 October 2019 at the Office of NACC, Nonthaburi Province, to listen to the progress report, and also collaborated in disseminating news & information of NACC.

through our communication channels such as making PR news scoop for “STRONG: Anti-corruption Mind” Project to provide knowledge and raise awareness of anti-corruption in the community. The Company’s executive have also become a member of Media Ethics Committee to strengthen morals, ethics and good governance in Thai society.

In December 2019, we organized the “Change Gifts into Merits” Event in which executives and employees were invited to donate their gifts provided by the third party to Bangkok School for the Blind in compliance with the drafted policy on taking & receiving gifts, entertainment and other corporate expenses, this event could raise the public mind among our personnel as well.



In 2019, Channel 3 was granted of 2019 NACC Awards on Clean TV Program Broadcaster, organized by Office of The National Anti-Corruption Commission to honor persons or entities which promote or support the prevention and suppression of corruption by creating moral-promoting and anti-corruption media contents. Channel 3’s drama series granted by this Award included “Luang Ta Mahachon – ‘I am a poor man’ Episode”, “Lom Phrai Pook Rak”, “Matuphoom Haeng Huachai”, “Neung Dao Fah Deaw”, Thong Ek Mhorya Tha Chalong”, and “Krong Kam”. BEC Group has also presented news programs to raise awareness of anti-corruption which will be discussed in the Topic “News & Information Broadcasting to Raise Social Awareness on Anti-Corruption Issues in Thai Society by BEC Group”.

BEC Group also provides **the corruption whistleblowing or complaint channels within the organization**, those who wish to whistle blowing/complaints can report the incident along with the submission of evidences to Department Director or superordinate who is directly in charge or to the Company’s Internal Audit Office through www.becworld.com under the Menu “Whistleblowing Channel”, or verbally or written notify/send email/letter. After receiving such complaint or whistleblowing, the Internal Audit Office will collect evidences and propose them to the Board of Directors to appoint a working team for screening, monitoring, factual investigation, and proposing the result to the Audit Committee for information verification. If what has been complaint or whistle blown is true, the Company will impose the punishment based on the Regulations of Employees’ Disciplines and seek the appropriate way to prevent damages and lay down measures/guidelines for reoccurrence prevention. After that, the Board of Directors shall be submitted of report for acknowledgement and approval of anti-corruption measures or corruption prevention guidelines. All complaints/whistleblowing taken shall be treated as confidential, details of the complainant/whistleblower and information source shall be not disclosed unless it is required by law. However, the complaint and suggestion policy has been drafting and revising before proposing to the Audit Committee and the Board of Directors for consideration. After that, it will be proposed to the Chairman of the Board for approval and enforcement.



CORRUPTION RISK ASSESSMENT

OF BEC GROUP

BEC Group has established the procedure for anti-corruption risk assessment which will be conducted by each department; for instance, Corporate Affairs Department shall assess the risk of taking-giving gifts, entertainment, supporting media organization/association on anniversary/special occasions, supporting media/public relations to government agencies, promoting political parties during the election, procurements of various projects. The Internal Audit Office, as a member of working group on Thailand's Private Sector Collective Action Coalition Against Corruption (CAC), will compile all corruption risk assessments in the organization to propose to the working group to analyze the causes of risks and seek preventive and corrective measures to prevent reoccurrence or permanently prevent corruptions in the Company. In addition, the Company has determined the guidelines for governance and supervision to prevent and monitor the corruption risks provided by the assessments, and set the guideline to monitor the compliance with anti-corruption policy, the CAC Working Group will be assigned to monitor the compliance and report to the management, Audit Committee and the Board of Directors.

In 2019, BEC Group realized the importance of risk management and assessment, the risk management policy was therefore drafted by setting the objectives, strategies, indicators, assessment, review, and communication of information about risk management. The corruption risk was one of topics to be considered in risk management and assessment as well.



NEWS & INFORMATION BROADCASTING TO RAISE SOCIAL AWARENESS ON ANTI-CORRUPTION ISSUES IN THAI SOCIETY

BY BEC GROUP

As a good media organization, we are aware that the corruption could happen anytime, anywhere and any occasion, it is one of serious threats which can ruin Thai economy and society, the news & information related to anti-corruption have been broadcasted to raise awareness of Thai people and build zero tolerance society, leading to the prevention, monitoring and solution of corruption problems, through our news programs under “Krob Krua Kao 3” scheme including 3 Miti News Program, P.O. Box Channel 3 News Program, Rueng Lao Chao Ni News Program, Tee Kao Chao News Program, Tiang Wan Tan Het Kan News Program, and Flash News Program, for example:



- 3 Miti News Program** presented the news about the World’s Corruption Index 2018 evaluated by the Transparency International (TI) from 180 countries around the world, it was found that Thailand was ranked as 99th. The objective of this news was to raise the anti-corruption alertness in Thai society, it was broadcasted on 29 January 2019 through Channel 3 and Channel 33HD.
- Flash News Program** reported the news that the President of Anti-Corruption Foundation was interviewed about the expectation on the government’s operation to focus on anti-corruption, transparency and verifiability, as well as all senators have been expected to audit the government’s works. This program was broadcasted on Channel 3 and Channel 33HD on 6 July 2019.
- Special Program “2019 Election – Thailand’s Direction”** hosted by Mr. Kitti Singhapat discussed about the anti-corruption policy with the guest, Mr. Chaturon Chaisang, Strategic President of Thai Save the Nation Party. It was broadcasted to the public as a part of increasing the public’s perception and raising their awareness on anti-corruption in Thailand’s national election, this program was broadcasted on Channel 3 and Channel 33HD on 4 February 2019.
- Tee Kao Chao News Program** presented and monitored the operations of National Anti-Corruption Commission, Region 3, Nakhon Ratchasima Province, in inspecting the students’ lunch project at schools in Nakhon Ratchasima Province after making random inspection, it was found that 4 schools were suspected to corrupt in students’ lunch project, the program demanded the justice for students and taking legal actions against the alleged. This program was broadcasted on Channel 28SD on 7 July 2019.

EXTERNAL COMPLAINT ACCEPTANCE OF BEC GROUP



The Board of Directors has determined the guideline and process for the reporting of complaints and provision of protection for the complainant/whistle-blower who reports any illegal or immoral action, any misconduct, misleading financial reports, defective internal control systems and violation of human rights as follows:

