



CORPORATE DISCLOSURE ON BUSINESS INTEGRITY IN ASEAN

21 July, 2016



Centre for Governance, Institutions & Organisations
NUS Business School



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AGENDA

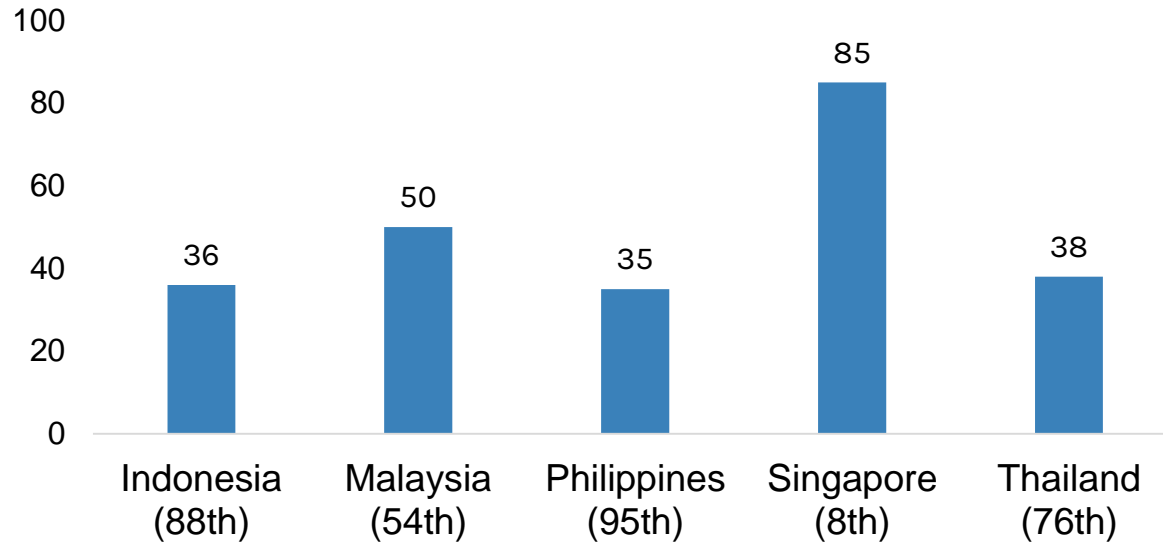
- ▶ Background
- ▶ Methodology & Limitations
- ▶ Findings for Top 50 Companies per Country
- ▶ Top 10 Companies with Highest Disclosure Rates



1.

BACKGROUND

2015 Corruption Perception Index Rankings & Scores



2.

METHODOLOGY & LIMITATIONS



DATA COLLECTION

Company Selection

Top 50 companies in 5 ASEAN countries by market capitalisations

- ▶ Indonesia
- ▶ Malaysia
- ▶ Philippines
- ▶ Singapore
- ▶ Thailand

Questionnaire

13 questions from Transparency International's study: *Transparency in Corporate Reporting*

Sources

- ▶ Companies website
- ▶ Annual reports, Sustainability reports, Corporate governance reports
- ▶ Code of Conduct

Scoring

1 = Fully Satisfied
0.5 = Partly Satisfied
0 = Not Satisfied

Limitations

- ▶ Language barriers
- ▶ Absence of public disclosure
- ▶ Ambiguous cases



3.

**FINDINGS
FOR TOP 50
COMPANIES
PER COUNTRY**



ASPECTS & QUESTIONS

Aspect 1

Internal
Commitment to
Anti-Corruption

- ▶ Question 1
- ▶ Question 2
- ▶ Question 3
- ▶ Question 4
- ▶ Question 7

Aspect 2

External
Commitment to
Anti-Corruption

- ▶ Question 5
- ▶ Question 6
- ▶ Question 8
- ▶ Question 9
- ▶ Question 13

Aspect 3

Reporting &
Monitoring

- ▶ Question 10
- ▶ Question 11
- ▶ Question 12

ASPECT 1

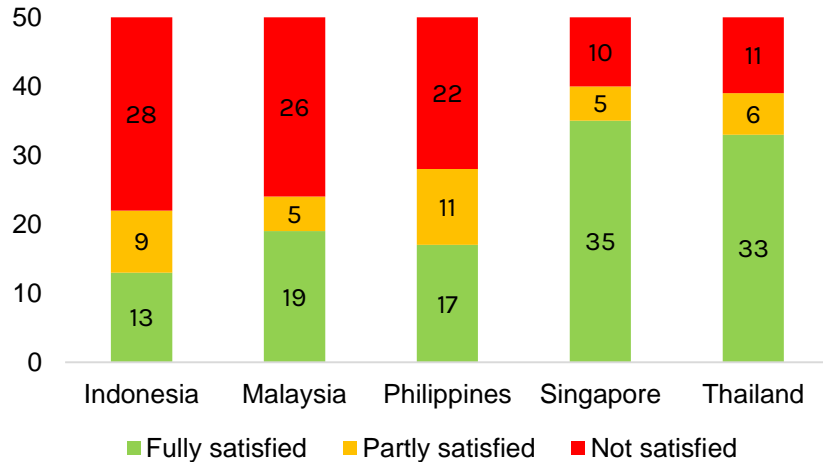
INTERNAL COMMITMENT TO ANTI-CORRUPTION

- Question 1 Does the company have a publicly stated commitment to anti-corruption?
- Question 2 Does the company publicly commit to be in compliance with all relevant laws, including anti-corruption laws?
- Question 3 Does the company leadership demonstrate support for anti-corruption?
- Question 4 Does the company's code of conduct/anti-corruption policy explicitly apply to all employees and directors?
- Question 7 Does the company have in place an anti-corruption training programme for its employees and directors?

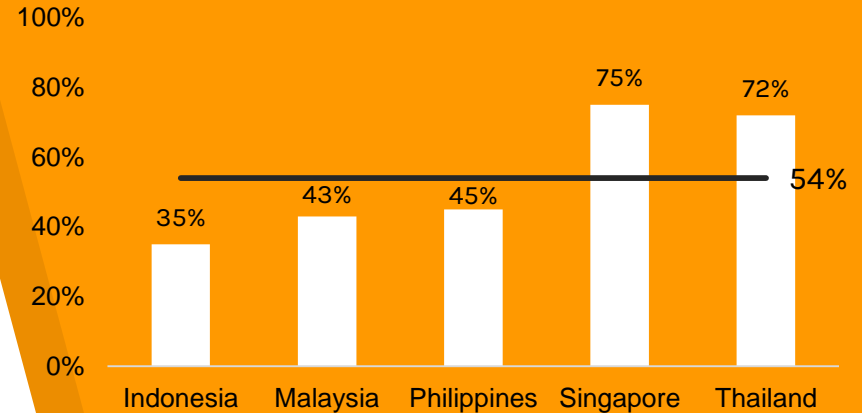
QUESTION 1

STATEMENT ON ANTI-CORRUPTION

Q1. Does the company have a publicly stated commitment to anti-corruption?



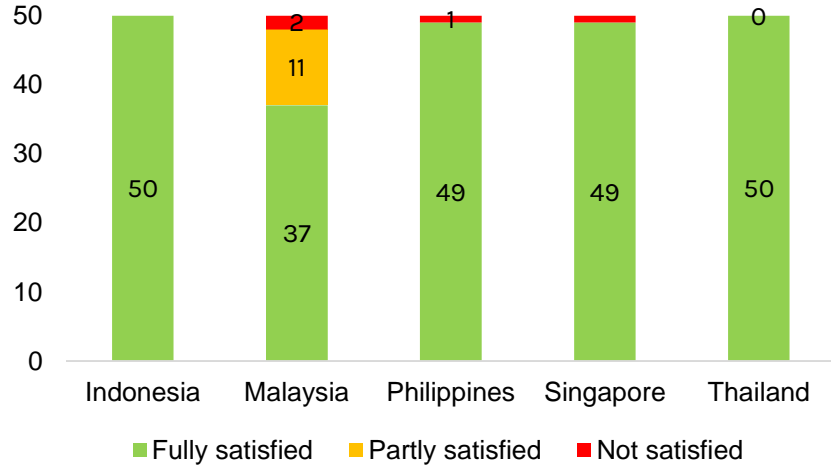
Q1. Average Level of Disclosure



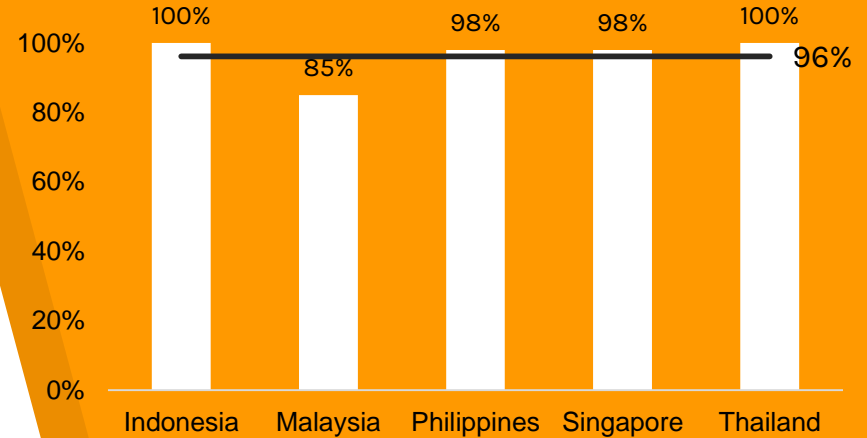
QUESTION 2

COMMITMENT TO COMPLY WITH LAWS & REGULATIONS

Q2. Does the company publicly commit to be in compliance with all relevant laws, including anti-corruption laws?



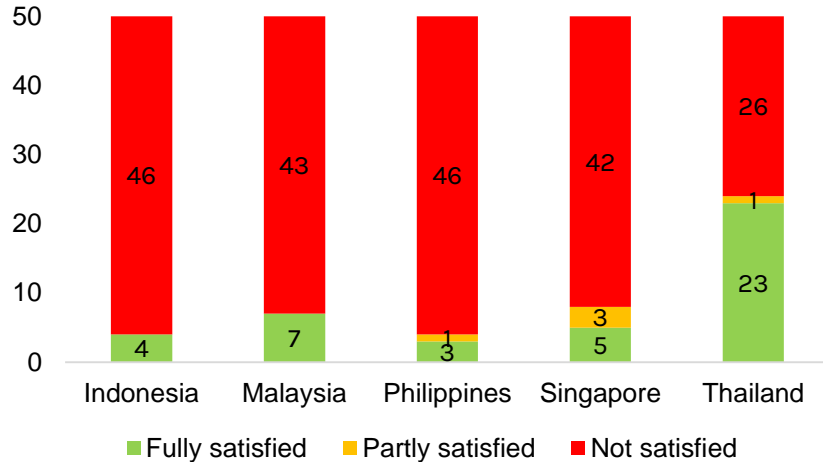
Q2. Average Level of Disclosure



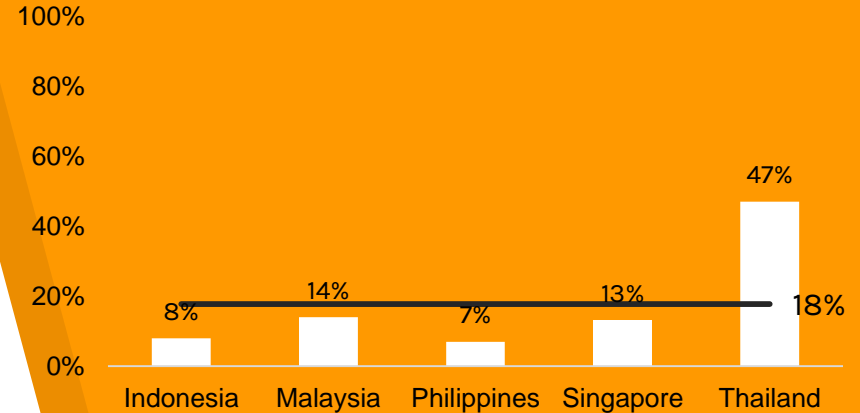
QUESTION 3

LEADERSHIP SUPPORT FOR ANTI-CORRUPTION

Q3. Does the company leadership demonstrate support for anti-corruption?



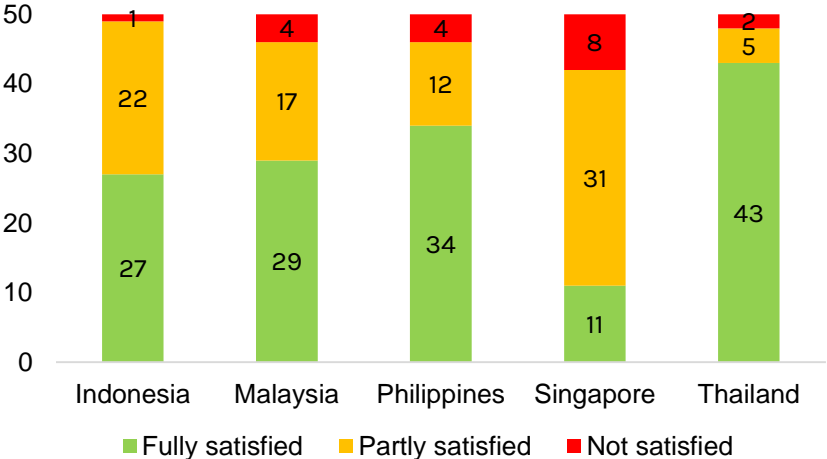
Q3. Average Level of Disclosure



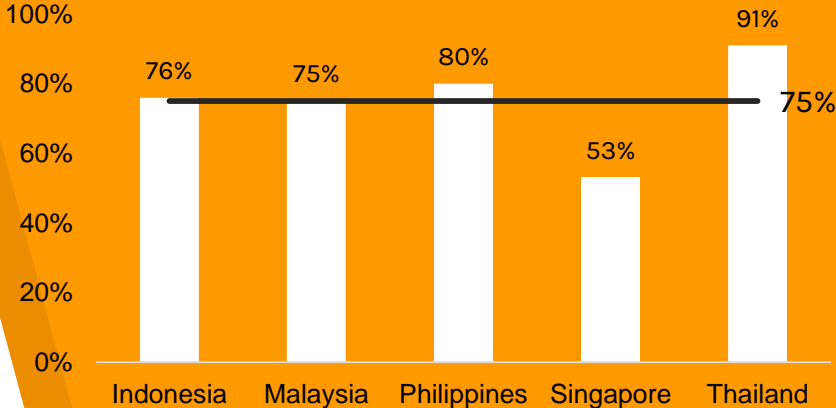
QUESTION 4

CODE OF CONDUCT TO ALL DIRECTORS & EMPLOYEES

Q4. Does the company's code of conduct/anti-corruption policy explicitly apply to all employees and directors?

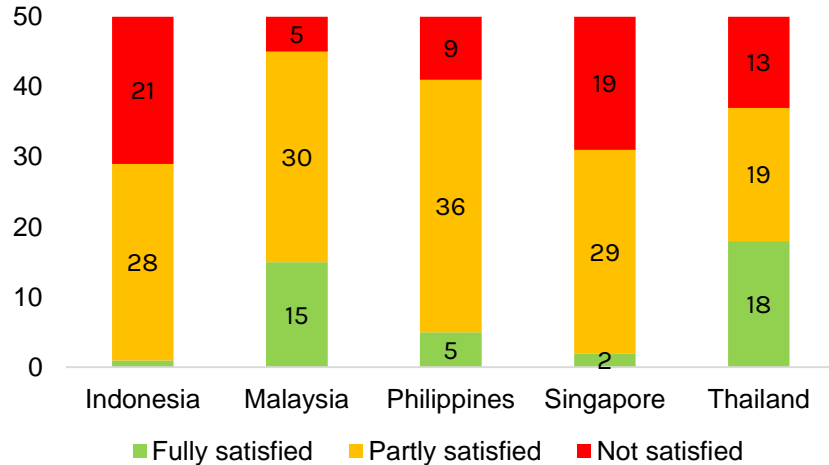


Q4. Average Level of Disclosure

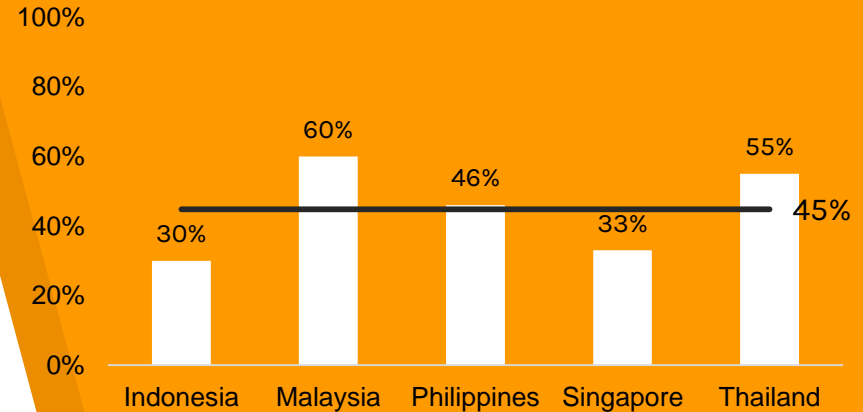


QUESTION 7: ANTI-CORRUPTION TRAINING FOR EMPLOYEES & DIRECTORS

Q7. Does the company have in place an anti-corruption training programme for its employees and directors?



Q7. Average Level of Disclosure



ASPECT 2

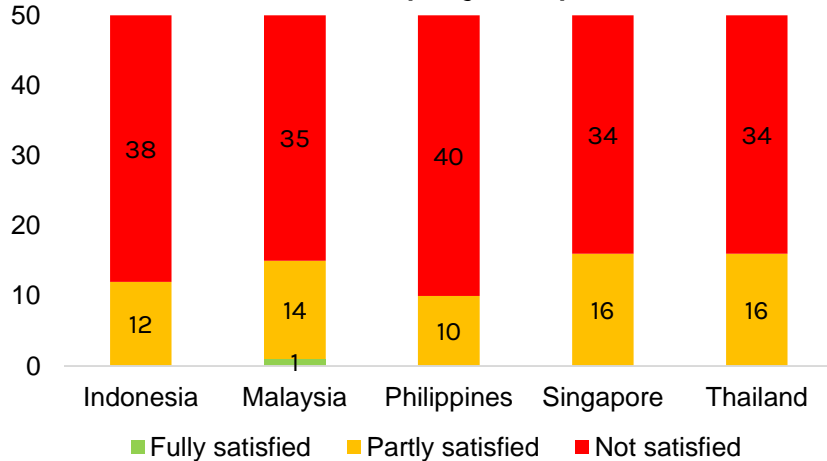
EXTERNAL COMMITMENT TO ANTI-CORRUPTION

- Question 5 Does the company's anti-corruption policy explicitly apply to persons who are not employees but are authorised to act on behalf of the company or represent it?
- Question 6 Does the company's anti-corruption programme apply to non-controlled persons or entities that provide goods or services under contract?
- Question 8 Does the company have a policy on gifts, hospitality and expenses?
- Question 9 Is there a policy that explicitly prohibits facilitation payments?
- Question 13 Does the company have a policy on political contributions that either prohibits such contributions or if it does not, requires such contributions to be publicly disclosed?

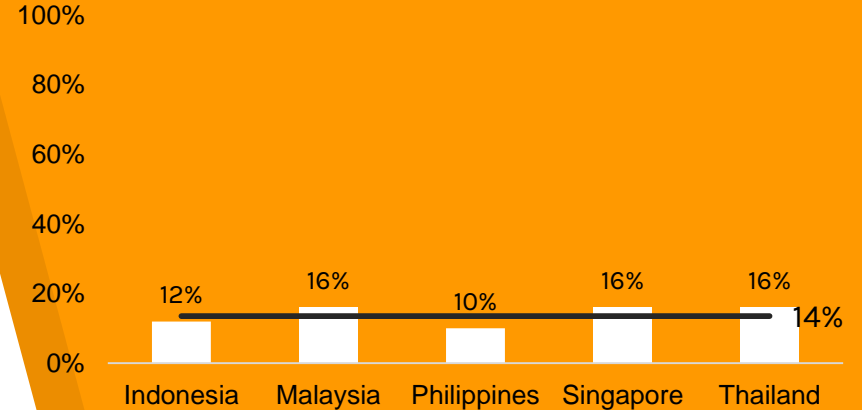
QUESTION 5

THIRD PARTY ACTING ON BEHALF OF THE COMPANY

Q5. Does the company's anti-corruption policy explicitly apply to persons who are not employees but are authorised to act on behalf of the company or represent it?



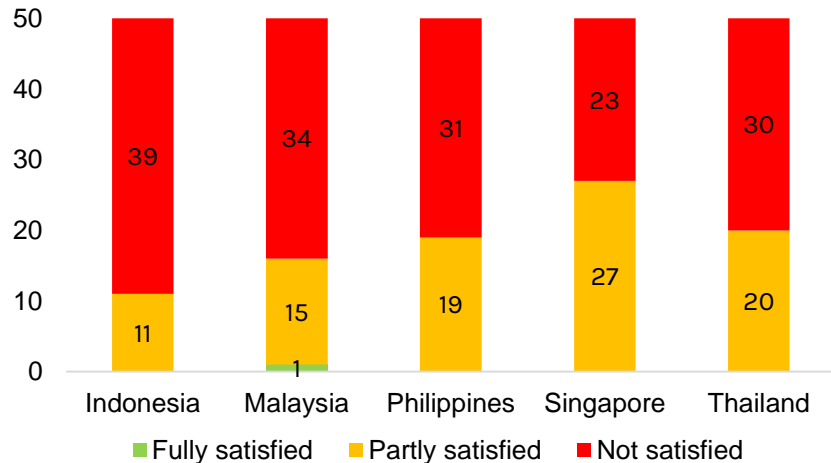
Q5. Average Level of Disclosure



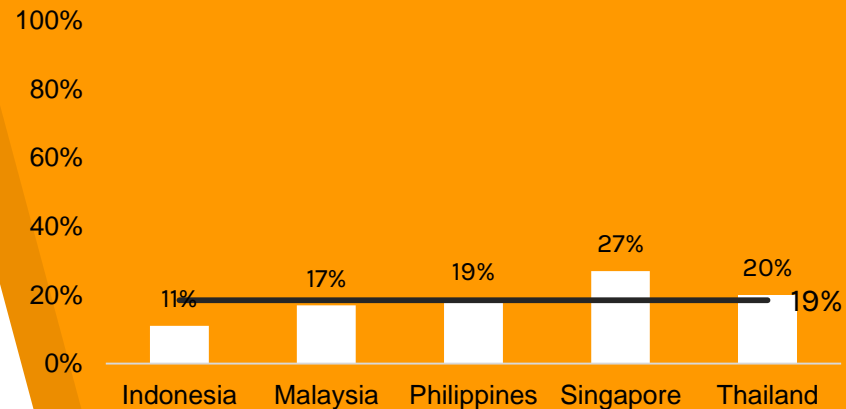
QUESTION 6

THIRD PARTY PROVIDER OF GOODS OR SERVICES

Q6. Does the company's anti-corruption programme apply to non-controlled persons or entities that provide goods or services under contract?



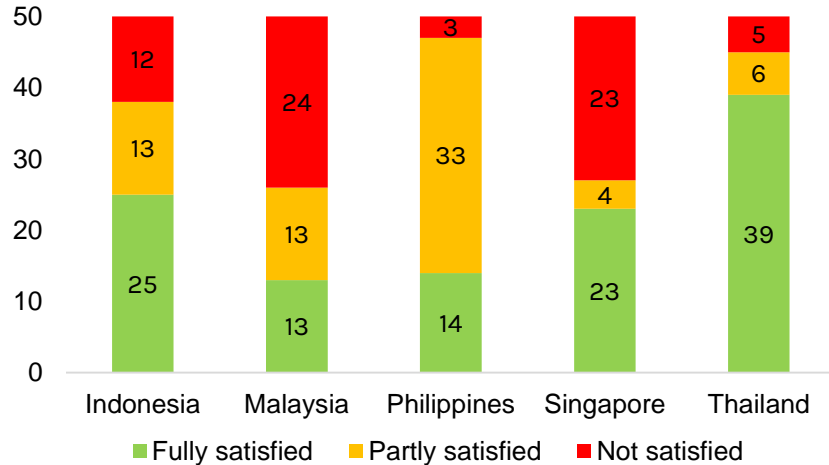
Q6. Average Level of Disclosure



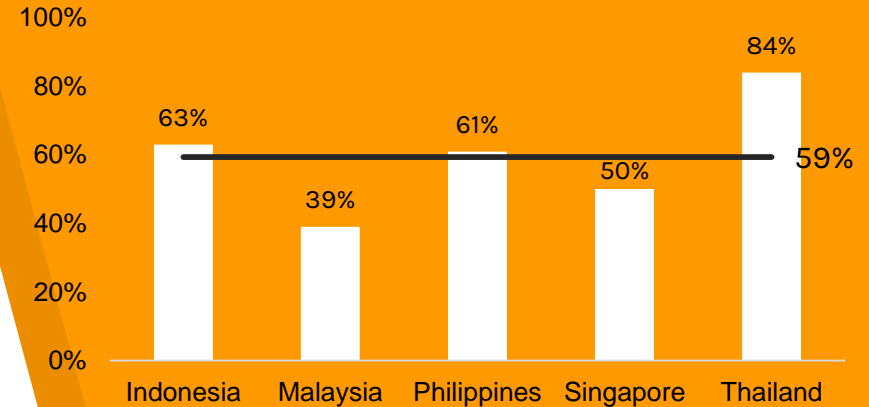
QUESTION 8

GIFTS, HOSPITALITY, AND EXPENSES

Q8. Does the company have a policy on gifts, hospitality and expenses?



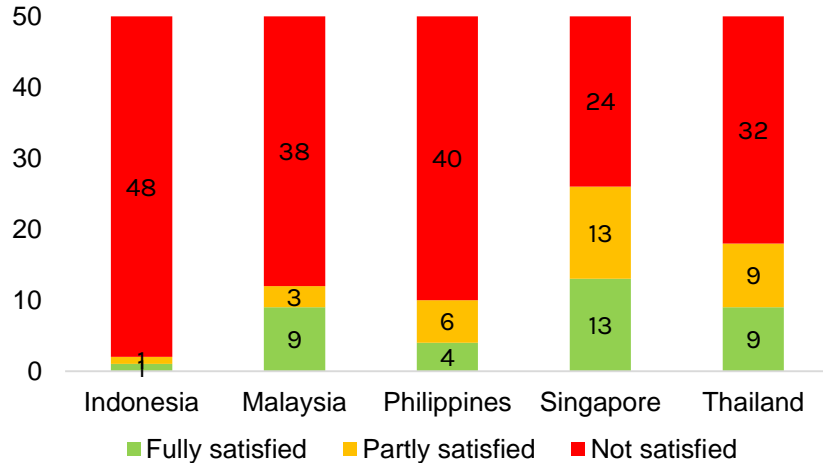
Q8. Average Level of Disclosure



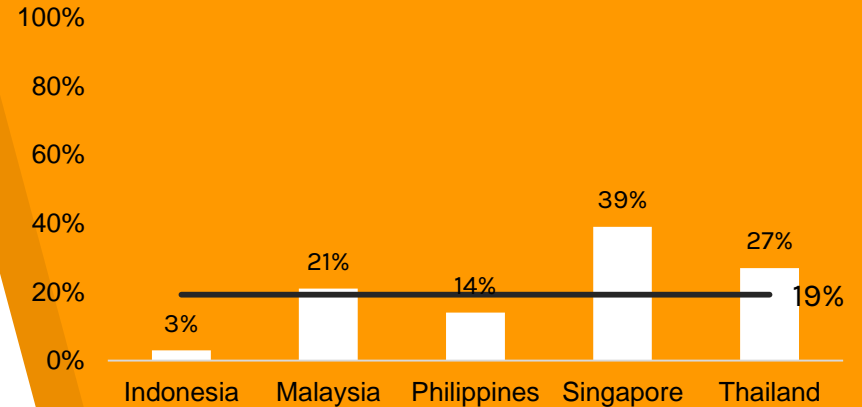
QUESTION 9

PROHIBITION OF FACILITATION PAYMENT

Q9. Is there a policy that explicitly prohibits facilitation payments?

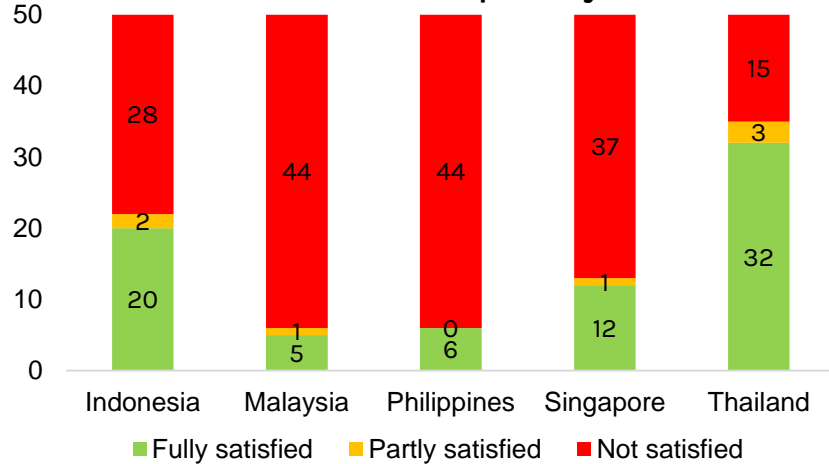


Q9. Average Level of Disclosure

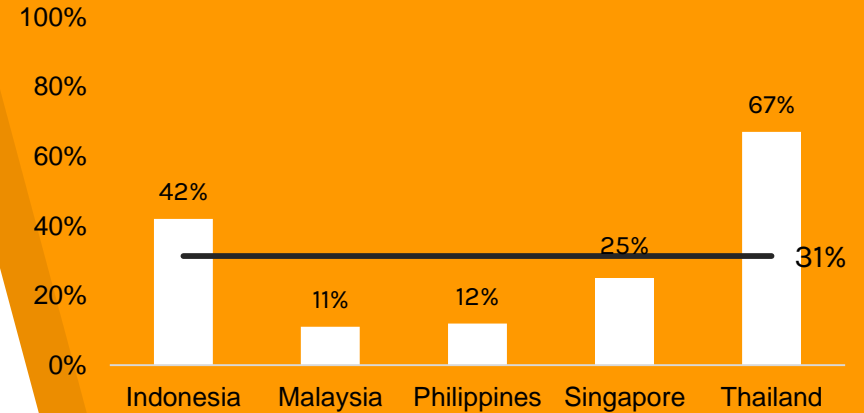


QUESTION 13 POLITICAL CONTRIBUTIONS

Q13. Does the company have a policy on political contributions that either prohibits such contributions or if it does not, requires such contributions to be publicly disclosed?



Q13. Average Level of Disclosure



ASPECT 3

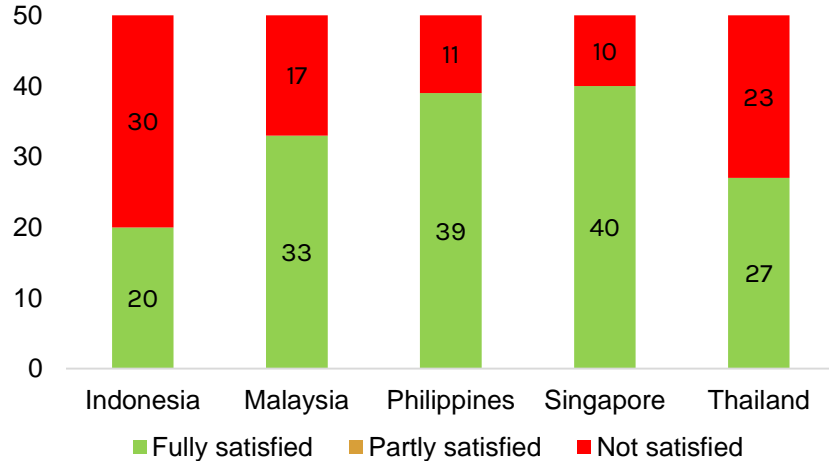
REPORTING & MONITORING

- Question 10 Does the programme enable employees and others to raise concerns and report violations (of the programme) without risk of reprisal?
- Question 11 Does the company provide a channel through which employees can report suspected breaches of anti-corruption policies, and does the channel allow for confidential and/or anonymous reporting?
- Question 12 Does the company carry out regular monitoring of its anti-corruption programme to review the programme's suitability, adequacy and effectiveness, and implement improvements as appropriate?

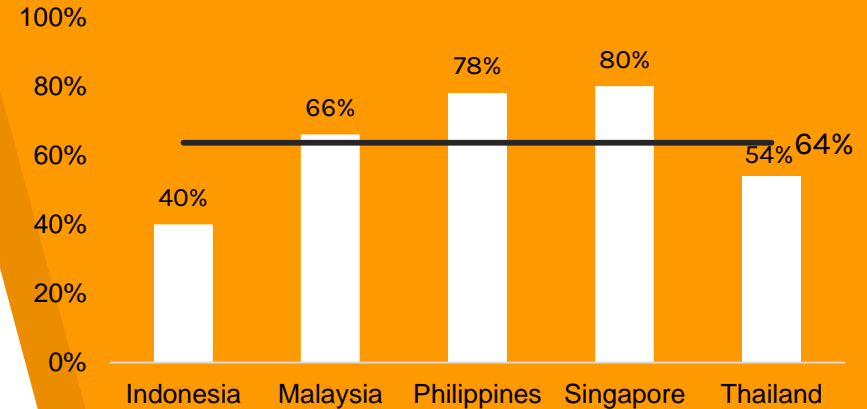
QUESTION 10

PROTECTION OF WHISTLEBLOWER

Q10. Does the programme enable employees and others to raise concerns and report violations (of the programme) without risk of reprisal?

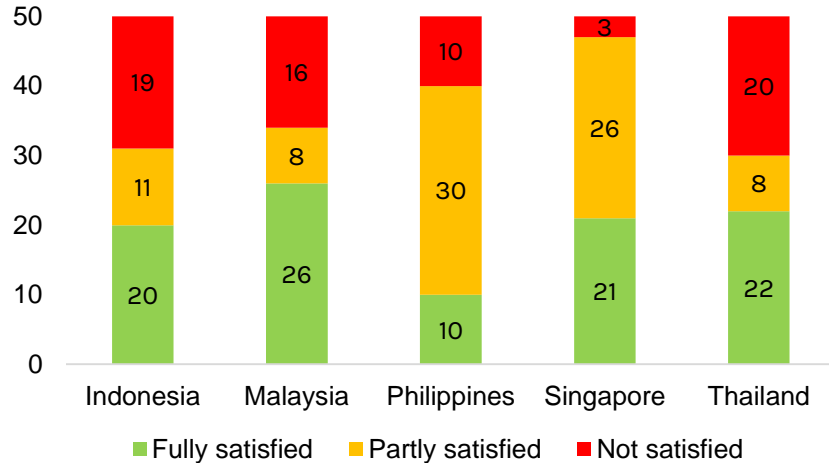


Q10. Average Level of Disclosure

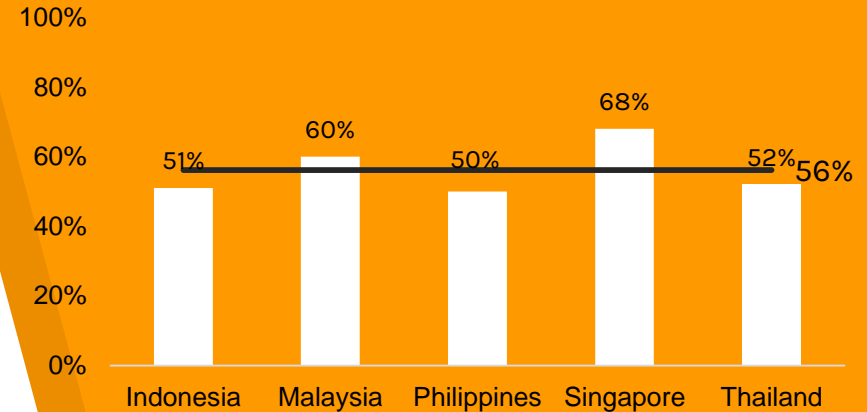


QUESTION 11: TWO-WAY COMMUNICATION CHANNELS FOR WHISTLEBLOWER

Q11. Does the company provide a channel through which employees can report suspected breaches of anti-corruption policies, and does the channel allow for confidential and/or anonymous reporting?

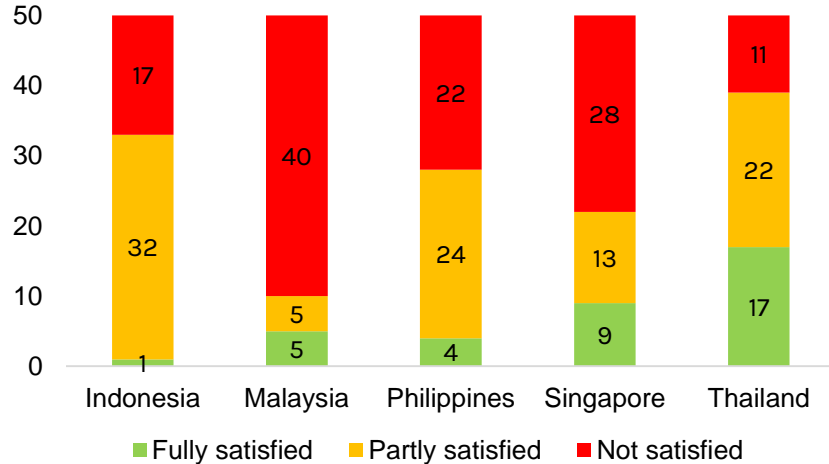


Q11. Average Level of Disclosure

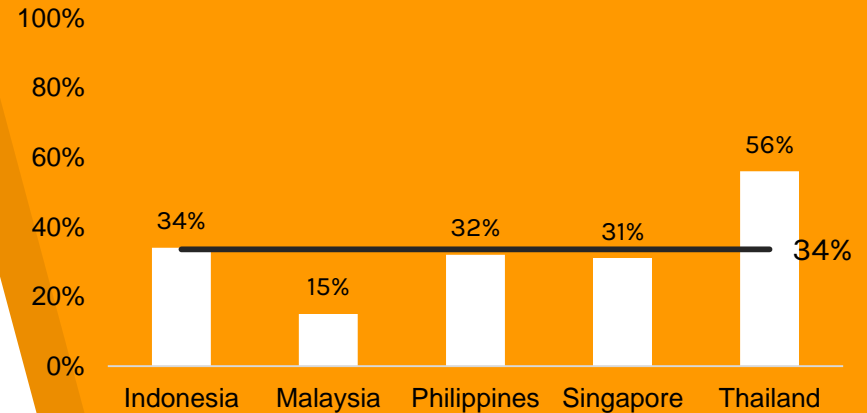


QUESTION 12: REGULAR MONITORING OF ANTI-CORRUPTION PROGRAMME

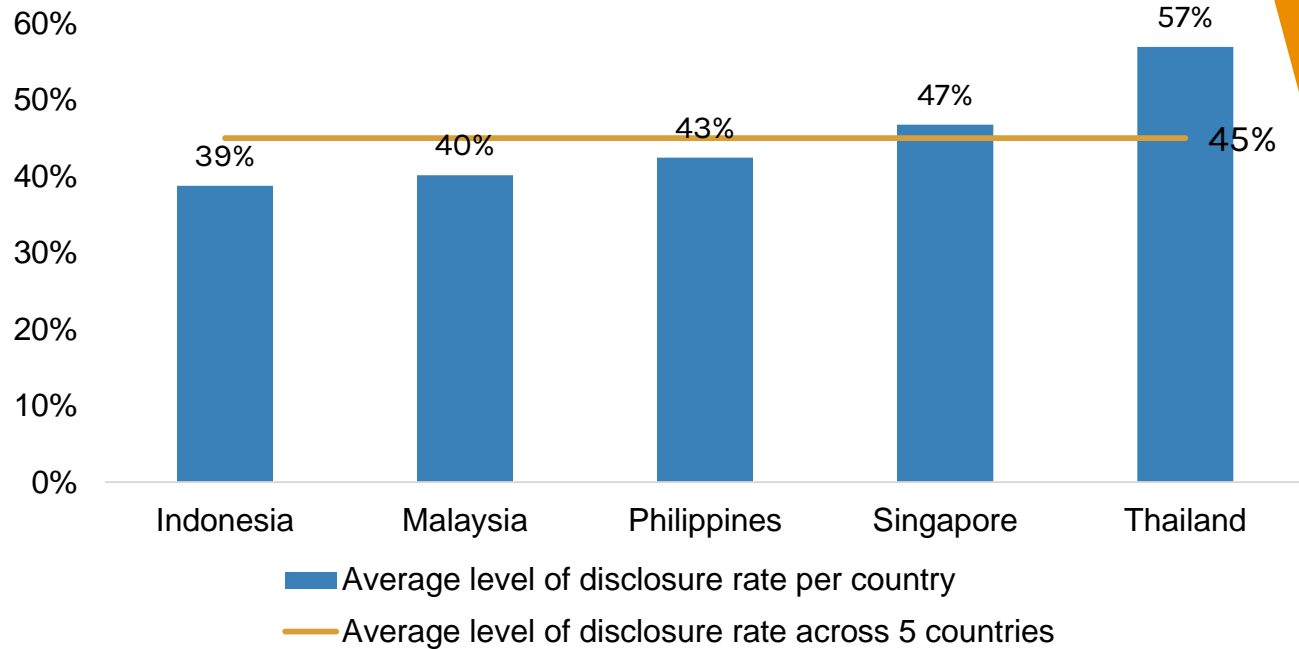
Q12. Does the company carry out regular monitoring of its anti-corruption programme to review the programme's suitability, adequacy and effectiveness, and implement improvements as appropriate?



Q12. Average Level of Disclosure



Overall Level of Disclosure





What does this mean for ASEAN?

4.

**TOP 10
COMPANIES
WITH HIGHEST
DISCLOSURE RATES**



INDONESIA

- ✓ Bank Central Asia Tbk Pt
- ✓ Bank CIMB Niaga Tbk Pt
- ✓ Bank Negara Indonesia Perser
- ✓ Bank Pan Indonesia Tbk Pt
- ✓ Bank Rakyat Indonesia Perser
- ✓ Bayan Resources Group
- ✓ Blue Bird Tbk Pt
- ✓ Bumi Serpong Damai Pt
- ✓ Jasa Marga (Persero) Tbk Pt
- ✓ Kalbe Farma Tbk Pt
- ✓ Lippo Karawaci Tbk Pt
- ✓ Perusahaan Gas Negara Perser
- ✓ Semen Indonesia Persero Tbk Pt
- ✓ Vale Indonesia Tbk
- ✓ Waskita Karya Persero Tbk Pt
- ✓ XL Axiata Tbk Pt

**Some companies share the same scores with each other.*



MALAYSIA

- ✓ Astro Malaysia Holdings Bhd
- ✓ Axiata Group Bhd
- ✓ British American Tobacco Malaysia Bhd
- ✓ Digi.Com Bhd
- ✓ Felda Global Ventures Holdings Bhd
- ✓ Hartalega Holdings Bhd
- ✓ IHH Healthcare Bhd
- ✓ IOI Corp Bhd
- ✓ KLCCP Stapled Group
- ✓ Lafarge Malaysia Bhd
- ✓ Nestle Malaysia Bhd
- ✓ Petronas Chemicals Group Bhd
- ✓ Petronas Dagangan Bhd
- ✓ Petronas Gas Bhd

**Some companies share the same scores with each other.*



PHILIPPINES

- ✓ Ayala Corp
- ✓ BDO Unibank Inc
- ✓ D&L Industries Inc
- ✓ DMCI Holdings Inc
- ✓ Holcim Philippines Inc
- ✓ International Container Terminal Services Inc
- ✓ Manila Water Co Inc
- ✓ Metro Pacific Investments Corp
- ✓ Security Bank Corp
- ✓ Semirara Mining & Power Corp
- ✓ Travellers International Hotel Group Inc

**Some companies share the same scores with each other.*



SINGAPORE

- ✓ City Developments Ltd
- ✓ DBS Group Holdings Ltd
- ✓ Keppel Corp Ltd
- ✓ Oversea-Chinese Banking Corp Ltd
- ✓ Sembcorp Industries Ltd
- ✓ Sembcorp Marine Ltd
- ✓ SIA Engineering Co Ltd
- ✓ Singapore Airlines Ltd
- ✓ Singapore Technologies Engineering Ltd
- ✓ United Overseas Bank Ltd

**Some companies share the same scores with each other.*



THAILAND

- ✓ Advanced Info Service Pcl
- ✓ Electricity Generating Pcl
- ✓ Bangchak Petroleum Pcl
- ✓ Intouch Holdings Pcl
- ✓ Bts Group Holdings Pcl
- ✓ Ptt Exploration & Production Pcl
- ✓ Central Plaza Hotel Pcl
- ✓ Ptt Public Company Limited
- ✓ Charoen Pokphand Foods Pcl
- ✓ Thai Oil Pcl
- ✓ Delta Electronics Thailand Pcl
- ✓ True Corp Pcl

**Some companies share the same scores with each other.*

**TOP 10
HIGHEST
DISCLOSURE
RATE ACROSS
ASEAN**

✓	Advanced Info Service Pcl	Thailand
✓	Bangchak Petroleum Pcl	Thailand
✓	Electricity Generating Pcl	Thailand
✓	Intouch Holdings Pcl	Thailand
✓	Sembcorp Industries Ltd	Singapore
✓	Sembcorp Marine Ltd	Singapore
✓	SIA Engineering Co Ltd	Singapore
✓	Singapore Technologies Engineering Ltd	Singapore
✓	Thai Oil Pcl	Thailand
✓	True Corp Pcl	Thailand



CREDITS

ASEAN CSR Network (ACN)

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CREDITS

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- ▶ Presentation template by [SlidesCarnival](#)
- ▶ View of KL Sentral, Hilton and Le Meridian at dusk by [Akira Mitsuda](#) (2008)
- ▶ Map of Southeast Asia (orthographic projection) by [Keepscases](#)
- ▶ Checkmark by To Uyen from Noun Project