

## 10. Corporate Social Responsibility

The Company, as the expressway and metro service provider, is committed to helping alleviate traffic problems in Bangkok and its surrounding provinces, through the fully-integrated mass rapid transit and transportation systems in order to upgrade the quality of life and shape the future of Thailand's transportation system. Furthermore, the Company operates its businesses based on the good corporate governance, and is socially responsible in both expressway and metro businesses.

### 10.1 Policy Overview

The Company is committed to operating its businesses with particular emphasis on society and the environment in pursuit of the Company's sustainable business growth. As such, the Company focuses on transparency and fairness in its operations with the aim to benefit and grow together with all groups of stakeholders. Therefore, the Company adopts and communicates its operating policy for sustainable development to all staff to ensure that they seriously implement and harmoniously incorporate it into their own work processes for sustainable growth of the Company and all its groups of stakeholders, as follows:

1. To be a leading organization for sustainable development through communication and exchange of best practices with all of the Company's stakeholders;
2. To incorporate the sustainable development concept into every work process and decision-making process of the Company;
3. To promote training, learning and counseling, focusing on practices according to sustainable development guidelines;
4. To support regional operation and collaboration to achieve sustainable development.

### 10.2 Corporate Social Responsibility and Sustainable Development

The Company has operated the expressway business and the metro business, and actively involved in corporate social responsibility and sustainable development, which can be summarized below.

#### 10.2.1 Expressway Business

The Company, as the expressway operator, is regarded as a key component of the national development, and it is committed to becoming a leading expressway service provider with good corporate governance, convenience and safety under the quality management and continued development. The Company also focuses on the social dimension by setting a clear social mission to coexist with society and pursue its sustainable development without causing any negative environmental impact.

To ensure sustainable coexistence with society in parallel to the Company's ongoing growth under the said social mission in the hope of building a good foundation for people in society for future development, it is then necessary:

- To formulate the fundamental concept based on such social mission for staff to enable them to efficiently perform, coordinate and develop society in collaboration with the stakeholders for the purpose of development of the quality of the neighborhoods surrounding the expressway routes, which will ensure such concept to materialize in the Company's operations. The focus on this concept originates from potential impact of the Company's business operations, from construction to provision of service, on the communities surrounding the expressway routes.
- To improve and enhance the efficiency of the routes by way of regular review of the operating procedures, which takes into consideration not only the compatibility with the current operations, but also future improvement and enhancement (preventive thinking), to minimize potential risks and impacts, ensure rapid management, instant response and more effective cost management.

- To play a key role in helping alleviate the traffic problem for people in society. It is a known fact that traffic congestion has many effects upon society, such as, its economic effects on business interactions of people; its social effects on people's emotional states; and its environmental effects as a result of emission of pollution to society and this world. The Company is determined to minimize these impacts by building good and most suitable expressway routes for society.
- To be recognized as a socially responsible business through staff operations to monitor the quality of the routes to always be ready for service and safe, as well as take care of, share knowledge and opportunities to the neighborhoods adjacent to the existing and future routes.

In light of the Company's commitment to development of the national transportation system to alleviate the traffic problems, and potential risks from its operations, corporate social and environmental responsibility has always been of great importance to the Company and an abiding principle to which the Company adheres in its business operations, creating the "Path to Happiness" by formulating the expressway network in Bangkok and its vicinities. The Company is well-equipped to invest in projects pertaining to expressways, connecting roads and other infrastructure projects of the government on the public private participation (PPP) basis to upgrade the quality of life and develop Thai society towards sustainable growth.

In addition, the Company is determined to provide quality and safe expressway services, with due care and taking into account the impact on stakeholders, economy, society and environment. The Company has adhered to fair practice and business ethics in every step of its work procedures, as well as developed and promoted innovations in terms of efficiency, effectiveness and value added to the business and all parties concerned. The Company is socially responsible in its operations to build up a good impression for the expressway users and society as a whole.

It is a clear policy of the Company to be responsible for rights of all groups of stakeholders, as follows:

1. Internal stakeholders, i.e., staff and executives of the Company and its subsidiaries;
2. External stakeholders, i.e., customers, business partners, lenders, counterparts, competitors, society, communities and schools located near the rights of way, including government sector and relevant authorities.

The Company regularly organizes various activities, e.g., conferences, dialogues, visits, public hearings, studies and surveys on demands and satisfaction, to promote good relationships between the Company and stakeholders. Such activities are aimed at making their interests and concerns heard for further improvement of the Company's operations. This goes further from a plan for developing connections with stakeholders to a mechanism that promotes their participation, including submission of information to the Company's executives, in the consideration of the Company's corporate strategy in the following year.

To achieve its goals, the Company has set out practical guidelines for corporate social responsibility to cover the entire Path to Happiness, namely, covering the current and potential impact, both positive and negative, on major stakeholders; and taking into account the process of the Company's business operations. The Company then determines the scope of its corporate social responsibility in three dimensions as follows:

1. The Source of Happiness focuses on staff treatment, development and care in terms of the quality of life, competency, morality and ethics, active participation in both internal and external processes to deliver the best quality of service to service users under normal and emergency situations.
2. The Path to Happiness focuses on ensuring safety from construction to maintenance, including fair and reciprocal treatment of business partners, counterparts, as well as on creating innovations with social and environmental responsibility throughout the whole process.

3. The Happy Society focuses on acting as a good and responsible citizen for the communities along the routes so as to develop a good quality of life and contribute to society at large.

### **Performance for Sustainable Development**

The Company's business philosophy for sustainable development focusing on creation of the "Path to Happiness" materializes by engaging staff collaboration with communities, society and environment in support of the achievement and continuity of the Company's social mission, as follows:

#### **1. The Source of Happiness**

The Company arranges for development of staff both in main and supporting lines of work, particularly staff in main line of work directly related to services on the expressways, where quality and safety are compulsory, in order to achieve its goal of providing excellent service to the utmost satisfaction and impression of the expressway service users. The Company formulates training courses so that staff will have skills and ability to use equipment and devices for specific tasks, i.e., rescue operation, traffic management, toll collection and maintenance of the system and carriageway.

##### **1.1 Rescue Operation and Traffic Management**

Rescue operation drills and assistance in case of serious accidents on the expressways are conducted. Safety training is organized every year, including training on use of the rescue operation vehicles on the expressways, traffic volunteer training and on the job training, and three-month new staff orientation prior to actual operation on the expressways, as well as service mind training.

##### **1.2 Toll Collection Operation**

The Company's personnel in charge of this field comprise personnel with the duty to collect tolls from the service users of the Si Rat - Outer Ring Road Expressway, whereby the Company provides the personnel training in toll collection to ensure that tolls are correctly and completely collected for facilitating the expressway service users' toll payment to be made rapidly. The Company's personnel in charge of toll revenue operation are responsible to ensure that tolls are correctly, transparently and timely collected, in collaboration with the government sector, namely, EXAT, which has the duty to collect tolls from the expressway service users. The Company provides internal on the job training regarding the role and responsibilities of toll collection controllers, emphasizing that tolls must be collected timely, and the counting of vehicles and collection records must be verified for accuracy.

In addition, the condition of toll collection equipment must be checked to be ready for full-time service and to ensure the accuracy of toll collection, which will help assure the Company's steady revenue streams and equally protect the interests of shareholders and stakeholders. The personnel in charge of this field will also attend overseas study visits on toll collection systems.

- 1.3 Structure Maintenance Operation: This is to ensure that the expressways will be ready and safe for service. The Company was internationally recognized as a company specializing in the inspection and maintenance of the Segmental Box Girder structures, with regular inspection, monitoring and surveillance all year round.

#### **2. On the Path to Happiness**

The expressway users are the heart of the Company. The Company is then ready to deliver and improve the expressway services to ensure the efficiency of rapid and safe transportation, uplift the quality of life, and play a role in developing Thai society. The Company appreciates innovations which will help minimize the impact of the operations on society, environment and stakeholders from construction to repair and maintenance of the expressways to stand ready for service to users to ensure their convenience and safety both under normal and emergency situations. This is to fulfill the Company's committed responsibility for the expressway users.

- 2.1 Expressway Construction : The Company adopted the internationally recognized Segmental Box Girder technology, which meets the AASHTO (American Association of State Highway Transportation Officials) standards, and which was considered a sophisticated technology at the time it was adopted. As a result, the Company was able to minimize impact on at-grade traffic and dust and noise pollution during the construction. The construction was completed according to plan without any protests from society and nearby communities. The expressways are safe, meet standards and effectively respond to users' transportation needs.
- 2.2 Expressway Maintenance : The Company carries out regular inspection and maintenance of the main structures of the expressways, under the independent consulting engineer's supervision and quality assessment of the expressways. The expressways are in a stable condition, meet standards and safety requirements, and the expressway users are able to enjoy convenient, rapid and safe transportation to their destinations.
- 2.3 Expressway Services : The expressways, by physical characteristics, mostly are elevated and linked as a network with a total length of 256.1 kilometers. The expressways have become effective strategic routes for sending aid to disaster victims, transporting equipment and supplies, and travelling by both public and private sectors, during the occurrence of any event or disaster which may impede the at-grade roads. Those events in the past have perfectly confirmed the strategic route status. Therefore, the Company, in its capacity as the operator of the Si Rat Expressway, the Si Rat - Outer Ring Road Expressway and the Udon Rattaya Expressway, sets out practical guidelines for dealing with unusual occurrences, so as to make the expressways available for service under emergency situations and return to normal as soon as possible. In this regard, the Company is ready to take various actions as follows:
1. The Company's communications staff in the Control Center monitor traffic condition on the expressways and provide travelling information to the expressway users. CCTV surveillance systems are installed on the expressways, along with radio-communications systems through the Control Center working 24 hours in close collaboration with other relevant authorities. The Company's rescue operation teams are patrolling the expressways at all times, and therefore, they are ready to instantly assist service users in any incident on the expressways. In addition, the teams also coordinate with police officers on duty on the expressways and at-grade roads in order to facilitate traffic management 24 hours a day. The traffic condition on the expressways is viewable by at-grade police officers from the video signals connected with the Company's CCTVs.
  2. The automatic toll collection system or Easy Pass was implemented by the Company's collaboration with the government sector beyond the terms of the relevant Concession Agreements, with the intention to improve services and minimize environmental impact from traffic congestion. This system has helped save travelling time and fuel for the expressway service users, protect the environment, minimize pollution at the toll plazas, reduce fuel consumption, and improve the quality of life.
  3. With respect to safety innovations, the Company sets up a dedicated unit responsible for research and development (R&D) to regularly improve safety of the expressways by means of road safety audits. The audit results are used for the expressway improvements for greater safety.

Under emergency situations or disaster occurrences: In case there is an event or external factor which results in an emergency, namely, peril, serious accident, earthquake and events which may be caused by terrorism or sabotage such as bombing and riot, including gathering of people for inciting public unrest, the Company requires all units to have emergency plans in response to any events which may suddenly occur and arranges for staff training to ensure that the staff in charge would be able to immediately take actions to resolve such emergency, as well as establishes a unit

for monitoring, warning and coordinating with relevant agencies to prevent the occurrence of any serious accident. The Company controls and monitors for strict compliance with the relevant laws. Moreover, the Company further establishes measures for inspection of the routes and their surrounding areas, including cooperation with police officers responsible for the areas around the routes. The Company takes out insurance against Property Damage of the structures of the Si Rat Expressway, the Si Rat - Outer Ring Road Expressway and the Udon Rattaya Expressway, and against Business Interruption, including Public Liability, on a yearly basis, in order to prevent any impact from possible damage.

Political Unrest : At-grade traffic was congested, including congestion at certain on-ramps and off-ramps of the expressways nearby the political rally locations. In order to minimize such impact, the Company arranges for an emergency backup plan in response to possible occurrences. The emergency backup plan involves staff rehearsals for all relevant units to resolve problems, as well as establishes a unit to follow up alerts and coordinate with relevant public agencies to monitor and immediately take actions to resolve such event.

During special long holidays, the Company, in association with EXAT, organizes safe travelling programs. Service units are set up on the expressways to provide a free initial car checkup, including drinking water and refreshing towels as refreshments for long distance trips which will help reduce accident rates.

- 2.4 Treatment towards Traders: Since the Company's business is a unique service which requires high investments for its operations, creditability can be built by the Company's fair treatment of its traders and financial sponsors, which is considered a key success factor to the Company's delivery of quality services to the expressway users, even during a crisis. The Company therefore sets out its practices for traders, namely, fair business operations; a commitment to procurement of standard goods and services, for the purpose of development and maintenance of sustainable relationship with traders, with the clear objectives in terms of quality of goods and services worth their value, technical standard and creditability. The Company therefore provides fair and equal procurement procedures to all traders in compliance with the work procedures regarding procurement in accordance with the requirements of ISO 9001 Quality Management System, based on procedures and measures against unfair competition; setting out guidelines for recognition of and respect for intellectual property of traders as well as protection of such rights; dealing with the supply chain in strict compliance with international standards, ISO 9001 Quality Management System, and ISO 14001 Environment Management System, by way of providing education and close monitoring and audits to ensure that the supply chain of traders in business association with the Company takes account of environmental impact, in the interests of the sustainability of their mutual business alliance. Financial sponsors include lenders, shareholders and creditors, with whom the Company strictly complies with contracts and its obligations to maintain its financial discipline.

### 3. The Happy Society

The Company takes care of communities surrounding the expressway routes to ensure that its business operations will not affect the quality of life and the environment. In doing so, the Company regularly surveys the communities and society nearby the rights of way according to plan. In this respect, the Company also sets out standard work procedures, including its requirement for equipment to prevent any impact or pollution to the nearby communities. In addition, the Company issues press releases to provide details and accepts complaints regarding various projects operated by the Company in order to prevent any possible difficulty to the nearby communities.

In order for guidelines for environmental concerns to be clear, measurable and acceptable, the Company applies ISO 14001: Environment Management System under the following environmental policy:

- Giving priority to pollution prevention and control through the operation and maintenance of the expressways in compliance with international standards, taking into account environmental impact on the expressway users, staff and communities;
- Raising staff awareness and promoting the efficient use of energy and natural resources;
- Complying with environment-related laws and other regulations;
- Reviewing objectives and goals for continued improvement of the environment management system;
- Communicating the environmental policy to the public and all parties concerned.

### 3.1 Business operations affecting the corporate social responsibility

In 2016, the Company and its subsidiaries operated their business in compliance with the laws and applicable rules and regulations without committing any offense or violation of the laws which may affect the Company's corporate social responsibility.

### 3.2 Corporate Social and Environmental Contribution Activities

The Company has a policy and is determined to continuously take care of every sector of society in respect of management of improved operational results, and value added to shareholders, focusing on nearby communities as well as take care of both nearby and remote communities. In 2016, the Company organized the corporate social and environmental activities as follows:

#### 1) Good Family Relationships

##### “Moms & Kids Strengthen Relationships with BEM at CORO Field in Ratchaburi”

was held on the occasion of the National Mother's Day, as a special family day, in which the Company played a part in strengthening family relationships by inviting the expressway users and their 14 families, totaling 42 persons, to travel on the Si Rat - Outer Ring Road Expressway heading to Ratchaburi Province to learn new theory agriculture as well as participating in activities to strengthen family relationships in such special time when moms and kids jointly decorated trees in loving and warm atmosphere for all families.

##### “Dads & Kids to Strengthen Relationships with BEM at the Palace in Nakhon Pathom”

was held on the occasion of the National Father's Day as the Company continued to realize the significance of activities to strengthen family relationships and then organized the “BEM Invites Dads & Kids to Visit the Palace in Nakhon Pathom” activity by inviting the expressway users and their 13 families, totaling 39 persons, to visit the Control Center Building of the Si Rat - Outer Ring Road Expressway (CCB7) and travel on the Si Rat - Outer Ring Road Expressway connecting with Krungthep - Krungthon heading to Nakhon Pathom Province to appreciate the picturesque of the Sanam Chandra Palace; learn the history in King Rama VI reign; pay homage to the Phra Pathom Chedi; visit the Little Tree Market; and participate in the painting with natural color activity to strengthen family relationships.

#### 2) Awareness of Environmental Preservation

Environmental preservation is of great importance to everyone and requires active participation. The Company then organized the program titled “Let's Love Environment with BEM” to campaign for the awareness of environmental and natural preservation by taking management and staff to participate in the Siam Weed Elimination activity to ensure more plant and food areas for wild animals at Khao Yai National Park in Nakhon Ratchasima Province.

#### 3) Moral and Ethical Awareness for Corporate Social Responsibility

“Hearing the Dharma with BEM” is intended to promote staff's moral and ethical awareness in order to pave a sustainable way for corporate social responsibility. The Company then organized this activity in which a group of executives and staff participated in hearing the Dharma by

Luang Phoo Mai Intasiri, Abbot of Wat Pha Khao Phu Luang, Nakhon Ratchasima Province, in order to properly apply such teaching to their present lifestyle and work environment.

**“Blood Donation”** is to give blood to give life as a part of the greatest giving. The Company, in association with The Thai Red Cross Society and Faculty of Medicine Vajira Hospital, Navamindradhiraj University, then organized three blood donation activities, with active participation of management and staff.

#### 4) **Good Relationships with Related Authorities**

The cooperation for provision of good services to meet the utmost satisfaction of the Expressway users is regarded as a key goal of the three collaborating authorities, namely, staff of the Company, staff of EXAT, and police officers of the Expressway Police Station 2. To strengthen relationships among them in order to ensure unity and maximum efficiency of the services, the Company organized activities, as follows:

**“Watch Movie with Expressway”** is an event where families of staff of EXAT and police officers of the Expressway Police Station 2 as well as families of the Company’s staff were invited to watch the movie **“Batman v Superman : Dawn of Justice”** at Esplanade Cineplex. All family members had a good time and enjoyed games and the 3D movie.

**“Donation of Cars and Motorcycles to EXAT and the Expressway Police Station 2”**, the Company is committed to taking care of and promoting the performance of the relevant authorities to ensure smooth operations, and to monitor and provide the rapid and efficient services for the expressway users. The Company granted cars and motorcycles to EXAT and the Expressway Police Station 2 for use on the Si Rat Expressway to facilitate the convenient travelling and maximum safety of the expressway users.

#### 5) **Promotion of Youth Learning**

Education represents a key foundation for youths’ sustainable development of knowledge, thoughts and values in order to become decent and quality citizens of society. The Company continues to encourage and support youth education every year through various activities as follows:

**“Scholarships to Staff’s Children”**, the Company granted scholarships to the Company’s staff’s children with good academic records at the levels of elementary and high school, and for higher education.

**“Scholarships to Adjacent Schools”**, the Company organized the **“BEM Grants Scholarships to Adjacent Schools”** activity, by granting scholarships to underprivileged students with good academic records, including funds for school development for educational purposes to 15 schools adjacent to the Si Rat Expressway, the Si Rat - Outer Ring Road Expressway and the Udon Rattaya Expressway.

**“Scholarships to Children of EXAT’s Staff”**, the Company, in association with the EXAT and the EXAT Club, granted scholarships to children of EXAT’s staff who are working on the Si Rat Expressway and the Udon Rattaya Expressway. The executives from both authorities jointly granted such scholarships.

**“Scholarships for Children of the Expressway Police Station 2’s Police Officers”**, the Company granted scholarships to children of the Expressway Police Station 2’s police officers, who collaborate with the Company in ensuring convenience and safety of the expressway users.

## 6) Support for Outdoor Learning Experience

The Company realizes that learning is not restricted only to classroom, and outdoor experience is an opportunity for children to personally and directly learn from experience. Such experience will help them understand various things clearly and comprehensively, and apply the knowledge in the future. The Company thus organized outdoor learning experience activities as follows:

**“Audio Library for Young Blinds”**, the Company acknowledges that reading will bring about sustainable knowledge. The Company supported and took part in the Audio Library for Young Blinds project, as organized by Nation Broadcasting Corporation Public Company Limited and the Foundation for the Blind in Thailand under the Royal Patronage of H.M. the Queen, in order to assist and share knowledge to youths with visual disabilities, by means of audio book recording, which will be organized as an audio library for children.

**“Let’s Inspire Children’s Talents”**, an activity on the occasion of National Children’s Day for 2016, was held for children to explore their own talents through fun activities, with participation by a number of children of the Company’s staff and children of the Expressway Police Station 2’s police officers, students from adjacent schools, including neighbors.

## 7) Support for Other Social Activities

**“Support for “Lankilaphat” Project under H.M. the King’s Initiative”** As His Majesty the King and Her Majesty the Queen have always expressed a concern for the well-being of their people in all aspects, by giving priority to development of personnel and communities to ensure their people are in better physical and mental health, the Office of H.M. Principal Private Secretary, in its capacity as secretary to His Majesty the King and the royal family members, one of whose missions is to be committed to performing works under the royal initiative in respect of improvement of the quality of people’s life, and in response to this royal initiative, initiated a project for construction of people’s playgrounds named “Lankilaphat”, literally meaning a “Sport Field for Growth”, to promote a variety of recreational activities, sports, community development, and other social and public activities, focusing on sustainable quality of life of people and communities, to carry on such royal initiative.

The Company took part in fulfilling such royal initiative by sponsoring and serving as member of the administration committee and subcommittee of the “Lankilaphat” project, starting with two pilot projects, namely, Lankilaphat 1 in Khlong Chan Housing Community, Bang Kapi District, which is currently completed and open for service, and Lankilaphat 2 under the Urupong Expressway, Ratchathewi District, which is under construction.

**“Jointly Granting Proceeds from Happy Running Marathon Activity to the Queen Sirikit National Institute of Child Health (the Children Hospital)”**, the Company, in association with the Expressway Authority of Thailand (EXAT), granted proceeds without deducting any expense from the Happy Running Marathon with the Si Rat - Outer Ring Road Expressway to the Queen Sirikit National Institute of Child Health (the Children Hospital) on the occasion of “Her Majesty the Queen’s 84th Birthday Anniversary” in order to develop the Queen Sirikit National Institute of Child Health to be our country’s key institute in full-service provision of care of and medical treatment to infants and babies with birth defects, including premature labor.



## 10.2.2 Metro Business

### 10.2.2.1 Overview

Based on the Company's commitment to socially and environmentally responsible business operations to ensure the sustainable business growth, the Company has taken into consideration potential impacts on the service users and all groups of stakeholders.

In this regard, stakeholders of the metro business include staff, customers, shareholders, traders, competitors, collaborators, creditors, regulatory units, media, society, communities, and environment.

Moreover, the Company focuses on transparency and fairness in selection of its partners along with support of fair treatment of labor, and establishes an eco-friendly procurement policy. The Company has taken care of its staff by way of competency development, and also taken care of society by way of career development and promotion of education, environmental management system, eco-friendly procurement, renewable resources utilization, and support of environmental innovations. The Company also jointly signed the Memorandum of Agreement on Cooperation Network for Development of Manpower and Expertise in Rail System Technology of the Country.

### 10.2.2.2 Operations and Reporting

The Company discloses its information on CSR in process and CSR after process via the Annual Report of the Company in compliance with the G4 Global Reporting Initiative (GRI) Sustainability Reporting Guidelines taking into account the four-dimensional indicators, namely, economy and finance, environment and energy, society and communities, and supervision. Moreover, the Company is committed to the socially/community and environmentally responsible business operations by complying with the laws and rules without taking advantage of the society as a whole, by realizing the accountability, value and significance of the social interest and environmental preservation.

### 10.2.2.3 Corporate Social Responsibility

This is for stakeholders in five aspects, which will lead to the Company's sustainability.

1. **Staff:** The Company realizes that all of the Company's staff are valuable and play an important role in its business operations, the Company then regularly and continuously supports development and training of staff at all levels. The Company is committed to fair treatment towards its staff under the nondiscrimination policy and provision of equitable opportunity for employment pursuant to the work rules and regulations and labor relations laws. The Company treats all staff equally regardless of gender, age, race and religion, position or physical abilities; everyone is treated and cared for in all respects as to job description, safety and work environment, training and development, career opportunity and advancement, consideration and welfare, whereby the clear criteria for career path are set out and appropriate remuneration is based on industrial benchmarking and in other many aspects. This is to satisfy staff to work for the Company to achieve the Company's goals and promote a participatory work environment and teamwork as well as organize the workplace on the occupational safety and health basis. Staff are allowed to show off their abilities as the Company has the notion that staff are regarded as valuable resources and strongly believes in their inner potential in order to make staff proud and determined to perform works as well as improving their own performance on a continual basis.

Moreover, the Company implemented the occupational safety and health policy in the business premises so that staff are healthy and safe in working.

“Happy Workplace”, the Company realizes that the happy work life of staff is important, as when staff are happy in their work, they will efficiently perform their duties, and quality works will then be delivered to the organization’s customers, thereby ensuring the organization’s sustainable growth. Therefore, the Company organized the “Happy Workplace” campaign, as an activity to enhance and improve the quality of work life for staff to ensure that they are able to work efficiently and happily, which covered eight aspects, as follows:

- 1) **Happy Body** : This activity promoted staff’s good health, both physically and mentally. The Company, in association with Intermedical Care and Lab Hospital, organized the activity to provide staff with information and advice on health and nutrition, exercise, mental care, and weight control to be in the standard criteria in order for staff to apply the obtained knowledge to self-care, etc. Moreover, the Company provided sports support, such as, forming a walking & running for health club and a football club, and held an activity for sports togetherness with staff in CH. Karnchang group and affiliated companies to strengthen relationships and ensure more efficient teamwork.
- 2) **Happy Society** : This activity promoted staff’s unity and social contribution to make society and environment better. The Company regularly communicated information relating to activities, both inside and outside the organization, via the intranet system
  - 2.1) **Internal Society**, the Company has continued to take care of staff, including their families, and always visits them when they are ill. In times of grief for a loss of their loved ones, the Company and colleagues jointly extended our condolences and jointly sponsored funeral ceremonies as well as provided financial assistance for arrangements.
  - 2.2) **External Society**, the Company organized activities to promote staff’s contributions to society and communities, such as, granting of scholarships and donation of supplies, clothes, sports equipment, books and stationery to students and schools in need or various foundations.
- 3) **Happy Heart** : This activity promoted generosity and volunteer spirit among staff and highlighted the Company’s contributions to society, namely, merit-making activities, such as, food offerings to monks on the occasion of New Year Day, merit-making on the occasion of the anniversary of MRT operations, contribution of supplies and items to temples, listening to Dharma talk, Blood Donation to Thai Red Cross Society, and Kathina Robe Offering ceremonies with temples located in the MRT alignment, with the objectives to support Buddhism and build up staff’s giving habits resulting in a happy mind from merit-making, a rise in work morale, and strengthening good relationships with communities along the MRT routes.
- 4) **Happy Relax** : This activity encouraged staff to relax and express their talents, e.g., “Thank You Party” at which staff played music and performed on stage, etc.
- 5) **Happy Family** : This activity encouraged staff to participate in common activities and build a relationship like a single family, in both their personal and work lives. One of the activities organized by the Company for staff to promote Thai traditions and strengthen the family institution was the “Promote Thai Traditions during Songkran Festival”, which involved a bathing rite for Buddha images, and pouring scented water over the palms of executives, etc.
- 6) **Happy Money** : This activity encouraged staff to know methods of financial management, self-sufficient economy, money utilization and savings. The Company initiated

the legal clinic program to provide staff with accurate and appropriate legal advice without charge, and the Happy Hour by Happy Workplace program which allowed staff and their families to sell goods, sweets, snacks and inventions produced by staff and their families at the Company's canteen for free, together with the **"Marketplace"** activity as regularly held by the Company for distribution of special-priced goods to staff or provision of news and information which were beneficial for staff in relation to money savings or debt management by various financial institutions.

- 7) **Happy Soul** : This activity encouraged staff to apply Dharma to livelihood both in their personal and social lives, namely, staff were allowed to participate in Buddhist ceremonies on traditional days, i.e., **"Guide to Practice Meditation for Happy and Mindful Life"**, whereby staff jointly prayed, meditated and listened to Dharma talk to enhance their physical and mental readiness and concentration on working via a variety of activities.
- 8) **Happy Brain** : This activity provided staff with knowledge in many forms, such as, provision of knowledge via internal communication channel to ensure that staff could catch up with news occurring on issues like health care, report and following up on new contagious diseases, provision of knowledge via articles of financial institutions and other knowledge which was useful for staff's self-care and application in their daily life.

**"Career Opportunity and Advancement"**, the Company is determined to restructure its organization and the work positions, and career paths, and salary of staff to be more appropriate to ensure staff career paths. In the near future, the Company's personnel should triple in order to accommodate the MRT Purple Line service, including other potential lines in the years to come. Therefore, the human resources management has become absolutely essential and necessary, and the Company must establish more clear and concrete direction for enhancement of competency of human resources starting from the retention of existing personnel, and recruitment of new staff for business expansion, as well as development of knowledge and skills for both existing and new staff, and update of job descriptions, including transfer of staff according to their knowledge and abilities, and promotion for career advancement.

**"Staff Capacity Building"**, the Company focused on personnel training and development, both inside and outside the organization, to maintain core knowledge within the organization, and to prepare our personnel to become the international standard mass rapid transit operator. Training courses provided for staff are described below.

#### 1) Knowledge Management: KM

The Company implemented the knowledge management project as intermediate KM Roadmap, with the objectives to identify the body of core knowledge which was necessary and important for the organization, to ensure a systematic collection of knowledge for all staff to have access to the source of such knowledge, knowledge sharing for ensuring the optimum benefits, and furthering the Company's corporate transition into a learning organization. Other than the management of core knowledge for train operations, the Company also promoted a community of practices (CoPs) to ensure learning and sharing of work experiences, problems, including solutions and improvement to work processes, in order to come up with the best practices.

#### 2) Codes of Conduct and Business Ethics Training

This training course was intended to serve as guidance for all staff regarding their work responsibilities and duties and to ensure that they understand and follow the

preliminary guidance described in the Company's Codes of Conduct and Business Ethics handbook, which is in line with the Company's vision, mission and corporate culture, in order to achieve goals for improved quality of work and life for staff. The Company also provides refresher training for the existing staff to update their knowledge by way of E-Learning & E-Exam, including regular exams for relevant staff once a year.

### 3) Annual Training & Development

The Company put into practice the idea of developing staff competency by improving the Training Roadmap for all levels of staff, namely, executives, supervisors and operating staff. The roadmap is intended to make sure that staff gain basic knowledge and skills required for their work performance, both technical and soft skills. These two types of skills are fostered in mandatory programs for new staff, e.g., an orientation program for new staff about the Company and train operations, including rules, regulations and requirements; a work safety program; and a quality management system program. The existing permanent staff are given refresher training on basic knowledge every year. All of these training programs should enable staff to apply such knowledge to their work performance and adapt themselves to the corporate culture, so as to have a sense of pride and to conduct themselves properly and in line with the goals.

## 2. Products and Services

To be one of the world's leading mass rapid transit operators with high quality of service, the Company is thus committed to development of the services to be comparable with the world's leading mass rapid transit systems by way of improvement of the quality of services to customers' satisfaction. Therefore, the Company pays attention to customer care in all respects, together with regular improvement and development of the quality of services according to the results of the annual survey on satisfaction, needs and expectations of passengers towards the MRT service quality; the results of inspection and monitoring of the internal processes; the results of inspection and monitoring by external agencies, etc., in order for customers as major stakeholders to derive satisfaction from the use of the MRT service. The Company's mission to provide safe, convenient, fast, reliable and punctual MRT service has been continuously applied to the operating plans so as to value added to the services, covering the areas as follows:

- 1) Value added to safety: The Company's business operations give priority to safety of passengers, staff, contractors, including everyone in the MRT system, as evidenced by the adoption of the international standard safety management system as a guideline for operations, namely, OHSAS/TIS 18001. Moreover, Lloyd's Register Rail (LR) is engaged as safety consultant to provide suggestions on risk management and to devise new safety management techniques for improvement of the Company's work processes to ensure more safety. As a result, the statistics of work-related accidents, including the statistics of passengers' injuries while using the MRT service, are likely to reduce. It is for this reason that the Company did receive the National Outstanding Awards 2013-2014 for Occupational Safety, Health and Environment for two years in a row.
- 2) Value added to convenience: As the metro is a mass rapid transit system with rapidity and definite service schedule for the service users' commute convenience as they can somewhat precisely anticipate the service schedules and sets out their commute plans, the Company thus gives priority to value added in convenience in its services from making an entrance to the stations, utilization of services until leaving the stations. To this effect, the Company has made various preparations to suit the convenience of the passengers

and the service users in all respects such as information services, common ticketing system and facilities within the stations.

- 3) Value added to rapidity: As the metro is a mass rapid transit system which offers the rapid services, a main reason that people select to commute by the metro, therefore, the Company supports other services from the passengers' entering into the stations until leaving the services with rapidity by means of development of the efficiency in service provision from where the passengers make an entrance to the stations and during the services, deletion of certain repeated steps which cause any unnecessary delay or increase in certain steps which more impress the passengers such as the passenger volume management system during rush hours on platforms, rapid services in the time when the passengers are so crowded or during the exhibitions, ticket issue or stored value card services are provided by staff who are active in providing clear suggestions, etc.
- 4) Value added to reliability: The Company is committed to the regular services of required standard to build the reliability in the metro system in respect of safety, convenience, and rapidity, whereby the Company continues to improve the quality of the services, for instance, maintenance and test of equipment are planned in a preventive and corrective manner, annual rehearsals for handling various emergency stimulations together with internal and external rescue agencies, improvement of safety system, ethical and equitable treatment towards passengers. Moreover, the Company accepts any comments or complaints from customers for further taking remedial actions to ensure improved services. The MRT service capability was assessed by Train Service Delivery, namely, the Company's MRT service capability was always more than 99 percent. In 2016, the Company's Train Service Delivery represented 99.78 percent from the target of 99.70 percent.
- 5) Value added to punctuality: The clear and punctual schedule of the MRT service enable passengers to manage their travelling time and do various activities more easily, not to mention that it results in their quality of life and mind health. The punctuality of the MRT service can be assessed by examining train punctuality with delays of not more than 5 minutes (Train Punctuality (Delay within 5 Min.)) in all MRT stations, which in 2016, the Company's Train Punctuality (Delay within 5 Min.) represented 99.93 percent from the target of 99.75 percent.

Moreover, the Company's membership in NOVA Group of Metros, a consortium of international metro service operators in a program of railway benchmarking, has inspired the development and improvement of service operations to achieve a higher level of success. Other than the standard set of service performance indicators, the Company has set out benchmarking indicators that are comparable to those of other members of the NOVA Group of Metros in various aspects in order to share knowledge and experience which will result in improvement and development of the services. Furthermore, in comparison with information in the NOVA Group, the Company's operational results are excellent in various respects, such as, train punctuality as compared with the train schedule, repair and maintenance to ensure the availability of trains for service, and work safety of staff, etc.

### 3. Traders

The Company formulates a policy to fairly treat its business partners and promotes the knowledge, understanding, practice, development in accordance with the framework for sustainable development in the Company's business sector, playing an important part in promoting and supporting to ensure the strength of the business operations, and upon the strength of the Company's business supply chain, the Company stably grows accordingly.

The Company operates its business fairly, with commitment to ethical treatment towards other organizations or the government sector, whether they be traders, business partners, contractual parties, competitors, as well as builds up the good relationship with these stakeholders, by emphasizing on the anti-corruption, public responsibility, fair competition, corporate social responsibility, and respect of the intellectual property, based on the guidelines and guiding practices which the Company treats the business stakeholders, such as, execution of any transactions with any traders/suppliers, and competitors, based on the guidelines for business operations with fairness and transparency, support of lawful labor, and promotion of sustainable business operations.

#### **Safety for Staff and Contractors**

The Company has conducted its work safety in accordance with Thai laws and local and international safety standards, i.e., TIS 18001:2011 and OHSAS 18001:2007, as assessed by TUV NORD (Thailand) Limited. The main objective is to supervise welfare for work performance in respect of occupational safety, health and environment of staff and persons in connection with operations in the metro system. The Company also prepared Plod Online E-magazine for communication with its staff to ensure their awareness of safety, quality and environment.

#### **4. Society**

As the Company is the service provider for the MRT Chaloe M Ratchamongkhon Line (MRT Blue Line) and the MRT Chaloe M Ratchadham Line (MRT Purple Line) or the MRT which cover the main routes in Bangkok and Nonthaburi so the communities surrounding the MRT routes are considered another group of stakeholders which has been prioritized by the Company. Therefore, provision of the services without having any impact on livelihood of the communities and society, including support and development of the communities and society in the areas where the Company operates its business, and the improved quality of life, are counted as the Company's significant responsibility in its capacity as a good citizen.

In this regard, the Company is determined to mainly improve the quality of life of residents in the communities, by focusing on development of the quality of life in four aspects, namely, family and community economies, physical health, mental health of residents in the communities, and environment in the communities, in which the Company strongly believes that these good factors will give rise to the positive effects on the quality of life of residents in the communities and also bring about a better society in the future. Over the past years, the Company organized a variety of activities to improve the quality of life of the communities and society, for instance, educational promotion project (Getting Fit Beat GAT by MRT), cooperation project with the government and private sectors to provide knowledge relating to health care and safety of use of the MRT services (M Care activity), art and cultural promotion activity projects (activities on the Children Day, activities on the Songkran Day), projects for glorification of the family institution, communities, private development organizations, including religious institution (activities on the Father Day, the Mother Day, the Elderly Day, Buddhist monk robe offering ceremonies), and internal society promotion activities through Happy Society project.

#### **5. Environment**

The Company is committed to continuing its operations on the environment in accordance with ISO 14000 standards, by implementing pollution prevention and control measures, mitigating environmental impacts and sustainable use of resources on the basis of three aspects of sustainable development, namely, society, economy, and environment.

For years, the Company continues its leading role in energy conservation by adopting energy conservation innovations in its business operations, along with sustainable environmental protection in accordance with the energy conservation policy and energy management manual, and also formulates the environmental impact mitigation measures and monitoring program, as well as submitting reports on its compliance with such measures to the Office of Natural Resources and Environmental Policy and Planning, the Ministry of Natural Resources and Environment. Moreover, the Company also formulates a policy on eco-friendly procurement and utilizes renewable resources to ensure the sustainable resource utilization, such as, water resource management project, return the metro cards project, paper conversion and recycling project.

In 2016, the Company implemented the energy-saving policy to save energy and minimize CO<sub>2</sub> emission to meet the annual target through the main projects as follows:

- 1) Controlling main air conditioning system operation at stations to ensure appropriateness by selecting low-voltage main air conditioning system with its capacity to cool areas as required at Chatuchak Station and Huai Khwang Station; and
- 2) Organizing energy-saving promotion activities by taking all staff or officials to go sightseeing at other leading organizations or companies with success in energy-saving implementation for use as guidelines in improvement of performance to ensure the organization's efficient energy utilization as well as helping project the image that "BEM is one of the leading organizations which gives priority to reduction of energy utilization for the country".

In 2017, the Company plans to regularly implement the energy-saving project for sustainable development of the energy management system as follows:

- 1) Project for installation of LED lighting system in replacement of fluorescent tubes inside (Southern) nine MRT stations;
- 2) Project for Energy Baseline inside MRT stations to assess the efficiency of the organizational energy management;
- 3) Energy-saving promotion activities for all staff or officials.

**Environmental Innovation Support :** The Company focuses on adaptation of energy conservation innovations in parallel with sustainably environmental conservation, by identifying instruments for operations heading the same direction to ensure the utmost efficiency, for instance, energy management handbook, annual energy preservation plan. In the previous years, the Company did create work innovations to reduce energy utilization in the train operation service on a regular basis and employ technologies to help save cost in the train operation service for the purpose of energy-saving together with environmental conservation, namely, giving precedence to metro specification and design in new lines to ensure that the metro system's structures, inside equipment and controlling systems have more efficiency in energy utilization; and in respect of main equipment in stations, introducing the Variable Speed Drive (VSD) to control the air conditioning system inside the stations, using LED lighting bulbs in replacement of ordinary lighting bulbs consuming more electricity in order to save energy inside the stations, and sharing energy management guidelines with international agencies from NOVA group of metros, etc. Moreover, the Company encourages its staff to participate in environment-related development in the business operations to build up and raise the awareness of energy-saving and optimal utilization of resources, and energy-saving promotion activities, let alone that the Company is determined to create the metro image that the metro is the new commuting mode choice for all to alleviate traffic congestion in Bangkok which gives rise to air pollution (vehicle exhaust) and reduce energy of the country (fuel oil), and it is regarded as one of the leading organizations which gives priority to reduction of energy utilization for the country.

#### 10.2.2.4 CSR after Process in the Previous Year

“Return the Metro Cards for Environmental Protection and Sustainable Social Development project”, the Company has maintained its commitment to environmental protection, together with social development with sustainability, to fully satisfy communities’ economic, social and environmental requirements through a variety of social contribution activities, with a focus on environmental protection. To this end, the Company organized the “Return the Metro Cards for Environmental Protection and Sustainable Social Development” project to invite MRT passengers to return their expired cards. The Company would donate Baht 10 per card for development of the quality of life in communities through activities in response to needs and livelihood of communities. These included the Share 2 Child activity for youths to learn the use of the MRT service for sightseeing at various places; and the M Care activity, in association with the Company’s alliances, in order to provide information on public health for passengers and the general public, including corporate social responsibility activities in other special occasions.

This project signifies the concerted efforts of all MRT users. The Company is committed to creating and pushing forward with the promotion of quality of life in society, together with environmental protection, to ensure a better quality of life for everyone in society with a bright future for future generations through sustainable development and growth.

In 2016, the Company spent monies from this project to organize activities for development of the quality in various terms of the communities surrounding the MRT routes, i.e., the MRT Chaloen Ratchamongkhon Line (MRT Blue Line) and the MRT Chalong Ratchadham Line (MRT Purple Line), classified into three parts as follows:

#### 1. Activities for Development of Quality of Life on Education

##### “Share 2 Child Activity”

January 9, 2016	The Company, in association with the Nonthaburi Civic Center, organized an exhibition booth on the occasion of National Children’s Day for 2016 by holding activities to develop outdoor learning skills on how to use service of the MRT Chalong Ratchadham Line (MRT Purple Line, Bang Yai - Tao Poon Section) to the participating children, youths and people, namely, <b>Fun Quizzes and Speak Out activity / Painting M Dolls activity / Playing Toss with MRT activity</b> , all of which would help them enhance outdoor experience; have more creative thinking and have fun with MRT, as well as granting shoes to youths in need, organizing an exhibition booth to give ice cream, and drinking water for free throughout the event.
March 4, 2016	The Company organized an activity in association with groups of students and teachers from Wat Pracha Satttha Tham School, Bangkok, located in the alignment of the MRT Chalong Ratchadham Line (Wongsawang Station), which were targeted for being allowed to take a free trial of the MRT Chaloen Ratchamongkhon Line (MRT Blue Line, Hua Lamphong - Bang Sue Section) to travel, to learn, and to experience Buddhism; to join activities enhancing meditation and wisdom at Wat Traimitr Withayaram Voraviham and Lord Buddha Museum at Wat Debsirindrawas.



August 19, 2016	The Company organized an activity in association with groups of students and teachers from Wat Madua School, Nonthaburi Province, located in the alignment of the MRT Chalong Ratchadham Line (Sam Yaek Bang Yai Station and Bang Phlu Station), which were targeted for being allowed to take a free trial of the MRT Chalong Ratchadham Line and the MRT Chaloem Ratchamongkhon Line to travel to broaden their experience by visiting the Chan-Based Buddhism; appreciating the picturesque of Chinese temple architecture at Wat Boromracha Kanchanaphisek Anusorn (Wat Leng Nei Yi 2) in Nonthaburi Province and Children’s Discovery Museum (in Bangkok) to expand and inspire youths’ imaginations.
September 4, 2016	The Company, in association with the Mass Rapid Transit Authority of Thailand (MRTA) and Bangkok Metro Networks Limited (BMN), organized the “Getting Fit Beat GAT by MRT Year 8.1” activity on the occasion of the service opening of the MRT Chalong Ratchadham Line by providing an opportunity for senior high school students to gain more knowledge from such activity for use in preparing themselves for General Aptitude Test (GAT) to further study at university level, in order to support education of Thai youths, let alone that this activity helped carry on the Company’s commitment to social assistance, particularly in educational development of youths as target group which would be the key power of the national development in the future.
September 16, 2016	The Company organized an activity in association with groups of students and teachers from Wat Bang Rak Yai School, Nonthaburi Province, located in the alignment of the MRT Chalong Ratchadham Line (Bang Rak Yai Station), which were targeted for being allowed to take a free trial of the MRT Chalong Ratchadham Line and the MRT Chaloem Ratchamongkhon Line to travel to broaden their experience by visiting Thai civilization learning places to enhance knowledge under the educational course of history, language and literature subjects, at Thai Nithat Exhibition Hall in the Thailand Cultural Center, and ending with fun activities through realistic paintings at the Art in Paradise in Bangkok to enhance learning and practice observation by touching real paintings.
October 6, 2016	The Company organized an activity in association with groups of students and teachers from Chum Chon Wat Samorakoat School in Nonthaburi Province, located in the alignment of the MRT Chalong Ratchadham Line (Yaek Nonthaburi 1 Station), which were targeted for being allowing to take a free trial of the MRT Chalong Ratchadham Line to broaden their experience by visiting scientific learning places at Children’s Discovery Museum (in Bangkok) to expand and inspire youths’ imaginations.
November 18, 2016	The Company organized an activity in association with groups of students and teachers from Dhammasiri Suksa School (Wat Noi Nok) in Nonthaburi Province, located in the alignment of the MRT Chalong Ratchadham Line (Phra Nang Klao Bridge Station), which were targeted for being allowed to take a free trial of the MRT Chalong Ratchadham Line and the MRT Chaloem Ratchamongkhon Line to travel to broaden their experience by visiting historic learning places in the eras of Krungsri Ayutthaya to Rattanakosin at Rattanakosin Exhibition Hall, Ratcha Damnoen Avenue.

## 2. Activity for Development of Quality of Life on Public Health

“M Care Activity”, the Company, in association with its partners, organized an exhibition booth to provide information on health, safety, and free health checkups for MRT passengers and residents surrounding the MRT routes and nearby communities, as follows:

- Exhibitions on health care and checkup by private hospitals to provide knowledge relating to proper and safe use of the MRT service (by Safety & Quality Division), such as, warning of pickpockets, safety in using escalators, etc., together with CSR bulletin board of Bangkok Expressway and Metro Public Company Limited.
- Passengers’ registration for getting coupons to join activities at various exhibition booths and bringing such coupons to make prize drawing within such event, namely, MRT tickets for 50 prizes worth Baht 50 each, totaling Baht 2,500, M Dolls / flash drives, fans, key rings, cotton bags, notebooks, etc.
- **Free Thai massage** by Thailand Caulfield Foundation for the Blind under the Royal Patronage of Her Royal Highness Princess Maha Chakri Sirindhorn.
- **Health checkup service (Pulse diagnosis)** and health care suggestions by traditional Chinese doctors, Alternative Medicine College, Chandrakasem Rajabhat University.
- **Health checkup service (Electrical pulse diagnosis)** according to elements, hand grip test, basic eye test by Kluaynamthai Hospital.
- **Fasting blood sugar, blood pressure checkup service, health risk assessment, health consult with professional nurses** from Bangpo Hospital.
- **Educating and demonstrating how to make initial breast cancer checkup** by Chulalongkorn Hospital.
- **“Adventure in No Belly Land”** with Thai Health Promotion Foundation (THPF).
- **Healthy food cooking demonstration** as well as educating on nutrition by Intermedical Care and Lab Hospital.
- **Initial oral and teeth health checkup service** by Mahidol University Faculty of Dentistry.
- **Health checkup service, health care suggestions with Thai tradition medicine and Chinese tradition medicine** by College of Oriental Medicine, Rangsit University.

## 3. Activity for Promotion of Other Public Benefits

“**Buddhist Monk Robe Offering Ceremony for 2016**”, the Company in association with communities surrounding the routes of the MRT Chaloem Ratchamongkhon Line (Blue Line) and the MRT Chalong Ratchadham Line (MRT Purple Line), together with the groups of executives and staff, jointly hosted the Buddhist monk robe offering ceremony for 2016 at Wat Madua, Nonthaburi Province, to raise funds for renovation of monks’ dwellings and support for Buddhism, whereby MRT passengers made donations with the Company in the total amount of Baht 817,000.

“**Return the Metro Cards for MRT Lucky Draw**”, which campaigned for passengers’ greater recognition of the “Return the Metro Cards for Environmental Protection and Sustainable Social Development” project by distributing metro card envelopes to passengers who purchased or showed their 1-Day Pass, 3-Day Pass or 30-Day Pass, filling in their names-addresses on the envelopes, inserting used-up 1-Day Pass, 3-Day Pass or 30-Day Pass in the envelopes, and then dropping them into the metro card boxes for lucky draw.

“**MRT’s Free Drinking Water Service for People to Mourn for His Majesty the King’s Passing**” Bangkok Expressway and Metro Public Company Limited (BEM) expressed our deepest and sincere condolences to remembrance of His Majesty the late Phra Bat Somdet Phra Poramintharamaha Bhumibol Adulyadej Mahitalathibet Ramathibodi Chakkrinaruebodin Sayammintharithat Borommanatbopit by installing free drinking water service counter for people who went to pay respect to the corpse of the late King during October 29 - 30, 2016 at Exit No. 2 of Hua Lamphong MRT station.

## 10.3 Anti-Corruption Policy

### 10.3.1 The Company's Anti-Corruption Policy

The Company realizes and gives priority to anti-corruption and fraud prevention, both inside and outside its organization. The Company thus formulates guidelines for proper conduct of directors, executives and staff via the code of business ethics of the Company. Furthermore, with the potential damage from corruption in mind, the Company then formulates anti-corruption policy containing the key practical guidelines as follows:

1. The Company's staff at all levels should carry out activities with fairness, integrity and transparency in business dealings with various agencies, provided that such activities must be lawful, and they have the duty to comply with the anti-corruption policy in the code of business ethics of the Company.
2. The Company promotes fair treatment with integrity towards its traders and compliance with any contractual commitments made with the Company's stakeholders.
3. Executives' and staff's awareness must be promoted to ensure that they refrain from committing any fraud and realize consequences of corruption.
4. Directors, executives and staff must refrain from accepting or offering any reception, gifts, and any other payments which are extravagant and unusual to those in business dealings with the Company.
5. The Company arranges for staff training to educate them regarding the anti-corruption policy, practices and guidelines.

The Company which operates the expressway business and the metro business did formulate and implement their respective anti-corruption policies, which can be summarized as follows:

### 10.3.2 Expressway Business

The Company sets out measures, based on both disciplinary and legal actions, against corruption. The fact-finding must be conducted by a committee comprising representatives from the human resources department, from the department of the offender and from other units. The Managing Director is authorized to consider imposing disciplinary actions in case of written warning and termination of employment. Should the misconduct constitute embezzlement, legal action will be undertaken to protect the Company's interests. Guidelines under this policy are as follows:

1. No business dealings may be entered into with any organization or unit which is involved in corruption.
2. Disciplinary and legal actions will be imposed and instituted against such staff who are involved in corruption

#### Additional Anti-Corruption Practices

The Company intends to operate its business with transparency without involvement with any corruption, in accordance with the good corporate governance principles. All directors, executives and staff must perform their duties with integrity, due care, prudence and in the best interests of the Company and fairness to stakeholders, as well as free from corruption, both internal and external.

1. The Company and its Subsidiary set out policy and measures for anti-corruption and prevention of payments or acceptance of bribery, including any actions contrary to morality and customary practices, which are written in the corporate governance policy, the Company's code of business ethics, and the work rules and regulations, for compliance by all directors, executives and staff.
2. The Company is aware of business risks from both internal and external factors which may affect its operations. The Company therefore sets out a systematic risk management, monitoring and measures to continuously minimize risks. The Corporate Governance and Risk Management Committee was thus appointed to consider the policy level while the Management has the duty to supervise the overall risk management process and perform the day-to-day operation on behalf of the Corporate Governance and Risk Management Committee. Such duties include monitoring, evaluation and preparation of a risk management report at the department level for submission to the Board of Directors for information. Moreover, the risk management manual and plan are prepared as operational guidelines, including risk

monitoring, evaluation and review in line with the internal and external circumstances. All work units must also prepare emergency plans for any emergency situation so as to be ready to resolve problems forthwith.

3. In order to comply with the written anti-corruption policy, the Company also builds up recognition of anti-corruption practices in the organization by way of training, using both physical and psychological approaches, to develop a positive attitude. The Company believes that decency emanates from inside out, so it regularly organized the “Hearing the Dharma with BEM” throughout 2016. In preparation for the application for certification of membership in Thailand’s Private Sector Collective Action Coalition Against Corruption, the Company had various departments conduct a self-assessment to identify potential improvements in compliance with the anti-corruption measures in Thailand’s Private Sector Collective Action Coalition Against Corruption. Moreover, the Company assigned two representatives, who are responsible for the corporate governance and the internal audit, to attend the Anti-Corruption: The Practical Guide (ACPG 15) course, organized by the Institute of Directors Association (IOD).
4. The Company surveys the compliance with the code of business ethics yearly for the executives to review their conduct in accordance with the code of business ethics.
5. The Company treats misconduct relating to fraud and corruption as serious disciplinary misconduct, and any violation is subjected to severe disciplinary action up to termination of employment without prior warning. The details of such misconduct are described as follows:
  - (1) Disclosure of the Company’s confidential information to any third parties;
  - (2) Breach of duty and/or fraudulent acts towards the Company, including a conspiracy with others to do so;
  - (3) Abuse of position for personal interest or for the interest of others;
  - (4) Acceptance of undue consideration in relation to assigned tasks;
  - (5) Showing impolite manners or use of aggressive, threatening, insulting words or causing bodily injury to supervisors, including visitors.

### 10.3.3 Metro Business

The Company gives priority to good corporate governance, including anti-corruption measures, and the Company has made determined arrangements to tackle issues of corruption pursuant to the good corporate governance. The Company has made its anti-corruption policy known to all staff and disseminated such policy on intranet website and the Company’s main website regarding the content of Corporate Governance, as well as providing training courses for all new directors of the Company to ensure their awareness of such matters from the beginning and holds an annual refresher and testing program for all staff, in order to review their conduct in accordance with the code of business ethics. Moreover, the Company takes into account potential damage as a result of corruption by arranging for a whistleblower guide for any matter which may give rise to damage to the Company by reporting directly to the Audit Committee.