



ASEAN DISCLOSURE INDEX

HOW ASEAN'S LEADING LISTED COMPANIES FARE ON
DISCLOSURE STANDARDS



EXPERTS WITH IMPACT

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ASEAN DISCLOSURE INDEX 2018

HOW ASEAN'S TOP 180 LISTED COMPANIES FARE ON DISCLOSURE STANDARDS

7.8/ 10

COMPOSITE DISCLOSURE (CD) SCORE

3/ 4


BOARD QUALITY (BQ) SCORE

3.8/ 5

RISK DISCLOSURE (RD) SCORE

ASEAN COUNTRY SCORES

	CD SCORE (Avg/ 10)	BQ SCORE (Avg/ 4)	RD SCORE (Avg/ 5)
MALAYSIA	8.7/ 10	3.5	4.2
THAILAND	8.6/ 10	3.2	4.5
SINGAPORE	8.3/ 10	3.2	4.1
INDONESIA	7.9/ 10	3.0	3.9
PHILIPPINES	7.8/ 10	2.9	3.9
VIETNAM	5.4/ 10	2.5	1.9



24 disclosure champions

FINANCIAL/BFSI DBS, OCBC, Bank Central Asia, Maybank, Siam Commercial Bank, CIMB Group, Bank Mandiri, Singapore Exchange, Krung Thai, Hong Leong Bank	ENERGY/UTILITIES Tenaga, Perusahaan Gas Negara
TELECOM/TECH Axiata, Digi, DTAC, InTouch	MANUFACTURING/INDUSTRIAL Sime Darby, PTT Global Chem, Petronas Chem, Indorama Ventures
NATURAL RESOURCES PTT Exploration, Petronas Dagangan	FOOD PRODUCERS IOI, Sime Darby Plantation
	REAL ESTATE/CONSTRUCTION Central Pattana

27%

only 49 companies provide Board Evaluation with involvement of a third-party expert

25%

COMPANY BOARDS HAVE NO FEMALE DIRECTORS

45%

DO NOT PROVIDE A CONVENIENT WHISTLEBLOWING MECHANISM (by email or phone)

26%

DO NOT provide Sustainability Reports with globally recognised reporting standards (e.g. GRI)

SECTOR-WISE DISCLOSURE

TOP PERFORMER



TELECOM/TECH

WEAK PERFORMERS



REAL ESTATE/CONSTRUCTION



MANUFACTURING/INDUSTRIAL



FOOD PRODUCERS

ASEAN Boards should expect greater scrutiny of Risk Disclosure metrics and gender diversity

ASEAN Disclosure Index 2018

About ASEAN Disclosure Index 2018

The ASEAN Disclosure Index 2018 report is a proprietary intellectual property of FTI Consulting. The author of the report, Amrit Singh Doo, has prepared the report by reviewing public information from Annual Reports and corporate websites of 180 listed companies in the ASEAN region to create a weighted Composite Disclosure scoring system with 12 disclosure parameters and applied it to the FTSE ASEAN Stars Index constituents (30 companies each from Singapore, Malaysia, Thailand, Indonesia, Philippines and Vietnam). The 12 disclosure parameters were divided into three groups: performance disclosure (two parameters), board quality (five parameters) and quality of risk disclosure (five parameters), and scored '0' or '1' on the basis of absence or presence of disclosure parameter. The full report can be downloaded on www.fticonsulting.com/aseandisclosureindex2018

About FTI Consulting

FTI Consulting, Inc. is a global business advisory firm dedicated to helping organisations manage change, mitigate risk and resolve disputes: financial, legal, operational, political & regulatory, reputational and transactional. With more than 4,600 employees located in 27 countries, FTI Consulting professionals work closely with clients to anticipate, illuminate and overcome complex business challenges and make the most of opportunities. For more information, visit www.fticonsulting.com



ASEAN DISCLOSURE INDEX HOW ASEAN'S LEADING LISTED COMPANIES FARE ON DISCLOSURE STANDARDS

EXECUTIVE SUMMARY

FTI Consulting has been reviewing corporate disclosure practices in different jurisdictions, making a distinction between mandatory and voluntary disclosure standards. Mandatory standards are legalistic, covered as required compliance, and adherence to them is a matter for legal practitioners and enforcement agencies. This report deliberately looks beyond mandatory standards and focusses on non-financial voluntary disclosure, in keeping with the direction of disclosure regulations in other jurisdictions and with an eye on institutional investor expectations. e.g. metrics for board evaluation or whistleblowing incidents reveal a transparent corporate culture.

This ASEAN Disclosure Index report reviews non-financial, voluntary disclosures and creates comparable benchmarks, with an eye on upcoming and anticipated disclosure regulations. It is a non-commercial, public research initiative by FTI Consulting that seeks to quantify and frame the ever-increasing standards of voluntary disclosure, in the form of an industry benchmarking report. It does not seek to be exhaustive or create a definitive measure of corporate disclosure or governance practices. It would be amiss not to mention efforts of the ASEAN Capital Markets Forum and the ASEAN Corporate Governance Scorecard which serves as a benchmarking toolkit for corporate governance for listed companies in the region.

The report splits 12 voluntary disclosure parameters into three categories (see Research Methodology on page seven) which reveals more information about performance (Performance Disclosure), board quality (Board Quality) and risk management (Risk Disclosure) and assigns weights to create a Composite Disclosure score, that has been applied to 180 ASEAN companies listed on seven stock exchanges across six different jurisdictions. Suggestions to improve the methodology are invited and will be incorporated in future editions of the report. The author of the report has reviewed 2017 EU regulations on non-financial disclosure, ESG disclosure demanded by institutional investors and existing corporate governance policies in the region prior to the preparation of this report.

The report focusses on aggregates of disclosure data, rather than on individual companies. The emphasis is on how the 180 ASEAN companies, taken as a group, disclose voluntary and non-financial information, though leading examples have been mentioned. Working with a smaller number of publicly available disclosure parameters, allows one to identify improvement areas as well as best practices.

- Overall, companies in the ASEAN region score well on corporate disclosure – evident from the 7.8/10 average Corporate Disclosure for all 180 companies. The average Board Quality score is at 3/4, while the average Risk Disclosure score is at 3.8/5.
- 13% or 24 companies are Disclosure Champions, i.e. they secure a 10/10 Composite Disclosure score.

The ASEAN Disclosure Index report also aggregates disclosure scores for each parameter, to identify parameters where the companies score well and where they do not. The report reveals the following:

- Most companies (73%) provide board evaluation through self-

assessment. This is adequate from a mandatory standard, but the report takes a higher standard i.e. evaluation by a third-party, and finds only 27% of companies meet the higher standard.

- 45% of the companies DO NOT provide a convenient whistleblowing mechanism (phone number or email).
- 37% of the companies DO NOT provide analyst transcripts or details of analyst engagement.
- 74% provide Sustainability Reports with internationally recognised benchmarks (e.g. GRI standards), reinforcing the strong ESG disclosure practice across the region.

Splitting the disclosure scores of the 180 constituent companies by jurisdiction (where they are based i.e. one of the ASEAN companies), sector and market capitalisation, provides additional interesting insights, such as:

- Malaysian and Thai companies score the highest average on Composite Disclosure followed by Singaporean companies. Vietnamese companies score the lowest on average Composite Disclosure (with an overwhelming number of companies providing Annual Reports and other disclosure information in Vietnamese only). The report acknowledges strong disclosure on specific parameters by companies based in Vietnam and Philippines, when they outperform companies from Singapore, Malaysia or Thailand.
- Telecom/Tech companies have the highest average Composite Disclosure scores, followed by Energy/Utilities companies. Real Estate/Construction and Manufacturing/Industrial companies have the lowest average Composite Disclosure score.
- Predictably, large-caps have high disclosure scores compared to mid-cap and small-cap companies. Exceptions to this are also highlighted, when small-cap companies display a higher disclosure standard on one parameter (e.g. gender diversity on the board) compared to larger companies.

ASEAN DISCLOSURE INDEX 2018 REPORT FINDINGS

Composite Disclosure Scores

The Top 180 listed companies in the ASEAN region, constituents of the benchmark index (here the constituents of the FTSE ASEAN Stars Index covering 30 listed companies each from six ASEAN jurisdictions – Singapore, Malaysia, Thailand, Indonesia, Philippines and Vietnam) together have an average Composite Disclosure score of 7.8/10.

There is significant difference in Composite Disclosure scores when split by jurisdiction – with Singapore, Malaysia and Thailand together in a high scoring group followed by Indonesia and Philippines, and then Vietnam.

- 13% (24 companies) have Composite Disclosure scores of 10/10. These are the Disclosure Champions – with 11 of them from Malaysia, eight from Thailand, three from Singapore and three from Indonesia.
- 9% (16 companies) have a Composite Disclosure Score of 5/10 or less.

¹ Constituents of the FTSE ASEAN Stars Index, as on June 2018. This has 30 companies each from Singapore, Malaysia, Thailand, Indonesia, Philippines and Vietnam. FTSE ASEAN Stars Index is a proprietary property of the London Stock Exchange Group plc.

² Constituents of the FTSE ASEAN Stars Index, as on June 2018

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Split by industry, these companies can be viewed as sector champions for corporate disclosure standards. They are:

INDUSTRY CATEGORY	DISCLOSURE CHAMPIONS (CD SCORE = 10)
FINANCIAL/ BFSI (10 companies)	DBS, OCBC, Bank Central Asia, Maybank, Siam Commercial Bank, CIMB Group, Bank Mandiri, Singapore Exchange, Krung Thai, Hong Leong Bank
TELECOM/ TECH (4 companies)	Axiata, Digi, DTAC, Intouch Telecommunications
NATURAL RESOURCES (2 companies)	PTT Exploration, Petronas Dagangan
ENERGY/ UTILITIES (2 companies)	Tenaga, Perusahaan Gas Negara
MANUFACTURING/ INDUSTRIALS (4 companies)	Sime Darby, PTT Global Chem, Petronas Chem, Indorama Ventures
FOOD PRODUCERS/ F&B (2 companies)	IOI, Sime Darby Plantation
REAL ESTATE/ CONSTRUCTION (1 company)	Central Pattana

Board Quality Scores

Together as a group, the Top 180 listed ASEAN companies have an average Board Quality score of 3/4, as defined by the five board quality score parameters (see methodology):

- 22% of the 180 companies (i.e. 39 companies) score the maximum of 4/4 for Board Quality scores, with only 5% (10 companies) scoring less than 2/4 on Board Quality parameters.
- Only 27% (49 companies) of the 180 ASEAN listed companies provide board evaluation with the involvement of a third-party expert, though most do provide self-evaluation assessment.
- 25% (45 companies) DO NOT provide even one female director on its board. This low gender diversity at the board level is despite having a policy on board diversity in some cases.
- Between the six jurisdictions, Malaysian companies have the highest average Board Quality Score of 3.5/4, followed by both Singaporean and Thai companies together at 3.2/4. This is followed by Indonesia (3/4), Philippines (2.9/4) and Vietnam (2.5/4).
- Aggregated by industry, Telecom/Tech companies have the highest average Board Quality score of 3.5/4, followed by Banks/BFSI and Healthcare/Pharma companies at 3.2/4. This is followed by Energy/Utilities at 3.1/4. Real Estate/Construction companies and Food/Consumer Goods companies are laggards with an average Board Quality score of 2.8/4.

Risk Disclosure Scores

Overall as a group, the Top 180 listed ASEAN companies score an average of 3.8/5 for Risk Disclosure, as defined by the five risk disclosure parameters (see methodology):

- 42% (75 companies) have a Risk Disclosure score of 5/5.
- 20% (36 companies) of the Top 180 ASEAN listed companies have Risk Disclosure scores of 2/5 or less. Between the six jurisdictions, Thai companies have the highest average Risk Disclosure score of 4.5/5, followed by Malaysian companies at 4.2/5, and then Singaporean companies at 4.1/5. They are then followed by Indonesia and Philippines (both at 3.9/5), and then Vietnam (1.9/5).
- Aggregated by industry, Telecom/Tech companies have the highest average Risk Disclosure score of 4.9/5, followed by Energy/Utilities (4.6/5). They are followed by Healthcare/Pharma companies (at 4.3/5). Manufacturing/Industrial is the laggard with an average Risk Disclosure score of 3.4/5.
- 45% (81 companies) of the 180 ASEAN companies DO NOT provide a convenient whistleblowing mechanism (phone number or email) that is mentioned on the website or the Annual Report. This may be despite a whistleblowing policy being in place.
- 37% (66 companies) DO NOT provide analyst transcripts or details of analyst engagement (even if investor presentations are available on the website).
- A majority (74%) provide Sustainability Reports with internationally recognised benchmarks (e.g. GRI standards), but the balance of 47 companies DO NOT do so.

NOTE: Taken as an aggregate, Performance Disclosure (PD) Score is 1/1, with very few companies not providing one of the two Performance Disclosure parameters. For this purpose, there is no separate section on Performance Disclosure.

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Disclosure Scores by Jurisdiction

The high disclosure performance of Malaysia and Thailand is commendable – with Malaysian companies clearly driving higher standards of board-related disclosures amongst other jurisdictions, while Thai companies score highest on Risk Disclosure. Singapore, Malaysia and Thailand score highly on disclosure parameters as compared to Indonesia and Philippines, which are close to one another. Vietnam is still a frontier jurisdiction and this also reflects in the scores. One way Vietnam could improve would be to simply make English language versions, in addition to Vietnamese versions, of disclosures available on corporate websites.

Interestingly, on the disclosure parameter of gender diversity at board level (i.e. at least one female director), companies from the Philippines, Vietnam and Singapore are aligned, i.e. 21 out of the 30 companies in Philippines, Vietnam and Singapore, each have at least one female director on their board. Malaysian companies are the top scorer on this parameter, followed by Thai companies. Indonesian companies are the weakest on this parameter.

Eight companies in the Philippines and three in Indonesia provide board evaluation, with the involvement of a third-party/external expert (a practice NOT followed by 19 Singaporean, 13 Malaysian and 20 Thai companies). Similarly, 19 companies in Philippines and 20 in Indonesia provide a convenient whistleblowing mechanism on their website (a practice that is NOT followed by 12 Singaporean, 10 Malaysian and eight Thai companies).

JURISDICTION	CD SCORE ³ (Avg/10)	BQ SCORE (Avg/4)	RD SCORE (Avg/5)
SINGAPORE (30 cos)	8.3	3.2	4.1
MALAYSIA (30 cos)	8.7	3.5	4.2
THAILAND (30 cos)	8.6	3.2	4.5
INDONESIA (30 cos)	7.9	3.0	3.9
PHILIPPINES (30 cos)	7.8	2.9	3.9
VIETNAM (30 cos)	5.4	2.5	1.9

Disclosure Scores by Sector

While the high disclosure scores of Telecom/Tech companies (9.4/10 Composite Disclosure, 3.5/4 for Board Quality and 4.9/5 for Risk Disclosure) isn't surprising, the disclosure performance of Energy/Utilities (second highest sector by score, at 8.8/10 for Composite Disclosure) is a revelation. It is followed by the Healthcare/Pharma sector (with 8.5/10 Composite Disclosure). The Banking/BFSI Sector is a surprising fourth despite its strong international profile, scoring as much as the Healthcare/Pharma sector on Board Quality Score (3.2/4) but falling short on Risk Disclosure (with a Risk Disclosure score of 3.5/5, compared to Healthcare/Pharma's 4.3/5). Manufacturing /Industrials sector and Real Estate/Construction companies fall behind other sectors with an average Composite Disclosure score of 7.4/10, and an average Risk Disclosure score of 3.4/5 and 3.5/5, respectively. This indicates the opportunity for boards of companies in these sectors to drive industry-wide initiatives to address these weaknesses and formulate sector-specific standards e.g. raising ESG Reporting/Disclosure in the manufacturing sector through industry standards.

Interestingly, eight out of 37 BFSI/banking sector companies DO NOT provide any form of gender diversity information on the board (i.e. at least one female member on the board), and neither do 12 out of the total 31 Real Estate/Construction sector companies in the reference group.

SECTOR	CD SCORE (Avg/10)	BQ SCORE (Avg/4)	RD SCORE (Avg/5)
FINANCIAL/ BFSI (37 cos.)	7.7	3.2	3.5
REAL ESTATE/ CONSTRUCTION (31 cos.)	7.4	2.8	3.5
MANUFACTURING/ INDUSTRIALS (27 cos.)	7.4	3.0	3.4
FOOD PRODUCERS/ F&B (24 cos.)	7.5	2.8	3.7
NATURAL RESOURCES (19 cos.)	7.5	3.0	3.5
TELECOM/TECH (14 cos.)	9.4	3.5	4.9
ENERGY/UTILITIES (10 cos.)	8.8	3.1	4.6
TRAVEL/ LEISURE/ SERVICES (13 cos.)	7.9	3.0	3.9
HEALTHCARE/ PHARMA (4 cos.)	8.5	3.2	4.3

³ Composite Disclosure = Performance Disclosure (PD) score + Board Quality (BQ) score + Risk Disclosure (RD) score. PD score is 1 across the group of companies.

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Disclosure Scores by Market Capitalisation⁴

Predictably, large-cap companies have high disclosure scores, and small-cap companies have lower disclosure scores. The high proportion of L1, L2 companies (94 companies, more than 50%, with market cap in excess of USD\$2 billion in the reference group of 180 companies) leads to a higher overall ASEAN Disclosure Index score. For the purpose of peer benchmarking, it may be prudent to compare with the appropriate size of the company, by market cap, to see how a company performs on its disclosure practices.

Interestingly, one small-cap company (m-cap < USD\$500 million) conducts Board Evaluation with the involvement of third-parties/external experts (a practice NOT followed by 15 L1 large-cap companies and 38 L2 large-cap companies). Similarly, one small-cap company provides a convenient whistleblowing mechanism on its website (a practice NOT followed by 11 L1 and 20 L2 large-cap companies). Thirteen small cap companies provide gender diversity at board level (i.e. at least one female director), but 10 L1 large-cap companies and 12 L2 large-cap companies DO NOT provide this.

SECTOR	CD SCORE (Avg/10)	BQ SCORE (Avg/4)	RD SCORE (Avg/5)
SL1 LARGE CAPS (35 cos, m-cap > USD\$5 billion)	8.8	3.4	4.4
L2 LARGE CAPS (59 cos. m-cap b/w USD\$2-5-billion)	8.3	3.2	4.2
M1 MID-CAPS (37 cos. m-cap b/w USD\$1-2 billion)	7.8	3.0	3.8
M2 MID-CAPS (26 cos. m-cap b/w USD\$500 million – 1 billion)	7.4	3.0	3.4
S SMALL-CAPS (23 cos. m-cap < USD\$500 million)	5.4	2.4	2.0

Qualitative Observations: Disclosure Best Practices

While reviewing disclosure information of all 180 companies, FTI Consulting came across a number of noteworthy examples, beyond the Disclosure Champions, where companies (and their boards) have clearly been pro-active and pushed for a higher, voluntary disclosure standard. Some of these which are mentioned below can be taken as best practice in the ASEAN region, and possibly beyond in the broader Asian region:

- Board diversity disclosure is strong in a number of companies, with detailed break-up of board composition by age, gender, experience and in some cases ethnicity (importantly keeping

multi-ethnicity in some jurisdictions). In cases where there is at least one female director on the board, the detailed board diversity disclosures are clearly a best-practice standard. Vietnam Dairy is the only company in the group of 180 companies to have a female Chairperson as well as CEO (this isn't necessarily a best practice, but worthy of note).

- Six companies provide metrics of whistleblowing incidents in the year and transparently report this in their Annual Reports, with some also providing resolution details. Contrary to what may be expected, these companies are from Indonesia, Philippines and Vietnam rather than the high disclosure jurisdictions. These six companies are - Ayala Corp, PLDT, Sampoerna, Telecom Indonesia, and VietJet Aviation.
- Disclosure of board evaluation practices at PTT, a state-owned company, is high with details of the process followed by the State Owned Enterprises evaluation committee and full disclosure of board evaluation scores in the Annual Report.

RESEARCH METHODOLOGY

The Board Quality weighted score of each company has been calculated on the basis of presence (1) or absence (0) of five information disclosure parameters publicly available, either on the company's website (W) or Annual Report (AR). The five parameters are: Board Diversity Policy/Targets for Gender Diversity/Presence of Female Directors on the Board (W/AR), Board Evaluation by External Third-Party Advisor or Consultant (W/AR), Director Remuneration (AR), Dividend Policy (AR/W), and Separation of Chairman and CEO Roles (AR/W).

Similarly, the Risk Disclosure weighted score has been calculated on the basis of presence (1) or absence (0) of five risk disclosure parameters - Whistleblowing Mechanism via phone number or email (W/AR), Top 10 Shareholding Info (W/AR), Recent Analyst Transcripts/ Updates (W), Stakeholder Engagement Info (W/AR), Sustainability Report/ESG Risk Mitigation Info (AR/W).

The Performance Disclosure weighted score is calculated on the basis of presence (1) or absence (0) of two performance related disclosure parameters – Relevant Operating Metrics (AR/W) and Business Strategy/ Objectives in Medium/ Long-Term (W/AR).

The Composite Disclosure score (Composite Disclosure score = Performance Disclosure score + Board Quality score + Risk Disclosure score) has been calculated for each company in benchmark FTSE ASEAN Stars Index, with a weight of 10% for Performance Score, 40% for Board Quality score and 50% for Risk Disclosure, as observed during period 1 July – 5 August 2018.

⁴ We created five m-cap categories (L1, L2, M1, M2, S) for this report – large-caps (L1, L2) defined as companies with m-cap more than USD\$2 billion, mid-caps (M1, M2) defined as companies with m-cap between USD\$2 billion to USD\$500 million, and small-caps as companies as those with m-cap less than USD\$500 million. Market capitalisation figures are as per June 2018 note of the FTSE ASEAN Stars Index.

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DISCLOSURE PARAMETERS	VALUE	WEIGHT	SCORE	SCORE x10 - NORMALISED
PERFORMANCE RELATED	Y (1)/N (0)	10%	0.1	1
Relevant Operating Metrics (W/AR)	1	5%	0.05	0.5
Business Strategy / Corp Objectives over Long Term (W/AR)	1	5%	0.05	0.5
BOARD QUALITY RELATED (BOARD QUALITY/ BQ SCORE)		40%		
Board Diversity Policy / Gender Diversity Targets (W/AR)	1	8%	0.08	0.8
Board Evaluation by Third Party (AR)	1	8%	0.08	0.8
Director & Key Executives Remuneration (AR)	1	8%	0.08	0.8
Dividend Policy (AR/ W)	1	8%	0.08	0.8
Separation of Chairman and CEO roles (AR/ W)	1	8%	0.09	0.8
RISK MANAGEMENT RELATED (RISK DISCLOSURE/ RD SCORE)		50%	0.5	5
Whistleblowing Mechanism/ Metrics (AR/W)	1	10%	0.1	1
Updated Shareholding/ Top 10 Shareholders Info (W/AR)	1	10%	0.1	1
Recent Analyst Transcripts/ Updates (W)	1	10%	0.1	1
Stakeholder (Non-Shareholder) Engagement Info (AR)	1	10%	0.1	1
Sustainability Report/ ESG Risks & Disclosure Info (AR/ W)	1	10%	0.1	1
TOTAL PARAMETERS/SCORE	15	100%	1	10

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Performance Disclosure Parameters: Definitions

- **Operating Metrics:** Specific, updated non-financial information pertaining to operations of the company in the previous financial year i.e. 2017, as revealed in the Annual Report or the company's website.
- **Business Strategy Information/Corporate Objectives over the Long Term:** Detailed and updated information on business strategy and how management intends to meet corporate objectives over the medium/long term, from the previous year (i.e. 2017) Annual Report or the company's website.

Board Quality Disclosure Parameters: Definitions

- **Board Diversity Policy/Gender Diversity Targets:** Gender-diversity information among the company's Board of Directors (Board of Commissioners in the case of Indonesian companies) as mentioned in the last Annual Report (FY 2017) or corporate website. Companies must have defined gender-diversity targets OR at least one female on the Board of Directors. Board diversity policy alone isn't considered a sufficient criteria.
- **Board Evaluation by Third Party:** Updated information about Board Evaluation done through the involvement of external third party advisors or consultants in the last Annual Report (FY 2017). Self-assessment by board members isn't considered a sufficient criteria.
- **Director and Key Executives Remuneration:** Updated Information about remuneration paid to Board Members in the last Annual Report (FY 2017).
- **Dividend Policy:** Updated information about dividend policy or details of historical dividends paid on the company's website or in the last Annual Report (FY 2016 or FY 2017).
- **Separation of Chairman and CEO Role:** Separate roles for Chairman of the Board (President Commissioner in the case of Indonesian companies) and the Executive Head or CEO, as disclosed in the last Annual Report (FY 2017).

Risk Disclosure Parameters: Definitions

- **Whistleblowing Mechanism/ Metrics:** A specific phone number or email ID that facilitates whistleblowing, easily accessible on the company's website or last Annual Report (FY 2017).
- **Shareholding Information/Top 10 Shareholders Information:** Updated share ownership structure from the previous two quarters, i.e. Q1, Q2 FY 2018.
- **Analyst Engagement OR Earning Call Transcripts:** Updated details of engagement with analysts OR earnings call transcripts from the last two quarters, i.e. for Q1 or Q2 FY 2018.

- **Stakeholder Engagement:** Updated details on stakeholder engagement, beyond investors, as disclosed either on the company's website, last Annual Report (FY 2017) or last Sustainability Report (FY 2017).
- **Sustainability Report/ESG Risks and Disclosure as per international benchmark:** Updated Sustainability Report (FY 2017) with detailed ESG Disclosures, within an internationally benchmarked standard (e.g. as per GRI principles).

Assumptions about Disclosure Language, Analyst Engagement, Board Evaluation by Third Party, Whistleblowing Mechanism

- All disclosure information is required to be in English and to be easily understood by international investors.
- It is assumed that 180 ASEAN listed companies would have interacted with at least one analyst in the last 12 months and that there should be at least one public disclosure regarding such an interaction and the information shared with an analyst or a group of analysts. Failure to record details of analyst engagement or earnings call transcripts in the previous 12 months earns a company a '0' for Analyst Engagement parameter under Risk Disclosure.
- The ASEAN Capital Markets Forum in its guidance note on Board Evaluation, indicated 'review of board evaluation method by a third-party/expert every two years' (see Method of Evaluation). Companies that have followed this proactively earn a score of '1' for 'Board Evaluation by Third Party'. Boards that have self-evaluated themselves, without involvement of a third party score '0' on this parameter.
- It has been assumed that the whistleblowing mechanism should be a convenient, electronic channel, i.e. a phone number or email that potential whistleblowers have easy access to. Snail-mail channels are not enough and not in the spirit of disclosure regulations or expectations of international investors.

Disclaimers & Disclosures

Additional & Voluntary Disclosures

This is a non-commercial public research report prepared by FTI Consulting. FTI Consulting has not received any consideration from any of the companies for publication of this report. None of these 180 companies covered in this report have received advance copies of this report before its public release.

Amrit Singh Deo, the preparer of this report, does not hold, nor has he traded in any shares of the companies in this report over the last 12 months.

Disclaimer

The ASEAN Disclosure Index is a report that makes general observations about disclosure data based on publicly available information. This is NOT a research report and no statement in this report should be interpreted as a recommendation or opinion relating to investment worthiness of any individual company or scrip in the capital markets in the ASEAN region. The FTSE ASEAN Stars Index constituents have been taken as a reference set only for the purpose of this non-technical report.

The views expressed herein are those of the author(s) and not necessarily the views of FTI Consulting, Inc., its management, its subsidiaries, its affiliates, or its other professionals.



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