COMTEC INTERGRATION SYSTEMS LIMITED

EDITORIAL POLICY

1-21-2021

Editorial Policy

Table of Contents

Introduction

1.0 Guiding Principles

2.0 Editorial Standards

3.0 Monitoring of Content

4.0 Legal Context

Annex 1: Grievance Procedure

Annex 2: Standard Operating Procedures

Definition of Terms

Introduction

The Editorial standards and policies outlined in this document address principles and standards by which content will be distributed on the Platform, whether produced in-house or produced by independent content creators. The guide also applies to content posted as comments and feedback on the channels created on the Platform. These principles and standards primarily pertain to the criteria by which content is evaluated for distribution and will also inform processes by which content is produced for the Platform.

Comtec is responsible and accountable for the quality and integrity of the content it distributes. If Comtec concludes that content fails to satisfy its overall standards of quality or any applicable standard or practice, Comtec reserves the right to reject the content for distribution.

Baze TV is an online video Platform operated Comtec, where content providers and creators can upload videos content to entertain audiences and to monetize based on the viewership.

This policy is informed by several legislations and policies including Kenya Constitution Article 33 and 34, Kenya Copyright Act, National Cohesion and Integration Act and the Kenya Programming Code among others.

2

1.0 Guiding Principles

The fundamental principles that shape the content of the programs and services on the Platform are editorial integrity, quality, fairness and safety.

Editorial Integrity Comtec makes every effort to ensure that the content it distributes satisfies editorial standards designed to assure integrity, credibility, transparency and quality.

Quality In selecting programs and other content for its Platform, Comtec seeks the highest quality available. Selection decisions require professional judgments about different aspects of content quality, including, but not limited to excellence, creativity, accuracy, balance, fairness, timeliness, innovation and credibility. Similar judgments must be made about the content's ability to inform, inspire, educate, challenge and entertain.

Fairness
Article 34 of the Kenya Constitution on Freedom of the Media affirms that we, as an online Platform will be free of political or commercial influence in the choice of our content. We will therefore be fair in choice of content, allowing for a diversity of opinion that seeks to eliminate underrepresentation.

Safety
The safety of children shall take priority over any editorial requirement. This Platform endeavors to safeguard the welfare of children when creating content as well as children using the Platform.

All productions must adhere to the Programming Code issued by the Communications Authority (CA) and follow the guidance on the participation of children in TV programs as stipulated in Section 4 of the Programming Code.

2.0 Editorial Standards

Editorial standards that guide content on the Platform are as follows:-

2.1.1 Fairness
Fair treatment of individuals generally requires that the words and actions of the people portrayed or identified are represented in a way that presents their strongest case and gives individuals or organizations that are the subjects of attack or criticism an opportunity to respond.

In line with the principle of fairness, content that contains any of the following elements will not be uploaded or distributed:

a. any unfair or misleading presentation of facts, including inaccurate statements of material fact, undocumented statements of fact that appear questionable on their face, misleading juxtapositions, misrepresentations or distortions.

b. content that unfairly treats people or misrepresents their views.

3

c. content that promotes ethnic discrimination and hatred.

2.1.2 Accuracy

Every effort must be made to assure that content is presented accurately and in context. Programs, websites and other content containing editorials, analysis, commentary and points of view must be held to the same standards of factual accuracy. A commitment to accuracy includes a willingness to correct the record if persuasive new information warrants a correction and to respond to feedback and questions from audiences. **<u>Irresponsible celebrity gossip and sensational political statements will not be accepted on the Platform.</u>**

2.1.2 Objectivity

Objectivity refers to the process by which a work is produced, including work that involves analysis or, as a result of reporting, arrives at conclusions. Those who develop content for distribution must enter into any inquiry with an open mind, not with the intent to present a predetermined point of view. Opinion and commentary are different from news and analysis. When content is devoted to opinion or commentary, the principle of transparency requires that opinion be clearly labeled as such.

2.1.3 Courage and Controversy

Content on the Platform shall provide courageous, impartial and responsible treatment of issues and honest reporting or presentation of social and economic tensions, disagreements and divisions. It may be necessary to protect identities, for example when creating content that includes human rights defenders, or victims of injustice, crime and exploitation. The content creators should ensure that their content in no way violates the privacy of the contributors on the production.

2.1.4 Experimentation and Innovation

The Platform seeks content that is innovative in format, technique or substance, provided that it adheres to the set editorial standards and does not offend the audiences.

2.1.5 Unprofessional Conduct

Content creators should adhere to the highest professional standards and the Platform may reject Content as per the set rejection process if there is reason to believe that a producer has violated basic standards of professional conduct such as plagiarism, use of licensed content without clearance, insensitivity to tragedy or grief. This list is not exhaustive.

2.1.6 Protection of Children:

We seek to protect our young viewers from any content that would be harmful to their physical, social, moral and mental development. The Platform will provide a safety feature within the settings that allows parents and/or care givers to ensure that the child has access only to child-friendly channels and content.

Content creators should therefore not incorporate or upload content that harms the development of children, exposes children to mature content, nudity, explicit language exposes children to exploitation or promotes child exploitation.

Where child victims are part of content such as documentaries etc, the creator must ensure that their identity is protected.

All content that features children **MUST** in all cases have written consent of a parent or guardian or primary caregiver. Copies of signed consent forms must be submitted with the videos prior to content being passed or published.

For the purposes of this Policy, a child is defined, as per Kenyan law as anyone under the age of 18.

This will include content that;

- Shows explicit (or otherwise) sexual exploitation of children.

- Is potentially dangerous or harmful to children, such as dangerous stunts or pranks.

- Could lead to the emotional or physical abuse of children, such as events of graphic violence, harmful thematics (adult driven), labor exploitation.

- Content that, although targeted at family or younger viewers, is misleading by containing inappropriate content; sexual, violence, drugs, death, crime.

- Promotes violence in any way either to self or to others.
- Promotes any kind of crime, such as harassment, theft, bullying.

2.1.7 Depending on the nature of content, and especially factual content, it may be necessary to protect identities of contributors, for example when creating content that includes human rights defenders, or victims of injustice, crime and exploitation. The content creator should ensure that their content in no way violates the privacy of the contributors on the production.

2.1.7 Objectionable Material
Responsible treatment of important issues may sometimes require the inclusion of controversial or sensitive material, but good taste must prevail in content. Morbid or sensational details, or material that is gratuitously offensive to general taste or manners (e.g. extreme violence, ethnic hatred, strong language, nudity, sexism), should not be included unless it is necessary to an understanding of the matter at hand.

Creators shall not incorporate nor upload any pornographic content.

2.1.7 (a)Harmful Content

Comtec will not allow content that is dangerous, harmful or illegal on its Platform.

Included in the list of content deemed as 'Harmful' is the following;

5

- Content that promotes risk to physical harm - including dangerous stunts.

- Content that instructs or encourages subscribers to harm or kill themselves or others.

- Content relating to the use of or sale of illegal substances or drugs.

- Content that promotes any form of self-harm including promotion of eating disorders, self-physical damage, or content that promotes emotional self-harm.

- Content that supports the use of dangerous substances as having health benefits.

- Content that promotes the exploitation of children and other vulnerable members of society.

- Instructional content that shows how to commit any kind of crime. This includes the manufacture of weapons, how to commit theft, any kind of skills development that could be used in committing a crime, including computer hacking or the like.

- Any content that promotes harm to pets or wildlife.

Note: This list is not exhaustive and is can to be amended from time to time.

2.1.7 (b) Hate Speech

Comtec supports the rights of subscribers to enjoy content either on its Platform or related Comtec online assets free of any insults or harassment due to any person or group's character, physical, mental or emotional. No content that infringes on this will be permitted on the Platform. Artists have a responsibility to create within these guidelines.

This will include:

- Any comment on physical attributes. This will include: age, disability, gender, ethnicity, tribe, name, sexual orientation, appearance.

- Status of an individual's experience in life, such as; family background, class, economic status.

- Insulting or trolling of an individual designed to provoke a negative reaction.

- Expresses stereotypes in a manner designed to offend or belittle a specific individual or group of individuals.

- Promotes violence or defamation against an individual or group of people.

- Content that uses any racial insults whatsoever designed to create a notion of false truth amongst the audience.

- That claims that any individual or group of people are inferior in any way to any other.

- That calls for violence or adoption of a negative connotation about other

6

individuals or people.

- Is designed to be to the detriment of any personal or group religious or spiritual belief system. This is to include faith, life choices such as diet

2.1.7 (c)Violence and Graphic Content

Comtec will not allow explicit content that is designed to either offend or encourage viewers into acts of violence.

This will include content that;

- Promotes violence against other people or groups or people.

- Shows violence involving or against children, irrespective of context.

- Graphically shows explicit content around transport accidents, war/terrorism, torture, fighting (outside sport), sexual assault, riots, medical operations (without educational intent), corpses, natural disasters, violent crime, CCTV, especially in a manner designed to shock or traumatize.

- Shows a perpetrator in the act of committing a violent crime.

- Shows ill treatment, in any form, of animals – pets or other wildlife (other than in the content of education or documentary).

- Shows any dismemberment of dead bodies – during or after.

- Fictional content that fails to demonstrate that dramatic violence is intended as part of a fictional script.

- Shows graphic use of blood/makeup designed to shock or traumatize.

2.1.7 (d) Nudity and Sexual Content

Content that is designed for sexual gratification is not allowed on the Platform. Likewise, any content that depicts any kind of fetishism, again designed for sexual gratification is also not allowed on the Platform. This applies to any content unless specifically vetted and passed solely for educational purposes.

This will include content that;

- Footage showing either clothed or unclothed, genitals, buttocks or breasts that is to be used for sexual gratification.

Any sexual acts, whether clothed or otherwise, for the purpose of sexual gratification.

2.1.8 Ownership of Content

Content creators should ensure that the content they upload on the site is as far as possible original. Content borrowed from other creators and use of archival material needs to have been cleared for use by respective owners or their agents. Any unauthorized use of content owned by others will be deemed as having violated this policy and will be removed (blocked from users view). Recourse for content creators whose content is blocked is outlined in section 3 of this policy.

2.1.9 Accessibility
To reach a wide audience, Comtec TV will target English and Kiswahili languages for the Platform. To facilitate access to local content by the audience, content creators will be required to include subtitles in English where local languages have been used. Subtitling will also apply where foreign languages are used. Live events of national importance will require the provider to put in place a mechanism to enable accessibility by Persons with Disability.

2.2 CONTENT SOURCING

Comtec TV will be a Platform that publishes captivating content that informs, inspires, educates and entertains. We will seek to maintain at least 40% local content (Kenyan) on the Platform as required by the Communication Authority, and all content must adhere to the guidelines on section 4.4 of the Programming Code.

Content genres will include but are not limited to:-

- Factual such as consumer, real life stories, science, crime and justice
- Drama such as historical, political, medical, thriller among others
- Sport such as athletics, championship games among others
- Children's programming such as factual and activities,
- Music such as songs, reviews, countdowns, behind the scenes
- Comedy such as Stand Up, Sketch, Satire among others
- Faith based content such as Religious holiday content
- Lifestyle content such as cooking, fashion, Do it yourself shows
- Live Events

The Platform will contain content sourced as follows:-

2.2.1 Own Content
The Platform will have promotional and informational content from the client on a designated channel that will serve to keep content providers and users apprised on how to use the Platform policy changes, promotion of services among others. Content providers on the Platform will need to be familiar with the editorial policy for content uploaded on the channel.

2.2.2 Acquired Content
The Platform provider will have the flexibility to organize content into channels and load their original content on those channels. Content providers are expected to align their uploads with the editorial policy. The content providers will have to comply with the editorial policy and Copyright laws to ensure that any non-original content for example

archival, music, content from other creators has been cleared with the owner(s) accordingly. The acquisitions procedure is outlined in schedule 1.

2.2.3 Commissioned Content
Comtec may from time to time choose to commission content from independent content creators. Each commission will be guided by the editorial policy and the type of content will be determined by the specific commission brief. The commissioning process is outlined in the operations policy and procedures.

2.2.4 Co-productions
Co-productions refer to arrangements where production is funded jointly by Comtec and one or more other parties, such as a producer, another broadcaster, an institution or a private investor. The aim of a co-production is usually to enable the production of a higher-quality product than either of the parties can produce by themselves. The co-production process is outlined in the Operations policy and procedures.

2.2.5 Pre-Licensing

Where Comtec adopts this approach, Comtec will be responsible for the contracting.

2.2.6 Content Approval
All content will be rated and approved by Comtec in accordance with the provisions of the Programming Code.

3.0 Monitoring of Content

All content on the Platform will be monitored including Content published by independent creators to ensure that it meets channel editorial policy guidelines.

3.1. Content Monitoring

The Platform will use both human and machine monitors to identify content that violates the policy. Identification may take place through flagging by monitors and complaints by users. Content may be found to violate policy owing to use of licensed content, content which has extreme violence, ethnic stereotyping and hatred, nudity, discrimination, self-harm, pornography, and exploitation of children.
Comments with abusive and derogatory language will not be allowed on the Platform.

3.2 Removal of Content
The Platform will remove flagged content and it will not be accessible to users. A notification will be sent to the content provider to inform him/her of the category of violation, action taken and action recommended. Where a content provider takes corrective action, for example editing out segments of content that violate the policy, the re-edited content may meet policy standards and therefore be retained on the Platform.

Where content does not meet editorial policy standards even after recommendations to edit, content will be rejected, and contract for the specific production will be terminated. The content provider is free to appeal the decision through the Video Manager or to pitch different content for publishing on the Platform.

The process or flagging and removal of Content is contained in the Grievance Procedure annexed hereto.

4.0 Legal Considerations Kenya Context

4.1 Kenya Constitution –Article 31 on the right to Privacy, Article 33 and Article 34 on rights to Freedom of Expression and Freedom of the Media

In developing this policy, we have taken into consideration Article 31 which guarantees the right not to have personal information about oneself or one's family revealed.

Article 33 of the Constitution which guarantees the right to Freedom of Expression which includes the right to seek, receive and impart information; and the right to artistic creativity. Content providers can express and impart their creativity but the content must not incite to violence or war, spread hate speech or advocate for hatred that constitutes ethnic incitement, causes harm or discrimination.

Article 34 guarantees freedom of the media so that this media Platform is free from state, political and commercial interference in its governance and operation.

4.2 The Copyright Act

The Kenya Copyright Act allows for registration of the tangible expression of creative works to allow for owners to exploit for commercial purposes. Content creators are encouraged to take measures to protect their content before sharing on Platform. The policy has a section on ownership of content.

4.3 Kenya Programming Code

The Programming Code gives guidelines on content and emphasizes protection of young audiences.

4.4 National Cohesion and Integration Commission Act

The definitions for ethnic discrimination and hate speech are adopted from this Act.

4.5 The Subscription Broadcasting Service Licence

The provisions of the Licence are adopted.

Annex A: Grievance Procedure

Comtec TV will create reporting mechanisms for the following:

1. Use of unauthorized materials on content
2. Violation of Privacy
3. Copyright infringement

4. Other areas of violation including but not limited to; harmful content, fairness & accuracy, violence and hate speech.

The Video Manager holds overall responsibility for implementation of this procedure.

1.0 PROCEDURE.

1.1 Complaint is received on videocontent@Comtec.co.ke and acknowledged by the Video Manager

1.2 The Video Manager shall review the complaint and confirm the claims being made are accurate for example; Is the said content on Platform? What is the grievance specifically? Does it violate editorial policy? Does the issue lie with ComtecTV or with Content Creator?

1.3 Where grievance is with ComtecTV, corrective action will be taken to meet Editorial standards.

1.4 Where grievance is with Content Provider, the complaint will be forwarded to the Content Provider for their action.

1.5 The Video Manager will complete the Complaint Assessment Form and capture the action taken to resolve matter.

2.0 RECORDS

The following records shall be generated by this procedure:-

- Original Email from aggrieved party
- Complaint assessment form

COMPLAINT ASSESSMENT FORM

Particulars of Complainant	
Name:	
ID No.	
Company Reg Number if applicable	
Phone Number	
Email :	
Particulars of offensive content	
Show Title	
Episode Number (If Applicable)	
Complaint Details:	

12

Supporting Evidence (if available)	
Remedy sought:	
Signed by complainant	
Signed by Acquisitions Manager	

SCHEDULE 1

STANDARD OPERATING PROCEDURE – CONTENT ACQUISITION

Introduction

This document is intended to provide a step-by-step approach from video content identification, submission, review, contracting, monitoring and feedback as governed by

the editorial policy. It embraces the practicality of ensuring transparency in the acquisition process by documenting every step required and also provides for equitable distribution and management of video content.

The Video Content Committee shall identify available and suitable video content for broadcast on the Comtec Platform that is in line with the criteria as captured in Annexure A. This is in addition to ensuring that not only does the video content meet the requirements but also includes metadata for on boarding and marketing as illustrated in Annexure B. The apportioning of broadcast times, license period and classification is subject to Comtec.

Functions

Content acquisition relies on other key function areas at different points in time during the process. Other key departments that are integral to the acquisition process include, but not limited to Operations, Marketing, Technical, Finance, Legal and Administration.

Standard Operating Procedure

Department	Content Acquisition
Responsibility	Acquisitions Manager
Description	A step-by-step approach from video content identification, submission, review, contracting, monitoring and feedback of video content

No.	Action / Task	Tools Required	Timelines
1	**Identification** - Identify content providers/partners with existing (library) or fresh (new) content - Make an introduction and request for samples (additional) of their work	- Social Media - References - Websites	Daily
2	**Submission** - Submitted content must be checked against the established criteria and editorial policy guidelines	- Content Portal / Video Transfer Platforms - Criteria Guideline	Daily
3	**Review** - Review submitted content – not less than 50% of the duration - Fill in the content acquisitions review form (should be signed by at least by 2 people in the VCC team) - If content is approved by the VCC acquisitions team, send sample video file to Operations for testing - Request for marketing material for publishing	- Content Portal / Video Transfer Platforms - Acquisitions Review Form - Marketing Requirements Form	3 – 5 Days
4	**Contracting** - If content is accepted after testing, send the on boarding guide form to the content provider/partner - Fill in a license agreement request form to the legal department for contracting	- On Boarding Guide Form - License Agreement Request Form	3 – 5 Days
5	**Monitoring** - With the VCC team, review content performance and make adjustments, where/if necessary	- Data Analytics	Weekly
6	**Feedback** - Revert back to content provider/partner on content performance and amendments, where/if required	- Meetings	Regularly

CONTENT ACQUISITION GUIDELINE

GENERAL CRITERIA	RELEVANT QUESTIONS (EXTERNAL)
1. Story/Narrative	• Is it relevant? • Does it resonate with our audiences? • Does it have a high value of entertainment? • Is it informative? • Is it current/fresh? • Is the story clear/well defined? • Does it have a compelling message? • Does it have any social impact? • Is it memorable? • Is the language appropriate? • Is it imaginative/creative? • Who is the primary target audience?
2. Technical Execution	• How is the video quality good? • How is the audio quality? • How is the lighting? • How is the edit and overall mix? • Is it visually appealing? • Is it the correct file size? • If not in local dialect, is it subtitled? • Is the music (if any) well used?
3. Format	• Does it fall within the required duration? • Does it fall within the proposed genres?
4. Style	• Is it original? • How has the technique been applied? • Is it innovative?
5. Volume	• How many hours are currently available? • Are there other episodes/sequel in production?
6. Production Status	• When was the content released? • What is the country of origin? • Has it won any awards?
GENERAL CRITERIA	**RELEVANT QUESTIONS (INTERNAL)**
7. Marketability	• Does it have a high level of engagement? • Does it have potential for sales?

16

	• Does it communicate brand value?
8. Commercial Appeal	• Has it been broadcast on other Platforms? • Is it currently being broadcast? If so, where?
9. Legal	• Is there proof of ownership? • Is the material used copyrighted? • Is there any existing license agreement/s?
10. Financial	• What is the cost model?

"Annexure B"

CONTENT ACQUISITION REVIEW DOCUMENT

A. PROGRAM DETAILS	
PRODUCTION COMPANY/ PRODUCER	
PROGAM TITLE	
GENRE/CATEGORY	
NO. OF SEASONS	
NO. OF EPISODES	
DURATION/EPISODE	
YEAR OF PRODUCTION	
COUNTRY OF ORIGIN	
CONTACT PERSON	
CONTACT DETAILS	
B. OTHER DETAILS (IF ANY)	
WEBSITE/ SOCIAL MEDIA LINKS	
RIGHTS RESTRICTIONS	
PRODUCT ADS IN THE PROGRAM	
LIST OF OTHER BROADCAST PLATFORMS	

PUBLICITY MATERIALS	
C. VCC COMMENTS (BASED ON KEY CRITERIA)	
1. STORY/NARRATIVE	
2. TECHNICAL EXECUTION	
3. FORMAT	

RECOMMENDATION:
- Approved For Testing
- Require More Samples OR Full Series/ Film For Review
- Rejected

Signed by VCC 1:   Date:
Signed by VCC 2:   Date:

"Annexure C"

The Programming Code for Broadcasting Services in Kenya

Programming-Code
-for-broadcasting-S