

D Disclosure and Transparency			
	Question	Answer	Remarks & Source Document
D.1 Transparent ownership structure			
D.1.1	Does the information on shareholdings reveal the identity of beneficial owners, holding 5% shareholding or more?	Y	<p>Remarks: The SEC General Information Sheet contains the list of shareholders (direct and indirect) of the Company and their corresponding holdings.</p> <p>Source Document:</p> <ul style="list-style-type: none"> • Annual Report, p. 18 • General Information Sheet (GIS), p. 7 -8
D.1.2	Does the company disclose the direct and indirect (deemed) shareholdings of major and/or substantial shareholders?	Y	<p>Remarks: The SEC General Information Sheet contains the list of shareholders (direct and indirect) of the Company and their corresponding holdings.</p> <p>Source Document:</p> <ul style="list-style-type: none"> • Annual Report, p. 18 • General Information Sheet (GIS), p. 7 -8
D.1.3	Does the company disclose the direct and indirect (deemed) shareholdings of directors (commissioners)?	Y	<p>Remarks: The SEC General Information Sheet contains the list of directors of the Company and their corresponding holdings.</p> <p>Source Document:</p> <ul style="list-style-type: none"> • Annual Report, p. 18 • General Information Sheet (GIS), p. 7 -8
D.1.4	Does the company disclose the direct and indirect (deemed) shareholdings of senior management?	Y	<p>Remarks: The SEC General Information Sheet contains the list of senior management of the Company (i.e. President and Executive Vice Presidents) and their corresponding holdings to the Company.</p> <p>Source Document:</p> <ul style="list-style-type: none"> • Annual Report, p. 19 • General Information Sheet (GIS), p. 7 -8
D.1.5	Does the company disclose details of the subsidiaries, associates, joint ventures and special purpose enterprises/ vehicles (SPEs)/ (SPVs)?	Y	<p>Remarks: The details of the Company's subsidiaries, associates, joint ventures and special purpose enterprises are disclosed in the Annual Performance Report.</p> <p>Source Document:</p> <ul style="list-style-type: none"> • Annual Report, p. 19

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D.2 Quality of Annual Report

	Does the company's annual report disclose the following items:		
D.2.1	Key risks	Y	<p>Remarks: The particular item is sufficiently disclosed in the Annual Performance Report of the Company.</p> <p>Source Document: Annual Report, Challenges, p. 5 & 9</p>
D.2.2	Corporate objectives	Y	<p>Remarks: The particular item is sufficiently disclosed in the Annual Performance Report of the Company.</p> <p>Source Document:</p> <ul style="list-style-type: none"> • Annual Report, p. 4 – 5 • Vision, Mission • Website
D.2.3	Financial performance indicators	Y	<p>Remarks: The particular item is sufficiently disclosed in the Annual Performance Report of the Company.</p> <p>Source Document: Annual Report, p. 8, 21 -23</p>
D.2.4	Non-financial performance indicators	Y	<p>Remarks: The particular item is sufficiently disclosed in the Annual Performance Report of the Company.</p> <p>Source Document: Annual Report, p. 7, Platinum Trusted Brand</p>
D.2.5	Dividend policy	Y	<p>Remarks: The particular item is sufficiently disclosed in the Annual Performance Report of the Company.</p> <p>Source Document: Annual Report, p. 17</p>
D.2.6	Details of whistle-blowing policy	Y	<p>Remarks: The particular item is sufficiently disclosed in the Annual Performance Report of the Company.</p> <p>Source Document: Annual Report, p. 5, Operating Philosophy</p>
D.2.7	Biographical details (at least age, qualifications, date of first appointment, relevant experience, and any other directorships of listed companies) of directors/commissioners	Y	<p>Remarks: The particular item is sufficiently disclosed in the Annual Performance Report of the Company.</p> <p>Source Document: Annual Report, p. 11-15</p>

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D.2.8	Training and/or continuing education programme attended by each director/commissioner	Y	<p>Remarks: The particular item is sufficiently disclosed in the Annual Performance Report of the Company.</p> <p>Source Document: Annual Report, p. 16</p>
D.2.9	Number of board of directors/commissioners meetings held during the year	Y	<p>Remarks: The particular item is sufficiently disclosed in the Annual Performance Report of the Company.</p> <p>Source Document: Annual Report, p. 19</p>
D.2.10	Attendance details of each director/commissioner in respect of meetings held	Y	<p>Remarks: The particular item is sufficiently disclosed in the Annual Performance Report of the Company.</p> <p>Source Document: Annual Report, p. 19</p>
D.2.11	Details of remuneration of the CEO and each member of the board of directors/commissioners	N	<p>Remarks: The particular item was not disclosed in the Annual Performance Report of the Company.</p> <p>Source Document:</p>
	Corporate Governance Confirmation Statement		
D.2.12	Does the Annual Report contain a statement confirming the company's full compliance with the code of corporate governance and where there is non-compliance, identify and explain reasons for each such issue?	Y	<p>Remarks: The Annual Performance Report of the Company contains a statement confirming the Company's full compliance with the Code of Corporate Governance.</p> <p>Source Document: Annual Report, p. 19</p>

D.3. Disclosure of related party transactions (RPT)

D.3.1	Does the company disclose its policy covering the review and approval of material/significant RPTs?	Y	<p>Remarks: The particular policy is expressly provided in the Manual of Corporate Governance, and sufficiently disclosed in the Annual Performance Report of the Company.</p> <p>Source Document:</p> <ul style="list-style-type: none"> • Manual of Corporate Governance, p. 13 • Annual Report, p. 17
D.3.2	Does the company disclose the name of the related party and relationship for each material/significant RPT?	Y	<p>Remarks: The particular item, if any, is sufficiently disclosed in the Annual Report and the Audited Financial Statements of the Company.</p> <p>Source Document:</p> <ul style="list-style-type: none"> • Annual Report, p. 17 • Audited Financial Statements , Note 32

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D.3.3	Does the company disclose the nature and value for each material/significant RPT?	Y	<p>Remarks: The nature and significant RPTs, if any, is sufficiently disclosed in the Annual Report and the Audited Financial Statements of the Company.</p> <p>Source Document:</p> <ul style="list-style-type: none"> • Annual Report, p. 17 • Audited Financial Statements , Note 32
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D.4	Directors and commissioners dealings in shares of the company		
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D.4.1	Does the company disclose trading in the company's shares by insiders?	Y	<p>Remarks: No disclosure required since the Company does not trade it shares.</p> <p>Source Document:</p> <p>Annual Report, p. 5</p>
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D.5 External auditor and Auditor Report			
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D.5.1	Are audit fees disclosed?	N/A	<p>Remarks: Being a non-PLC, the Company only undertakes to disclose audit fees when required by a particular law or by courts of competent jurisdiction.</p> <p>Source Document:</p>
	Where the same audit firm is engaged for both audit and non-audit services,		
D.5.2	Are the non-audit fees disclosed?	N/A	<p>Remarks: Being a non-PLC, the Company only undertakes to disclose audit fees when required by a particular law or by courts of competent jurisdiction.</p> <p>Source Document:</p>
D.5.3	Does the non-audit fees exceed the audit fees?	N/A	<p>Remarks: Being a non-PLC, the Company only undertakes to disclose audit fees when required by a particular law or by courts of competent jurisdiction.</p> <p>Source Document:</p>

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D.6 Medium of communications

Does the company use the following modes of communication?			
D.6.1	Quarterly reporting	Y	<p>Remarks: The Company uses quarterly reporting as one of its modes of communication.</p> <p>Source Document: Company Website/Customer Newsletter</p>
D.6.2	Company website	Y	<p>Remarks: The Company uses its website as one of its modes of communication.</p> <p>Source Document: Company Website</p>
D.6.3	Analyst's briefing	Y	<p>Remarks: The Company uses its own investment analyst who regularly reports to the Board, Management, Employee and Client Forums.</p> <p>Source Document: Company Website and Annual Report</p>
D.6.4	Media briefings /press conferences	Y	<p>Remarks: The Company uses media briefings and press conferences as one of its modes of communication.</p> <p>Source Document:</p> <ul style="list-style-type: none"> • Annual Report • Company Website • Press release

D.7 Timely filing/release of annual/financial reports

D.7.1	Is the audited annual financial report released within 120 days from the financial year end?	Y	<p>Remarks: The Audited Financial Statements of the Company are released to the directors and the shareholders prior to the scheduled Board and annual stockholders' meetings. The AFS is then submitted to the regulators within the period required by them.</p> <p>Source Document: Minutes of the Stockholders' meeting (submitted to regulators)</p>
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D.7.2	Is the audited annual financial report released within 90 days from the financial year end?	N	<p>Remarks:</p> <p>Source Document:</p>
D.7.3	Is the audited annual/financial report released within 60 days from the financial year end?	N	<p>Remarks:</p> <p>Source Document:</p>
D.7.4	Is the true and fairness/fair representation of the annual financial statement/reports affirmed by the board of directors/commissioners and/or the relevant officers of the company?	Y	<p>Remarks: The Board of Directors and the Shareholders regularly approve and affirm the Annual Financial Statements of the Company.</p> <p>Source Document: Annual Report, p. 19</p>

D.8 Company website			
	Does the company have a website disclosing up-to-date information on the following:		
D.8.1	Business operations	Y	<p>Remarks: The Company website discloses among others information relating to business operations of the Company.</p> <p>Source Document:</p> <ul style="list-style-type: none"> • Company Website, Individual and Business Section
D.8.2	Financial statements/reports (current and prior years)	Y	<p>Remarks: The Company website discloses among others information relating to financial statements of the Company.</p> <p>Source Document:</p> <ul style="list-style-type: none"> • Annual Report • Published Synopsis

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D.8.3	Materials provided in briefings to analysts and media	Y	<p>Remarks: The Company website discloses among others information relating to briefings to analysts and media.</p> <p>Source Document: Company Website, About Us, Media Center Section</p>
D.8.4	Shareholding structure	Y	<p>Remarks: The Company website discloses among others information relating to the shareholding structure of the Company.</p> <p>Source Document: Company Website - Annual Report, p. 18</p>
D.8.5	Group corporate structure	Y	<p>Remarks: The Company website discloses among others information relating to the Company's group corporate structure.</p> <p>Source Document: Company Website - Annual Report, p. 18</p>
D.8.6	Downloadable annual report	Y	<p>Remarks: The Company website contains the downloadable Annual Performance Report of the Company.</p> <p>Source Document: Company Website - Quick Links, Corporate Governance Section</p>
D.8.7	Notice of AGM and/or EGM	Y	<p>Remarks: The Company website contains the Notice of the Annual Stockholders' Meeting of the Company.</p> <p>Source Document: Notice of Annual Stockholders Meeting</p>
D.8.8	Company's constitution (company's by-laws, memorandum and articles of association)	Y	<p>Remarks: The Company website contains the Company's Articles of Incorporation and By-Laws.</p> <p>Source Document: Articles of Incorporation and By-Laws</p>
D.8.9	All of the above (D.8.1 to D.8.8) are available in English	Y	<p>Remarks: All of the above information are in English language.</p> <p>Source Document: Company Website</p>

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D.9 Investor relations

D.9.1	Does the company disclose the contact details (e.g. telephone, fax, and email) of the officer responsible for investor relations?	Y	<p>Remarks: Since the Company is not a publicly-listed company, it has no contact details required herein. However, the Company has in its website a Hotline which can be used by all its stakeholders (i.e. customers, employees, and investors of affiliate companies) and the public.</p> <p>Source Document: Company Website</p>
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