ATTACHMENT

TABLE OF COMMENTS

COMMENTS TO ISSUES RAISED IN CONSULTATION PAPER 1/2015

PROPOSED AMENDMENTS TO THE LISTING REQUIREMENTS RELATING TO SUSTAINABILITY STATEMENT IN ANNUAL REPORTS

AND THE SUSTAINABILITY REPORTING GUIDE

Regulatory Policy & Advisory

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| --- | --- | --- |
| NAME OF RESPONDENT   | : |  |
| CONTACT PERSON & CONTACT NUMBER | : |  |
| EMAIL ADDRESS | : |  |

| ISSUES | COMMENTS |
| --- | --- |
| PROPOSAL 1 |
| 1. | Do you agree with the proposal for ALL listed issuers on the Main Market and ACE Market to disclose a narrative statement of their management of material sustainability matters (“Sustainability Statement”), in the annual reports as set out in paragraph 44 of the Consultation Paper? Please state your views and reasons for your views. |  |
| 2. | Do you agree with the proposal set out in paragraph 45 of the Consultation Paper to state as a best practice in Practice Note 9/Guidance Note 11 of the LR that –1. all listed issuers should ensure that the Sustainability Statement contains information that is balanced, comparable and meaningful by referring to the Guide; and
2. in identifying the material sustainability matters, the listed issuer should consider the themes set out in the Guide?

Please state your views and reasons for your views. |  |
| 3. | Alternatively, if you have other suggestions for the Sustainability Statement, please provide your suggestions together with your reasons. |  |
| PROPOSAL 2 |
| 4. | Do you agree that a **Main Market listed issuer** must include all of the following information (collectively referred to as the “**detailed disclosures**”) in its Sustainability Statement as set out in paragraph 56 of the Consultation Paper:  |  |
| 1. the internal structure of how sustainability matters are managed;
 |  |
| 1. the scope of the Sustainability Statement and basis for the scope;
 |  |
| 1. material sustainability matters and how they are identified and managed including details on -
 |  |
| 1. policies to manage these sustainability matters;
 |  |
| 1. measures or actions taken to deal with these sustainability matters; and
 |  |
| 1. indicators relevant to these sustainability matters.

Please state your views and reasons for your views. |  |
| 5. | Is the information required above appropriate and adequate? Is there any other information that should be included? |  |
| 6. | Do you agree with the proposal set out in paragraph 57 of the Consultation Paper that *material sustainability matters* refer to such matters that – |  |
| 1. reflect the group’s significant EES impacts; or
 |  |
| 1. substantively influence the assessment and decisions of stakeholders.

Please state your views and reasons for your views. |  |
| 7. | Do you think the proposed definition of *material sustainability matters* is clear? If not, please provide your suggestions or alternatives. |  |
| PROPOSAL 3 |
| 8. | Do you agree with the proposal to allow the listed issuer the option of issuing its Sustainability Statement in a separate report as set out in paragraph 71 of the Consultation Paper? If yes, should the listed issuer be given the extra time up to the date of the annual general meeting to issue its Sustainability Statement?Please state your views and the reasons for your views. |  |
| 9. | Do you agree that the following Main Market listed issuers should be required to disclose the Sustainability Statement with the detailed disclosures set out paragraph 56 of the Consultation Paper in their annual reports issued for financial year ending on or after 31 December 2016: |  |
| 1. listed issuers with market capitalisation (excluding treasury shares) of RM1 billion and above as at 31 December 2015;
 |  |
| 1. listed issuers admitted to the Main Market after 31 December 2015 with market capitalisation (excluding treasury shares) of RM1 billion and above as at date of listing; or
 |  |
| 1. listed issuers with market capitalisation (excluding treasury shares) of RM1 billion and above as at 31 December of any calendar year after 31 December 2015?

Please state your views and reasons for your views. |  |
| 10. | Do you agree that ACE Market listed corporations and Main Market listed issuers with market capitalisation (excluding treasury shares) below RM1 billion should be required to disclose the Sustainability Statement without the detailed disclosures set out in paragraph 56 of the Consultation Paper, in their annual reports issued for financial year ending on or after **31 December 2016**? Please state your views and reasons for your views. |  |
| 11. | Do you agree that Main Market listed issuers with market capitalisation (excluding treasury shares) below RM1 billion should be required to disclose the Sustainability Statement **with the detailed disclosures** set out paragraph 56 of the Consultation Paper, in their annual reports issued for financial year ending on or after **31 December 2018**?Please state your views and reasons for your views. |  |
| 12. | Is the size of the Main Market listed issuers based on market capitalisation of RM1 billion appropriate for purposes of determining the implementation? If not, please provide your suggestions or alternatives. |  |
| PROPOSAL 4 |
| 13. | Does the Guide provide appropriate and adequate introduction to the concept of sustainability and importance of sustainability management and sustainability disclosure to business?Please state your views and reasons for your views. |  |
| 14. | Do you agree that the Guide provides sufficient guidance to listed issuers in relation to the following disclosure requirements:1. the internal structure of how the sustainability matters are managed;
2. the scope of the Sustainability Statement and basis for the scope;
3. material sustainability matters and how they are identified and managed including details on –
4. policies to manage these sustainability matters;
5. measures or actions taken to deal with these sustainability matters; and
6. indicators relevant to these sustainability matters?

Please state your views and reasons for your views. |  |
| 15. | Are the themes and indicators provided in the Guide appropriate and adequate? If not, please provide your suggestions or alternatives. |  |
| 16. | Are the references, best practices and case studies provided in the Guide appropriate and adequate? If not, please provide your suggestions or alternatives. |  |
| 17. | What further information or guidance would you like to see in the Guide to help you comply with the Proposed Sustainability Amendments as discussed above? |  |
| 18. | Is there any other information or guidance that should be included in the Guide? |  |

[End of Attachment]