ATTACHMENT

TABLE OF COMMENTS

 COMMENTS TO ISSUES RAISED IN CONSULTATION PAPER NO. 4/2019

PROPOSED AMENDMENTS TO THE MAIN MARKET AND ACE MARKET LISTING REQUIREMENTS IN RELATION TO ANTI-CORRUPTION MEASURES AND CORPORATE EXERCISES DIGITISATION

Regulatory Policy & Advisory

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

| ISSUES | COMMENTS |
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| PROPOSAL 1 |
|  | Do you have any comment on the proposals mandating a listed issuer to ensure that its board of directors does the following *[paragraph 6 of the Consultation Paper]:*1. establishes and maintains policies and procedures on -
2. anti-corruption that is guided by, the GAP issued pursuant to section 17A(5) of the MACC Act, or any other recognised framework which is similar to, or more stringent than Guidelines on Adequate Procedures; and
3. whistle-blowing;
4. reviews such policies and procedures annually, and publishes them on the listed issuer’s website; and
5. includes corruption risk in its annual risk assessment framework?

Please state the reasons for your views. | [ ]  Yes [ ]  No *Suggestions & reasons:*

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| PROPOSAL 2 |
|  | Do you agree with the proposal that in addition to the manual method in place currently, a listed issuer must also facilitate its securities holders to perform the following electronically *[paragraph 17 of the Consultation Paper]*: 1. subscription and payment for rights issue;
2. conversion and payment for convertible securities; and
3. election to participate in a Dividend Reinvestment Scheme?

Please state the reasons for your views. | [ ]  Agree [ ]  Disagree [ ]  No comment*Reasons:*

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|  | Do you agree with the electronic mode as proposed for purposes of facilitating the corporate actions by securities holders electronically i.e. “through an internet-based facility made available to securities holders, the use of automated teller machines or any other electronic mode as may be prescribed by the Exchange” *[paragraph 18 of the Consultation Paper]*?Please state the reasons for your views. | [ ]  Agree [ ]  Disagree [ ]  No comment*Reasons:*

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|  | Do you agree with the proposal to disclose the electronic procedures for conversion or exercise of convertible securities and completing the election notice to participate in a Dividend Reinvestment Scheme, in the notice of conversion or exercise and statement accompanying the election notice respectively *[paragraph 20 of the Consultation Paper]*?Please state the reasons for your views. | [ ]  Agree [ ]  Disagree [ ]  No comment*Reasons:*

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