ATTACHMENT

TABLE OF COMMENTS

 COMMENTS TO ISSUES RAISED IN CONSULTATION PAPER NO. 1/2024

PROPOSED AMENDMENTS TO THE MAIN MARKET LISTING REQUIREMENTS AND ACE MARKET LISTING REQUIREMENTS

IN RELATION TO SUSTAINABILITY REPORTING REQUIREMENTS AND OTHER ENHANCEMENTS

Regulatory Policy & Advisory

Bursa Malaysia Berhad

12th Floor, Exchange Square

Bukit Kewangan

50200 Kuala Lumpur

E-mail: rpa@bursamalaysia.com

Facsimile: +603-2732 0065

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

| ISSUES | COMMENTS |
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| 1. **ALIGNING THE SUSTAINABILITY REPORTING FRAMEWORK UNDER THE LR TO REFLECT THE ADOPTION OF THE ISSB STANDARDS IN LINE WITH THE NSRF**
 |
|  | Proposed Sustainability Reporting Amendments - Mandatory disclosure of common sustainability matters *[applicable for both Main and ACE Market listed issuers]* |
|  | Is the mandatory disclosure of the common sustainability matters as set out in paragraph 9.3(a) of the Consultation Paper still appropriate in the Sustainability Statement that is prepared in accordance with the ISSB Standards? Please provide your views and reasons for your views. | [ ]  Yes [ ]  No [ ]  No comment*Reasons:*

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|  | Do you agree that all the common sustainability matters remain relevant and applicable to all listed issuers, irrespective of the industry they are in? If not, what should be retained or removed? Please provide your suggestions and reasons for your suggestion. | [ ]  Agree [ ]  Disagree [ ]  No comment*Reasons & Suggestions (if any):*

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|  | Do you have any comments on the proposed disclosure standards of the common sustainability matters in the Sustainability Statement even though the ISSB Standards may not necessitate such disclosure:1. for a Main Market listed issuer, in accordance with either the ISSB Standards or the said requirements[[1]](#footnote-2) pursuant to paragraph 11.5 of the Consultation Paper?
2. for an ACE Market listed corporation, to provide the disclosure in accordance with ISSB Standards on best endeavour basis pursuant to paragraph 12.4 of the Consultation Paper?

Please elaborate and state the reasons for your views. | *Comments and reasons for comments:*

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|  | Other Proposed Amendments *[applicable for both Main & ACE Market listed issuers]* |
|  | Do you have any comments on the proposal to disclose the percentage of employees and directors by ethnicity (in addition to gender and age group) for the common sustainability matter on diversity as set out in paragraph 9.5 of the Consultation Paper?Please elaborate and state the reasons for your views. | *Comments and reasons for comments:*

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|  | Transitional Arrangements to Facilitate Implementation *[applicable for both Main and ACE Market listed issuers]* |
|  | Do you have any comments on the proposed disclosure standards of the sustainability related risks and opportunities[[2]](#footnote-3) that are not climate-related, during the respective Transitional Period: 1. for a Main Market listed issuer which has yet to prepare its Sustainability Statement in accordance with the IFRS S1 as set out in paragraph 11.4 of the Consultation Paper, to disclose in accordance with the said requirements[[3]](#footnote-4) ?
2. for an ACE Market listed corporation which has yet to prepare its Sustainability Statement in accordance with the IFRS S1 as set out in paragraph 12.3 of the Consultation Paper, it is strongly encouraged to provide the disclosures in accordance with IFRS S1 or as a minimum, report in accordance with paragraph 12.6(b) of the Consultation Paper[[4]](#footnote-5)?

Please state your comments and reasons for your comments. | *Comments and reasons for comments:*

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|  | Sustainability Statement by ACE Market listed corporations prior to the ACE implementation date *[applicable for ACE Market listed corporations only]* |
|  | Do you have any comments on the proposals as described in paragraph 12.6 of the Consultation Paper where an ACE Market listed corporation must, as a minimum prepare the Sustainability Statement in the following manner prior to the implementation of the Proposed Sustainability Reporting Amendments:1. for FYE on or after 31 December 2024 and 31 December 2025 respectively, the ACE Market listed corporation must continue to disclose a narrative statement of its management of material sustainability matters, and in doing so, be guided by the Sustainability Reporting Guide?
2. for FYE on or after 31 December 2026, the ACE Market listed corporation must disclose -
3. the sustainability-related risks and opportunities covering the following key components:

 (aa) governance: the governance structure in place to monitor and manage the sustainability-related risks and opportunities;(bb) strategy: the measures or action taken to manage the sustainability-related risks and opportunities;(cc) risk management: the processes in place to prioritise and monitor the sustainability-related risks and opportunities; and (dd) metrics and targets: the indicators relevant to the sustainability-related risks and opportunities, together with the data for the last 3 financial years, and performance targets (if such targets are set); 1. the 9 common sustainability matters together with their respective indicators; and
2. a summary of the data and performance targets disclosed in the Sustainability Statement, in relation to the reported indicators, in a prescribed format?

Please state your comments and reasons for your comments. | *Comments and reasons for comments:*

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|  | General *[applicable for both Main and ACE Market listed issuers]* |
|  | Do you have any other suggestions to enhance the sustainability reporting requirements under the LR? Please provide your suggestions and the reasons for your suggestions. | *Suggestions and reasons for suggestions:*

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| 1. **PROMOTING SHAREHOLDER PARTICIPATION IN GENERAL MEETINGS OF LISTED ISSUERS BY REQUIRING PHYSICAL OR HYBRID MEETINGS *[applicable for both Main and ACE Market listed issuers]***
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|  | Do you have any comments to the proposal described in paragraph 17 of the Consultation Paper i.e. 1. a listed issuer must hold its general meeting in a physical venue in Malaysia (“**Main Venue**”); and
2. in addition to the Main Venue, if a listed issuer holds its general meeting at more than one physical venue concurrently or utilises virtual meeting technology for shareholders to attend the general meeting remotely, the listed issuer must –
3. put in place the necessary tools and infrastructure to support a smooth broadcast and interactive participation by shareholders; and
4. ensure that shareholders are accorded with equitable rights to speak and vote without being physically present at the Main Venue?
 | *Comments and reasons for comments:*

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| 1. **STRENGTHENING ACCOUNTABILITY OF ADVISERS WHEN PROMOTING APPLICANTS FOR LISTING BY NAMING THEM IN PUBLIC DOCUMENTS OF LISTED ISSUERS FOR A SPECIFIED PERIOD**
 |
|  | Proposal to name the Recognised Principal Adviser in public documents *[applicable for Main Market listed issuers only]* |
|  | Do you agree with the proposal that for 2 full financial years from the date of its admission, a Main Market listed issuer must state the name of the listing RPA in all its announcements and documents issued to its securities holders, as described in paragraph 22 of the Consultation Paper? Please state the reasons for your views. | [ ]  Agree [ ]  Disagree [ ]  No comment*Reasons:*

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|  | Proposed clarifications in the ACE LR *[applicable for ACE Market listed corporations only]* |
|  | Do you agree with the proposal that a Sponsored Corporation that meets the Main Market quantitative criteria and exempted from continued compliance with the Sponsor requirements under Rule 3.21(1) of the ACE LR, be required to name the listing Sponsor for 2 full financial years from its admission, as set out in paragraph 24(b) of the Consultation Paper?Please state the reasons for your views. | [ ]  Agree [ ]  Disagree [ ]  No comment*Reasons:*

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[End of Attachment]

1. Paragraphs 6.2(a) and (c) of Practice Note 9 as at 31 December 2024 as set out in Appendix II of the Consultation Paper. [↑](#footnote-ref-2)
2. This includes any of the common sustainability matters. [↑](#footnote-ref-3)
3. Paragraphs 6.2(a) and (c) of Practice Note 9 as at 31 December 2024 as set out in Appendix II of the Consultation Paper. [↑](#footnote-ref-4)
4. The ACE Market listed corporation must disclose in accordance with the following: the governance structure in place to monitor and manage the sustainability-related risks and opportunities; the measures or action taken to manage such risks and opportunities; the processes in place to prioritise and monitor such risks and opportunities; the indicators relevant to such risks and opportunities together with data for the last 3 financial years and performance targets (if any); the 9 common sustainability matters; and a summary of the data and performance targets in a prescribed format. [↑](#footnote-ref-5)