

Question 1

Do you agree with our proposal to introduce a code provision ("CP") requiring an issuer's board to set culture in alignment with issuer's purpose, value and strategy?

Yes

Please give reasons for your views.

We agree that the Company, through its Board of Directors, should establish its overall purpose, values and culture and develop a strategy towards achieving such overall purpose and deliver such values and culture.

Question 2a

Do you agree with our proposal to introduce a CP requiring establishment of an anti-corruption policy?

Yes

Please give reasons for your views.

Anti-corruption is crucial to achieving good corporate governance. The Company has in place an anti-corruption program.

Question 2b

Do you agree with our proposal to upgrade a Recommended Best Practice ("RBP") to CP requiring establishment of a whistleblowing policy?

Yes

Please give reasons for your views.

Whistleblowing is crucial to achieving good corporate governance. The Company has in place a whistleblowing program.

Question 3

Do you agree with our proposal to introduce a CP requiring disclosure of a policy to ensure independent views and input are available to the board, and an annual review of the implementation and effectiveness of such policy?

Yes

Please give reasons for your views.

The Company's corporate governance policy prescribes the need of having a strong independent element on the Board, which can effectively exercise independent judgment.

Question 4a

Do you agree with our proposal regarding re-election of an independent non-executive director serving more than nine years ("Long Serving INEDs") to revise an existing CP to require (i) independent shareholders' approval; and (ii) additional disclosure on the factors considered, the process and the board or nomination committee's discussion in arriving at the determination in the explanation on why such Long Serving INED is still independent and should be re-elected?

No

Please give reasons for your views.

While the understanding of the business and affairs of the issuer by the Long Serving INEDs is an advantage to the Company, we agree that the existing mechanisms regarding independence of INEDs should be strengthened to ensure that the Board continues to benefit from their independent views.

(i) No. Regarding independent shareholders' approval, we query if this is the appropriate approach to this matter. It's in the Company's best interests that INEDs remain independent. However, this matter should not be seen and dealt with as a matter in which independent shareholders require protection against majority shareholders. Independent shareholders' approval could create an inappropriate point of leverage and votes could be cast for the wrong reasons, in opposition to majority shareholders and not necessarily in the interest of the Company. Minority shareholders will be able to make informed investment decisions with the proposed enhanced disclosures and it is not appropriate to give them increased voting rights to effectively override the decisions of the majority shareholders.

(ii) Yes. We agree with the proposed additional disclosures

Question 4b

Do you agree with our proposal to introduce a CP requiring an issuer to appoint a new independent

non-executive director ("INED") at the forthcoming annual general meeting where all the INEDs on the board are Long Serving INEDs, and disclosing the length of tenure of the Long Serving INEDs on the board on a named basis in the shareholders' circular?

No

Please give reasons for your views.

No. Once you can establish that the Long Serving INEDs remain independent, the appointment of a new INED at the AGM seems redundant and undesirable, given the difficulties in finding suitable candidates.

We agree with disclosing the length of tenure of the Long Serving INEDs on the board on a named basis in the shareholders' circular. Proper disclosure in this regard will permit investors to make investment decisions and issuers should not be compelled to expand the size of their board of directors if they make a judgment that it is in the best interests of the company to retain long serving directors.

Question 5

Do you agree with our proposal to introduce a new RBP that an issuer generally should not grant equity-based remuneration (e.g. share options or grants) with performance-related elements to INEDs as this may lead to bias in their decision-making and compromise their objectivity and independence?

Yes

Please give reasons for your views.

We support the view that any equity-based remuneration should not include performance related elements.

Question 6a

Do you agree with our proposal to highlight that diversity is not considered to be achieved by a single gender board in the note of the Rule?

Yes

Please give reasons for your views.

Question 6b

Do you agree with our proposal to introduce a Mandatory Disclosure Requirement ("MDR") requiring all listed issuers to set and disclose numerical targets and timelines for achieving gender diversity at both: (a) board level; and (b) across the workforce (including senior management)?

No

Please give reasons for your views.

We fully support board and workplace diversity, but we are opposed to numerical targets (quotas). Companies should be seeking to appoint the best available candidates and the use of such targets introduces an unhealthy appetite for compromise.

Question 6c

Do you agree with our proposal to introduce a CP requiring the board to review the implementation and effectiveness of its board diversity policy annually?

Yes

Please give reasons for your views.

Without numerical targets.

Question 6d

Do you agree with our proposal to amend the relevant forms to include directors' gender information?

Yes

Please give reasons for your views.

It will enhance transparency of the board and diversity information.

Question 7

Do you agree with our proposal to upgrade a CP to Rule requiring issuers to establish a nomination committee chaired by an INED and comprising a majority of INEDs?

Yes

Please give reasons for your views.

The Company has established a Nomination and Corporate Governance Committee since this listing in

2011, such Committee being composed on a majority of INEDs and chaired by an INED.

Question 8

Do you agree with our proposal to upgrade a CP to a MDR to require disclosure of the issuer's shareholders communication policy (which includes channels for shareholders to communicate their views on various matters affecting issuers, as well as steps taken to solicit and understand the views of shareholders and stakeholders) and annual review of such policy to ensure its effectiveness?

Yes

Please give reasons for your views.

We agree with the annual review of the shareholders communication policy to ensure its effectiveness and with the setting up of appropriate communication channels.

We disclose our shareholders communication policy on the Company's website and on our annual report.

Question 9

Do you agree with our proposal to introduce a Rule requiring disclosure of directors' attendance in the poll results announcements?

Yes

Please give reasons for your views.

Timely information is important.

Question 10

Do you agree with our proposal to delete the CP that requires issuers to appoint non-executive directors for a specific term?

Yes

Please give reasons for your views.

Given the retirement by rotation requirements, the specific term seems unnecessary.

Question 11

Do you agree with our proposal to elaborate the linkage in the Code by (a) setting out the relationship between corporate governance and environmental, social and governance ("ESG") in the introductory section; and (b) including ESG risks in the context of risk management under the Code?

Yes

Please give reasons for your views.

Question 12

Do you agree with our proposal to amend the Rules and the ESG Guide to require publication of ESG reports at the same time as publication of annual reports?

Yes

Please give reasons for your views.

Given their growing interdependency and the advantages of a holistic and comprehensive assessment we agree that it would be preferable that the ESG information and the financial information are published simultaneously.

Question 13

Do you have any comments on how the re-arranged Code is drafted in the form set out in Appendices III and IV to the Consultation Paper and whether it will give rise to any ambiguities or unintended consequences?

No

Please give reasons for your views.

We agree with the proposed re-arrangement of the Code in the form set out in Appendices III and IV to this paper.

Question 14

In addition to the topics mentioned in the Consultation Paper, do you have any comments regarding what to be included in the new guidance letter on corporate governance (i.e. CG GL) which may be helpful to issuers for achieving the Principles set out in the Code?

No

Please give reasons for your views.

Question 15a

Do you agree with our proposed implementation dates for all proposals (except the proposals on Long Serving INED): the financial year commencing on or after 1 January 2022?

Yes

Please give reasons for your views.

Question 15b

Do you agree with our proposed implementation dates for proposals on Long Serving INED: the financial year commencing on or after 1 January 2023?

Yes

Please give reasons for your views.

In what regards the disclosing of the length of tenure of the Long Serving INEDs on the board on a named basis in the shareholders' circular and additional disclosures.