

## STATEMENT OF COMPLIANCE WITH THE MALAYSIAN CODE FOR INSTITUTIONAL INVESTOR

### **Principle 1: Disclosing Policies on Stewardship**

We consider stewardship one of our key fundamentals in our responsible investment process to promote sound corporate governance as an informed and engaged shareholder. Our stewardship initiatives include engagement with investee companies and participation in proxy voting whereby we integrate Environmental, Social and Governance (ESG) considerations in our approach. Our sustainability framework is approved and overseen by our board of directors and it includes responsible investing strategies.

### **Principle 2: Monitoring Investee Companies**

As part of our investment process and active ownership, we engage and monitor our investee companies on an ongoing basis. We proactively monitor various areas relating to our investee companies such as industry landscape, corporate governance, business and financial analysis, human resources policies and environmental-related approach. Our monitoring may be through company meetings with senior management of the investee companies, site visits, participation at general meetings and other appropriate communication channels.

### **Principle 3: Engaging Investee Companies**

An important part of our research work is engagement with our investee companies. During our engagement process, we engage our investee companies on topics covering a wide range of issues, including but not limited to governance-related questions, business challenges, risks, strategies and sustainability. In the event where there is a lack of clarity or information, we may further engage the companies to address our concerns and to understand better. Where necessary, we would encourage the investee companies to enhance transparency and improve disclosure.

### **Principle 4: Managing Conflicts of Interest**

At Singular, policies are put in place to manage actual and potential conflicts of interest. We adopt the CFA Institute's Code of Ethics and Standards of Professional Conduct in our business operation and practices. With this respect, we have policies on fair dealing, gifts, best execution, anti-bribery and corruption, anti-money laundering and insider dealing.

### **Principle 5: Incorporating Sustainability Considerations**

We integrate ESG considerations in our responsible investing process. We believe that responsible corporate behaviour with respect to ESG factors can generally have a positive influence on long-term financial performance of investee companies. The ESG integration methodology enables us to identify material ESG risks and opportunities with respect to our investment portfolios.

### **Principle 6 Publishing Corporate Governance Policy and Voting Guidelines**

Voting is an essential tool for us in our active ownership initiatives as it allows us to convey our expectations to our investee companies. We generally vote to reflect our endorsement of management and board actions that demonstrate a commitment towards creating durable and long-term value for the shareholders. Since 2021, we actively participate in proxy voting where it is practicable.

### **Principle 7 Collaborative Response on Corporate Governance and Sustainability Issues**

Corporate governance is one of the most important components we focus on in our investment analysis. We strive to support collaborative initiatives undertaken by the regulators and industry stakeholders in promoting good corporate governance and sustainability practices as we believe that the promotion of sustainable practices is a collective effort.