D. Disclosure and Transparency

D.1	Transparent ownership structure	
D.1.1	Does the information on shareholdings reveal the identity of beneficial owners, holding 5% shareholding or	Annual Report / Annual CG
	more?	Report.
D.1.2	Does the company disclose the direct and indirect (deemed) shareholdings of major and/or substantial	Annual Report / Annual CG
	shareholders?	Report.
D.1.3	Does the company disclose the direct and indirect (deemed) shareholdings of directors (commissioners)?	Annual Report / Annual CG
		Report.
D.1.4	Does the company disclose the direct and indirect (deemed) shareholdings of senior management?	Annual Report / Annual CG
		Report.
D.1.5	Does the company disclose details of the parent/holding company, subsidiaries, associates, joint ventures and	Annual Report / Annual CG
	special purpose enterprises/ vehicles (SPEs)/ (SPVs)?	Report.

D.2	Quality of Annual Report		
Does the company's annual report disclose the following items:			
D.2.1	Key risks	Annual Report	
D.2.2	Corporate objectives	Annual Report	
D.2.3	Financial performance indicators	Annual Report	
D.2.4	Non-financial performance indicators	Annual Report	
D.2.5	Dividend policy	Annual Report	
D.2.6	Details of whistle-blowing policy	Annual Report	
D.2.7	Biographical details (at least age, qualifications, date of first appointment, relevant experience, and any other	Annual Report	
	directorships of listed companies) of directors/commissioners		
D.2.8	Training and/or continuing education programme attended by each director/commissioner	Annual Report	
D.2.9	Number of board of directors/commissioners meetings held during the year	Annual Report	
D.2.10	Attendance details of each director/commissioner in respect of meetings held	Annual Report	
D.2.11	Details of remuneration of each member of the board of directors/commissioners	Annual Report	
	Corporate Governance Confirmation Statement		
D.2.12	Does the Annual Report contain a statement confirming the company's full compliance with the code of	Annual Report	
	corporate governance and where there is non-compliance, identify and explain reasons for each such issue?		

D.3. Disclosure of related party transactions (RPT)

		Source Document/
		Location of Information
D.	Disclosure and Transparency	
D.3.1	Does the company disclose its policy covering the review and approval of material/significant RPTs?	Annual Report / Annual CG
		Report.
D.3.2	Does the company disclose the name of the related party and relationship for each material/significant RPT?	Annual Report / Annual CG
		Report.
D.3.3	Does the company disclose the nature and value for each material/significant RPT?	Annual Report / Annual CG
		Report.

D.4	Directors and commissioners dealings in shares of the company	
D.4.1	Does the company disclose trading in the company's shares by insiders?	Annual Report / Annual CG
		Report.

D.5	External auditor and Auditor Report	
D.5.1	Are audit fees disclosed?	Annual Report
	Where the same audit firm is engaged for both audit and non-audit services	
D.5.2	Are the non-audit fees disclosed?	Annual Report
D.5.3	Does the non-audit fee exceed the audit fees?	Annual Report

D.6	Medium of communications		
	Does the company use the following modes of communication?		
D.6.1	Quarterly reporting	Announcement / Company	
		website	
D.6.2	Company website	Company website	
D.6.3	Analyst's briefing	Annual Report /	
		Announcement / Company	
		website	
D.6.4	Media briefings /press conferences	Annual Report /	
		Announcement / Company	
		website	

D.7	Timely filing/release of	f annual/financial reports

		Source Document/
		Location of Information
D.	Disclosure and Transparency	
D.7.1	Are the audited annual financial report / statement released within 120 days from the financial year end?	Announcement / Company
		website/ Exchange website
D.7.2	Is the annual report released within 120 days from the financial year end?	Annual Report / Company
		website
D.7.3	Is the true and fairness/fair representation of the annual financial statement/reports affirmed by the board of	Annual Report / Company
	directors/commissioners and/or the relevant officers of the company?	website

D.8	Company website	
Does the company have a website disclosing up-to-date information on the following:		
D.8.1	Business operations	Company website
D.8.2	Financial statements/reports (current and prior years)	Company website
D.8.3	Materials provided in briefings to analysts and media	Company website
D.8.4	Shareholding structure	Company website
D.8.5	Group corporate structure	Company website
D.8.6	Downloadable annual report	Company website
D.8.7	Notice of AGM and/or EGM	Company website
D.8.8	Minutes of AGM and/or EGM	Company website
D.8.9	Company's constitution (company's by-laws, memorandum and articles of association)	Company website

D.9	Investor relations		
D.9.1	Does the company disclose the contact details (e.g. telephone, fax, and email) of the officer / office responsible	Annual Report / Company	
	for investor relations?	website	