



No.	Principles and Recommendations	Remarks
Α	Rights of Shareholders	
A.1	1 Basic Shareholder Rights	
A.1.1	Does the company pay (interim and final/annual) dividends in an equitable and timely manner; that is, all shareholders are treated equally and paid within 30 days after being (i) declared for interim dividends and (ii) approved by annual general meeting (AGM) for final dividends?	Impack pays dividends in an equitable and timely manner.  The details of AGMS approval and the implementation as follow:  Annual Report 108  Announcement Summary of Minutes of AGMS 2021  Interim Dividend FY 2020  Final Dividend FY 2020
A.2	Right to participate in decisions concerning fundamental c	orporate changes
	Do shareholders have the right to participate in:	
A.2.1	Amendments to the company's constitution?	Information about the right of Impack's Shareholders to participate on any amendments on the Company's Constitution are identified in:  Annual Report 198  Article 23 Impack's Article of Association
A.2.3	The authorization of additional shares?	Information about the right of Impack's Shareholders to participate on the authorization of additional shares are identified in:  Article 23 Impack's Article of Association





A.2.4	The transfer of all or substantially all assets, which in effect results in the sale of the company?	Information about the right of Impack's Shareholders to participate on the transfer of all or substantially all assets, which in effect results in the sale of the company are identified in:  Annual Report 198  Article 23 Impack's Article of Association
A.3		
A.3.1	Do shareholders have the opportunity, evidenced by an agenda item, to approve remuneration (fees, allowances, benefit-in-kind and other emoluments) or any increases in remuneration for the non- executive directors/ commissioners?	Information about the right of Impack's shareholders have the opportunity, evidenced by an agenda item, to approve remuneration or any increases in remuneration for the non-executive directors/commissioners are identified in:  Annual Report 122-123  Notice of 2021 AGMS  Result of 2021 AGM
A.3.2	Does the company provide non-controlling shareholders a right to nominate candidates for board of directors/ commissioners?	Information about Impack provide non-controlling shareholders a right to nominate candidates for board of directors/commissioners are identified in:  Article 21 sub article (8.a) Impack's Article of Association
A.3.3	Does the company allow shareholders to elect directors/commissioners individually?	Annual Report 114  Article 21 sub article (8.a) Impack's Article of Association





A.3.4	Does the company disclose the voting procedures used before the start of meeting?	Impack disclose the voting procedures used before the start of meeting as reflected in: <u>Annual Report 198-199</u> <u>Rules and Procedure AGMS 2021</u>
A.3.5	Do the minutes of the most recent AGM record that the shareholders were given the opportunity to ask questions and the questions raised by shareholders and answers given recorded?	The minutes of the most recent Impack's AGMS record that the shareholders were given the opportunity to ask questions and the questions raised by shareholders and answers given recorded are identified in:  Annual Report 116-123  Announcement Summary of Minutes of AGMS 2021  Minutes of AGMS 2021  Announcement Summary of Minutes of AGMS 2020  Minutes of AGMS 2020
A.3.6	Does the company disclose the voting results including approving, dissenting, and abstaining votes for all resolutions/each agenda item for the most recent AGM?	Impack disclose the voting results including approving, dissenting, and abstaining votes for all resolutions/each agenda item for the most recent AGMS are identified in:  Annual Report 116-123  Announcement Summary of Minutes of AGMS 2021





		Impack disclose the list of board members who attended the most recent AGM are identified in:
A.3.7	Does the company disclose the list of board members who attended the most recent AGM?	Annual Report 115
		Announcement Summary of Minutes of AGMS 2021
		Attendance List BoD & BoC AGMS 2021





A.3.8	Does the company disclose that all board members and the CEO (if he is not a board member) attended the most recent AGM?	Impack disclose that all board members and the CEO attended the most recent AGM are identified in:  Annual Report 115  Annual Remark of Minutes of AGMS 2021  Attendance List BoD & BoC AGMS 2021
A.3.9	Does the company allow voting in absentia?	Impack allow the shareholders to conduct voting in absentia by providing the proxy, with e-ASY KSEI or fill the proxy form which available in Impack's website since 28 days before the AGMS are identified in:  Notice of 2021 AGMS  Invitation of 2021 AGMS  Rules and Procedure AGMS 2021
A.3.10	Did the company vote by poll (as opposed to by show of hands) for all resolutions at the most recent AGM?	Impack conducted vote by poll for all resolutions at the most recent AGMS are identified in:  Annual Report 116-123  Announcement Summary of Minutes of AGMS 2021
A.3.11	Does the company disclose that it has appointed an independent party (scrutineers/inspectors) to count and/or validate the votes at the AGM?	Impack disclose that it has appointed an independent party (scrutineers/inspectors) to count and/or validate the votes at the AGMS are identified in:  Announcement Summary of Minutes of AGMS 2021





A.3.12	Does the company make publicly available by the next working day the result of the votes taken during the most recent AGM/EGM for all resolutions?	Impack make publicly available by the next working day the result of the votes taken during the most recent AGM/EGM for all resolutions are identified in:  Announcement Summary of Minutes of AGMS 2021  Announcement Summary of Minutes of EGMS 2020
A.3.13	Does the company provide at least 21 days notice for all AGMs and EGMs?	Impack provide at least 21 days notice for all AGMS and EGMS are identified in:  Notice of 2021 AGMS  Notice of AGMS 2020
A.3.14	Does the company provide the rationale and explanation for each agenda item which require shareholders' approval in the notice of AGM/circulars and/or the accompanying statement?	Impack provide the rationale and explanation for each agenda item which require shareholders' approval in the notice of AGM/circulars and/or the accompanying statement are identified in:  Notice of 2021 AGMS  Impack's Website
A.3.15	Does the company give the opportunity for shareholder to place item/s on the agenda of AGM?	Impack give the opportunity for shareholder to place item/s on the agenda of AGMS are identified in:  Annual Report 115-116  Preliminary Notice AGMS 2021  Article 21 sub article (8.a) Impack's Article of Association





A.4	Markets for corporate control should be allowed to function in an efficient and transparent manner	
A.4.1	In cases of mergers, acquisitions and/or takeovers requiring shareholders' approval, does the board of directors/ commissioners of the company appoint an independent party to evaluate the fairness of the transaction price?	In cases of mergers, acquisitions and/or takeovers requiring shareholders' approval, the board of directors/ commissioners of Impack will comply to regulation of Capital Market and Article of Association of the company.  During 2021, There is no cases of mergers, acquisitions and/or takeovers requiring shareholders' approval.
A.5	The exercise of ownership rights by all shareholders, including	ng institutional investors, should be facilitated
A.5.1	Does the company disclose its practices to encourage shareholders to engage the company beyond AGM?	Information Disclosure Report Impack has disclosed information to public, on media of Impack website and IDX website. Impack has also submitted periodic reports to IDX, OJK Capital Market and Integrated SPE-IDX e-reporting sites. The information disclosure report is presented in the section of Investor Information in Impack's website and Annual Report.  Annual Report 170





No.	Principles and Recommendations	Remarks
В	Equitable Treatment of Shareholders	
В.	Shares and Voting Rights	
B.1.1	Does the company's ordinary or common shares have one vote for one share?	Each shares of Impack have one vote for one share are identified in:  Annual Report 116-123  Article 23 Impack's Article of Association
B.1.2	Where the company has more than one class of shares, does the company publics the voting rights attached to each class of shares (e.g. through the company website reports/the stock exchange/the regulator's website)?	Impack has no more than one class of shares
B.2	Notice of AGM	
B.2.2	Does each resolution in the most recent AGM deal with only one item, i.e., there is no bundling of several items into the same resolution?	Each resolution in the most recent Impack's AGM deal with only one item are identified in:  Annual Report 116-123  Notice of 2021 AGMS  Announcement Summary of Minutes of AGMS 2021
B.2.1	Are the company's notice of the most recent AGM/circulars fully translated into English and published on the same date as the local - language version?	Impack's notice of the most recent AGMS/circulars fully translated into English and published on the same date as the Bahasa Indonesia are identified in:  Notice of AGMS 2021 – Bahasa Indonesia  Notice of AGMS 2021 – English Translation
	Does the notice of AGM/circulars have the following details:	





B.2.3 Are the profiles of directors/commissioners (at least age, academic qualification, date of appointment, experience, and directorships in other listed companies) in seeking election/re-election included?

The profiles of directors/commissioners in seeking election/re-election are included as reflected in:

**BoC Profile/Curriculum Vitae AGMS 2021** 

**BoD Profile/Curriculum Vitae AGMS 2021** 





B.2.4	Are the auditors seeking appointment/re- appointment clearly identified?	The auditors seeking appointment/re-appointment clearly identified as reflected in:  Notice of 2021 AGMS  Impack's Website
B.2.4	Were the proxy documents made easily available?	Proxy documents available at Impack's Website and Share Administration Bureau as reflected in:  Impack's Website  Notice of 2021 AGMS
B.3	Insider trading and abusive self-dealing should be prohibited	
B.3.1	Does the company have policies and/or rules prohibiting directors/commissioners and employees to benefit from knowledge which is not generally available to the market?	Impack have policies and/or rules prohibiting directors/commissioners and employees to benefit from knowledge which is not generally available to the market as reflected in:  Insider Trading Policy
B.3.2	Are the directors/commissioners required to report their dealings in company shares within 3 business days?	The directors/commissioners report their dealings in company shares align with the prevailing regulations.  Board of Directors Manual  Annual Report 69-70





B.4	Related party transactions by directors and key executive	
B.4.1	Does the company have a policy requiring directors/commissioners to disclose their interest in transactions and any other conflicts of interest?	Impack have a policy requiring directors/commissioners to disclose their interest in transactions and any other conflicts of interest as reflected in:  Board of Directors Manual
B.4.2	Does the company have a policy requiring a committee of independent directors/commissioners to review material RPTs to determine whether they are in the best interests of the company	Impack have a policy requiring a committee of independent directors/commissioners to review material RPTs to determine whether they are in the best interests of the company and shareholders as reflected in:  Affiliated Transaction Policy
B.4.3	Does the company have a policy requiring board members (directors/commissioners) to abstain from participating in the board discussion on a particular agenda when they are conflicted?	Impack have a policy requiring board members (directors/commissioners) to abstain from participating in the board discussion on a particular agenda when they are conflicted as reflected in:  Board of Directors Manual
B.4.4	Does the company have policies on loans to directors and commissioners either forbidding this practice or ensuring that they are being conducted at arm's length basis and at market rates?	Board of Directors Manual
B.5		
B.5.1	Does the company disclose that RPTs are conducted in such a way to ensure that they are fair and at arms' length?	Impack disclose that RPTs are conducted in such a way to ensure that they are fair and at arms' length as reflected in:  Affiliated Transaction Policy
B.5.2	In case of related party transactions requiring shareholders' approval, is the decision made by disinterested shareholders?	There is no case of RPTs requiring shareholders' approval during: - January 2020 until December 2020 - January 2021 until June 2021





No.	Principles and Recommendations	Remarks
С	Role of Stakeholders	
C.1	The rights of stakeholders that are established by law or through mu	tual agreements are to be respected
	Does the company disclose a policy and practices that address:	
		Impack disclose a policy and practices that address the existence and scope of the Impack's efforts to address customers' welfare as reflected in:
C.1.1	The existence and scope of the company's efforts to address customers' welfare?	Annual Report 222
		Sustainability Report 70-72
		Impack has policy and practices in selecting supplier/vendor/contractor as reflected in:
		Sustainability Report 51-52
C.1.2	Supplier/contractor selection procedures?	Sustainability Report 34
		Sustainability Report 44
		Procurement Policy





C.1.5	The company's efforts to ensure that its value chain is environmentally friendly or is consistent with promoting sustainable development?	Impack policies and efforts to ensure that its value chain is environmentally friendly or is consistent with promoting sustainable development in:  Sustainability Report 73-85
C.1.6	The company's efforts to interact with the communities in which they operate?	Impack efforts to interact with the communities in which they operate as reflected in:  Sustainability Report 66-69
C.1.7	The company's anti-corruption programs and procedures?	impack's anti-corruption programs and procedures are identified in:  Anti-Corruption Policy  Sustainability Report 39-40
C.1.8	How creditors' rights are safeguarded?	Creditor's rights are safeguarded, as reflected in:  Creditor's Rights Policy
C.1.9	Does the company have a separate report/section that discusses its efforts on environment/economy and social issues?	Impack have a separate report/section that discusses its efforts on environment/economy and social issues, as reflected in:  Sustainability Report (SR2020)
C.2	Where stakeholder interests are protected by law, stakeholders should have the opportunity to obtain effective address for violation of their rights.	
C.2.1	Does the company provide contact details via the company's website or Annual Report which stakeholders (e.g. customers, suppliers, general public etc.) can use to voice their concerns and/or complaints for possible violation of their rights?	Impack provide contact details via website or Annual Report which stakeholders can use to voice their concerns and/or complaints for possible violation of their rights, as reflected in:  Sustainability Report 70-72





C.3	Mechanisms for employee participation should be permitted to develop	
C.3.1	Does the company explicitly disclose the policies and practices on health, safety and welfare for its employees?	Sustainability Report 40  Sustainability Report 50  Sustainability Report 55-66
C.3.2	Does the company explicitly disclose the policies and practices on training and development programs for its employees?	Impack explicitly disclose the policies and practices on training and development programs for its employees as reflected in:  Annual Report 217  Sustainability Report 50  Sustainability Report 57  Sustainability Report 64-65
C.3.3	Does the company have a reward/compensation policy that accounts for the performance of the company beyond short-term financial measures?	<ul> <li>The Company give extra bonuses in a form of Impack shares. The purpose of giving extra bonuses in a form of Impack shares:</li> <li>Boosting the productivity of employees.</li> <li>Creating harmony among employees, the management, and shareholders in elevating the Company's performance.</li> <li>Award for employees' contribution.</li> <li>Developing employees' sense of belonging which is expected to have a positive impact in increasing employees' engagement with the Company.</li> <li>The extra bonus given by the Company to employees will be withheld for 3 years from the time it is given. The rules and procedure regarding the extra bonus (in a form of shares) refer to Impack's internal policies</li> </ul>





C.4	Stakeholders including individual employee and their representative bodies, should be able to freely communicate their concerns about illegal or unethical practices to the board and their rights should not be compromised for doing this	
C.4.1	Does the company have a whistleblowing policy which includes procedures for complaints by employees and other stakeholders concerning alleged illegal and unethical behaviour and provide contact details via the company's website or annual report	Impack have a whistleblowing policy which includes procedures for complaints by employees and other stakeholders concerning alleged illegal and unethical behaviour and provide contact details via the company's website or annual report as reflected in:  Annual Report 195-196  Whistleblowing Policy
C.4.2	Does the company have a policy or procedures to protect an employee/person who reveals alleged illegal/unethical behavior from retaliation?	Impack have a policy or procedures to protect an employee/person who reveals alleged illegal/unethical behaviour from retaliation as reflected in:  Annual Report 195-196

No.	Principles and Recommendations	Remarks
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 more?	Information about Impack's shareholders reveal the identity of beneficial owners, holding 5% shareholding or more, as reflected in: <u>Annual Report 69-70</u>
D.1.2	Does the company disclose the direct and indirect (deemed) shareholdings of major and/or substantial shareholders?	Impack disclose the direct and indirect (deemed) shareholdings of major and/or substantial shareholders as reflected in:  Annual Report 69-70





D.1.3	Does the company disclose the direct and indirect (deemed) shareholdings of directors (commissioners)?	Impack disclose the direct and indirect (deemed) shareholdings of directors and commissioners as reflected in: <u>Annual Report 69-70</u>
D.1.4	Does the company disclose the direct and indirect (deemed) shareholdings of senior management?	Impack disclose the direct and indirect (deemed) shareholdings of directors as reflected in:  Annual Report 69-70
D.1.5	Does the company disclose details of the parent/holding company, subsidiaries, associates, joint ventures and special purpose enterprises/vehicles (SPEs)/(SPVs)?	Impack disclose details of the parent/holding company, subsidiaries, associates, joint ventures and special purpose enterprises/vehicles as reflected in:  Annual Report 72-73
D.2	Quality of Annual Report	
	Does the company's annual report disclose the following items:	
D.2.1	Corporate Objectives	Impack's prospects, strategic priorities & projection were disclosed in: <u>Annual Report 106-107</u>
D.2.2	Financial Performance indicators	Impack's financial performance indicators and financial performance realization against the target for the last three years can be found in:  Annual Report 16-19





D.2.3	Non-Financial Performance indicators	Impack 's non-financial indicators were disclosed in:  Annual Report 82-87  Sustainability Report 25
D.2.4	Dividend Policy	Impack's Dividen Policy as reflected in:  Annual Report 108  Dividend Policy
D.2.5	Biographical details (at least age, academic qualifications, date of first appointment, relevant experience, and any other directorships of listed companies) of all directors/commissioners	Biographical details and any other directorships of listed companies) of all directors/commissioners are disclosed in: <u>Annual Report 56-65</u>
D.2.6	Attendance details of each director/commissioner in all directors/commissioners meetings held during the year	Attendance details of each director/commissioner in all directors/commissioners meetings held during the year are disclosed in: <u>Annual Report 155-165</u>





D.2.7	Total remuneration of each member of the board of directors/commissioners	Annual Report 2020 discloses the Board of Commissioners' Remuneration and Board of Directors' Remuneration  Annual Report 144  Annual Report 154
	Corporate Governance Confirmation Statement	
D.2.8	Does the Annual Report contain a statement confirming the company's full compliance with the code of corporate governance and where there is non-compliance, identify and explain reasons for each such issue?	Impack was disclosed the Statement of Implementation of Good Corporate Governance Principles as reflected in:  Annual Report 112-113
D.3	Disclosure of Related Party Transactions (RPTs)	
D.3.4	Does the company disclose its policy covering the review and approval of material RPTs?	Impack disclose its policy covering the review and approval of material RPTs as reflected in:  Affiliated Transaction Policy
D.3.5	Does the company disclose the name, relationship, nature and value for each material RPTs?	Impack's disclose the name, relationship, nature and value for each material RPTs as reflected in:  Annual Report 109
D.4	Directors and Commissioners dealings in the shares of the company	
D.4.1	Does the company disclose trading in the company's shares by insiders?	Impack disclose trading in the company's shares by insiders as reflected in:



		Annual Report 69-70
D.5	External Auditor and Auditor Report	



	Where the same audit firm is engaged for both audit and non-audit services	
D.5.1	Are the audit and non-audit fees disclosed?	The audit and non-audit fees disclosed were disclosed in: <u>Annual Report 79-80</u>
D.5.2	Does the non-audit fee exceed the audit fees?	The non-audit fees doesn't exceed the audit fees disclosed are disclosed in: <u>Annual Report 79-80</u>
D.6	Media of Communications	
	Does the company use the following modes of communication?	
D.6.1	Quarterly Reporting	Impack's Quarterly Report
D.6.2	Company Website	Impack's Website
D.6.3	Analyst's meeting	Will be updated
D.6.4	Media briefings/press conferences	Information about media briefing/press conference are disclosed in:  Impack's Website
D.7	Timely filing/release of annual/financial reports	
D.7.1	Are the audited annual financial report/statement released within 120 days from the financial year end?	Impack's Consolidated Financial Statement  IDX Website Financial and Annual Report Section  Choose:  1. Financial Report  2. Stock  Company Code: IMPC Year: 2020  Period: Yearly



D.7.2	Is the annual report released within 120 days from the financial year end?	IDX Website Form  IDX Company Profile
D.7.3	Is the statement that the Annual Financial Report has been presented correctly and fairly, confirmed by the Board of Commissioners or the Board of Directors and/or related officials of the company.	Information about the Annual Financial Report has been presented correctly and fairly, confirmed by the Board of Commissioners or the Board of Directors are disclosed in:
D.8	Company Website	Annual Report 223
<b>D.</b> 0	Does the company have a website disclosing up-to-date information	on the following:
	boes the company have a website disclosing up to date information	Information about financial statement are disclosed in:
D.8.1	Financial statements/reports (latest quarterly))	Impack's Website Corporate Presentation
D.8.2	Materials provided in briefings to analysts and media	Information about materials for analyst and media are disclosed in:  Impack's Website
D.8.3	Downloadable Annual Report	The Annual Report can be download through:  Impack's Website
D.8.4	Notice of AGM and/or EGM	Information about Notice of AGM/EGM are disclosed in:  Impack's Website
D.8.5	Minutes of AGM and/or EGM	Information about Minutes of AGM and/or EGM are disclosed in:  Impack's Website  Announcement Summary of Minutes of AGMS 2021



D.8.6 <b>D.9</b>	Company's constitution (company's by-laws, memorandum and association)  Investor Relations	Minutes of AGMS 2021  Announcement Summary of Minutes of EGMS 2020  Minutes of EGMS 2020  Information about Impack's Constitution are disclosed in:  Impack's Website (Deed of Establishment)
D.9.1	Does the company disclose the contact details (e.g. telephone, fax, and email) of the officer/office responsible for investor relations?	Contact Details of Impack, are disclosed in: <u>Annual Report 44</u>



No.	Principles and Recommendations	Remarks
E	RESPONSIBILITIES OF THE BOARD	
E.1	Board Duties and Responsibilities	
	Clearly defined board responsibilities and corporate governance policy	
		The information about corporate governance policy and board charter are disclosed in:
E.1.1	Does the company disclose its corporate governance policy/board charter?	Annual Report 112-113
		Impack's Website (GCG Policy)
		Impack's Website Organizational Structure



E.1.2	Are the types of decisions requiring board of directors/commissioners' approval disclosed?	Annual Report 142-143
E.1.3	Are the roles and responsibilities of the board of directors/commissioners clearly stated?	Annual Report 142-143
	Corporate Vision/Mission	
E.1.4	Does the company have an updated Vision and Mission statement?	Annual Report 50
E.1.5	Does the board of directors play a leading role in the process of developing and reviewing the company's strategy at least annually?	The Company has Strategic Plans and Management Budget Plans ("MBP") that shall be approved by Board.  All Operating Unit will be required to prepare a strategic plan periodically and a Management Plan annually. All the consolidated plan (Group Strategic & Management Plans) must be approved by Board before the budget year.
E.1.6	Does the board of directors have a process to review, monitor and oversee the implementation of the corporate strategy?	Board of directors Impack have a process to review, monitor and oversee the implementation of the corporate strategy in BOD meeting. All the process to review, monitor and oversees are set out in the Manual Book of Group Management File section "Group Strategic & Management Budget Planning"  Annual Report 155
E.2	Board Structure	
	Code of Ethics or Conduct	



E.2.1	Are the details of the code of ethics or conduct disclosed?	Annual Report 193-194
E.2.2	Are all directors/commissioners, senior management and employees required to comply with the code/s?	Annual Report 193-194
E.2.3	Does the company have a process to implement and monitor compliance with the code/s of ethics or conduct?	Annual Report 193-194
	Board Structure & Composition	
E.2.4	Do independent directors/commissioners make up at least 50% of the board of directors/commissioners?	Annual Report 28
E.2.5	Does the company have a term limit of nine years or less or 2 terms of five years 1) each for its independent directors/commissioners?  1) The five years term must be required by legislation which pre-existed the introduction of the ASEAN Corporate Governance Scorecard in 2011	The company has 2 terms of five years each for its independent directors/commissioners.  Refer to:  Board of Directors Manual
E.2.6	Has the company set a limit of five board seats that an individual independent/non- executive director/ commissioner may hold simultaneously?	Annual Report 56-65



E.2.7	Does the company have any executive directors who serve on more than two boards of listed companies outside of the group?	Impack does not have any executive directors who serve on more than two boards of listed companies outside of the group
	Nomination Committee (NC)	
E.2.8	Does the company have a Nominating Committee?	Impack Nominating Committee is served by Board of Commissioners
E.2.9	Is the Nominating Committee comprised of a majority of independent directors/commissioners?	Annual Report 164-165
E.2.10	Is the chairman of the Nominating Committee an independent director/commissioner?	Annual Report 163-168
E.2.11	Does the company disclose the terms of reference/governance structure/charter of the Nominating Committee?	Annual Report 163-168  Remuneration and Nomination Committee Charter
E.2.12	Is the meeting attendance of the Nominating Committee disclosed and if so, did the Nominating  Committee meet at least twice during the year?	Annual Report 168
	Remuneration Committee (RC)/Compensation Committee	
E.2.13	Does the company have a Remuneration Committee?	Impack Remuneration Committee is served by Board of Commissioners



E.2.14	Is the Remuneration Committee comprised of a majority of independent directors/commissioners?	Annual Report 164-165
E.2.15	Is the chairman of the Remuneration Committee an independent director/commissioner?	Annual Report 163-168
E.2.16	Does the company disclose the terms of reference/governance structure/charter of the Remuneration Committee?	Annual Report 163-168
E.2.17	Is the meeting attendance of the Remuneration Committee disclosed and, if so, did the Remuneration Committee meet at least twice during the year?	Annual Report 163-168
	Audit Committee (AC)	
E.2.18	Does the company have an Audit Committee?	Annual Report 157-163
E.2.19	Is the Audit Committee comprised entirely of non- executive directors/commissioners with a majority of independent directors/commissioners?	Annual Report 157-163
E.2.20	Is the chairman of the Audit Committee an independent director/commissioner?	Annual Report 157-163



E.2.21	Does the company disclose the terms of reference/governance structure/charter of the Audit Committee?	Annual Report 163-168  AC Charter
E.2.22	Does at least one of the independent directors/commissioners of the committee have accounting expertise (accounting qualification or experience)?	Annual Report 163-168
E.2.23	Is the meeting attendance of the Audit Committee disclosed and, if so, did the Audit Committee meet at least four times during the year?	Annual Report 163-168
E.2.24	Does the Audit Committee have primary responsibility for recommendation on the appointment, and removal of the external auditor?	Annual Report 163-168
E.3	Board Processes	
	Board Meetings and Attendance	
E.3.1	Are the board of directors meeting scheduled before the start of financial year?	Will be updated
E.3.2	Does the board of directors/commissioners meet at least six times during the year?	Annual Report 144



E.3.3	Has each of the directors/commissioners attended at least 75% of all the board meetings held during the year?	Annual Report 155-156  Board of Directors Manual
E.3.4	Does the company require a minimum quorum of at least 2/3 for board decisions?	Annual Report 144-145  Board of Directors Manual
E.3.5	Did the non-executive directors/commissioners of the company meet separately at least once during the year without any executives present?	Annual Report 155-156
	Access to Information	
E.3.6	Are board papers for board of directors/commissioners meetings provided to the board at least five business days in advance of the board meeting?	Board of Directors Manual
E.3.7	Does the company secretary play a significant role in supporting the board in discharging its responsibilities?	Annual Report 169-173
E.3.8	Is the company secretary trained in legal, accountancy or company secretarial practices and has kept abreast on relevant developments?	Annual Report 169-173
	Board Appointment and Re-Election	



E.3.9	Does the company disclose the criteria used in selecting new directors/commissioners?	Board of Directors Manual
E.3.10	Did the company describe the process followed in appointing new directors/commissioners?	Based on recommendation of Remuneration and Nomination Committee and submitting to GMS approval
E.3.11	Are all directors/commissioners subject to re- election every 3 years; or 5 years for listed companies in countries whose legislation prescribes a term of 5 years <sup>2)</sup> each?  2) The five years term must be required by legislation which pre-existed the introduction of the ASEAN Corporate Governance Scorecard in  2011	Board of Directors Manual
	Remuneration Matters	
E.3.12	Does the company disclose its remuneration (fees, allowances, benefit-in-kind and other emoluments) policy/ practices (i.e. the use of short term and long term incentives and performance measures) for its executive directors and CEO?	Will be updated
E.3.13	Is there disclosure of the fee structure for non- executive directors/commissioners?	Will be updated
E.3.14	Do the shareholders or the Board of Directors approve the remuneration of the executive directors and/or the senior executives?	Annual Report 122



E.3.15	Does the company have measurable standards to align the performance-based remuneration of the executive directors and senior executive with long- term interests of the company, such as claw back provision and deferred bonuses?	Will be updated
	Internal Audit	
E.3.16	Does the company have a separate internal audit function?	Annual Report 174-177
E.3.17	Is the head of internal audit identified or, if outsourced, is the name of the external firm disclosed?	Annual Report 174-177
E.3.18	Does the appointment and removal of the internal auditor require the approval of the Audit Committee?	Annual Report 174-177
	Risk Oversight	
E.3.19	Does the company establish a sound internal control procedures/risk management framework and periodically review the effectiveness of that framework?	Annual Report 179-189
E.3.20	Does the Annual Report/Annual CG Report disclose that the board of directors/commissioners has conducted a review of the company's material controls (including operational, financial and compliance controls) and risk management systems?	The Board of directors/commissioners has conducted a review of the Company's material controls through Board meeting. Outside the Board meeting, the Board also having meeting with Subsidiaries-Unit Head regularly to review the operational, financial and compliance.



E.3.21	Does the company disclose the key risks to which the company is materially exposed to (i.e. financial, operational including IT, environmental, social, economic)?	Annual Report 179-189
E.3.22	Does the Annual Report/Annual CG Report contain a statement from the board of directors/commissioners or Audit Committee commenting on the adequacy of the company's internal controls/risk management systems?	Annual Report 180-190
E.4	People on the Board	
	Board Chairman	
E.4.1	Do different persons assume the roles of chairman and CEO?	Annual Report 142
E.4.2	Is the chairman an independent director/commissioner?	Annual Report 142
E.4.3	Is any of the directors a former CEO of the company in the past 2 years?	Annual Report 58
E.4.4	Are the roles and responsibilities of the chairman disclosed?	Annual Report 151
	Lead Independent Director	
E.4.5	If the Chairman is not independent, has the Board appointed a Lead/Senior Independent Director and has his/her role been defined?	Annual Report 142



	Skills and Competencies	
E.4.6	Does at least one non-executive director/commissioner have prior working experience in the major sector that the company is operating in?	Annual Report 58-65
E.5	Board Performance	(THESE INDICATORS WILL BE UPDATED)