

MEMORANDUM

TO : ALL DEALER'S REPRESENTATIVES (DRs)
FROM : THE MANAGEMENT
DATE : 26 SEPTEMBER 2024
SUBJECT : GUIDELINES ON CONDUCT FOR CAPITAL MARKET INTERMEDIARIES

We refer to the Securities Commission's Guidelines on Conduct for Capital Market Intermediaries ("Conduct Guidelines"), revised on 29 March 2024 that will come into effect on 1 October 2024.

The revised Conduct Guidelines, among others, includes new provisions in relation to the following:

- a) Treatment of vulnerable clients;
- b) Provision of personal advice to clients; and
- c) Provision of a capital market related service on or through an online platform.

In relation to treatment of vulnerable clients, DRs are required to explain to clients towards client's understanding of vulnerabilities and to ask if client has any vulnerabilities as well as disclosing such information to the Company. DRs are also required to identify and respond appropriately to vulnerable clients.

It is also a requirement for clients to disclose if they fall under any of the non-exhaustive list indicated below:

1. Disabilities* – clients with disabilities that may affect their ability to make an informed decision.
2. Life events – clients who have experienced adverse life events resulting in temporary or long-term financial hardship such as unemployment, or death or total permanent disability of the main breadwinner.
3. Financial resilience – clients with a low ability to withstand financial shock such as clients who are overly-indebted, have cash flow problems or have no savings.
4. Capability – clients with low knowledge of financial matters, low confidence in managing money or low capability in other relevant areas such as literacy, language or digital skills.
5. Age – Senior citizens who may be less technologically able.

Note: Disabilities refers to long-term: (a) hearing impairment; (b) visual impairment; (c) speech impairment; (d) physical impairment; or (e) learning impairment such as dyslexia or low spectrum autism.*

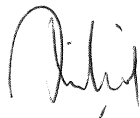
If you identify your client as a vulnerable client, kindly let us have a written confirmation, either from you or client, to be submitted to Documentation Department or to the Head of Operations of your respective branch.

For more information on vulnerable client and on the additional provisions, please refer to the following attachments:

1. Guidelines on Conduct for Capital Market Intermediaries; and
2. Frequently Asked Questions on the above Conduct Guidelines.

Please be guided accordingly.

Thank you.

A handwritten signature in black ink, appearing to be 'Ali', written in a cursive style.