



RATINGS

POLICY

TREATMENT OF CONFIDENTIAL INFORMATION

RAM Rating Services Berhad (763588-T)

Level 8, Mercu 2

KL Eco City

No.3, Jalan Bangsar

59200, Kuala Lumpur

Malaysia

T: (603) 3385 2488

F: (603) 3385 2582

E: ramratings@ram.com.my

W: www.ram.com.my

JULY 2023

TREATMENT OF CONFIDENTIAL INFORMATION POLICY

INTRODUCTION

RAM Ratings is dedicated to maintaining objectivity, independence, integrity and transparency in the rating process. RAM Ratings' policies are designed to be consistent with RAM Ratings Code of Conduct, which incorporates the best practices outlined in the IOSCO Code of Conduct Fundamentals for Credit Rating Agencies, and in compliance with the Securities Commission's Guidelines for Credit Rating Agencies' Registrations. RAM Ratings' treatment of Confidential Information policy is designed to be consistent with these principles.

This policy should be read along with:

1. RAM Ratings Code of Conduct where all employees shall be bound by the Code of Conduct and this policy. RAM Ratings requires all employees to comply with all the terms and conditions to ensure that all Confidential Information is appropriately handled, used and protected.
2. Personal Investment and Trading of Securities policy.
3. Rating Dissemination and Publication policy.

In the course of providing rating services to the capital market, we receive from time to time, information provided by the rated issuer or its advisor/arranger/sponsor/promoter pursuant to RAM Ratings' appointment as the credit rating agency duly recognised under the Guidelines on Credit Rating Agencies, for the rating exercise.

For purposes of this policy, the term Confidential Information relates to such information relied upon, and/or provided by the rated issuer or its advisor/arranger/sponsor/promoter, used for arriving at a credit rating, unless such information:

1. Is already known to RAM Ratings free of any confidentiality obligation at the time it is obtained;
or
2. Becomes publicly known through no wrongful act of RAM Ratings; or
3. Is rightfully received by RAM Ratings from a third party.

Confidential Information also includes:

1. Matters arising from any internal discussions in reaching a rating decision;
2. Information concerning the rating committee process, including, but not limited to the voting decisions and voting members that deliberated; and
3. Information concerning the content or timing of a pending rating action prior to public dissemination.

POLICY STATEMENT

Measures to safeguard Confidential Information

This policy is intended to facilitate compliance with applicable regulatory requirements and to ensure appropriate measures to safeguard such Confidential Information. Such measures include the following:

1. *Handling and Maintenance of Confidential Information*

When managing property and records belonging to or in possession of RAM Ratings, employees shall take all reasonable measures to ensure that such information is kept securely, and strictly adhere to the file management practices consistent with RAM Ratings' standard operating procedures to ensure security, confidentiality and integrity of records. It is expected for all employees to take the appropriate action required to prevent unauthorised access to any records that are confidential in nature such that all Confidential Information are maintained in a secure manner.

2. *Use of Confidential Information*

- a. The use of Confidential Information will only be for purposes of the rating process and related rating activities. Apart from the use of Confidential Information to perform its credit rating assessment, RAM Ratings may use such information for publishing ratings-related research and analytical reports and for modeling purposes, provided that the Confidential Information is not presented in a way that can be directly tied to the issuer or rated entity.
- b. To ensure that employees do not benefit from the knowledge of such Confidential Information, all employees are bound to comply with RAM Ratings' Policy on Personal Investment and Trading of Securities.

3. *Disclosure of Confidential Information*

- a. All employees are prohibited to share or disclose Confidential Information received in connection to the rating exercise unless it is regarding the analytical work relating to their general function of credit ratings, or when it is required to perform oversight responsibilities or necessary to comply with regulatory requirement or when required by law. All such actions must remain consistent with RAM Ratings' other policies. While an employee may discuss matters related to an issuer or transaction or industry sector with external parties, it must be limited to information that is publicly available.
- b. Information about a pending or a future rating action, including information disclosed and internal deliberations discussed during the rating process is considered material, and such Confidential Information cannot be used or shared under any circumstances except for the circumstances highlighted in 3(a) above. For the purposes of this policy, material information is deemed as information that may affect an investment decision of a rational investor, or the market for that security.

- c. When dealing with any party other than the rated issuer or its advisor/arranger/sponsor/promoter, no employee shall share or communicate Confidential Information entrusted to RAM Ratings, except to the rating committee who may use such Confidential Information in their deliberations to arrive at the rating decision.

4. *Application to non-employees/agents of RAM Ratings*

Non-employees of RAM Ratings or external members of RAM Ratings' rating committee shall be subject to the following:

- a. They shall have acknowledged and agreed to their roles and responsibilities as set out in the terms of reference of rating committee and shall comply with the provisions therein; and
- b. Employees of RAM Ratings' holding company shall have access to Confidential Information provided that such access to Confidential Information is on an "as need" basis. These employees shall be bound by its own confidentiality obligations and RAM Ratings' Code of Conduct.

5. *When information is no longer confidential*

Confidential Information relied upon in the rating decision shall remain as Confidential Information until such time when the information has been released or published on RAM Ratings' website. In line with our policy on Rating Dissemination and Publication when the rating is publicly disseminated, RAM Ratings shall consider comments from the issuer to correct any factual contents in the rating report and reserves the right to disseminate the rating report in whatever form RAM Ratings, in its editorial judgement, determines to be the most appropriate.

Published by RAM Rating Services Berhad
Reproduction or transmission in any form is prohibited
except by permission from RAM Rating Services Berhad.
© Copyright 2023 by RAM Rating Services Berhad