



# CSC HOLDINGS LIMITED

Company Registration No. 199707845E

## **STAKEHOLDER ENGAGEMENT AND INVESTOR RELATIONS POLICY**

### **1. Introduction**

- 1.1 This Stakeholder Engagement and Investor Relations Policy ("**Policy**") sets out the policy and framework for engaging the Stakeholders of CSC Holdings Limited ("**Company**").
- 1.2 Stakeholders are parties who may be affected by the Company's activities, or whose actions can affect the ability of the Company to conduct its activities. For the purposes of this Policy, the term "**Stakeholder**" shall refer to the following:
  - 1.2.1 Investors;
  - 1.2.2 Employees;
  - 1.2.3 Customers (main-contractors/sub-contractors);
  - 1.2.4 Suppliers;
  - 1.2.5 Our community (BCA, MOM, NEA, LTA, PUB);
  - 1.2.6 Government agencies; and
  - 1.2.7 Regulators (SGX, MAS, ACRA)
- 1.3 The Company is committed to actively engage its shareholders through regular, effective and fair communication in compliance with the Singapore Code of Corporate Governance 2018 ("**Code**"), Practice Directions in relation to the Code and current best practices.
- 1.4 Further, the board of directors ("**Board**") of the Company recognizes that as part of its overall responsibility to ensure that the best interests of the Company are served, it is not only required to consider the Company's obligations owed to its shareholders, but also the needs and interests of its material Stakeholders. The Board recognizes that the relationships with material Stakeholders may have an impact on the Company's long term sustainability.

### **2. Principles**

- 2.1 In its relations with Stakeholders, the Company accepts and promotes the following basic principles:
  - 2.1.1 Establishment of a responsible business model which is responsible, transparent, committed and capable of creating sustainable value for all Stakeholders;
  - 2.1.2 An organizational structure which promotes and coordinates responsible actions with Stakeholders, and uses various instruments to favour communication and dialogue with Stakeholders, while constantly adapting to their expectations and interests; and
  - 2.1.3 Allocation of resources to channels for dialogue with Stakeholders, in order to establish balanced relationships between corporate values and

social expectations, taking into account Stakeholders' interests and concerns.

- 2.2 The Company's commitment to business ethics and corporate social responsibility (in particular, the principles of integrity, fairness and transparency as drivers of credibility and mutual trust) are the foundations on which the Company builds its relations with Stakeholders.
- 2.3 The Company shall disseminate significant and reliable information on its performance and activities and annually prepare and publish financial and non-financial information on its activities, following a generally accepted method in the case of non-financial information, and subjecting such information to independent external verification, if appropriate.

### **3. Avenues for Communication**

- 3.1 The Company shall adopt various avenues of communication to effectively engage each group of Stakeholders. The Company's strategy and key areas of focus in relation to the management of Stakeholder relationships are set out in Appendix 1, and may be varied from time to time.
- 3.2 In particular, the Company acknowledges the importance of regular communication with shareholders, and shall facilitate the participation of shareholders during general meetings and other dialogues to allow shareholders to communicate their views on various matters affecting the Company. The Company's approach towards shareholders' meetings is set out in Appendix 2.
- 3.3 In accordance with the Company's obligations under the Sustainability Reporting Guide of the SGX-ST Listing Rules and best practices, the Company shall also include the material outcomes of its engagement with Stakeholders in its annual sustainability report.
- 3.4 A copy of this Policy shall be disclosed in the Company's Annual Report, and made available on the Company's corporate website at <http://www.cschl.com.sg>.

### **4. Monitoring and Review of Policy**

- 4.1 The Board shall oversee the implementation of, and ongoing monitoring of the Company's progress against the principles set under this Policy.
- 4.2 Further, the Board shall review the terms of this Policy periodically, where appropriate, to ensure that it remains consistent with the Board's objectives and responsibilities.

### **5. Company Contacts**

- 5.1 Shareholders may contact the corporate office via the following channels:

Telephone: 6262 6266  
Fax: 6791 7783  
Email: [corp@cschl.com.sg](mailto:corp@cschl.com.sg)

- 5.2 Shareholders may also contact the Chairman of the Board, at the following address:

Email: [leonghornkee@gmail.com](mailto:leonghornkee@gmail.com)

5.3 All Stakeholders may direct any queries regarding this Policy to corp@cschl.com.sg.

**6. Stakeholder Privacy**

6.1 The Company recognizes the importance of Stakeholders' privacy, and will not disclose Stakeholders' information without their consent unless required by law.

**APPENDIX 1: STRATEGY AND KEY AREAS OF FOCUS**

<b>Stakeholder</b>	<b>Goal</b>	<b>Key Areas of Focus</b>	<b>Our Strategy</b>	<b>Mode and Frequency</b>
<b>Investors</b>	<ul style="list-style-type: none"> <li>To provide regular updates on financial performance, business strategies and other issues</li> </ul>	<ul style="list-style-type: none"> <li>Clear and timely communication on operational and financial performance</li> </ul>	<ul style="list-style-type: none"> <li>All shareholders are informed of all major developments that impact the Group or Company</li> <li>Price-sensitive announcements, including half-year and full-year results and press release are released to shareholders through SGXNET and can also be found on the Company's website.</li> <li>The Annual Report shall set out the steps taken to solicit and understand the view of investors.</li> </ul>	<ul style="list-style-type: none"> <li>Half-year and full-year Financial Results Announcements</li> <li>Annual General Meeting</li> <li>Regular updates via corporate website</li> <li>Announcements and press releases throughout the year</li> <li>Annual Reports</li> </ul>
<b>Employees</b>	<ul style="list-style-type: none"> <li>To enhance employee knowledge and skills</li> <li>To strengthen safety culture within the organization</li> <li>Career development</li> </ul>	<ul style="list-style-type: none"> <li>Continuous training to address high staff turnover rate for experienced employees</li> <li>Staff motivation and ensuring safety standards are constantly maintained</li> <li>Ensuring safety awareness and</li> </ul>	<ul style="list-style-type: none"> <li>Adequate training to ensure staffs are equipped with required knowledge and skills to perform their duties and responsibilities competently.</li> <li>Annual review of performance</li> </ul>	<ul style="list-style-type: none"> <li>Allocate training budget annually for employee training and development</li> <li>Annual Safety award for individuals and teams</li> <li>Enroll operations staff into appropriate courses as and when required</li> <li>Annual staff appraisal</li> </ul>

		<p>practices at all times</p> <ul style="list-style-type: none"> <li>Fair remuneration and recognition</li> </ul>		
<b>Customers (main contractors/sub-contractors)</b>	<ul style="list-style-type: none"> <li>To offer a full range of capabilities in foundation and geotechnical engineering field with high level of expertise</li> <li>To deliver the highest quality of work through identification of customer needs and statutory requirements</li> </ul>	<ul style="list-style-type: none"> <li>Delivery on schedule with satisfactory quality, good safety record</li> </ul>	<ul style="list-style-type: none"> <li>Weekly on-site meeting with client to monitor progress of the project</li> <li>On-site inspection by senior management and dedicated engineers/project managers</li> <li>Sound safety management system</li> <li>Timely communication with the customers when technical issues or unforeseeable circumstances arise which may cause a delay in completion or require additional time and resources to resolve</li> </ul>	<ul style="list-style-type: none"> <li>Participate in industry events</li> <li>Weekly regular meetings and communication, as necessary</li> </ul>
<b>Suppliers</b>	<ul style="list-style-type: none"> <li>To forge strategic partnerships</li> <li>To promote overall safe condition of works through providing and maintaining</li> </ul>	<ul style="list-style-type: none"> <li>Transparent and fair procurement and other business practices</li> <li>Compliance with terms and conditions of business contracts</li> </ul>	<ul style="list-style-type: none"> <li>Transparent business processes in the selection of tenders</li> <li>Avenues to report incidents of abuse and corruption</li> <li>Whistle-blowing policy</li> </ul>	<ul style="list-style-type: none"> <li>Meetings with suppliers for market updates or addressing concerns, as necessary throughout the year</li> <li>Weekly regular meetings with subcontractors; and as necessary</li> </ul>

	sufficient resources for timely completion for subcontractors			
<b>Our Community</b>	<ul style="list-style-type: none"> <li>To create economic, social and environmental value that benefits the local communities</li> </ul>	<ul style="list-style-type: none"> <li>Minimise any negative social, public health or environmental impact</li> <li>Support deserving community efforts and underprivileged groups</li> </ul>	<ul style="list-style-type: none"> <li>Ensure outputs of all work activities do not cause undue pollution to society to provide a sustainable built environment</li> <li>Community involvement</li> </ul>	<ul style="list-style-type: none"> <li>Future periodic reporting on our sustainability performance</li> <li>Annual corporate social responsibility initiatives</li> </ul>
<b>Government Agencies</b>	<ul style="list-style-type: none"> <li>To comply with applicable laws and regulations</li> <li>Zero Reportable Accident, free of infringement and ensuring works do not damage properties</li> <li>Keep noise within prescribed limits</li> </ul>	<ul style="list-style-type: none"> <li>Statutory compliance in terms of Quality, Environmental, Health &amp; Safety</li> </ul>	<ul style="list-style-type: none"> <li>Quality, Environmental, Health &amp; Safety policy and objectives are clearly defined</li> <li>Management strives to provide an accident-free workplace for all employees and interested parties</li> <li>The Group strives to prevent environmental, health &amp; safety hazards that are undesirable to employees, and interested parties through continuous reviews and improvement of its integrated management system and complying with the applicable regulations as</li> </ul>	<ul style="list-style-type: none"> <li>Attending workshops and seminars organised by government agencies as required</li> <li>Regular communication and visits to sites as required</li> </ul>

	<ul style="list-style-type: none"> <li>• Ensure works do not damage or affect sewers and services</li> </ul>		required	
<b>Regulators (SGX, MAS, ACRA)</b>	<ul style="list-style-type: none"> <li>• To comply with applicable laws and regulations</li> </ul>	<ul style="list-style-type: none"> <li>• Regulatory compliance</li> </ul>	<ul style="list-style-type: none"> <li>• All financial results, including price-sensitive information, are released in a timely manner</li> <li>• Maintain high standard of corporate governance</li> <li>• Seek professional assistance when required on compliance matters</li> </ul>	<ul style="list-style-type: none"> <li>• Half-year and full-year financial reporting</li> <li>• Attend seminars and workshops organized by regulators as required</li> </ul>

## **APPENDIX 2: CONDUCT OF SHAREHOLDERS' MEETINGS**

- 1.1 The Company treats all shareholders fairly and equitably, and recognises, protects and facilitates the exercise of shareholders' rights and continually reviews and updates such governance arrangements.
- 1.2 The Company recognises the need to communicate with shareholders on all material matters affecting the Group and does not practice selective disclosure. Price sensitive announcements, including half-year and full-year results and press release (the "**Corporate Announcements**") are released to shareholders on an equal and timely basis through SGXNET. The Corporate Announcements can also be found on the Company's website at [www.cschl.com.sg](http://www.cschl.com.sg).
- 1.3 The Company encourages shareholders to participate actively in general meetings. Shareholders are informed of shareholders' Meeting through notices published in the national newspapers. The Company sends Circular including the Notice of AGM to all shareholders at least 14 days before the AGM. The electronic Annual Report will be available at the Company's website at [www.cschl.com.sg](http://www.cschl.com.sg) at least 14 days before the AGM to ensure that all the shareholders have adequate time to review the Annual Report before the AGM. Upon request, hardcopies of the Annual Report are provided to shareholders.
- 1.4 In line with continuous obligations of the company to the SGX-ST Listing Rules and the Companies Act (Chapter 50), the Board's policy is that all shareholders should be equally and timely informed of all major developments that impact the Group or the Company.
- 1.5 The Company does not have a formal dividend policy. The Board considers the Company's capital structure, cash requirements and future plans in deciding whether to declare dividends.
- 1.6 The Company's Constitution allows a member of the Company to appoint up to two proxies to attend and vote in place of the member. Proxies need not be a member of the Company. The Company's Constitution provided that subject to its Constitution, the Companies Act (Cap. 50) and the Listing Rule, the Directors may allow for voting in absentia and electronic voting methods including but not limited to voting by mail, email or fax.
- 1.7 At AGMs, shareholders are given the opportunity to air their views and ask questions regarding the Group and its businesses. Separate resolutions on each distinct issue are proposed at general meetings for approval. The Board members and Chairman of the Board, AC, NC and RC are present and available to address shareholders' questions at the AGM. The external auditors are present to address shareholders' queries about the conduct of audit and the preparation and content of auditors' report. The legal advisors will also be invited to attend the AGM (if necessary).
- 1.8 The Company prepares minutes of general meetings that include substantial and relevant comments or queries from shareholders relating to the agenda of the meeting, and responses from the Board and management.
- 1.9 To ensure that the shareholders have the opportunity to participate effectively in and vote at general meetings, voting at general meetings has to be conducted by way of poll with effect from 1 August 2015. The Chairman of the meeting, with the assistance of service providers engaged by the Company, will brief shareholders to familiarise them with the detailed procedures involved in voting



by way of poll. An announcement containing the detailed results of the number of votes cast for, and against, each resolution and the respective percentages will be announced after the general meeting via SGXNet.