



Singapore Exchange Regulation
2 Shenton Way
#02-02, SGX Centre 1
Singapore 068804

18 May 2026

Dear Sir or Madam,

Subject: Response to Consultation Paper on Enhanced Disclosures: Value Creation and Investor Engagement

Glass Lewis appreciates the opportunity to provide feedback to Singapore Exchange Securities Trading Limited (“SGX-ST”) and Singapore Exchange Regulation (“SGX RegCo”) on the consultation paper concerning enhanced disclosures relating to value creation and investor engagement.

Glass Lewis is an independent provider of global governance services, delivering proxy research and vote management solutions to institutional investors worldwide. Our work focuses on board accountability, alignment of incentives with long-term value creation, and the quality of disclosure supporting informed shareholder decision-making.

This letter is provided for communication purposes and summarizes selected themes relevant to the consultation. Detailed responses to the consultation questions are intended to be submitted separately in the prescribed format and should be relied upon as the formal submission.

The proposals outlined in the consultation paper are broadly aligned with evolving global market expectations, where investors are increasingly focused on clarity around how companies generate sustainable value, allocate capital, and engage with shareholders. In this context, the direction taken represents a constructive step toward improving transparency and strengthening market discipline. Set out below are several key themes that Glass Lewis considers particularly relevant to the consultation, reflecting areas where enhanced disclosure may support more informed shareholder assessment and stronger market transparency.

Key Themes and Market Perspectives

Remuneration and Value Creation Alignment

Investor scrutiny of executive remuneration continues to center on whether incentive structures genuinely support long-term value creation. Enhanced disclosure of the financial and non-financial performance indicators used to determine remuneration would provide more meaningful insight into how boards translate strategy into measurable outcomes.

As outlined in the consultation paper, visibility over these indicators allows investors to assess whether performance metrics are appropriately calibrated and aligned with long-term objectives. In practice, the most decision-useful disclosures explain not only what metrics are used, but why they matter and how they influence outcomes.



This is particularly relevant in markets where variable remuneration may be broad-based or subject to discretion. In such cases, clearer articulation of performance conditions and potential pay outcomes helps reduce ambiguity and supports more consistent assessment across issuers.

Disclosure of material changes to performance indicators further strengthens accountability. Where metrics evolve over time, explanations provide necessary context and help preserve comparability, reducing the risk that changes may be interpreted as a weakening of performance discipline.

Capital Management and Dividend Transparency

The introduction of a requirement to maintain and disclose a dividend policy addresses a longstanding gap in transparency around capital distribution practices. As noted in the consultation paper, the absence of a stated policy may contribute to uncertainty and weaker investor confidence.

At the same time, dividend policy is only one component of how companies deliver shareholder returns. Investors increasingly assess capital allocation more broadly, including how boards balance reinvestment, distributions, share buybacks, and balance sheet considerations.

In this context, disclosure that situates dividend decisions within a wider capital management framework is often more useful. Clarity on capital allocation priorities, financial constraints, and return expectations allows investors to better assess the consistency and discipline of decision-making.

This is particularly important for larger or more complex issuers, where capital allocation plays a central role in long-term value creation and valuation outcomes. A principles-based approach remains appropriate, allowing flexibility while setting a clear expectation for meaningful disclosure.

Investor Engagement and Market Accessibility

The requirement to maintain a website for investor engagement reflects current market practice and the increasing reliance on digital channels as the primary interface between issuers and investors. A centralized platform enhances accessibility to key information and supports more consistent dissemination of disclosures.

Beyond access to information, the quality of engagement has become an increasingly important factor in investor confidence and valuation. Structured investor relations practices, supported by a formal policy, provide a clear framework for communication and accountability.

The consultation paper highlights that effective engagement plays a key role in ensuring that an issuer's value creation strategy is understood and appropriately reflected by the market. Disclosure of engagement activities, including frequency, channels, and key themes discussed, offers insight into how issuers interact with investors and respond to feedback.

Where disclosures also demonstrate how investor input has influenced decision-making, they provide a stronger signal of governance effectiveness and board responsiveness.

Proportionality and Implementation

A proportionate approach to implementation remains important to ensure that enhanced disclosure requirements lead to meaningful outcomes rather than procedural compliance.



Larger or more complex issuers are generally expected to provide more structured and detailed disclosures, particularly in areas such as capital management and investor engagement. Smaller issuers may reasonably adopt more principle-based approaches, provided that disclosures remain clear and decision-useful.

The phased implementation timeline outlined in the consultation paper provides a practical pathway for issuers to review existing frameworks and enhance reporting processes over time.

Concluding Observations

The proposed enhancements represent a measured step toward improving the quality and consistency of disclosure across the market. Greater clarity around remuneration frameworks, capital allocation practices, and investor engagement would support more informed investment decisions and reinforce market discipline.

Over time, more decision-useful disclosure is likely to contribute to stronger investor confidence, improved comparability across issuers, and more efficient capital allocation. The focus on value creation and engagement is consistent with broader global trends, where transparency is increasingly expected to explain not only outcomes, but the underlying drivers of long-term performance.

Respectfully submitted,

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