BlackRock

April 5, 2024

Singapore Exchange Regulation (SGX RegCo)

Re: BlackRock's response to the Singapore Exchange Regulation's consultation paper on "Sustainability Reporting: Enhancing Consistency & Comparability"

Background

On March 7, 2024, the Singapore Exchange Regulation (SGX RegCo) initiated a public consultation process seeking feedback from the market on how the International Sustainability Standards Board's (ISSB) standards should be incorporated into sustainability reporting rules for climate-related disclosures in Singapore, and proposing that certain sustainability-related information be reported on a mandatory basis by listed companies. The planned incorporation of ISSB standards was recommended by the Sustainability Reporting Advisory Committee (SRAC) on February 28, 2024 after a consultation process which concluded on September 30, 2023.

BlackRock³ submitted a response to the SGX RegCo's consultation paper on April 5, 2024. In our experience, long-term investors like our clients can benefit from enhanced disclosures on business-relevant issues, including material climate-related risks and opportunities, where appropriate. We find, therefore, that disclosure consistent with the ISSB standards may better enable investors to assess company-specific and material climate-related risks and opportunities. As such, our response welcomes the proposed incorporation of ISSB standards into the Sustainability Reporting Regime for listed issuers. Our response also notes our view that Singapore-listed companies are well positioned to prepare the primary components of a sustainability report that the recommendations propose be mandated, though it also reiterates the need for flexibility in areas where relevant climate data, reporting standards, quality controls, and reporting methodologies are still evolving and may diverge among different sectors and markets.

¹ Singapore Exchange Limited, "<u>Consultation Paper on Sustainability Reporting: Enhancing Consistency and Comparability,</u>" March 7, 2024

² BlackRock submitted a response to the SRAC concerning its recommendations on September 29, 2023. For further reading, please see: https://www.blackrock.com/corporate/literature/publication/our-response-to-the-srac-recommendations-on-climate-reporting.pdf.

recommendations-on-climate-reporting.pdf.

³ BlackRock is a publicly traded investment management firm that provides a broad range of investment management and technology services to institutional and retail clients worldwide. The assets BlackRock manages belong to its clients which include public and private pension plans, insurers, official institutions, endowments, universities, charities, family offices, wealth managers, and, ultimately, the individual investors that they serve, many of whom are saving for retirement.