

Malaysian Rating Corporation Berhad has been engaged by SME Bank as an independent external reviewer for its Sustainability Sukuk Framework. This external review was conducted according to the analytical framework in MARC's Impact Bond Assessment (IBA) methodology that is published on its website.

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SUMMARY

Small Medium Enterprise Development Bank Malaysia Berhad (SME Bank or the Bank) has engaged Malaysian Rating Corporation Berhad (MARC) to review its Sustainability Sukuk Framework (Framework) and provide an assessment of the Framework's alignment with the ASEAN Sustainability Bond Standards (ASEAN SUS), ASEAN Green Bond Standards (ASEAN GBS) and ASEAN Social Bond Standards (ASEAN SBS), as administered by the ASEAN Capital Markets Forum (ACMF), and the Sustainable and Responsible Investment (SRI) Sukuk Framework (SRI Sukuk Framework) in the Securities Commission Malaysia's (SC) Guidelines on Unlisted Capital Market Products under the Lodge and Launch Framework issued on 9 March 2015 and revised on 26 April 2021 (LOLA Guidelines). Developed in consultation with the International Capital Market Association (ICMA), the ASEAN SUS, ASEAN GBS and ASEAN SBS are aligned with ICMA's Sustainability Bond Guidelines (SBG), Green Bond Principles (GBP) and Social Bond Principles (SBP) respectively. In assigning the assessment, MARC has relied on the pre-issuance information provided by SME Bank.

Established in 2005, SME Bank is a development financial institution (DFI) wholly owned by the Ministry of Finance (MOF), regulated by Bank Negara Malaysia (BNM) and supervised by the Ministry of Entrepreneur Development and Cooperatives (MEDAC). SME Bank is a specialised financial institution established by the Government of Malaysia (Government) with a mandate to develop and promote small and medium enterprises (SMEs), a key sector considered of strategic importance to Malaysia's overall socio-economic development objectives. Apart from expanding access to finance for domestic SMEs, SME Bank provides ancillary services including consultation and advisory services to nurture and support the growth of the SME sector through its subsidiaries. SME Bank's initiatives in the SME field continue to be guided by adherence to the core elements of its sustainability approach – responsible banking, responsible business practices and social impact creation. Its financing of SMEs is geared to both financial sustainability and social impact.

SME Bank has developed the Framework as the guideline for all its issuances of Sustainability Sukuk. The Framework has been drawn up in alignment with the SRI Sukuk Framework and ACMF'S ASEAN SUS, ASEAN GBS, ASEAN SBS. It is also benchmarked against ICMA'S SBG, GBP and SBP. SME Bank intends to use the proceeds to finance and/or refinance, in part or in whole, new or existing assets, businesses and/or projects that directly support 11 of the 17 United Nations Sustainable Development Goals (SDGs).

All 11 eligible categories for the use of proceeds identified in the Framework are recognised as impactful by the ASEAN GBS, ASEAN SBS and the SRI Sukuk Framework. Each of the eligible asset categories will support achieving one or more of the SDGs such as "Good Health and Well-Being" (SDG 3), "Quality Education" (SDG 4), "Gender Equality" (SDG 5), "Clean Water and Sanitation" (SDG 6), "Affordable and Clean Energy" (SDG 7), "Decent Work and Economic Growth" (SDG 8), "Industry, Innovation and Infrastructure" (SDG 9), "Reduced Inequalities" (SDG 10), "Sustainable Cities and Communities" (SDG 11), "Responsible Consumption and Production" (SDG 12) and "Climate Action" (SDG 13). These eligible categories align with the green and social project categories recognised by the ASEAN GBS and ASEAN SBS.

SME Bank's green eligible categories target the six initial key sectors identified by the National Green Technology Master Plan as having high potential to facilitate green growth in Malaysia: energy, manufacturing, transport, building, waste and water. Additionally, each green eligible category also has the potential to advance multiple SDG targets. SME Bank's social project eligible categories, meanwhile, offer meaningful economic and social impacts and benefits for local and national communities. They have the potential to create decent work, improve gender equity, provide economic opportunities to unserved and underserved social groups and address in part the negative socioeconomic impacts of the coronavirus disease (COVID-19) pandemic.

Furthermore, as the country's predominant form of enterprise, SMEs play an important role in delivering more inclusive growth and adapting to the technological transition. In this context, MARC believes SME Bank, through the allocation of Sustainability Sukuk proceeds to SME financing, will enable SMEs to enhance their contributions to inclusive growth in diverse economic and social contexts. MARC considers the expected sustainability benefits of the use of proceeds to be highly coherent with SME Bank's sustainability approach, the SDGs, and national sustainable development priorities.

The process for the project evaluation and selection is clearly defined and transparent, with sufficiently detailed selection and exclusion criteria. Eligible asset screening, selection and approval are conducted in accordance with existing processes for the evaluation of environmental and social risks, and credit approval. A dedicated Sustainability Sukuk Working Committee (SSWC) will be entrusted with the responsibility to ensure that the eligible asset pool conforms to the eligibility criteria in the Framework. Any asset that no longer meets the eligibility criteria will be removed and replaced by the Compliance and Risk Management Committee acting on recommendation by the SSWC.

The net proceeds from the issue of Sustainability Sukuk will be managed on a portfolio basis. MARC considers the process for the management of proceeds to be in line with market practice. SME Bank will make available on its corporate website an annual Sustainability Sukuk Report that will provide information related to the use and allocation of the Sustainability Sukuk proceeds, the unutilised amount and where such unutilised amount is placed or invested pending utilisation, the removal or substitution of eligible assets, and relevant expected environmental and/or social impacts.

Based on our review of the relevant documentation and assessment as per our IBA methodology, we have assigned a "Gold" assessment to the Framework. MARC also opines that the Framework is correspondingly aligned with the core components of the ASEAN SUS, ASEAN GBS and ASEAN SBS as well as the SRI Sukuk Framework.

INTRODUCTION

Through its 26-branch network comprising seven regional centres, 18 enterprise centres and one business centre, SME Bank complements the banking institutions by focusing on unserved and underserved SMEs. The promotion of the small business sector is at the heart of SME Bank's mission of developing SMEs as an engine of economic growth for Malaysia. SME Bank actively supports the small business sector through a variety of instruments and activities with a broad focus on the manufacturing, services and construction sectors.

In support of the Government's policy agenda under the SME Masterplan 2012-2020 (SME Masterplan), SME Bank, in addition to the roles of provider, enabler and catalyst for SME financing, took on the role of facilitator of a beyond-banking ecosystem. Launched with the objectives to increase SME productivity and promote inclusive growth, the SME Masterplan had set targets to expand the contribution of SMEs in national Gross Domestic Product (GDP), employment and exports. As principal DFI for the SME sector under the SME Masterplan, noteworthy focus areas of the Bank among others were and continue to be:

- innovation and technology adoption to promote greater innovation and technology adoption by SMEs;
- access to financing to ensure that creditworthy SMEs have access to financing for working capital and investment;
- human capital development to enhance human capital and entrepreneurship development among SMEs; and
- market access to expand market access for goods and services produced by SMEs.

The Bank is driving change in the SME sector's adoption of technology and capacity building through wholly-owned subsidiary, Centre for Entrepreneur Development and Research Sdn Bhd (CEDAR) and effective public-private partnerships. The Bank launched ODELA, an e-commerce platform in 2019, to spur digital adoption and digital entrepreneurship. ODELA onboards SMEs for business-to-business (B2B) activities and extends training and capacity building support to member SMEs. A digital initiative under the National SME Digital Platform, ODELA allows SMEs to access and enhance their visibility among B2B buyers, expand their customer base and capture new opportunities in a changing business landscape. Another noteworthy digital initiative, ScoreXcess, processes micro and small business financing applications based on the business needs of SMEs for submission to participating SME financing agencies. Both digital initiatives help SMEs to build up credit history and profiles which are fundamental to their financial and economic inclusion.

SME Bank continues to evolve SME banking beyond traditional credit and liquidity solutions with a data-driven and analytics strategy. In its role as an e-marketplace operator, SME Bank continues to play an important role in promoting financial inclusion and social impact, especially in the current context of unprecedented challenges related to the COVID-19 pandemic. Similarly, SME Bank's areas of focus in financing are geared towards sustainable development outcomes. The Framework supports SME Bank's approach to financing for sustainable development and investor engagement on its commitment to the SDGs.

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COMPLIANCE REVIEW FORM

01 IMPACT SIGNIFICANCE ANALYSIS

MARC's qualitative analysis of use of proceeds impact is conducted in the context of the SDGs. As a globally accepted guidepost for transition to sustainable development, the SDGs serve as a useful framework of reference for project impact analysis. The 17 SDGs are at the heart of a global sustainability agenda covering three broad areas of economic, social and environmental development to be reached by 2030.

The Sustainability Sukuk proceeds will be allocated towards financing or refinancing in part or in whole, new or existing assets, businesses and/or projects (collectively, eligible assets) that meet SME Bank's eligibility criteria as detailed in the Framework. The 11 eligible asset categories are renewable energy projects, clean transportation, green buildings, energy efficiency, sustainable water and wastewater management, waste and pollution control, affordable basic infrastructure, access to essential services: healthcare, access to essential services: education and vocational training, socioeconomic advancement and empowerment and pandemic outbreak socioeconomic impact mitigation.

	GREEN PROJECTS					
1						
	Sustainability Objective: Climate change mitigation	Eligibility Criteria:	Alignment to the SDGs:			
	Climate change mitigation Sustainability Benefit: Avoidance of greenhouse gas (GHG) emissions The criteria that SME Bank has set for renewable energy (RE) projects will ensure that eligible assets are compatible with transition to a decarbonised development path or provide a substantial contribution to climate change mitigation based on GHG emission thresholds. Moreover, for hydropower generation projects, eligibility is limited to small projects whose capacity is less than 25MW. Malaysia has set a target to improve the RE capacity in its power mix to 31% by 2025 in its Power Sector Development Plan 2021- 2039. The Government's plan for renewable energy forms part of wider efforts to ensure Malaysia achieves its pledged commitment to reduce its GHG emissions up to 45% in terms of emission intensity of GDP by the year 2030 relative to 2005 levels.	 Acquisition, construction, research, development, operation, renovation and/or maintenance of renewable energy production units; as well as the connection of RE production units to the electricity grid and enhancement of grid transmission capacity. RE sources include: solar energy; hydropower (<25 MWh or power density >10W/m2 or GHG emissions intensity <50gCO2e/kWh); geothermal (with direct emissions of less than 100gCO2e/kWh); and bio energy. Manufacturing, trading and/or import of components of RE technology. 	The use of RE sources will improve national energy security and contribute to climate change mitigation. The utilisation of biogas for energy production reduces the GHG emissions and electricity consumption from the grid. The RE assets will have a positive impact on the achievement of SDG 7, target 7.2 – increase the share of RE in the global energy mix by 2030. Eligible assets are likely to contribute to SDG 13 which calls for urgent measures to combat climate change and its effects. 7 AFFORDABLE AND 13 CLIMATE CLEAN ENERGY			

Clean Transportation

Sustainability Objective: Climate change mitigation

Sustainability Benefit: Avoidance of GHG emissions

SME Bank will finance zero or low carbon transport infrastructure and vehicles, bicycles including electrified public transportation systems and associated equipment for such systems within the Clean Transportation category.

Reducing the negative impact of the transport system on the environment is a key policy objective of Malaysia's National Transport Policy (NTP) 2019-2030. Other relevant national policies and targets to which this eligible category will contribute to include:

- The National Automotive Policy under which there is a target to reduce carbon emissions in line with the ASEAN Fuel Economy Roadmap of 5.3 Lge/100km by 2025
- The National Land Public Transport Masterplan under which a 40% modal share of public transport in urban areas is targeted by 2030; and
- The National Electric Mobility Blueprint 2015-2030 which targets 100,000 electric cars, 100,000 electric motorcycles, 125,000 charging stations, 2000 electric buses by 2030.

Projects included under this category will advance the modal shift to low-emission modes of transport which, in turn, will help promote a sustainable land transportation system for the long-term health and safety of communities.

Eligibility Criteria:

- Acquisition, construction, research, development, maintenance, and/or operation of electric vehicles (EV), bicycles, and associated infrastructure (including EV charging and alternative fuel infrastructure); or
- Acquisition, construction, research, development, maintenance, and/or operation of:
 - Electrified and/or lowemission passenger vehicles; and/or
 - Public/mass transportation systems and/or of equipment for such systems (e.g. Mass Rapid Transport, Bus Rapid Transit).

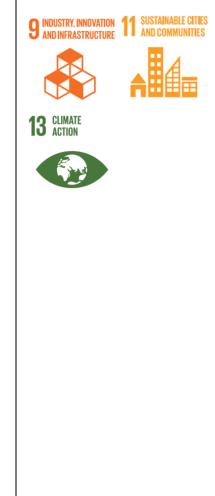
Alignment to the SDGs:

Transportation accounts for 20% of global energy use, and passenger vehicles cause 10% of energy-related CO2 emissions. Cleaner vehicles, bicycles and public transportation systems can play an important role in advancing goals on climate change mitigation and air quality.

Zero or low carbon transport infrastructure projects will have a positive impact on the achievement of: SDG 9, target 9.1 – develop quality, reliable, sustainable and resilient infrastructure.

SDG 11, target 11.2 - By 2030, provide access to safe, affordable, accessible and sustainable transport systems.

Eligible assets are likely to contribute to SDG 13 which calls for urgent measures to combat climate change and its effects.



	Sustainability Objective:	Eligibility Criteria:	Alignment to the SDGs:
	Climate change mitigation		
		 Construction, research, 	Buildings are responsible for over 30%
	Sustainability Benefits:	development, renovation,	of global GHG emissions and are a
	Reduction of energy	maintenance and/or major contributor to climate char	
	consumption and avoidance of	purchase of commercial or	Energy and resource efficient buildings
	GHG emissions	residential buildings that:	contribute substantially to reducing
		 Meet recognised green 	GHG emissions and the environmental
	Under the green building	certification standards	footprint.
	category, SME Bank targets	such as:	
	buildings that have obtained or	 Green Building Index 	This eligible category is likely to make
	will obtain either one of the	(GBI) (Gold and	direct contributions to the following
	top two levels of the	above)	SDGs and/or corresponding targets:
	recognised green certification	 Leadership in Energy 	SDG 7, target 7.3: By 2030, double the
	standards listed in the criteria.	and Environmental	global rate of improvement in energy
	It has also committed to	Design (LEED) (Gold	efficiency.
	allocating the proceeds to	and above)	SDG 11, target 11.3: By 2030, enhance
	refurbish buildings that	 Green Real Estate 	inclusive and sustainable urbanisation
	contribute to improving energy	(GreenRE) (Gold and	and capacity for participatory,
	efficiency or emission	above)	integrated and sustainable human
	reduction by at least 20%. The	 Building Research 	settlement planning and management.
	thresholds applied by the Bank	Establishment	The assets are likely to contribute to
	in its eligibility criteria with respect to certification	Environmental	SDG 13 which calls for urgent measures
	schemes and non-certified	Assessment Method	to combat climate change and its
	refurbished buildings provide	(BREEAM) (Excellent	effects.
	assurance that eligible assets	and above); or	enects.
	belonging to this category will	 Achieve a minimum of 	AFFORDARI F AND
	have recognisable positive	20% improvement in	CLEAN ENERGY AND COMMUNITIES
	environmental impact.	energy use or carbon	
		emission as a result of	
		refurbishment.	
			13 CLIMATE
			IO ACTION
			12
4	Energy Efficiency		
	Sustainability Objective: Climate change mitigation	Eligibility Criteria:	Alignment to the SDGs:
	Chinate change mitigation	• Excilition and any imment that	Using energy more officiently is one of
	Sustainability Benefits:	 Facilities and equipment that reduce energy consumption 	Using energy more efficiently is one of the most effective ways to reduce GHG
	Reduction of energy	or improve the efficiency of	emissions and meet growing energy
	consumption and avoidance of	resources, including:	demand. By lowering overall electricity
	GHG emissions	 Installation of energy 	demand, energy efficiency
		efficient heating,	improvements help reduce the need
	This energy efficiency projects	ventilation, air	for new electricity generation and
	that will be financed under this	conditioning,	transmission infrastructure.
	eligible category will contribute	refrigeration, lighting and	
	to the achievement of national	electrical equipment; and	This eligible category is likely to make
	targets under Malaysia's	 Systems for capture and 	direct contributions to the following
	National Energy Efficiency	recycling of waste heat	SDGs and corresponding targets:
	Action Plan 2016 and Green	such as district heating	SDG 7, target 7.3: By 2030, double the
	Technology Master Plan	and heat recovery.	global rate of improvement in energy
	Malaysia (GTMP) 2017-2030.	and near recovery.	efficiency.
	, , ,		, ,

3 Green Buildings

4 Energy Efficiency (Cont'd)				
<u> </u>	Eligibility Criteria:	Alignment to the SDGs:		
The former targets a savings of 52,233 GWh of electricity from 2016 to 2025, corresponding to an 8% reduction of electricity demand by 2025 across residential, commercial and industrial sectors. The GTMP, meanwhile, targets a 15% improvement in energy efficiency by 2030 compared with 2015.	 Projects that improve efficiency in the delivery of bulk energy services such as energy storage, smart grids, demand response; or Projects that enable monitoring and optimisation of the amount and timing of energy consumption such as smart meters, load control systems, sensors or building information systems. 	SDG 9, target 9.4: By 2030, upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes. 7 AFFORDABLE AND CLEAN ENERGY 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE		
5 Sustainable Water and Wastewa	ter Management			
Sustainability Objective:	Eligibility Criteria:	Alignment to the SDGs:		
Pollution prevention and control Sustainability Benefits: Water conservation Flood mitigation Alleviation of pollution This eligible category provides for the allocation of Sustainability Sukuk proceeds to water and wastewater management projects. It also lends support to initiatives by the Government to promote reclaimed water use by the Government as set out in the GTMP and the national target to recycle 100% of sludge by 2030.	 Acquisition, construction, research, development, operation, renovation and/or maintenance of facilities, systems or equipment used for sustainable water and wastewater management, including: Collection, treatment, recycling and reuse of water and wastewater; Flood prevention, flood defense or storm water management; Improvement to water infrastructure that increases water efficiency (e.g. water saving systems, technologies and water metering); and Wastewater treatment infrastructure with the objective of reducing pollutant discharge load or improving plant efficiency. 	Water has a critical role in transitioning to the circular economy. A circular economy or resource recovery approach to water and wastewater management can alleviate stress on primary water resources which are under pressure from the continuing population growth and urbanisation. A circular economy approach to wastewater management can also contribute to climate action. Sustainable waste and wastewater management are key SDG 6 targets as highlighted below: SDG 6, target 6.3: By 2030, improve water quality by reducing pollution, eliminating dumping and minimising release of hazardous chemicals and materials, halving the proportion of untreated wastewater and substantially increasing recycling and safe reuse. SDG 6, target 6.4: By 2030, substantially increase water-use efficiency across all sectors and ensure sustainable withdrawals and supply of freshwater to address water scarcity. 6 CLEAN WATER AND SANITATION		

6			
T	Sustainability Objective:	Eligibility Criteria:	Alignment to the SDGs:
	Pollution prevention and	 Acquisition, construction, 	
	control	development, operation,	Waste management has significant
		renovation and/or	potential as a contributor to climate
	Sustainability Benefits:	maintenance of facilities,	change. An estimated 10% to 15%
	Environmentally sound waste	systems or equipment used	reduction in life cycle GHG emissions
	management	for:	can be achieved through landfill
	5	 Treatment, collection, 	mitigation and diversion, energy from
	Under this eligible category,	reuse, reduction of	waste, recycling, and other types of
	Sustainability Sukuk proceeds	emissions, reduction of	improved solid waste management.
	will be used to finance	waste and hazardous	Sustainable waste management also
	sustainable waste		helps to conserve natural and non-
		waste or treatment of	renewable resource and contributes to
	management projects. It	contaminated soil; or	
	supports national priorities to	 Diverting waste and/or 	a more resource-efficient economy.
	promote waste prevention and	hazardous waste away	
	steer waste management	from landfill	This eligible category is likely to mak
	towards greater resource	 Research into and 	direct contributions to the followin
	efficiency as outlined in the	development of processes,	SDGs and corresponding targets:
	GTMP.	infrastructure, technology	SDG 11, target 11.6: By 2030, reduce th
		and facilities that promote	adverse per capita environmenta
		efficient resource use and	impact of cities, including by payin
		management (e.g. circular	special attention to air quality an
		economy, water and energy	municipal and other wast
		conservation).	management.
		conservation).	SDG 12, target 12.5: By 2030
			substantially reduce waste generatio
			, ,
			recycling and reuse.
			11 AND COMMUNITIES 12 CONSUMPTION AND PRODUCTION
1	Affordable Bacic Infrastructure	SOCIAL PROJECTS	
L	Affordable Basic Infrastructure		Alignment to the SDGs:
1	Sustainability Objective:	SOCIAL PROJECTS Eligibility Criteria:	Alignment to the SDGs:
L		Eligibility Criteria:	
L	Sustainability Objective: Affordable basic infrastructure	Eligibility Criteria:Construction, development,	This eligible category is likely to make
L	Sustainability Objective: Affordable basic infrastructure Sustainability Benefits:	 Eligibility Criteria: Construction, development, operation, renovation and/or 	This eligible category is likely to make direct contributions to the following
L	Sustainability Objective: Affordable basic infrastructure Sustainability Benefits: Improved access to affordable	 Eligibility Criteria: Construction, development, operation, renovation and/or maintenance of facilities, 	This eligible category is likely to make direct contributions to the following SDGs and corresponding targets:
L	Sustainability Objective: Affordable basic infrastructure Sustainability Benefits: Improved access to affordable transport, energy and internet	 Eligibility Criteria: Construction, development, operation, renovation and/or maintenance of facilities, services, systems or 	This eligible category is likely to make direct contributions to the following SDGs and corresponding targets: SDG 7, target 7.1: By 2030, ensure
	Sustainability Objective: Affordable basic infrastructure Sustainability Benefits: Improved access to affordable	 Eligibility Criteria: Construction, development, operation, renovation and/or maintenance of facilities, 	This eligible category is likely to make direct contributions to the following SDGs and corresponding targets: SDG 7, target 7.1: By 2030, ensure universal access to affordable, reliable
	Sustainability Objective: Affordable basic infrastructure Sustainability Benefits: Improved access to affordable transport, energy and internet	 Eligibility Criteria: Construction, development, operation, renovation and/or maintenance of facilities, services, systems or 	This eligible category is likely to make direct contributions to the following SDGs and corresponding targets: SDG 7, target 7.1: By 2030, ensure universal access to affordable, reliable and modern energy services.
L	Sustainability Objective: Affordable basic infrastructure Sustainability Benefits: Improved access to affordable transport, energy and internet	 Eligibility Criteria: Construction, development, operation, renovation and/or maintenance of facilities, services, systems or equipment used for: 	This eligible category is likely to make direct contributions to the following SDGs and corresponding targets: SDG 7, target 7.1: By 2030, ensure universal access to affordable, reliable and modern energy services.
	Sustainability Objective: Affordable basic infrastructure Sustainability Benefits: Improved access to affordable transport, energy and internet coverage.	 Eligibility Criteria: Construction, development, operation, renovation and/or maintenance of facilities, services, systems or equipment used for: Development of 	This eligible category is likely to make direct contributions to the following SDGs and corresponding targets: SDG 7, target 7.1: By 2030, ensure universal access to affordable, reliable and modern energy services.
	Sustainability Objective: Affordable basic infrastructure Sustainability Benefits: Improved access to affordable transport, energy and internet coverage. This eligible category will	 Eligibility Criteria: Construction, development, operation, renovation and/or maintenance of facilities, services, systems or equipment used for: Development of infrastructure to provide 	This eligible category is likely to make direct contributions to the following SDGs and corresponding targets: SDG 7, target 7.1: By 2030, ensure universal access to affordable, reliable and modern energy services. SDG 9, target 9.c: Significantly increase access to information and
	Sustainability Objective: Affordable basic infrastructure Sustainability Benefits: Improved access to affordable transport, energy and internet coverage. This eligible category will contribute to advances	 Eligibility Criteria: Construction, development, operation, renovation and/or maintenance of facilities, services, systems or equipment used for: Development of infrastructure to provide communities that have limited access or no 	This eligible category is likely to make direct contributions to the following SDGs and corresponding targets: SDG 7, target 7.1: By 2030, ensure universal access to affordable, reliable and modern energy services. SDG 9, target 9.c: Significantly increase access to information and
	Sustainability Objective: Affordable basic infrastructure Sustainability Benefits: Improved access to affordable transport, energy and internet coverage. This eligible category will contribute to advances towards universal access to essential services such as	 Eligibility Criteria: Construction, development, operation, renovation and/or maintenance of facilities, services, systems or equipment used for: Development of infrastructure to provide communities that have limited access or no access to services such as 	This eligible category is likely to make direct contributions to the following SDGs and corresponding targets: SDG 7, target 7.1: By 2030, ensure universal access to affordable, reliable and modern energy services. SDG 9, target 9.c: Significantly increase access to information and communications technology and strive to provide universal and affordable
	Sustainability Objective: Affordable basic infrastructure Sustainability Benefits: Improved access to affordable transport, energy and internet coverage. This eligible category will contribute to advances towards universal access to essential services such as transport, energy and internet,	 Eligibility Criteria: Construction, development, operation, renovation and/or maintenance of facilities, services, systems or equipment used for: Development of infrastructure to provide communities that have limited access or no access to services such as transport and energy; or 	This eligible category is likely to make direct contributions to the following SDGs and corresponding targets: SDG 7, target 7.1: By 2030, ensure universal access to affordable, reliable and modern energy services. SDG 9, target 9.c: Significantly increase access to information and communications technology and strive to provide universal and affordable access to the internet.
	Sustainability Objective: Affordable basic infrastructure Sustainability Benefits: Improved access to affordable transport, energy and internet coverage. This eligible category will contribute to advances towards universal access to essential services such as transport, energy and internet, which are fundamental to	 Eligibility Criteria: Construction, development, operation, renovation and/or maintenance of facilities, services, systems or equipment used for: Development of infrastructure to provide communities that have limited access or no access to services such as transport and energy; or Development of 	This eligible category is likely to make direct contributions to the following SDGs and corresponding targets: SDG 7, target 7.1: By 2030, ensure universal access to affordable, reliable and modern energy services. SDG 9, target 9.c: Significantly increase access to information and communications technology and strive to provide universal and affordable access to the internet. (<i>Although SDG 9.c. was set as a 2020 targe</i>
	Sustainability Objective: Affordable basic infrastructure Sustainability Benefits: Improved access to affordable transport, energy and internet coverage. This eligible category will contribute to advances towards universal access to essential services such as transport, energy and internet, which are fundamental to equitable social development.	 Eligibility Criteria: Construction, development, operation, renovation and/or maintenance of facilities, services, systems or equipment used for: Development of infrastructure to provide communities that have limited access or no access to services such as transport and energy; or Development of infrastructure to provide 	This eligible category is likely to make direct contributions to the following SDGs and corresponding targets: SDG 7, target 7.1: By 2030, ensure universal access to affordable, reliable and modern energy services. SDG 9, target 9.c: Significantly increase access to information and communications technology and strive to provide universal and affordable access to the internet.
	Sustainability Objective: Affordable basic infrastructure Sustainability Benefits: Improved access to affordable transport, energy and internet coverage. This eligible category will contribute to advances towards universal access to essential services such as transport, energy and internet, which are fundamental to equitable social development. It also coherently aligns with	 Eligibility Criteria: Construction, development, operation, renovation and/or maintenance of facilities, services, systems or equipment used for: Development of infrastructure to provide communities that have limited access or no access to services such as transport and energy; or Development of infrastructure to provide communities with 	This eligible category is likely to make direct contributions to the following SDGs and corresponding targets: SDG 7, target 7.1: By 2030, ensure universal access to affordable, reliable and modern energy services. SDG 9, target 9.c: Significantly increase access to information and communications technology and strive to provide universal and affordable access to the internet. (<i>Although SDG 9.c. was set as a 2020 targe</i> <i>COVID-19 has increased the importance of</i>
L	Sustainability Objective: Affordable basic infrastructure Sustainability Benefits: Improved access to affordable transport, energy and internet coverage. This eligible category will contribute to advances towards universal access to essential services such as transport, energy and internet, which are fundamental to equitable social development. It also coherently aligns with the national sustainable	 Eligibility Criteria: Construction, development, operation, renovation and/or maintenance of facilities, services, systems or equipment used for: Development of infrastructure to provide communities that have limited access or no access to services such as transport and energy; or Development of infrastructure to provide communities with increased affordable 	This eligible category is likely to make direct contributions to the following SDGs and corresponding targets: SDG 7, target 7.1: By 2030, ensure universal access to affordable, reliable and modern energy services. SDG 9, target 9.c: Significantly increase access to information and communications technology and strive to provide universal and affordable access to the internet. (<i>Although SDG 9.c. was set as a 2020 targe</i> <i>COVID-19 has increased the importance of</i> <i>having access to affordable internet</i> <i>coverage.</i>)
L	Sustainability Objective: Affordable basic infrastructure Sustainability Benefits: Improved access to affordable transport, energy and internet coverage. This eligible category will contribute to advances towards universal access to essential services such as transport, energy and internet, which are fundamental to equitable social development. It also coherently aligns with the national sustainable development strategy and	 Eligibility Criteria: Construction, development, operation, renovation and/or maintenance of facilities, services, systems or equipment used for: Development of infrastructure to provide communities that have limited access or no access to services such as transport and energy; or Development of infrastructure to provide communities with increased affordable internet coverage and 	This eligible category is likely to make direct contributions to the following SDGs and corresponding targets: SDG 7, target 7.1: By 2030, ensure universal access to affordable, reliable and modern energy services. SDG 9, target 9.c: Significantly increase access to information and communications technology and strive to provide universal and affordable access to the internet. (<i>Although SDG 9.c. was set as a 2020 target</i> <i>COVID-19 has increased the importance of</i> <i>having access to affordable internet</i> <i>coverage.</i>) SDG 11, target 11.2: By 2030, provide
L	Sustainability Objective: Affordable basic infrastructure Sustainability Benefits: Improved access to affordable transport, energy and internet coverage. This eligible category will contribute to advances towards universal access to essential services such as transport, energy and internet, which are fundamental to equitable social development. It also coherently aligns with the national sustainable development strategy and priorities. For instance,	 Eligibility Criteria: Construction, development, operation, renovation and/or maintenance of facilities, services, systems or equipment used for: Development of infrastructure to provide communities that have limited access or no access to services such as transport and energy; or Development of infrastructure to provide communities with increased affordable 	This eligible category is likely to make direct contributions to the following SDGs and corresponding targets: SDG 7, target 7.1: By 2030, ensure universal access to affordable, reliable and modern energy services. SDG 9, target 9.c: Significantly increase access to information and communications technology and strive to provide universal and affordable access to the internet. (<i>Although SDG 9.c. was set as a 2020 targe COVID-19 has increased the importance of having access to affordable internet coverage.</i>) SDG 11, target 11.2: By 2030, provide access to safe, affordable, accessible
L	Sustainability Objective: Affordable basic infrastructure Sustainability Benefits: Improved access to affordable transport, energy and internet coverage. This eligible category will contribute to advances towards universal access to essential services such as transport, energy and internet, which are fundamental to equitable social development. It also coherently aligns with the national sustainable development strategy and	 Eligibility Criteria: Construction, development, operation, renovation and/or maintenance of facilities, services, systems or equipment used for: Development of infrastructure to provide communities that have limited access or no access to services such as transport and energy; or Development of infrastructure to provide communities with increased affordable internet coverage and 	This eligible category is likely to make direct contributions to the following SDGs and corresponding targets: SDG 7, target 7.1: By 2030, ensure universal access to affordable, reliable and modern energy services. SDG 9, target 9.c: Significantly increase access to information and communications technology and strive to provide universal and affordable access to the internet. (<i>Although SDG 9.c. was set as a 2020 target</i> <i>COVID-19 has increased the importance of</i> <i>having access to affordable internet</i> <i>coverage.</i>) SDG 11, target 11.2: By 2030, provide access to safe, affordable, accessible and sustainable transport systems for
L	Sustainability Objective: Affordable basic infrastructure Sustainability Benefits: Improved access to affordable transport, energy and internet coverage. This eligible category will contribute to advances towards universal access to essential services such as transport, energy and internet, which are fundamental to equitable social development. It also coherently aligns with the national sustainable development strategy and priorities. For instance,	 Eligibility Criteria: Construction, development, operation, renovation and/or maintenance of facilities, services, systems or equipment used for: Development of infrastructure to provide communities that have limited access or no access to services such as transport and energy; or Development of infrastructure to provide communities with increased affordable internet coverage and speed and/or mobile 	This eligible category is likely to make direct contributions to the following SDGs and corresponding targets: SDG 7, target 7.1: By 2030, ensure universal access to affordable, reliable and modern energy services. SDG 9, target 9.c: Significantly increase access to information and communications technology and strive to provide universal and affordable access to the internet. (<i>Although SDG 9.c. was set as a 2020 target COVID-19 has increased the importance of having access to affordable internet coverage.</i>) SDG 11, target 11.2: By 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by
L	Sustainability Objective: Affordable basic infrastructure Sustainability Benefits: Improved access to affordable transport, energy and internet coverage. This eligible category will contribute to advances towards universal access to essential services such as transport, energy and internet, which are fundamental to equitable social development. It also coherently aligns with the national sustainable development strategy and priorities. For instance, facilitating wide availability of	 Eligibility Criteria: Construction, development, operation, renovation and/or maintenance of facilities, services, systems or equipment used for: Development of infrastructure to provide communities that have limited access or no access to services such as transport and energy; or Development of infrastructure to provide communities with increased affordable internet coverage and speed and/or mobile 	This eligible category is likely to make direct contributions to the following SDGs and corresponding targets: SDG 7, target 7.1: By 2030, ensure universal access to affordable, reliable and modern energy services. SDG 9, target 9.c: Significantly increase access to information and communications technology and strive to provide universal and affordable access to the internet. (<i>Although SDG 9.c. was set as a 2020 target</i> <i>COVID-19 has increased the importance of</i> <i>having access to affordable internet</i> <i>coverage.</i>) SDG 11, target 11.2: By 2030, provide access to safe, affordable, accessible and sustainable transport systems for

health technologies aimed atimprovemepromoting health equity. Theand private	evelopment, vation and/or facilities, ns or public, for non-profit is accessible ns, including: ructure for or nts to public
communities, is a key policy objective of Malaysia's National Fiberisation and Connectivity Plan (NFCP) 2019- 2023.2Access to Essential Services: Healthcare2Access to Essential Services: HealthcareSustainability Objective: Access to essential healthcare servicesEligibility Criteria: operation, reno maintenance of services, system equipment for y subsidised and/ health certhat infrastructure, facilities, services, education and digital health technologies aimed at promoting health equity. The links between health and- New infrast improveme and private clinics, heal	CLEAN ENERGY Image: CLEAN ENERGY CLEAN ENERGY Image: CLEAN ENERGY Image: CLEAN ENERGY Image: CLEAN ENERGY
Sustainability Objective: Access to essential healthcare servicesEligibility Criteria: Construction, d operation, reno maintenance of services, system equipment for p subports investments in infrastructure, facilities, services, education and digital health technologies aimed at promoting health equity. The links between health andEligibility Criteria: construction, d operation, reno maintenance of services, system equipment for p subsidised and/ healthcare that improveme and private clinics, heal	evelopment, vation and/or facilities, ns or public, for non-profit is accessible ns, including: ructure for or nts to public
Sustainability Objective: Access to essential healthcare servicesEligibility Criteria: (a construction, d operation, renormaintenance of services, system equipment for p subsidised and/ health care that to all population - New infrast improveme and private clinics, healSustainability Benefits: Promoting health equity• Construction, d operation, renormaintenance of services, system equipment for p subsidised and/ healthcare that to all population - New infrast improveme and private clinics, heal	evelopment, vation and/or facilities, ns or public, for non-profit is accessible ns, including: ructure for or nts to public
Access to essential healthcare servicesConstruction, d operation, reno maintenance of services, system equipment for y subsidised and/ health centre, facilities, services, education and digital health technologies aimed at promoting health equity. The links between health andConstruction, d operation, reno maintenance of services, system equipment for y subsidised and/ healthcare that to all population – New infrast improveme and private clinics, heal	evelopment, vation and/or facilities, ns or public, for non-profit is accessible ns, including: ructure for or nts to public
Sustainability Benefits:operation, renormationPromoting health equityservices, system equipment for p subsidised and/ healthcare that to all populationThe eligibility category supports investments in infrastructure, facilities, services, education and digital health technologies aimed at promoting health equity. The links between health andoperation, renormation maintenance of services, system equipment for p subsidised and/ healthcare that to all population - New infrast and private clinics, heal	wation and/orprovides affordable access to health care for all residents. In 2020,is orMalaysia's universal health coverage (UHC) score further improved to 73, up from 70 in 2018. As demands and expectations for health care and health outcomes continue to rise in line with income levels against the backdrop of steadily rising health care expenditure,
potential socioeconomic diagnostic e impacts of this intended use of – Aged care f proceeds category particularly services; – impactful. – Mental hea and services; – Public healt services, inc emergency	thcare centre; hedical and equipment; acilities andsector to play alongside the public health system in providing equitable access to more responsive and higher quality healthcare.Ith facilities s; chcare cluding response and trol services; medical aining; thcare; and isabilityThis eligible category is likely to contribute to SDG 3 and its following targets: 3.4: By 2030, reduce by one third premature mortality from non- communicable diseases through prevention and treatment and promote mental health and well-being. 3.8: By 2030, achieve universal health coverage, including financial risk protection, access to quality essential health-care services and access to safe, offective quality and affordable

Access to Essential Services: Educ	cation and Vocational Training	
Sustainability Objective:	Eligibility Criteria:	Alignment to the SDGs:
Access to education		
	 Construction, development, operation, renovation and/or maintenance of facilities, services, systems or equipment for public and government-subsidised education that is broadly accessible to all populations, including: New infrastructure for or improvements to universities, colleges, schools and early learning services; Activities that target inclusion of excluded and/or marginalised populations in the education system; and Digital learning. 	Educational attainment is linked to a wide range of positive outcomes including longer life expectancy, higher employment rates and higher earnings A well-educated labour pool drives economic productivity in addition to improving the resilience of businesses and the national economy. This eligible category is likely to contribute to SDG 4 and its following targets: 4.1: By 2030, ensure that all girls and boys complete free, equitable and quality primary and secondary education leading to relevant and effective learning outcomes. 4.2: By 2030, ensure that all girls and boys have access to quality early childhood development, care and pre- primary education so that they are ready for primary education. 4.3: By 2030, ensure equal access for all women and men to affordable quality technical, vocational and tertiary education, including university. 4 QUALITY EDUCATION
Socioeconomic Advancement and Sustainability Objective:	d Empowerment Eligibility Criteria:	Alignment to SDGs:
Socioeconomic Advancement		
and Empowerment Sustainability Benefits: Financial inclusion of start-ups and micro-, small and medium- sized enterprises (MSMEs) Economic empowerment for women-owned/led SMEs Promotion of national economic growth Promotion of decent work, entrepreneurship and economic inclusion Reduced gender inequality This use of proceeds category allows the Bank to directly address inclusion gaps affecting targeted groups such as women and disadvantaged communities in three areas: access to finance, access to	 Financing for start-ups and MSMEs. To be eligible for the use of proceeds, the assets should exhibit one (1) or more of the following characteristics: Operate in sectors/activities that contribute to other UN SDGs in the Framework; Owned or operated by marginalised, unserved or underserved groups; and/or Benefit low-income populations or areas in terms of employment; and/or expanded access to basic needs such as food, healthcare and education. 	The predominant form of enterprise in Malaysia, MSMEs play a major role in the domestic economy and job creation. MSMEs have the potential to provide decent jobs and economic empowerment through self- employment and/or to categories of employees considered vulnerable such as women, youth and the aged. This eligible category is likely to make direct contributions to the following SDGs and corresponding targets: SDG 5, Target 5.5: Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic, and public life.

4	Socioeconomic Advancement and Empowerment (Cont'd)				
<u> </u>		Eligibility Criteria:	Alignment to SDGs:		
	skills and employment, and access to services. This eligible category has the potential to contribute significantly to financial inclusion (of start-ups and MSMEs) and the promotion of social equity while enhancing gender equality and women empowerment. It complements national strategies on economic inclusion and allows a strong focus to be maintained with respect to additionality and development impact. Under the National Entrepreneurship Policy 2030, the Government has set a target for SMEs to increase their contribution to GDP to 50% by 2030. The Framework defines low- income populations as the bottom 40% of households with a monthly income of RM4,850 and below (B40). Importantly, it provides for the continued alignment of its definition of MSMEs and B40 with that of SME Corporation Malaysia and Department of Statistics, respectively.		Alignment to SDGs: SDG 8 and its following targets: 8.3: Promote development-oriented policies that support productive activities, decent job creation, entrepreneurship, creativity and innovation, and encourage the formalisation and growth of MSMEs, including through access to financial services. 8.5: By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value. 8.10: Strengthen the capacity of domestic financial institutions to encourage and expand access to banking, insurance and financial services for all. SDG 10 and its targets: 10.1: By 2030, progressively achieve and sustain income growth of the bottom 40% of the population at a rate higher than the national average. 10.2: By 2030, empower and promote the social, economic and political inclusion of all irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status. 5 ENDER 6 ECONOMIC GROWTH 10 REDUCED 10 REDUCED 10 REDUCED		
L					
5	Pandemic Outbreak Socioeconor				
	Sustainability Objective: Pandemic economic relief	Eligibility Criteria:	Alignment to the SDGs:		
	Sustainability Benefits: Prevent and/or alleviate socio- economic disruptions caused by the pandemic such as unemployment in the short run or as part of a longer-term economic recovery.	 Financing or other financial services to support SMEs who have been assessed by SME Bank as facing financial stress as a result of the pandemic outbreak; or Financing or other financial services to support initiatives designed to prevent or 	Supporting SMEs to address immediate threats to their survival posed by the impact of the COVID-19 pandemic on business is crucial to promoting sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all (SDG 8).		

5	Pandemic Outbreak Socioeconomic Impact Mitigation (Cont'd)				
	This eligible use of proceeds category will help to protect earlier pre-pandemic gains made in advancing economic empowerment and inclusion to the extent that sustainable recovery and long-termism in the economy are supported.	alleviate unemployment.	SDG 8, target 8.3: Promote development-oriented policies that support productive activities, decent job creation, entrepreneurship, creativity and innovation, and encourage the formalisation and growth of MSMEs, including through access to financial services. Supporting economically and financially viable SMEs affected by the economic fallout from the pandemic is also key to advancing social sustainability. 8 DECENT WORK AND ECONOMIC GROWTH		

Overall Impact Significance

The 11 eligible categories identified in the Framework align with the green and social project categories recognised by the ASEAN GBS, ASEAN SBS and the SRI Sukuk Framework (also the ICMA's GBP and SBP). Each eligible category maps to one or more of the SDGs such as "Good Health and Well-Being" (SDG 3), "Quality Education" (SDG 4), "Gender Equality" (SDG 5), "Clean Water and Sanitation" (SDG 6), "Affordable and Clean Energy" (SDG 7), "Decent Work and Economic Growth" (SDG 8), "Industry, Innovation and Infrastructure" (SDG 9), "Reduced Inequalities" (SDG 10), "Sustainable Cities and Communities" (SDG 11), "Responsible Consumption and Production" (SDG 12) and "Climate Action" (SDG 13).

SME Bank's green eligible categories target the six initial key sectors identified by the GTMP as having high potential to facilitate green growth in Malaysia: energy, manufacturing, transport, building, waste and water. Likewise, the social eligible categories are also intended to contribute to meaningful economic and social impacts and benefits for local and national communities. They have the potential to create decent work, improve gender equity, provide economic opportunities to unserved and underserved social groups and address in part the negative socioeconomic impacts of the COVID-19 pandemic.

Furthermore, as the country's predominant form of enterprise, SMEs play an important role in delivering more inclusive growth and adapting to the technological transition. Given the above, MARC is of the opinion that the eligible assets funded by the Sustainability Sukuk proceeds will enable SMEs to enhance their contributions to inclusive growth in diverse economic and social contexts.

Overall, the anticipated impact of the use of proceeds is assessed to be very significant, considering their potential to contribute to additionality and advance transformative sustainable development. Finally, the expected sustainability benefits of the use of proceeds are highly coherent with SME Bank's sustainability approach, the SDGs, and national sustainable development priorities.

Very Significant	This level of impact significance is assigned where underlying projects are expected to generate very visible positive ground level impact. Projects at this level support the realisation of long-term integrated visions of sustainable development that are consistent with global sustainability goals, as well as national sustainable development goals and priorities.
Significant	This level of impact significance is assigned where underlying projects are expected to generate a visible positive ground level impact. Projects at this level have the potential to facilitate adjustments towards a more sustainable development trajectory and to meaningfully advance national level sustainable development goals.
Fairly Significant	This level of impact significance is assigned where underlying projects are expected to generate a ground level impact which, although at a lower magnitude than that expected for higher assessment levels, is still considered noteworthy.
Marginal	This level of impact significance is assigned where underlying projects are expected to generate a positive but limited ground level impact.
Not Significant	This level of impact significance is assigned where underlying projects are expected to have negligible ground level impact.

02 ALIGNMENT WITH THE ASEAN SUS, ASEAN GBS, ASEAN SBS AND THE SRI SUKUK FRAMEWORK

A summary of the findings of our review is given below. The detailed review is attached in this assessment's appendix.



The proceeds of the Sustainability Sukuk will be allocated to finance and/or refinance new or existing eligible assets from green and social project categories recognised by the ASEAN GBS and ASEAN SBS (in turn, the ICMA's GBP and SBP). Eligible assets to be financed through the Sustainability Sukuk are to be originated in line with the criteria defined in the Framework for the following 11 use-of-proceeds categories:

- Principle One: Utilisation of Proceeds
- Renewable energy;
- Clean transportation;
- Green buildings;
- Energy efficiency;
- Sustainable water and wastewater management;
- Waste and pollution control;
- Affordable basic infrastructure;
- Access to essential services;
- Employment generation;
- Socioeconomic advancement and empowerment; and
- Pandemic outbreak socioeconomic impact mitigation.

The pandemic outbreak socioeconomic impact mitigation category is specifically aimed at mitigating the socioeconomic impact of the COVID-19 health crisis.

The Framework considers general financings as eligible assets/projects where a minimum 80% of the financing recipient's revenue is derived from sources that meet the eligibility criteria set out in the Framework. Clear exclusion criteria have also been defined by the Bank. The eligible use-of-proceeds categories and associated expected sustainability benefits are in line with SME Bank's sustainability approach and its focus SDGs. SME Bank may include additional green and/or social eligible categories from time to time which shall in all instances be aligned with the SRI Sukuk Framework, the ASEAN GBS, ASEAN SBS and the ICMA's GBP and SBP. The Bank's Board of Directors has the ultimate responsibility for reviewing and approving the Framework and any subsequent changes to it.

The eligible categories have been mapped against directly supported SDGs in the Framework. A register of eligible assets will be maintained by SME Bank that will be periodically reviewed to verify that all assets in the register continue to meet the criteria under the Framework. SME Bank has committed to disclose in its Sustainability Sukuk Report the allocation of proceeds to each eligible category in aggregate. In MARC's opinion, the defined eligible use-of-proceeds categories meet the criteria for use of proceeds as set forth in the ASEAN GBS and ASEAN SBS, and the SRI Sukuk Framework. MARC considers the inclusion of emissions intensity and energy efficiency threshold requirements in the green use of proceeds eligibility criteria as important to ensuring that the green assets financed or refinanced by the Bank deliver significant positive environmental benefits in terms of climate change mitigation as intended.



Principle Two: Process for Project Evaluation and Selection

The process for the project evaluation and selection is clearly defined and transparent, with sufficiently detailed selection and exclusion criteria. Eligible asset screening, selection and approval are conducted in accordance with existing processes for the evaluation of environmental and social risks, and credit approval. SME Bank's Business Division will perform the initial selection and evaluation of eligible assets based on the eligibility criteria within the 'Use of Proceeds' section of the Framework. Environmental and social due diligence will be conducted for eligible assets as part of the Bank's credit underwriting process. Prior to selection for the eligible asset pool, all eligible assets will be reviewed and approved by approving authorities within their defined approval authority limits.

A dedicated SSWC is entrusted with the responsibility to ensure that the eligible asset pool conforms to the eligibility criteria in the Framework. Any asset that no longer meets the eligibility criteria will be removed and replaced. The SSWC comprises senior management from the Group Risk Division, Group Finance Management Division and Group Compliance Division.

The SSWC will assume the responsibility for monitoring the eligible assets portfolio. An eligible asset that ceases to meet the eligibility criteria can be substituted with an asset that is evaluated and selected in accordance with the said procedures. The SSWC reports to the Compliance and Risk Management Committee (CRMC) which has the responsibility to approve any addition to or removal from the eligible asset pool and endorse the eligible assets register. The Framework identifies excluded activities which cannot be financed by the Sustainability Sukuk proceeds.

The net proceeds will be managed on a portfolio basis in accordance with the Framework. SME Bank will track the allocation of the proceeds and the eligible asset portfolio via its internal reporting system. Pending full allocation of sukuk proceeds towards eligible assets, SME Bank will hold the balance of the net proceeds in cash, cash equivalents and/or invest in other liquid marketable instruments in accordance with its liquidity management policy.

If an eligible asset ceases to meet the eligibility criteria and is removed from the eligible asset pool, SME Bank commits to reallocate as soon as practicable the equivalent amount of proceeds to other eligible assets. SME Bank will continuously monitor the allocation to eligible assets to ensure that the aggregate value of the eligible asset portfolio matches or exceeds the balance of net proceeds of outstanding Sustainability Sukuk.



Principle Three: Management of Proceeds



Principle Four: Reporting SME Bank will make available its Sustainability Sukuk Report on its website, and on a timely basis as warranted by material developments. The report will provide information in respect of:

- Net proceeds raised from each Sustainability Sukuk issuance;
- Aggregate amounts of proceeds allocated to each eligible project category;
- The balance of unallocated proceeds at the end of the reporting period and where this is placed or invested pending utilisation; and
- The removal or substitution of the eligible assets.

SME Bank intends to provide, where possible, examples of the eligible assets financed or refinanced by the Sustainability Sukuk as well as relevant impact metrics by eligible category. Relevant impact indicators for all the 11 use of proceeds categories have been included in the Framework under Section 5.2 Impact Reporting.

In MARC's opinion, the reporting commitments are aligned with the requirements of the ASEAN GBS, ASEAN SBS, the SRI Sukuk Framework and market practice.

Overall Assessment

	Clarity of Issuance Process and Disclosure	Total Score	
\square	High	10- 12 points	
	Good	7 -9 points	
	Satisfactory	4 – 6 points	
	Low	Below 4 points	

Equal weighting is given to each of the four principles in arriving at the total score which is then expressed on the above four-point descriptive scale which ranges from High to Low.

Assessment Grade	High	Good	Satisfactory	Low
	3	2	1	0

03 ANALYSIS OF SUSTAINABILITY PERFORMANCE

In 2019, SME Bank embarked on a two-year digital transformation programme to provide services beyond financing by fostering SME participation in the digital economy and providing value-added solutions. SME Bank is spearheading the National SME Digital Platform, under which it has launched two initiatives to date through wholly-owned subsidiary, Centre for Entrepreneur Development and Research (CEDAR). Through these initiatives, SME Bank is working to advance the financial inclusion and economic development of the MSME community in keeping with its mandate from the Government to nurture and develop the nation's SMEs and to facilitate the financial inclusion of the unserved and underserved SMEs.

Given the macroeconomic impact of the COVID-19 crisis on domestic SMEs, the Bank's role in strengthening social safety nets, supporting businesses, and facilitating access to finance is growing in importance. As the economy enters a recovery phase, facilitating new financing for growth and enhancing SMEs capacity and growth potential through advisory services and financial education will be crucial in promoting the overall development of the SME sector. The beyond-banking ecosystem platform and data-driven approach taken by SME Bank offers a collaborative, coordinated and cost-effective approach to tackling currently underpenetrated SME segments and unmet capacity building needs of SMEs. The development of an inclusive and competitive SME sector as envisioned in the National Entrepreneurship Policy 2030 is imperative for a fair and equitable distribution of economic development by 2030 as encapsulated in Malaysia's Shared Prosperity Vision 2030.

The Bank has defined the key elements of its sustainability approach as responsible banking, responsible business practices and social impact creation through enabling SMEs. Its sustainability approach aligns with the re-orientation of its Islamic finance business model towards value-based intermediation (VBI) and its focus on generating positive and sustainable impact to the economy, community, and environment. For instance, entrepreneurship facilitation and community empowerment, underpinning thrusts of VBI, are integral parts of the Bank's approach to nurturing and developing SMEs. Where sustainability governance is concerned, the Board of Directors of SME Bank has committed itself to promote sustainability through appropriate environmental, social and governance (ESG) considerations in the Bank's business strategies. Overall, MARC views the Framework as coherent with the Bank's strategic sustainability priorities and commitments to support Malaysia's sustainable development.

As a DFI that supports sustainable development, additionality and development impact are at the core of SME Bank's programmes and activities. SME Bank measures its development impact based on the performance measurement framework (PMF) developed by BNM in collaboration with the World Bank and DFIs. The PMF facilitates proper attribution of impact to the Bank's programmes and activities and corresponding accountability. This provides a somewhat robust assurance of SME Bank's capacity to integrate development impact in its financing portfolio. Where managing the environmental and social (E&S) risks of eligible projects is concerned, MARC understands that the evaluation of E&S risks is integrated into the Bank's overall credit and risk management process. Additionally, the Bank has developed exclusion criteria to identify and manage potentially material environmental and social risks associated with its financing activities.

SME Bank's integration of environmental sustainability in its financing portfolio is evidenced by a 70% year-on-year increase in approved financing to the green technology sector to RM372.5 million in 2019. The Bank intends to support SMEs in the clean energy, clean transportation, energy-saving and

emission-reduction, waste and pollution control sectors, as detailed in its Framework for its inaugural Sustainability Sukuk issuance. SME Bank has articulated commitment to manage the environmental impact of its properties and activities, which covers energy and water efficiency improvements, resource saving, and recycling. The Bank monitors its electricity and water consumption to manage its electricity and water use and reduce its impacts to protect the environment. It has also incorporated environmental considerations into its procurement process.

SME Bank employs the standards of the Global Reporting Initiative (GRI) in its sustainability reporting and integrates its financial, social, and environmental performance into one annual report. The overall quality of SME Bank's integrated reporting provides a high level of assurance of the Bank's ability to meet its impact reporting obligations under its Framework.

Sustainability Performance Assessment

Excellent/Highest Assurance	The issuer positions itself as a sustainability leader in its industry, ranking in the "top tiers" of performance across multiple categories of engagement, ranging from supply chain management to environmental performance. Sustainability-related risks and opportunities are integrated with the business strategy. Well-defined sustainability policies and practices are augmented by strong accountability systems which allow for a benchmarking of the issuer's performance against stated objectives and the incorporation of external assurance in its sustainability reporting framework.
Very Good/High	The issuer has integrated risk-based sustainability considerations in its operations and has a robust process for assessing significant sustainability risks exposures to minimise adverse impacts on its business. The focus of the issuer's sustainability performance monitoring and evaluation is on managing risk exposures to minimise downside risk. Globally-recognised best practice reporting frameworks guide the issuer's sustainability reporting.
Good/Medium	The issuer has adopted a CSR-centric sustainability strategy that prioritises stakeholder engagement and goodwill building. Sustainability is a small part of the issuer's business strategy, nonetheless there is evidence to suggest that its sustainability performance has progressed beyond maintaining regulatory compliance. The issuer has implemented general sustainability reporting to investors.
Fair/Basic	The issuer has a policy of regulatory compliance but has yet to incorporate sustainability considerations into its business operations. At this performance level, the goal of sustainability management is to achieve and maintain compliance with health, safety, and environmental requirements mandated by government laws and regulations.
Poor/Weak	The issuer has a record of poor sustainability performance or operates in unsustainable industries.

MARC's assessment of the issuer's sustainability implementation capabilities and performance is expressed on a five-level descriptive scale that runs from "Excellent" to "Poor" which corresponds to five levels of assurance (Highest, High, Medium, Basic and Weak). The assurance level can be interpreted as a measure of MARC's confidence in the issuer's continuing performance of its sustainability obligations in line with marketplace expectations and in compliance with the Framework for the Sustainability Sukuk issuance.

04 RATING SCALE

GRADE

DESCRIPTION

Bonds assessed at this level are judged to offer very significant environmental and/or social sustainability impact based on the projects supported or expected to be supported by the bond issuance. The processes used or to be used for the allocation and administration of proceeds, decision making process of eligible projects and the reporting of performance indicators are consistent with the core principles of the GBP and/or SBP and applicable market guidance or standards and should support high standards of accountability and transparency.



Bonds assessed at this level are judged to offer significant environmental and/or social sustainability impact based on the projects supported or expected to be supported by the bond issuance. The processes used or to be used for the allocation and administration of proceeds, decision making process of eligible projects and the reporting of performance indicators are consistent with the core principles of the GBP and/or SBP and applicable market guidance or standards and should support good standards of accountability and transparency.



Bonds assessed at this level are judged to offer fairly significant environmental and/or social sustainability impact based on the projects supported or expected to be supported by the bond issuance. The processes used or to be used for the allocation and administration of proceeds, decision making process of eligible projects and the reporting of performance indicators are consistent with the core principles of the GBP and/or SBP and applicable market guidance or standards and should support satisfactory standards of accountability and transparency. Minor shortcomings exist in the areas assessed but none of major concern.

MARC

Incorporated in October 1995, MARC is a full-service domestic credit rating institution. MARC's ratings are recognised and accepted in the Malaysian capital markets. MARC is recognised by Bank Negara Malaysia and Securities Commission, respectively, as an External Credit Assessment Institution (ECAI) under Basel II and as a bond rating agency regulated under the Guidelines on the Registration of Credit Rating Agencies issued by the Securities Commission on 30 March 2011. MARC adopts practices and procedures for Domestic Credit Rating Agencies based on the guidance on the Code of Conduct Fundamentals provided by the International Organisation of Securities Commissions (IOSCO) and the Association of Credit Rating Agencies in Asia (ACRAA). MARC has consulted international best practices and the International Capital Market Association's Guidelines for Green, Social and Sustainability Bonds External Reviews in its conduct of external reviews, particularly in relation to the organisation and content of external reviews.

Following a series of outreach and external reviewer capacity-building initiatives jointly undertaken by domestic market regulators and World Bank Group, MARC published for public comment its proposed criteria for rating green, social or sustainability bonds in April 2018. The version that was adopted in July 2018 after public consultation can be accessed on MARC's website at <u>https://www.marc.com.my/images/Rating Methodologies/8/Impact Bond Assessments 20180713</u> .pdf. As explained in the criteria, MARC's analytical framework consists of three components that provide insight to the green, social and sustainability credentials of green, social and sustainability bonds: (1) an assessment of environmental and/or social benefits of the underlying funded project(s); (2) an assessment of compliance with internationally recognised principles and market standards for the evaluation of such bonds; and (3) an evaluation of the issuer's sustainability strategy and performance. Bonds which meet the minimum thresholds in each of the three analytical components will be rated Gold, Silver or Bronze.

For more information, visit <u>www.marc.com.my</u> or contact us at <u>marc@marc.com.my</u>.

Review of Compliance with the ASEAN GBS 2018, ASEAN SBS 2018, ASEAN SUS 2018 and SRI Sukuk Framework 2021

SME Bank Sustainability Sukuk Framework Key Additional Features complied with:

The proceeds allocated for the Project must not be used for ineligible projects specified by the ASEAN GBS (i.e. fossil fuel power generation projects) as well as the ASEAN SBS (i.e. projects which involve activities that pose a negative social impact related to alcohol, gambling, tobacco and weaponry).

Periodic reporting on the allocation of the sukuk proceeds.

The external reviewer's credentials and scope of review conducted to be made publicly accessible from a website designated by the Issuer throughout the tenure of the sukuk.

Criteria	Compliance with criteria	Remarks/Scope of Work Undertaken
Issuer <u>ASEAN GBS/SBS/SUS</u> 3.1 The issuer must be an ASEAN issuer, or the eligible green and/or social project(s) must be in an ASEAN country.	The issuer is an ASEAN issuer.	
<u>SRI Sukuk Framework</u> 7.02 The proceeds (of Sukuk) will be applied exclusively for funding of any activities or transactions relating to the Eligible SRI projects.	The net proceeds of the Sustainability Sukuk issued under the Framework will be allocated only to finance and/or refinance*, in part or in whole, new or existing assets, businesses and/or projects (collectively, "Eligible Assets") that correspond to eligible SRI projects under the SRI Sukuk Framework. The Framework considers general financings as eligible assets/projects where a minimum 80% of the financing recipient's revenue is derived from sources that meet the eligibility criteria set out in the Framework. *Eligible Assets are considered to be "financed" from the net proceeds of Sustainability Sukuk when the relevant Eligible Asset is financed after the Sustainability Sukuk's issuance. Eligible Assets are considered to be "refinanced" from the net proceeds of a Sustainability Sukuk when the relevant Eligible Asset was financed before the Sustainability Sukuk's issuance.	Evaluation of alignment of the Framework with the SRI Sukuk Framework.
7.04 An issuer who wishes to issue an SRI sukuk must establish policies and processes to ensure compliance with the SRI Sukuk Framework as set out in these Guidelines.	The Bank will enhance existing processes where necessary to ensure compliance with the SRI Sukuk Framework.	

Continuous accessibility of information on use of proceeds, process for project evaluation and selection, and management of proceeds to investors throughout the tenure of the sukuk.

Criteria	Compliance with criteria	Remarks/Scope of Work Undertaken
Eligible Projects		
7.07		
 An eligible SRI project refers to a project that seeks to achieve any one or a combination of the following objectives: (a) Preserving and protecting the environment and natural resources; (b) Conserving the use of energy; (c) Promoting the use of renewable energy; (d) Reducing greenhouse gas emission; (e) Addressing or mitigating a specific social issue or seeking to achieve positive social outcomes especially but not exclusively for a target population; or (f) Improving the quality of life of the society. 	Eligible projects as defined by the Framework will achieve any one or a combination of objectives (a) through (f) set out in paragraph 7.07 of the SRI Sukuk Framework.	
7.08		
 The Eligible SRI projects may include but not limited to the following: (a) Green projects that relate to, amongst others-renewable energy; energy efficiency; pollution prevention and control; environmentally sustainable management of living natural resources and land use; clean transportation; sustainable water and wastewater management; climate change adaptation; eco- efficient and/or circular economy adapted products; and green buildings which meet regional, national, or internationally recognised standards or certifications. (b) Social projects that relate to, 	Eligible project categories detailed in the Framework align with eligible SRI project categories in paragraph 7.08 (a) and (b) of the SRI Sukuk Framework. The Framework also details a social project category - pandemic outbreak socioeconomic impact mitigation - that is specifically aimed at mitigating the socioeconomic impact of the COVID-19 health crisis. Eligible green project categories include renewable energy; clean transportation; green buildings; energy efficiency; sustainable water and wastewater management; and waste and pollution control.	The Framework provides flexibility to SME Bank to add green and/or social eligible project categories as needed from time to time. In view of this and to address concerns as to future dilution of its environmental and social credentials, the Framework clarifies that any eligible project categories to be added would be aligned to those recognised by the SC, ACMF and ICMA frameworks or guidelines.
 amongst others-affordable basic infrastructure; access to essential services; affordable housing; employment generation including the potential effect of SME financing and microfinance; food security; and socioeconomic advancement and empowerment. (c) Projects which are the combination of Green and Social projects as described in (a) and (b) above; and (d) Waqf projects that relate to the development of waqf properties or assets. 	affordable basic infrastructure; access to essential services; employment generation including the effect of SME financing and microfinance; socioeconomic advancement and empowerment, as well as pandemic outbreak socioeconomic impact mitigation.	

Criteria	Compliance with criteria	Remarks/Scope of Work Undertaken
Use of Proceeds <u>ASEAN GBS/SBS/SUS</u> 4.1 4.1.1 The utilisation of issue proceeds must be described in the documentation for issuance.	The utilisation of the Sustainability Sukuk proceeds is described in the Framework.	The Sustainability Sukuk proceeds will be used to finance and/or refinance, in part or in whole, new or existing eligible assets falling within the green and social categories recognised by the ASEAN GBS and ASEAN SBS.
4.1.2 The Issuer must disclose the following information: The categories of eligible Green and/or Social Projects to which the issue proceeds will be allocated; and/or the information on specific Green and/or Social Projects in the case where the issuer has identified the specific Green and/or Social Projects to which the issue proceeds will be allocated.	The eligible use of proceeds categories identified by the Framework are aligned with the green and social project categories recognised by the ASEAN GBS and ASEAN SBS.	
4.1.3 All designated Green and/or Social Projects must provide clear environmental/social benefits, which will be assessed and, where feasible, quantified by the Issuer.	The eligible use of proceeds project categories set out in the Framework are recognised as impactful by the ASEAN GBS and ASEAN SBS.	
4.1.4 In the event that all or a proportion of the proceeds are or may be used for refinancing, it is recommended that Issuers provide an estimate of the share of financing and refinancing, and where appropriate, also clarify which investments or project portfolios may be refinanced and, to the extent relevant, the expected look-back period for refinanced projects.	The expected look-back period for refinanced assets has yet to be determined.	MARC has recommended a look-back period not exceeding 36 months for refinanced eligible assets which has been duly noted by the Bank.
Process for Project Evaluation and Selection <u>ASEAN GBS/SBS/SUS</u> 4.2 4.2.1 The issuer must clearly communicate to investors: (i) The environmental/social sustainability objectives;	The broad environmental and social objectives corresponding to the projects financed and/or refinanced are conveyed by the green and social project categories.	
(ii) The process by which the Issuer determines how the projects fit within the identified eligible project categories; and	The Framework details an internal process by which all eligible projects will be assessed and selected.	The governance structure for the Sustainability Sukuk as described in the Framework comprises the Bank's Board of Directors and the CRMC, supported by the SSWC.

Criteria	Compliance with criteria	Remarks/Scope of Work Undertaken
Process for Project Evaluation and	The Business Division selects, evaluates,	
Selection (Cont'd)	and proposes prospective eligible assets	
<u>ASEAN GBS/SBS/SUS</u>	to the relevant approving authorities in	
	accordance with selection criteria set	
	out in the Framework.	
	A Sustainability Sukuk Working	SME Bank's Board of Directors is ultimately
	Committee (SSWC) has been created	responsible for reviewing and approving the
	which is composed of senior	Framework and any subsequent changes to
	management representatives from its	it. It shall also review and approve the
	Group Risk, Group Finance	annual reporting as prescribed under the
	Management and Group Compliance	Framework.
	will periodically review the eligible asset	
	pool throughout the life of the	
	Sustainability Sukuk and recommend	
	the removal of any projects to the CRMC	
	that no longer meet the eligibility	
	criteria and should be replaced with	
	new projects as soon as feasible.	
	The CRMC is responsible for approving	
	any addition to or removal from the	
	eligible asset pool. Additionally, the	
	CRMC is also responsible for reviewing	
	and endorsing the eligible asset register.	
(iii) The related eligibility criteria,	The eligibility criteria to be used for the	
including, if applicable,	evaluation and selection of the eligible	
exclusion criteria or any	assets are sufficiently detailed and	
other process applied to	transparent. The Framework also	
identify and manage	identifies excluded activities which	
potentially material	cannot be financed by the Sustainability	
environmental and social	Sukuk proceeds. The Bank will put in	
(E&S) risks associated with	place appropriate procedures and	
the selected projects.	guidelines such as the establishment of	
	criteria checklist as part of its E&S risk	
	due diligence on eligible assets.	
4.2.2		
The Issuer must establish the process	The Framework outlines the process and	
for project evaluation and selection	accountabilities for project evaluation	
prior to the issuance of the Bonds and	and selection.	
disclose the same to investors in the		
documentation for the issuance of the		
Bonds.		
1 2 2		
4.2.3	The Bank has nositioned this	Where green buildings are concerned the
Issuers are encouraged to position this	The Bank has positioned this information within the context of its	Where green buildings are concerned, the Framework specifies third-party certification
information within the context of the	information within the context of its	
Issuer's overarching objectives,	overarching objective to support SME	systems to be used by the Bank to identify
strategy, policy and/or processes	development which, in turn, has the	energy-efficient buildings. These include Green Building Index (GBI), Leadershin in
relating to environmental and social sustainability. Issuers are also	potential for wide reaching impacts on the SDGs nationally. The critical	Green Building Index (GBI), Leadership in Energy and Environmental Design (LEED),
encouraged to disclose any green and	contribution of MSMEs to broader social	Green Real Estate (GreenRE) and Building
social standards or certifications	economic objectives, including job	Research Establishment Environmental
referenced in project selection.	creation makes them a key priority area	Assessment (BREEAM).
	for achieving the SDGs.	Assessment (DILLAIVI).

Criteria	Compliance with criteria	Remarks/Scope of Work Undertaken
4.2.4 It is recommended that the Issuer's process for project evaluation and selection be supported by an external review.	The issuer has appointed MARC as the external reviewer for the Sustainability Sukuk.	
 4.2.5 The Issuer must make the following publicly available on a website designated by the Issuer at the time of the issuance and throughout the tenure of the Bonds: (i) The process for project evaluation; (ii) The use of proceeds; and (iii) External review report on the process (if any). 	The issuer has committed to make the required information available on its website at www.smebank.com.my	The Framework provides information on the process for project evaluation. The Bank will prepare and publish its Sustainability Sukuk Report on its website annually. MARC's external review assessment will also be made available on the Bank's corporate website.
Management of Proceeds ASEAN GBS/SBS/SUS		
4.3 4.3.1 Prior to the issuance of the Bonds, the Issuer must disclose to investors in the documentation for the issuance of the Bonds the process for managing the net proceeds from the Bonds.	Prior to issuance, the Bank will make the Framework which details the management of proceeds available on its website.	
4.3.2 The net proceeds of the Bonds, or an amount equal to these net proceeds, must be credited into a sub-account, moved to a sub-portfolio or otherwise tracked by the Issuer in an appropriate manner and attested to by a formal internal process. The total amount deployed from the net proceeds for the eligible projects need not occur simultaneously.	The Bank will manage the Sustainability Sukuk proceeds on a portfolio basis to ensure that the aggregate value of the eligible asset portfolio matches or exceeds the balance of net proceeds of outstanding Sustainability Sukuk and track the use of proceeds internally. The balance of unallocated net proceeds will be held in cash, cash equivalents and/or other liquid marketable investments.	
4.3.3 As long as the Bonds are outstanding, the balance of the tracked net proceeds must be periodically adjusted to match allocations to eligible projects made during that period.	The Bank will have in place a register of eligible assets to track the use of proceeds and ensure allocations to the portfolio match or exceed the balance of net proceeds of outstanding Sustainability Sukuk.	
4.3.4 The Issuer must also disclose to investors in the documentation for the issuance of the Bonds the intended types of temporary placement for the balance of unallocated net proceeds.	The Bank has disclosed in the Framework the intended types of temporary placement for the balance of unallocated net proceeds.	

SUSTAINABILITY SUKUK FRAMEWORK ASSESSMENT JUNE 2021

Criteria	Compliance with criteria	Remarks/Scope of Work Undertaken
Management of Proceeds (Cont'd) <u>ASEAN GBS/SBS/SUS</u> 4.3.5 It is recommended that the Issuer's management of proceeds be supplemented by the use of an auditor, or other third party, to verify the internal tracking method and the allocation of funds from the Bonds proceeds.	In addition to MARC's appointment as the external reviewer for the Framework, independent verification of the management of proceeds by an appropriate external assurance provider as and when required is provided for under the Framework in the section "External Review".	
4.3.6 Where the Issuer appoints an auditor or other third party to verify the Issuer's management of proceeds, the Issuer must make the report produced by the auditor or other third party publicly available on a website designated by the Issuer at the time of the issuance of the Bonds.	MARC's external review assessment will be published on SME Bank's corporate website at www.smebank.com.my.	
SRI Sukuk Framework 7.13 An issuer must ensure that the proceeds allocated for the Eligible SRI projects are credited into a designated account or otherwise tracked in an appropriate manner.	The Framework provides for the Sustainability Sukuk proceeds to be allocated to eligible projects in line with the Bank's internal systems.	
Reporting <u>ASEAN GBS/SBS/SUS</u> 4.4 4.4.1 Issuers must report to investors at least on an annual basis and are encouraged to make more frequent reporting on the use of proceeds until full allocation, and on a timely basis in the case of material developments. The annual report should include a list of the projects to which the Bonds proceeds have been allocated, as well as a brief description of the projects and the amounts allocated, and their expected impact.	 The Bank intends to report to investors on allocation and impact on an annual basis until full allocation, and thereafter, as warranted by any new/material developments. In its annual Sustainability Sukuk Report, the Bank will provide information in respect of: Net proceeds raised from each Sustainability Sukuk issuance; Aggregate amounts of proceeds allocated to each eligible project category; The balance of unallocated Sustainability Sukuk proceeds at the end of the reporting period and where this is placed or invested pending utilisation, and The removal or substitution of the eligible assets. 	The Bank commits to impact reporting using quantitative metrics where possible, to be made available in the company's annual Sustainability Sukuk report.

SUSTAINABILITY SUKUK FRAMEWORK ASSESSMENT JUNE 2021

Criteria	Compliance with criteria	Remarks/Scope of Work Undertaken
4.4.2 Where confidentiality agreements, competitive considerations, or a large number of underlying projects limit the amount of detail that can be made available, the Issuer may present the information in generic terms or on an aggregated portfolio basis (e.g. percentage allocated to certain project categories).	The Bank intends to provide examples of eligible assets financed and/or refinanced by the Sustainability Sukuk as well as impact metrics for each of the eligible project categories.	
4.4.3 It is recommended that Issuers use qualitative performance indicators, and where feasible, quantitative performance measures and disclose the key underlying methodology and/or assumptions used in the quantitative determination.	To the extent possible, the Bank plans to report on impact metrics in aggregate for each eligible project category; it has provided examples of quantitative performance measures in the Framework.	
4.4.4 It is recommended that the Issuer's annual reporting on the use of proceeds be supplemented by a confirmation of such use of proceeds by an external reviewer along with any relevant updates of the external review.	Updates of the external review are encouraged but are strictly voluntary.	
4.4.5 The Issuer must provide to investors the annual reporting and the external review on the annual reporting, if any, through a website designated by the Issuer and/or annual reports throughout the tenure of the Bonds.	The Bank commits to report annually and publicly on its website throughout the tenure of the Sustainability Sukuk. The external review on the annual reporting is encouraged by the ASEAN GBS and ASEAN SBS but is strictly voluntary.	
 <u>SRI Sukuk Framework</u> 7.14 An issuer must provide the following information to the sukukholders annually through a designated website: a) The original amount allocated for the Eligible SRI projects; b) The amount utilised for the Eligible SRI projects; c) The unutilised amount and where such unutilised amount is placed or invested pending utilisation; and d) The list of the Eligible SRI projects in which the SRI sukuk proceeds have been allocated to and a brief description of the said Eligible SRI projects and their impact or expected impact, including the key underlying methodology or assumptions used to determine the impact or expected impact. 	The issuer has committed to provide information items (a) through (d) annually through its corporate website under the Framework.	

SUSTAINABILITY SUKUK FRAMEWORK ASSESSMENT JUNE 2021

Criteria	Compliance with criteria	Remarks/Scope of Work Undertaken
Disclosure Requirements		
SRI Sukuk Framework 7.15 Where an issuer is unable to make available comprehensive information as specified in paragraph 7.14 above due to confidentiality agreements or competitive considerations, such information may be provided in generic terms or on an aggregated portfolio basis.	Complied. Refer to assessment of compliance with the ASEAN GBS/SBS 4.4.2.	
 7.16 The following information must be included: a) The overall SRI objectives that the issuer intends to achieve; b) The utilisation of proceeds from the issuance of the SRI sukuk. Where all or part of the proceeds are used for refinancing, an issuer must provide the amount of proceeds being allocated for refinancing and which Eligible SRI projects to be refinanced; 	Complied. Refer to assessment of compliance with the ASEAN GBS/SBS 4.2.1. Complied. Refer to assessment of compliance with the ASEAN GBS/SBS 4.1.1 and 4.1.4.	
 c) The Eligible SRI projects in which the proceeds will be allocated; 	Complied. Refer to assessment of compliance with the ASEAN GBS/SBS 4.1.2.	
d) The details of the Eligible SRI projects and to the extent possible, impact objectives from the Eligible SRI projects;	Complied. Refer to assessment of compliance with the ASEAN GBS/SBS 4.1.3	
e) The processes used by the issuer to evaluate and select the Eligible SRI projects;	Complied. Refer to assessment of compliance with the ASEAN GBS/SBS 4.2.	
f) The criteria used by the issuer to identify and manage material environmental or social risks.	Complied. Refer to assessment of compliance with the ASEAN GBS/SBS 4.2.	
 g) associated with the Eligible SRI projects; 	Complied. Refer to assessment of compliance with the ASEAN GBS/SBS 4.2.	
 h) The processes used by the issuer to manage the proceeds from the issuance of the SRI sukuk; and i) A statement that the issuer has complied with the relevant environmental, social and governance standards or recognised best practices relating to the Eligible SRI projects. 	Complied. Refer to assessment of compliance with the ASEAN GBS/SBS 4.3. Complied.	
External Review <u>ASEAN GBS/SBS/SUS</u> 5.1 Issuers are recommended to appoint external review providers for the bond issuances or programmes.	MARC has been engaged as the independent external reviewer for the Framework.	

Criteria	Compliance with criteria	Remarks/Scope of Work Undertaken
External Review (Cont'd) ASEAN GBS/SBS/SUS 5.2		
The external review may be partial, covering only certain aspects of the bonds framework or full, assessing alignment with all four core components as stated in the relevant standards. 5.3	The review conducted by MARC is a full review and addresses alignment with all four components of the relevant standards.	MARC has established a transparent score- based framework for its green, social and sustainability sukuk and bond assessments analysis that is published on the agency's website. The differentiated approach taken recognises that some projects offer more environmental and/or social benefits than others
The external review provider must have the relevant expertise and experience in the components of the Bonds which they are reviewing.	MARC is registered with the SC as a credit rating agency and has conducted the external review assessment according to the analytical framework in MARC's IBA methodology.	
5.4 The external review provider must also disclose their relevant credentials and expertise, and the scope of the review conducted in the external review report.	Required disclosure of the external review provider's relevant credentials and expertise, and the scope of the review will be made in the external review assessment.	

THE UN SUSTAINABLE DEVELOPMENT GOALS



GOAL 1: End poverty in all its forms everywhere

2 ZERO HUNDER SSSS **GOAL 2:** End hunger, achieve food security and improved nutrition and promote sustainable agriculture



GOAL 3: Ensure healthy lives and promote well-being for all at all ages



GOAL 4: Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all



GOAL 5: Achieve gender equality and empower all women and girls



GOAL 6: Ensure availability and sustainable management of water and sanitation for all



GOAL 7: Ensure access to affordable, reliable, sustainable and modern energy for all



GOAL 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all



GOAL 9: Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation



GOAL 10: Reduce inequality within and among countries



GOAL 11: Make cities and human settlements inclusive, safe, resilient and sustainable



GOAL 12: Ensure sustainable consumption and production patterns



GOAL 13: Take urgent action to combat climate change and its impacts



GOAL 14: Conserve and sustainably use the oceans, seas and marine resources for sustainable development

15 UFE ON LAND

GOAL 15: Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss



GOAL 16: Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels



GOAL 17: Strengthen the means of implementation and revitalize the global partnership for sustainable development

A Green Bond Assessment, Social Bond Assessment or Sustainability Bond Assessment, hereafter collectively referred to as Impact Bond Assessments, is not a credit rating. This assessment is arrived based on the Impact Bond Assessment (IBA) criteria that MARC has published and continuously evaluates and updates. The IBA may be changed or withdrawn at any time for any reason in the sole discretion of MARC. IBAs are not a recommendation to buy, sell, or hold any security. IBAs do not comment on the adequacy of market price or the suitability of any security for a particular investor. The IBA does not constitute a recommendation to buy, sell or hold any security and/or investment. MARC receives fees from issuers, insurers, guarantors, other obligors, and underwriters for rating securities.

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