

C	Role of Stakeholders	
C.1	The rights of stakeholders that are established by law or through mutual agreements are to be respected.	
	Does the company disclose a policy that :	
C.1.1	Stipulates the existence and scope of the company's efforts to address customers' welfare?	<p>Yes, the company stipulates the existence and scope of its efforts to address customer's welfare. References are as follows:</p> <ul style="list-style-type: none"> • Annual Corporate Governance Report, pg. 43 (H) Role of Stakeholders – http://www.sminvestments.com/annual-corporate-governance-report • Annual Report, pg. 62, Rights, Roles and Protection of Stakeholders (1st paragraph) - http://www.sminvestments.com/annual-reports • Revised Code of Ethics http://www.sminvestments.com/code-ethics
C.1.2	Explains supplier/contractor selection practice?	<p>Yes, the company explains supplier/contractor selection practice. References are as follows:</p> <ul style="list-style-type: none"> • SMIC Website – Company Policies – Policy for Vendor Selection and Purchase of Goods and Services - http://www.sminvestments.com/company-policies • Annual Corporate Governance Report, pg. 43 (H) Role of Stakeholders – http://www.sminvestments.com/annual-corporate-governance-report • Revised Code of Ethics pg. 2, III. Ethical Practices- Support for Diversity and Non-Discrimination http://www.sminvestments.com/code-ethics
C.1.3	Describes the company's efforts to ensure that its value chain is environmentally friendly or is consistent with promoting sustainable development?	<p>Yes, the company describes its efforts to ensure that its value chain is environmentally friendly and that it promotes sustainable development. References are as follows:</p> <ul style="list-style-type: none"> • SMIC Website – Company Policies – Policy for Vendor Selection and Purchase of Goods and Services - http://www.sminvestments.com/company-policies

		<ul style="list-style-type: none"> Annual Corporate Governance Report, pgs. 43-44 (H) Role of Stakeholders – Environmentally friendly value chain http://www.sminvestments.com/annual-corporate-governance-report
C.1.4	Elaborates the company's efforts to interact with the communities in which they operate?	<p>Yes, the company elaborates on its efforts to interact with the communities in which it operates. References are as follows:</p> <ul style="list-style-type: none"> Annual Corporate Governance Report, pgs. 43-44 (H) Role of Stakeholders –Community Interaction http://www.sminvestments.com/annual-corporate-governance-report Annual Report, pgs. 48-51, SM Foundation Feature- http://www.sminvestments.com/annual-reports
C.1.5	Describe the company's anti-corruption programmes and procedures?	<p>Yes, the company describes its anti-corruption program and procedures. Reference is as follows:</p> <ul style="list-style-type: none"> Annual Corporate Governance Report, pgs. 43-44 (H) Role of Stakeholders –Anti-Corruption Program http://www.sminvestments.com/annual-corporate-governance-report SMIC Website – Company Policies – Policy on Accountability, Integrity and Vigilance - http://www.sminvestments.com/company-policies
C.1.6	Describes how creditors' rights are safeguarded?	<p>Yes, the company describes how creditors' rights are safeguarded. Reference is as follows:</p> <ul style="list-style-type: none"> Annual Corporate Governance Report, pgs. 43-44 (H) Role of Stakeholders –Safeguarding Creditor's Rights http://www.sminvestments.com/annual-corporate-governance-report Revised Code of Ethics http://www.sminvestments.com/code-ethics
	Does the company disclose the activities that it has undertaken to implement the above mentioned policies?	
C.1.7	Customer health and safety	Yes, the company stipulates the activities it has taken to address customer's welfare. References

		<p>are as follows:</p> <ul style="list-style-type: none"> • Annual Corporate Governance Report, pg. 43 (H) Role of Stakeholders – http://www.sminvestments.com/annual-corporate-governance-report • Annual Report, pgs. 48-51, SM Foundation Feature- http://www.sminvestments.com/annual-reports • Annual Report, pg. 62, Rights, Roles and Protection of Stakeholders (1st paragraph) - http://www.sminvestments.com/annual-reports • Revised Code of Ethics http://www.sminvestments.com/code-ethics
C.1.8	Supplier/Contractor selection and criteria	<p>Yes, the company explains supplier/contractor selection practice. References are as follows:</p> <ul style="list-style-type: none"> • SMIC Website – Company Policies – Policy for Vendor Selection and Purchase of Goods and Services - http://www.sminvestments.com/company-policies • Annual Corporate Governance Report, pg. 43 (H) Role of Stakeholders – http://www.sminvestments.com/annual-corporate-governance-report • Revised Code of Ethics pg. 2, III. Ethical Practices- Support for Diversity and Non-Discrimination http://www.sminvestments.com/code-ethics
C.1.9	Environmentally-friendly value chain	<p>Yes, the company describes its efforts to ensure that its value chain is environmentally friendly and that it promotes sustainable development. References are as follows:</p> <ul style="list-style-type: none"> • SMIC Website – Company Policies – Policy for Vendor Selection and Purchase of Goods and Services - http://www.sminvestments.com/company-policies • Annual Corporate Governance Report, pgs. 43-44 (H) Role of Stakeholders – Environmentally friendly value chain http://www.sminvestments.com/annual-corporate-

		governance-report
C.1.10	Interaction with the communities	<p>Yes, the company elaborates on its efforts to interact with the communities in which it operates. References are as follows:</p> <ul style="list-style-type: none"> • Annual Corporate Governance Report, pgs. 43-44 (H) Role of Stakeholders –Community Interaction http://www.sminvestments.com/annual-corporate-governance-report • Annual Report, pgs. 48-51, SM Foundation Feature- http://www.sminvestments.com/annual-reports
C.1.11	Anti-corruption programmes and procedures	<p>Yes, the company describes its anti-corruption program and procedures. Reference is as follows:</p> <ul style="list-style-type: none"> • Annual Corporate Governance Report, pgs. 43-44 (H) Role of Stakeholders –Anti-Corruption Program http://www.sminvestments.com/annual-corporate-governance-report • SMIC Website – Company Policies – Policy on Accountability, Integrity and Vigilance - http://www.sminvestments.com/company-policies
C.1.12	Creditors' rights	<p>Yes, the company describes how creditors' rights are safeguarded. Reference is as follows:</p> <ul style="list-style-type: none"> • Annual Corporate Governance Report, pgs. 43-44 (H) Role of Stakeholders –Safeguarding Creditor's Rights http://www.sminvestments.com/annual-corporate-governance-report • Revised Code of Ethics http://www.sminvestments.com/code-ethics
C.1.13	Does the company have a separate corporate responsibility (CR) report/section or sustainability report/section?	<p>Yes, the company has a separate corporate responsibility report. References are as follows:</p> <ul style="list-style-type: none"> • SMIC Website – Corporate Social Responsibility http://www.sminvestments.com/corporate-social-responsibility

		<ul style="list-style-type: none"> Annual Report, pgs. 48-51, SM Foundation Feature- http://www.sminvestments.com/annual-reports
C.2		
C.2.1	Does the company provide contact details via the company's website or Annual Report which stakeholders (e.g. customers, suppliers, general public etc.) can use to voice their concerns and/or complaints for possible violation of their rights?	<p>Yes, the company provides contact details which stakeholders may access to voice concerns or complaints for the possible violation of their rights in both the website and annual report. References are as follows:</p> <ul style="list-style-type: none"> SMIC Website – Contact Us http://www.sminvestments.com/contact-us Annual Report, pg. 68 – Corporate Information - http://www.sminvestments.com/annual-reports
C.3	Performance-enhancing mechanisms for employee participation should be permitted to develop.	
C.3.1	Does the company explicitly disclose the health, safety, and welfare policy for its employees?	<p>Yes, the company discloses the policy that pertains to the health, safety and welfare of its employees. References are as follows:</p> <ul style="list-style-type: none"> Revised Code of Ethics, pg. 3, C) Environmental and Safety Practices & D) Employee Welfare http://www.sminvestments.com/code-ethics Annual Corporate Governance Report, pg. 45 (3) Performance enhancing mechanisms for employee participation–http://www.sminvestments.com/annual-corporate-governance-report Annual Report, pg. 62, Rights, Roles and Protection of Stakeholders (1st paragraph) - http://www.sminvestments.com/annual-reports Annual Report, pg. 63, Employee Welfare - http://www.sminvestments.com/annual-reports
C.3.2	Does the company publish relevant information relating to health, safety and	Yes, the company publishes relevant information relating to the health, safety and welfare of its

	welfare of its employees?	<p>employees. References are as follows:</p> <ul style="list-style-type: none"> • SMIC Website – Company Policies – Employee Welfare – Health, Safety and Welfare - Data http://www.sminvestments.com/company-policies • Annual Corporate Governance Report, pg. 45 (3) Performance enhancing mechanisms for employee participation—http://www.sminvestments.com/annual-corporate-governance-report
C.3.3	Does the company have training and development programmes for its employees?	<p>Yes, the company has training and development programs for its employees. References are as follows:</p> <ul style="list-style-type: none"> • Annual Corporate Governance Report, pg. 45 (3) Performance enhancing mechanisms for employee participation (c) State the company’s training and development...– http://www.sminvestments.com/annual-corporate-governance-report • SMIC Website – Company Policies – Employee Welfare – Employee Development and Growth - Data http://www.sminvestments.com/company-policies • Annual Report, pg. 63, Orientations and Training - http://www.sminvestments.com/annual-reports • Annual Report, pg. 63, Employee Welfare - http://www.sminvestments.com/annual-reports
C.3.4	Does the company publish relevant information on training and development programmes for its employees?	<p>Yes, the company publishes relevant data on the training and development programs for its employees. References are as follows:</p> <ul style="list-style-type: none"> • SMIC Website – Company Policies – Employee Welfare – Employee Development and Growth - Data http://www.sminvestments.com/company-policies • Annual Corporate Governance Report, pg. 45 (3) Performance enhancing mechanisms for employee participation (c) State the company’s training and development...–

		<p>http://www.sminvestments.com/annual-corporate-governance-report</p> <ul style="list-style-type: none"> • Annual Report, pg. 63, Orientations and Training - http://www.sminvestments.com/annual-reports • Annual Report, pg. 63, Employee Welfare - http://www.sminvestments.com/annual-reports
C.3.5	Does the company have a reward/compensation policy that accounts for the performance of the company beyond short-term financial measures?	<p>Yes, the company has a reward/compensation policy that accounts for the performance of the company beyond short term financial measures. References are as follows:</p> <ul style="list-style-type: none"> • Annual Corporate Governance Report, pg. 46 (d) State the company’s reward/compensation policy...–http://www.sminvestments.com/annual-corporate-governance-report
C.4	Stakeholders including individual employee and their representative bodies, should be able to freely communicate their concerns about illegal or unethical practices to the board and their rights should not be compromised for doing this.	
C.4.1	Does the company have procedures for complaints by employees concerning illegal (including corruption) and unethical behaviour?	<p>Yes, the company has procedures for complaints by employees concerning illegal and unethical behaviour. References are as follows:</p> <ul style="list-style-type: none"> • Revised Code of Ethics http://www.sminvestments.com/code-ethics • Annual Corporate Governance Report, pgs. 43-44 (H) Role of Stakeholders –Anti-Corruption Program http://www.sminvestments.com/annual-corporate-governance-report • SMIC Website – Company Policies – Policy on Accountability, Integrity and Vigilance - http://www.sminvestments.com/company-policies

ASEAN Corporate Governance Scorecard

<p>C.4.2</p>	<p>Does the company have a policy or procedures to protect an employee/person who reveals illegal/unethical behavior from retaliation?</p>	<p>Yes, the company company’s Policy on Accountability, Integrity and Vigilance contains a “no-retaliation” portion. Reference is as follows:</p> <ul style="list-style-type: none"> • SMIC Website – Company Policies – Policy on Accountability, Integrity and Vigilance - http://www.sminvestments.com/company-policies
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