

## INVESTOR RELATIONS POLICY

### 1 INTRODUCTION

GEM Asset Management Pte. Ltd. (“**GEMAM**” or the “**Company**”) is a fund manager licensed by the Monetary Authority of Singapore (“**MAS**”). We are committed to maintaining transparent, timely, and equitable communication with our investors. This Investor Relations Policy outlines the principles and practices that guide our engagement with investors and other stakeholders.

The Company endeavours to convey all essential and relevant disclosure and information to shareholders and other prospective investors in a balanced, effective and timely manner, and in clear and plain language. The Company also strives to consistently disclose both positive and negative developments of the Company, and that all disclosure is presented and conveyed factually and clearly.

### 2 TYPES OF INVESTOR COMMUNICATIONS

We communicate with investors through the following channels:

Communication Type	Frequency	Content
Investor Due Diligence	Onboarding, as required	Subscription form, identification documents, corporate structure, source of funds/wealth, etc.
Periodic Reports	Semi-Annually / Annually	NAV report, portfolio updates, market commentary.
Capital Call Notices	As required	Drawdown requests, payment instructions, and supporting details.
Distribution Notices	As required	Income distribution or capital repayment details.
Ad Hoc Updates	As events occur	Material changes (e.g., key personnel, fund strategy, relevant regulatory updates).

### 3 HOW TO REACH US

If you are reaching out cold, please contact us at [info@gem-asset.com](mailto:info@gem-asset.com), and we will refer you to the relevant department/staff. Otherwise, you may reach out directly to our investment managers with whom you have already contacted.

**Office Hours:** Monday – Friday, 9:00 a.m. to 6:00 p.m. (Singapore Time)

**Response Time:** We aim to acknowledge all queries within **three (3)** business days and provide a substantive response within **five (5)** business days for relevant/substantive queries.

#### **4 HOW WE DISCLOSE MATERIAL INFORMATION**

All material information is disclosed to all investors simultaneously via email or formal written communication. Where required by regulations, we also submit such information to MAS.

#### **5 PROHIBITIONS ON SELECTIVE DISCLOSURE**

The Company strictly prohibits selective disclosure – providing material non-public information to one investor or group of investors before disclosing it to all investors. If inadvertent selective disclosure occurs, we will promptly rectify this by disseminating the same information to all investors.

#### **6 CONFIDENTIALITY AND DATA PROTECTION**

We are committed to protecting your personal data and investment information in accordance with the Singapore Personal Data Protection Act 2012 (“**PDPA**”) and our internal data protection policies. Please refer to our Privacy Statement for more details.

#### **7 REPORTING CONCERNS**

If you suspect any breach of this Investor Relations Policy or have concerns regarding our investor communications, please reach out to [info@gem-asset.com](mailto:info@gem-asset.com). For matters on whistleblowing, you may also refer to our Notice on Whistleblowing.