

3 December 2024

Pornanong Budsaratragoon  
Secretary-General  
The Securities and Exchange Commission, Thailand  
333/3 Vibhavadi-Rangsit Road, Chomphon  
Chatuchak Bangkok 10900  
Thailand

By email to: [esg-sec@sec.or.th](mailto:esg-sec@sec.or.th)

## **ASIFMA AMG response to the consultation on Principle of Thailand Sustainability Disclosure Roadmap regarding International Sustainability Standards (ISSB Roadmap) issued by The Securities and Exchange Commission, Thailand**

Dear Secretary-General Pornanong Budsaratragoon

On behalf of the Asia Securities Industry & Financial Markets Association (“**ASIFMA**”) <sup>1</sup> Asset Management Group (“**AAMG**”), we express the views of our members which are predominantly global asset managers operating in Asia.

We welcome the opportunity for market participants to comment on the Principle of Thailand Sustainability Disclosure Roadmap regarding International Sustainability Standards (“**ISSB Roadmap**”), to adopt the International Sustainability Standards Board (“**ISSB**”) IFRS Sustainability Disclosure Standard (or “**ISSB Standards**”). We commend the efforts of The Securities and Exchange Commission, Thailand (“**SEC**”) to align sustainability reporting standards in Thailand with the global baseline.

As regulators, listing exchanges and standard setters across Asia start to implement the ISSB Standards in their respective jurisdictions, we want to ensure the views and expectations of global investors are clear. We therefore take the opportunity to share our paper entitled “**Adoption of the ISSB Standards in Asia: ASIFMA Asset Management Group Position Paper**”. This paper provides insights on the nuances of the adoption of ISSB Standards that is currently underway throughout the region from the

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<sup>1</sup> ASIFMA is an independent, regional trade association with over 150 member firms comprising a diverse range of leading financial institutions from both the buy and sell side, including banks, asset managers, law firms and market infrastructure service providers. Together, we harness the shared interests of the financial industry to promote the development of liquid, deep and broad capital markets in Asia. ASIFMA advocates stable, innovative, competitive and efficient Asian capital markets that are necessary to support the region’s economic growth. We drive consensus, advocate solutions and effect change around key issues through the collective strength and clarity of one industry voice. Our many initiatives include consultations with regulators and exchanges, development of uniform industry standards, advocacy for enhanced markets through policy papers, and lowering the cost of doing business in the region. Through the [GFMA](#) alliance with [SIFMA](#) in the United States and [AFME](#) in Europe, ASIFMA also provides insights on global best practices and standards to benefit the region.

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perspective of global investors. We hope it is useful to inform the SEC as it finalises the roadmap for the adoption of ISSB Standards in Thailand.

Please feel free to contact Yvette Kwan at [ykwan@asifma.org](mailto:ykwan@asifma.org) if you have any questions regarding any of our comments.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Yvette Kwan', with a long horizontal stroke extending to the right.

Yvette Kwan  
Executive Adviser  
Asia Securities Industry & Financial Markets Association