



Registration No. 200501002315 (679361-D)

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## CORPORATE DISCLOSURE POLICY

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### 1. DISCLOSURE STRUCTURE AND RESPONSIBILITIES

- 1.1 The Board is responsible in ensuring that the policy is implemented effectively and disclosure requirements are fulfilled.
- 1.2 The Board delegates the implementation of the Policy to the Finance Director.
- 1.3 The Board reviews the Policy from time to time to ensure its relevance.
- 1.4 The Finance Director shall serve as the primary contact person for matters referred to in this Policy.
- 1.5 The responsibilities of the Finance Director are as follows:-
  - a) to ensure timely disclosure and announcement of material information in accordance with the ACE Market Listing Requirements of Bursa Malaysia Securities Berhad (Bursa Securities);
  - b) to respond to any query raised by Bursa Securities; and
  - c) to implement and monitor compliance of this Policy.
- 1.6 The Executive Directors shall serve as the Authorised Spokespersons to speak and respond on behalf of the Company to shareholders, stakeholders and the public generally in regards to the Group's operations, financial position, prospects, strategies, products, services, management and governance.

### 2. DISCLOSURE CONTROLS & PROCEDURES

#### 2.1 Material Information

- 2.1.1 Immediate announcements must be made of material information in accordance with the ACE Market Listing Requirements of Bursa Securities.
- 2.1.2 The general guideline to determine materiality are as follows:
  - a) Any information that is reasonably expected to impact on the price, value or market activity of the Company's securities; or
  - b) Any information that is reasonably expected to impact the decision of holder of securities of the Company or an investor in determining his choice of action.

2.1.3 Any material information that is being withheld temporarily, the Company is committed to ensuring strictest confidentiality is maintained by limiting the number of persons having access to the material information and ensuring the security of all confidential documents.

2.1.4 In the event that material information is or is believed to have been inadvertently disclosed to third parties or where the material information has become generally available through the media or otherwise, the Company shall immediately announce the information to Bursa Securities.

## **2.2 Rumours & Reports**

2.2.1 Whenever the Company becomes aware of of any rumour or report, true or false, that contains material information, the Finance Director shall make due enquiry before publicly clarify, confirm or deny the report or the rumour.

2.2.2 After the endorsement of the Board, the Company shall immediately announce its response to Bursa Securities via the Bursa Link.

## **2.3 Unusual Market Activity**

2.3.1 Where unusual price movement, trading activity, or both (“unusual market activity”) occurs, the Finance Director shall carry out an enquiry to ascertain the cause of any unusual market activity in its securities.

2.3.2 After the endorsement of the Board, the Company shall immediately announce its response regarding the unusual market activity to Bursa Securities via the Bursa Link.

## **2.4 Unwarranted Promotional Disclosure Activity**

2.4.1 The Company shall not participate in any promotional disclosure activity which may have misled investors or cause unwarranted price movement and trading activity in the Company’s securities.

2.4.2 Such activity includes news release, public announcements, predictions, reports or advertisement, which are not justified by actual developments concerning the Company, exaggerated, flamboyant, overstated or over-zealous.

## **2.5 Insider Trading**

2.5.1 The Company affirms its awareness of the provisions of Section 188 of the Capital Markets and Services Act 2007 (Amended 2010) and the Companies Act 2016 in regards to insider trading.

2.5.2 Directors, Management and employees of the Company and its subsidiaries shall not trade on the basis of any material information that has not been disclosed to the public.

## **2.6 Closed Period**

2.6.1 Closed period is defined as a period commencing from 30 calendar days before the targetted date of announcement to Bursa Securities of the Company’s quarterly results, up to the date of the announcement of the Company’s quarterly results.

2.6.2 During closed period, the directors are prohibited from commenting on current period

earnings estimates and financial assumptions. Communication must be limited to commenting on publicly available or non-material information.

## **2.7 Analyst Reports**

2.7.1 The Company recognises the important role performed by research analysts in assisting the establishment of an efficient market.

2.7.2 Notwithstanding the above, the Company is not responsible for, and does not endorse the analyst reports that contain commentary on the Company or any statements or opinions therein.

## **2.8 Industry Conferences Presentations**

2.8.1 The Executive Directors will review all presentations, hand-out materials and speech notes to ensure accuracy and consistency with other public disclosures.

2.8.2 Any presentation made or hand-out materials distributed at any industry conferences or investors events by Executive Directors shall be made available on the Company's website.

## **2.9 Corporate Website**

2.9.1 All the Company's publicly disclosed material information and presentations will be made available at the Company's website.

2.9.2 The Executive Directors are to ensure the Company's website be kept up-to-date with the Company's latest disclosures.

## **2.10 Confidential Information**

2.10.1 In general, all information regarding the Group, its operations, financial condition and future prospects, should be regarded as material and price-sensitive, and must be treated as confidential unless it is already available to the public.

2.10.2 Access to information shall be restricted only to relevant persons who have a legitimate reason consistent with their duties or obligations to the Company or its subsidiaries.

2.10.3 Any employee privy to confidential information is prohibited to communicate to any other persons unless it is necessary in the course of business or required by law or authorised by the Executive Directors.

2.10.4 Confidential information should not be discussed in places where the discussion may be overheard and caution should be exercised when reading confidential information on smart phones or devices in public places.

## **2.11 Leakage and accidental disclosure**

2.11.1 In the event of an information leakage or accidental disclosure of unpublished material information, the situation should be addressed to the Finance Director.

2.11.2 If deemed necessary, the Company will make an appropriate announcement to the Bursa Securities soonest possible, which may be followed by a press release and/or other communication methods.

## **2.12 Procedures For Disclosures**

- 2.12.1 The Company Secretary or the external adviser duly appointed by the Board shall prepare the announcement to Bursa Securities.
- 2.12.2 The Finance Director will review and validate the information contained in the announcement.
- 2.12.3 The Finance Director is required to approve each announcement prior to its release unless blanket approval is given to routine announcements.
- 2.12.4 No disclosure of material information shall be made on individual or selective basis unless such information has previously been fully disclosed and disseminated to the public.

## **3. ENFORCEMENT**

- 3.1 Any employee who violates this Policy may be cautioned or face disciplinary action which includes termination of employment with the Group.
- 3.2 If any of the employees of the Group has doubt as to his/her responsibilities under this Policy, he/she should seek clarification and guidance from the Finance Director or the Senior Management.