

KEYFIELD INTERNATIONAL BERHAD

Registration No. 202001038989 (1395310-M)
(Incorporated in Malaysia)

CORPORATE DISCLOSURE POLICY

1. INTRODUCTION

Keyfield International Berhad (“Keyfield” or “the Company”) is committed to upholding high standards of transparency and promotion of investor confidence through the provision of comprehensive, accurate and quality information on a timely and even basis.

In adopting this policy, Keyfield has taken into account the recommendations contained in the Malaysian Code on Corporate Governance (“MCCG”), the disclosure obligations contained in the Main Market Listing Requirements (“Listing Requirements”) of Bursa Malaysia Securities Berhad (“Bursa Securities”) and the Corporate Disclosure Guide issued by Bursa Securities in September 2011.

2. RATIONALE AND OBJECTIVES

The primary objectives of Keyfield’s Corporate Disclosure Policy are:

- To promote and elevate a high standard of integrity and transparency through timely comprehensive, accurate, quality and full disclosure.
- To promote and maintain market integrity and investor confidence.
- To exercise due diligence to ensure the veracity of the information being disseminated is factual, accurate, clear, timely and comprehensive.
- To build good relationships with all stakeholders based on transparency, openness, trust and confidence.
- To have in place efficient procedures for management of information, which promotes accountability for the disclosure of material information.

3. DISCLOSURE STRUCTURE AND RESPONSIBILITY

To achieve its objectives, Keyfield has adopted the following structure and responsibility.

3.1. Corporate Disclosure Policies and Procedures

Keyfield has adopted the following Disclosure Policies and Procedures.

- Communicating and responding to all stakeholders in respect of all information relating to the Group through all forms of communication channels as outlined under 3.4 below.

3.2. Designated Spokesperson:

- Chairperson of the Board
- Chief Executive Officer
- Any other spokesperson as may be authorised by the Board of Directors of Keyfield

3.3. The Designated Spokesperson is responsible for:

- Proper dissemination of information and ensuring compliance with the disclosure obligations under the Listing Requirements.

- Communication, overseeing and co-ordinating the disclosure of material information to all stakeholders in accordance with the Listing Requirements and ensuring appropriate security measures are in place to maintain the integrity of the information being disseminated.

3.4. **Disclosure and Dissemination Channels**

Keyfield is authorised to make use of a broad range of communication channels to disseminate information to its stakeholders and these include :

- Bursa Announcements
- General Meetings
- Annual reports
- The Company's website
- Press Conferences/Media Releases
- Telephone/Facsimile/E-mail/Post
- Such other means of communication as may be deemed appropriate.

3.4.1. **Bursa Announcements**

Keyfield shall make announcements to Bursa Malaysia Securities Berhad ("Bursa Securities") in accordance with Bursa Securities' Main Market Listing Requirements.

All announcements made to Bursa Securities are available to stakeholders on the Company's website at keyfieldoffshore.com as soon as reasonably practical after such information is released to Bursa Securities.

3.4.2. **General Meetings**

The Annual General Meeting and other general meetings of the Company are the primary forum for communication with shareholders and for shareholders' participation.

a. **Date, Time and Location of General Meetings**

The date, time and location of the Annual General Meeting and other general meetings shall be set out in detail in the Notice of the Meetings which shall be given to shareholders at least 21 clear days prior to the date of the meetings. The Notice shall also be advertised in the National Edition of an English newspaper and posted on the Company's website.

b. **Proxy Form**

A proxy form allowing shareholders to appoint a proxy to attend in the event the shareholders cannot attend the meeting shall accompany the Notice of Meeting distributed to all shareholders.

c. **Questions from Shareholders to the Chairperson, Directors and External Auditors**

At the Annual General Meeting and other general meetings, shareholders are encouraged to participate and ask questions about or comment on the management, the performance of the Company and/or the conduct of the audit and the External Auditors Report or the subject matter which is being tabled for shareholders consideration.

The Chairperson shall provide reasonable time for questions and answers to ensure that all subject matters tabled are thoroughly considered and debated. The engagement should be interactive and include robust discussion on financial and non-financial performance as well as long-term strategies. Shareholders should also be provided with sufficient opportunities to pose questions during the general meeting and all the questions should receive a meaningful response.

Shareholders may also send in their questions and comments in advance either through e-mail, facsimile or post to be raised and answered at the general meetings.

d. Virtual or hybrid Annual General Meeting

For Annual General Meeting conducted virtually, the board shall ensure that the conduct of a virtual general meeting (fully virtual or hybrid) supports meaningful engagement between the board, senior management and shareholders. This includes having in place the required infrastructure and tools to support among others, a smooth broadcast of the general meeting and interactive participation by shareholders. Questions posed by shareholders should be made visible to all meeting participants during the meeting itself.

e. Minutes of the General Meeting

Minutes of the general meeting should be circulated to shareholders no later than 30 business days after the general meeting.

3.4.3. **Annual Report**

The Company's Annual Report to shareholders is the central means of communicating to shareholders and other stakeholders the Company's activities, operations and performance over the past financial year.

The Company shall include an overview of the application of the Practice set out in the Malaysian Code on Corporate Governance ("MCCG") in its annual report and disclose the application of each Practice set out in the MCCG during its financial year, to Bursa Securities in a prescribed format ("Corporate Governance Report") and announce the same together with the announcement of the annual report.

The Annual Report is distributed to shareholders annually and is sent together with the Notice of the Annual General Meeting at least 21 clear days prior to the date of the Annual General Meeting.

The Annual Report and the Corporate Governance Report shall also be available on the Company's website as soon as reasonably practical after the said Reports have been released to Bursa Securities.

3.4.4. **The Company's Website**

The Company's website at keyfieldoffshore.com contains information about the Company including shareholders' communications.

All announcements and press releases made to Bursa Securities and other relevant corporate information that has been officially released to the market shall be available as soon as reasonably practical after such information has been released to Bursa Securities.

3.4.5. **PRESS CONFERENCES/MEDIA RELEASES**

The Company may occasionally organise press conferences and media releases in conjunction with the execution of significant or major agreements, products launches or presentations.

Presentations made during Press Conferences/Media Releases shall be available on the Company's website as soon as reasonably practical after such information is released to Bursa Securities.

3.4.6. **TELEPHONE, FACSIMILE, E-MAIL CONTACT AND POST**

All stakeholders, including shareholders may contact or communicate with the Company as follows:

For Investor Relations related queries, please contact the following:

KEYFIELD INTERNATIONAL BERHAD
Corporate Affairs Department

B-31-02, Tower B, Pavilion Embassy, 200, Jalan Ampang, Kuala Lumpur City Centre, 50450 Kuala Lumpur.

Tel No. : +603 7972 9118
Fax No. : +603 7972 9110
E-mail : ir@keyfieldoffshore.com

** Issues regarding Corporate Governance should be addressed to the Chairperson's office. Issues regarding financial performance, operations and business should be addressed to the Chief Executive Officer's Office.*

The Company shall respond within a reasonable time frame to stakeholders' queries and concerns.

Issues relating to the Company's securities should be addressed to the Company's Share Registrar as follows:

Tricor Investor & Issuing House Services Sdn Bhd
Unit 32-01, Level 32, Tower A, Vertical Business Suite, Avenue 3, Bangsar South, No. 8, Jalan Kerinchi, 59200 Kuala Lumpur
Tel No. : +603-2783 9299

4. DOCUMENT MANAGEMENT

Keyfield has in place a structured and streamlined document management system in place for each of its operating departments.

These documents are securely stored and where material and sensitive, are restricted in its circulation to authorised personnel and locked away.

Keyfield also has in place, a secured Information Technology system for communication and document management purposes supported and maintained by its IT team.

Access to information in the IT system is secured and controlled through password protection and authorised access restrictions.

Financial information and other material price-sensitive information accessibility is further restricted to only designated senior management employees in the finance/accounts department.

The finance/accounts department's information is not shared or accessible by other departments within the Group.

5. RESTRICTIONS, PROHIBITIONS AND CONFIDENTIALITY

Only the following persons who "need to know" are authorised to have access and become privy to sensitive and material information that has not been disclosed and made available to the public.

- a) members of the Board of Directors.
- b) the Chief Financial Officer and senior executives in the finance/accounts department designated by the Chief Executive Officer/Chief Operating Officer/Chief Financial Officer.
- c) the Company Secretary, auditors, reporting accountants, lawyers, consultants and investment advisers on a "need to know basis" to enable such persons to carry out their roles and responsibilities at the appropriate time as may be determined by the Chief Executive Officer/Chief Operating Officer/Chief Financial Officer.
- d) the authorised persons upon coming into possession of such confidential information are reminded:
 - Of the need to keep the information strictly confidential
 - Of the restriction for insiders who are in possession of unreleased material information not to trade in the Company's securities or the securities of such related third parties, where applicable.
 - Tip any third party with such information.

6. WHERE CONFIDENTIALITY IS COMPROMISED

In the event, the confidentiality of the information has been compromised, Keyfield shall take the appropriate steps to make an immediate announcement of the information (or clarify the status) to Bursa Securities.

Confidentiality is deemed to have been compromised where such information appears in analyst reports, media reports or market rumours accompanied by unusual market activity.

Where Keyfield becomes aware of a rumour or report, the Chief Executive Officer/Chief Operating Officer/Chief Financial Officer shall consult with its Directors, major shareholders and such other relevant persons involved in the matter to determine:

- whether the rumour or report contains undisclosed material information, and
- whether immediate disclosure is required to clarify, confirm or deny the rumour or report.

As a general rule it is not Keyfield's policy to respond or comment on market rumours and speculations unless they appear to contain elements of undisclosed material information.

This Corporate Disclosure Policy was first approved by the Board of Keyfield on 22 February 2021 with revisions approved on 16 July 2021.