



MKH OIL PALM (EAST KALIMANTAN) BERHAD
Registration No: 200401023680 (662186-D)

CORPORATE DISCLOSURE POLICY & PROCEDURES

1. INTRODUCTION

The Board of Directors (the “**Board**”) of MKH Oil Palm (East Kalimantan) Berhad (the “**Company**”) and its subsidiaries (the “**Group**”) are committed to provide accurate, clear, timely and complete disclosure of material information pertaining to the Company’s performance and operations to shareholders, investors and the public generally.

In formulating the Corporate Disclosure Policy & Procedures (“**CDPP**” or the “**Policy**”), the Company has taken into account the recommendations of the Malaysian Code on Corporate Governance (“**MCCG**”) and its disclosure obligations contained in the Main Market Listing Requirements (“**MMLR**”) of Bursa Malaysia Securities Berhad (“**Bursa Securities**”).

2. PURPOSE

The primary objectives of the CDPP are:

- a) to raise awareness and provide guidance to the directors, management and employees of the Company on the disclosure requirements and practices;
- b) to provide guidelines in disseminating corporate information to the media, and in dealing with shareholders, stakeholders, analysts and the investing public;
- c) to ensure compliance with all applicable legal and regulatory requirements on disclosure obligations required by the MMLR of Bursa Securities; and
- d) to foster good relations with the investing community based on integrity and transparency.

3. SCOPE

This Policy applies to all directors, management team, officers, authorised spokespersons and employees of the Company in disseminating material information to the public, which shall include but not limited to:-

- a) written statements - announcements, annual reports, press releases, presentation materials for investors, circular to shareholders, quarterly results, financial statements, electronic mail communication and information on the Company’s corporate website; and
- b) oral statements - Chairman’s speech at general meetings, analyst briefings, interviews, press conferences, roadshows and/or events and etc.

Company’s disclosures to the regulators, media and the public shall be communicated by the designated authorised spokespersons.

4. CORPORATE DISCLOSURE COMMITTEE

The Company recognises the important of disseminating factual and accurate information in a timely manner to preserve its integrity and social responsibility. As such, the Company has established the Corporate Disclosure Committee (“**CDC**”) consists of the Executive Directors, Group Financial Controller, Company Secretary or their designates or alternates, for overseeing all matters relating to the Company’s corporate disclosure practices and to ensure adherence to the CDPP.

The functions and responsibilities of the CDC include:-

- a) to ascertain whether corporate developments, transactions and other events constitute material information and the timely disclosure of material information in accordance with the MMLR and securities laws.
- b) to review and approve contents to be provided to the media, investment community and external parties, the contents to be published in the Investor Relations section of the Company's corporate website;
- c) to respond immediately to rumour or reports and unusual market activity as prescribed under Paragraph 9 and 10 of the MMLR of Bursa Securities;
- d) to review and update the CDPP from time-to-time to ensure compliance with the MMLR of Bursa Securities and other regulatory requirements; and
- e) to create awareness amongst the Board, management and employees on the CDPP.

5. AUTHORISED SPOKESPERSON

The Company has identified the following spokespersons who will be responsible to make public statements to the regulators, shareholders including the investing public:-

- a) Primary spokesperson
 - i. Non-Independent Non-Executive Chairman ("Chairman"); and
 - ii. Plantation Director.

The Company's Chairman and Plantation Director have been appointed to communicate with audience constituents and respond to questions in relation to the corporate vision, strategies, developments, future prospects, financial plans and operation matters.

- b) Secondary Spokesperson
 - i. Group Financial Controller.

The Group Financial Controller may only communicate to audience constituents on information already in public domain, unless they are authorised by the Primary Spokespersons to undertake broader communications.

The authorised spokespersons should practice caution when commenting and communicating with the media, the investment community or other external parties to avoid speculation or rumours.

An employee shall not respond to any inquiries from the media or investing public unless authorised to do so in the absence of the authorised spokespersons. Employees shall not disclose any material information without obtaining prior approval from the authorised spokespersons or the Company's management.

6. PROCEDURES AND PRACTICES ON CORPORATE DISCLOSURE

- (a) Material Information

Pursuant to Paragraph 9.03(2) of MMLR, information is considered material if it is reasonable expected to have a material effect on:

- (i) the market price, value or market activity of the Company's securities; and
- (ii) the decision of a holder of securities or an investor in determining his/her choice of action.

Material information may include information which:-

- (i) concern the Group's assets and liabilities, business, financial operation or prospects;
- (ii) related to dealing with employees, suppliers, customers and others;
- (iii) relates to any event affecting the present or potential dilution of the rights or interest of the Company's shareholders; or
- (iv) relates to any event materially affecting the size of the public holding of the Company's securities.

(b) Immediate Disclosure of Material Information

The CDC shall assist the Board in exercising judgement when deciding whether the information in question is material and requires immediate disclosure for the prescribed events as set out in Paragraph 9.04 of the MMLR of Bursa Securities.

As materiality can be very subjective, the Company will take the approach of assessing the likely effect of the information on the price scope of activities and financial position or performance of the Company's securities in addition to whether the circumstances or event are measurable and trigger materiality thresholds in the percentage ratio calculation method set out in the MMLR of Bursa Securities.

All announcements (with or without material information) are subjected to the Board's approval before they are released to Bursa Securities and/or Securities Commission ("SC") by the Company Secretary.

A trading halt will be instituted when the Board believes it is necessary to maintain efficient trading of the Company's securities and having the content of the news or material information to be understood better and broadly circulated. An announcement shall be made once after the Company, via the Company Secretary, requests Bursa Securities for a suspension in the trading of the Company's securities.

7. WITHHOLDING CONFIDENTIAL INFORMATION

The Company will only withhold material information from the public consistent with those as outlined in Paragraph 9.05(3) of the MMLR and other applicable legislation. These include:

- a) when immediate disclosure would prejudice the ability of the Company to pursue its corporate objectives;
- b) when the facts are in a state of flux and a more appropriate moment for disclosure is imminent;
- c) where the laws prohibit the disclosure of such information.

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

Notwithstanding Paragraph 9.05 of the MMLR, 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 must immediately announce the information to the Bursa Securities.

8. PUBLIC DISSEMINATION

The material information shall be disclosed and disseminated by the Company in a most effective manner to the public. Disclosure of material information shall not be made to an individual or selective basis to the analysts, media, shareholders or other external party, unless such information has previously been fully disclosed and disseminated to the public.

If material information is inadvertently disclosed at any meetings with analysts, media, shareholders or others, it must be publicly disseminated as promptly as possible.

Any public disclosure of material information must be disclosed and released first to Bursa Securities and/or SC, the press and newswire services. For the avoidance of doubt, the Company must not release any material information to the media even on an embargoed basis until it has given the information to Bursa Securities.

9. INSIDER TRADING

In accordance with Section 188(1) of the Capital Market and Services Act 2007 (“CMSA”) and the Companies Act, 2016, an individual is an “insider” if that individual:

- a) possesses information that is not generally available which on becoming generally available, a reasonable person would expect it to have a material effect on the price or the value of the securities; and
- b) knows or ought reasonably to know that the information is not generally available.

The restriction of insider trading is governed by Section 188 of the CMSA and Paragraph 9.14 and 9.15 of the MMLR. An insider must not:-

- a) acquire or dispose of the securities of the Company, or enter into an arrangement for or with a view to the acquisition or disposal of the securities of the Company, on the basis of the material information which is not known to the investing public;
- b) procure, directly or indirectly, an acquisition or disposal of, or the entering into an agreement for or with a view to the acquisition or disposal of the securities of the Company, on the basis of the material information which is not known to the investing public; or
- c) inform or tip any other person of undisclosed material information unless the sharing of the information is in the necessary course of business.

Employees or directors who possess undisclosed material information are prohibited from dealing directly or indirectly in the Company’s securities unless the information has been publicly disclosed at least one (1) full market day from the date of the announcement of material information.

10. CLOSED PERIOD

“**Closed Period**” is defined as a period commencing thirty (30) calendar days before the targeted date of announcement up to the date of the announcement of the Company’s quarterly results to Bursa Securities.

During Closed Periods, the Authorised Spokesperson is prohibited from commenting on the current period earnings and financial assumptions. Communications shall be limited to commenting on publicly available or non-material information.

The Company Secretary will advise the Directors and principal officers on the trading restrictions in the Company’s securities in accordance with the provisions of the MMLR of Bursa Securities.

11. CLARIFICATION ON MARKET RUMOURS OR REPORTS

Whenever the Company is aware that a report or rumour which contains error in the material information is being circulated, an immediate announcement shall be made to Bursa Securities to deny or clarify the report or rumour with sufficient facts provided to support the denial or clarification.

In the instance of a report or rumour contains material information that is correct, the Company shall respond promptly by making an announcement for public release, supported by facts and including but not limited to an indication of the state of negotiation or of corporate plans as reported.

The Company shall not comment to any report or rumour predicting earnings, sales forecast or other quantitative data. The Board undertakes this responsibility with assistance from the Executive Directors and the Company Secretary.

12. UNUSUAL MARKET ACTIVITY (“UMA”)

The Company will undertake due enquiry when there is unusual trading activity or price movement of the Company’s securities irrespective whether a written UMA query is issued by Bursa Securities. The due enquiry will be undertaken with the relevant persons in order to determine the cause and thereafter to issue a clarifying announcement on an immediate basis.

13. FORWARD-LOOKING INFORMATION

The Company may convey its future direction to the public with the intention of assisting the market to evaluate and accurately value the Company’s securities. The forward-looking information does not constitute undisclosed material information and is subjected to the Board’s review and/or approval. The Company shall only disclose information such as prospects, revenue, profits estimates, forecasts, projections or internal targets or key performance indicators which are based on historical and publicly disclosed data.

14. DEALINGS WITH THE MEDIA AND INVESTMENT COMMUNITY

Authorised spokesperson is allowed to participate in briefing sessions, meet with media and other market experts, institutional financial specialists, investment community on behalf of the Company to initiate contact with them and response to their calls.

The Company's authorised spokesperson shall only divulge factual and non-speculative information which has been reviewed and/or approved by the Board. The authorised spokesperson shall not reveal any confidential material information nor comment or respond to unexpected questions that involve or may involve the disclosure of undisclosed material information.

15. CORPORATE WEBSITE

All the Company's publicly disclosed material information and presentations to analysts and conferences will be made available through the corporate website from time to time.

The Investor Relations & Corporate Communications contact person is responsible to ensure that the Company's website be kept up-to-date with the Company's latest disclosures.

16. APPROVAL AND REVISION OF THE CDPP

This policy was adopted by the Board of Directors on 27 September 2022 with revision approved on 25 April 2024. The Board shall review the CDPP from time to time to ensure its relevance and practicality. All updates and revisions will be updated on the Company's website.