

CORPORATE DISCLOSURE POLICY

The Board of Directors (the Board) is 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 this policy, the Company has taken into account the recommendations contained in the Malaysian Code on Corporate Governance (MCCG) 2012 and its disclosure obligations contained in the Listing Requirements of Bursa Malaysia Securities Berhad.

OBJECTIVES

The objectives of the Corporate Disclosure Policy are as follows:-

- (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 and policies in disseminating corporate information to, and in dealing with shareholders, stakeholders, analysts, media and the investing public;
- (c) To ensure compliance with all applicable legal and regulatory requirements on disclosure of material information; and
- (d) To build good investor relations with the investing public that inspires trust and confidence.

INTERNAL STRUCTURE AND SYSTEM FOR CORPORATE DISCLOSURE

The Board is ultimately responsible for ensuring that the Corporate Disclosure Policy is implemented and the disclosure requirements are fulfilled.

The Board delegates the implementation of the Corporate Disclosure Policy to the Management Committee of the Company which consists of:-

Corporate Disclosure Committee (CDC)

- (a) The CDC consists of the Group Managing Director, Chief Executive Officer/Company Secretary and Head of Corporate Planning.
- (b) The CDC has been established to oversee all matters relating to the Company's corporate disclosure practices and to ensure adherence to the Corporate Disclosure Policy
- (c) The functions and responsibilities of the CDC include:-
 - Maintaining an awareness and understanding of the disclosure rules and guidelines;
 - Ascertaining whether corporate developments, transactions and other events constitute material information and if so, ensuring the procedures outlined in the Disclosure Policy are fully adhered to;
 - Implementing and monitoring of compliance with the Corporate Disclosure Policy and undertaking reviews of any violations, including assessment and implementation of appropriate consequences and remedial actions; and
 - Reviewing and updating the Corporate Disclosure Policy from time to time to ensure compliance with the Main Market Listing Requirements of Bursa Malaysia Securities Berhad and other regulatory requirements.

Authorised Spokesperson

(a) Primary Spokesperson

- Chairman; and
- Managing Director/Chief Executive Office (MD/CEO)

The Company's Chairman and MD/CEO 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

- Chief Operating Officer or Chief Financial Officer

The Chief Operating Officer or Chief Financial Officer may only communicate to audience constituents on information already in the public domain, unless they are authorized by the Primary Spokespersons to undertake broader communications.

PROCEDURES AND PRACTICES ON CORPORATE DISCLOSURE

Material Information

(a) Material information is any information about the Company and its subsidiaries which are reasonably expected to have a material effect on:

- The market price, value or market activity of the Company's securities; and
- The decision of a holder of securities or an investor in determining his choice of action.

And may include information which –

- Concern the Company's assets and liabilities, business, financial condition or prospects;
- Relates to dealing with employees, suppliers, customers and others;
- Relates to any event affecting the present or potential dilution of the rights or interests of the listed issuer's securities; or
- Relates to any event materially affecting the size of the public holding of its securities.

(b) The following are the guidelines which the Company will follow to fulfill its obligation to make immediate announcement of materials information:-

- For the prescribed events which may require immediate disclosure as set out in Paragraph 9.04 of the Main Market Listing Requirements of Bursa Securities;
- Materiality can be very subjective and 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 the materiality thresholds in the percentage ratio calculation method set out in the Main Market Listing Requirements of Bursa Securities.

Withholding Confidential Information

- (a) The Company will withhold material information from the public for legitimate business purposes. These include:
 - When immediate disclosure would prejudice the ability of the Company to pursue its corporate objectives;
 - When the facts are in a state of flux and a more appropriate moment for disclosure is imminent; and
 - Where the company or securities laws restrict such disclosure.
- (b) If the material information is being withheld, the Company must ensure that the strictest confidentiality is maintained by limiting the number of people with access to the material information and ensuring the security of all confidential documents.

Procedures for Disclosure of Material Information

- (a) The CDC will manage all of the Company's releases of announcements of material information to Bursa Securities through the Company Secretary or the appointed merchant bank in accordance with the applicable securities law and Listing Requirements and the announcement shall then be approved by the CEO and MD before release to Bursa Securities.
- (b) The Chief Financial Officer, Legal Affairs and the relevant departments will review and verify the accuracy of all financial data and all information contained in the announcement to ensure that disclosures are consistent with the prevailing accounting standard and guidelines.
- (c) After the release of the announcement to Bursa Securities, it will then be made available on the Company's website.

Insider Trading

- (a) Anyone who has access to material information of the Company, its financial condition and its operations, is regarded as an Insider. Material information which is in the possession of an Insider and has not been disclosed to the investing public is Insider Information.
- (b) Insiders may not deal in the Company's securities while in possession of Inside Information, nor may they pass on that information to help another person deal in the Company's securities.
- (c) The relevant provisions of the Capital Markets and Services Act 2007 apply to all Insiders.
- (d) 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 Main Listing Requirements.

REVIEW OF THE CDP

- (a) The CDP has been adopted by the Board and any subsequent amendment to the CDP can only be approved by the Board
- (b) The CDC will review the CDP periodically to ensure that it is effective in accordance with any new regulations on the disclosure obligations and practices.