

**SPB DEVELOPMENT BERHAD**  
**CORPORATE DISCLOSURE POLICY**

**1. INTRODUCTION**

- 1.1 As a public listed company, SPB Development Berhad (“**Company**”) and its subsidiaries (“**Group**”) are committed to upholding the highest standards of transparency, accountability and integrity in the disclosure of all material information of the Group (“**Material Information**”) to the shareholders, investors and public generally in an accurate, clear, factual, complete and timely manner.
- 1.2 In formulating this Corporate Disclosure Policy (“**Policy**”), the Company is obliged to comply with the Malaysian Code on Corporate Governance (“**MCCG**”) issued by the Securities Commission Malaysia and its disclosure obligations contained in the Main Market Listing Requirements (“**MMLR**”) of Bursa Malaysia Securities Berhad (“**Bursa Securities**”).

**2. OBJECTIVES**

- 2.1 The objectives of this Policy are as follows:
- (a) to raise awareness and provide guidance to the Board of Directors (“**Board**”), and employees (“**Employees**”) of the Company on the Group’s disclosure requirements and practices;
  - (b) to promote and maintain market integrity and investor confidence of the Company;
  - (c) to provide the shareholders, investors, analysts, media representatives and other stakeholders with comprehensive, accurate and quality information issued by the Group on a timely and even basis and to avoid selective disclosure;
  - (d) to ensure that the Group observes best practices in relation to disclosure as illustrated in the Corporate Disclosure Guide issued by Bursa Securities and to ensure compliance with all applicable legal and regulatory requirements on disclosure of Material Information;
  - (e) to build good investor relations with the investing public that inspires trust and confidence; and
  - (f) to reinforce the Group’s commitment to comply with the continuous disclosure obligations imposed by the relevant Malaysian securities laws and regulations and the MMLR.

**3. SCOPE AND APPLICATION**

- 3.1 The Policy applies to the conduct of all its Directors, Employees, and professional advisers appointed by the Company which include, amongst others, its auditors, investment bankers and advisers, and to all methods that the Group use to communicate with the investing public in the dissemination of Material Information especially price sensitive information, including but not limited to:
- (a) documents filed with the authorities or published on the websites of the securities regulators and the Company;
  - (b) written statements in annual reports and quarterly reports;
  - (c) financial and non-financial disclosure;
  - (d) press releases;

- (e) letters/circulars to shareholders,
- (f) speeches/presentations by senior management of the Company (“**Senior Management**”);
- (g) information on the Group’s website and other electronic communications;
- (h) oral statements made in individual or group meetings, telephone conversations, interviews with members of the investment community (which includes analysts, investors, investment dealers, brokers, investment advisers and investment managers) or with Employees;
- (i) press conferences or interviews with media; and
- (j) any other dealings with the public generally.

3.2 This Policy does not apply to:

- (a) communication made in the ordinary course of business of the Group not involving Material Information;
- (b) Material Information that is already in the public domain;
- (c) Material Information that is not generated or owned by the Company; and
- (d) Material Information that summarises, realigns or is computed from Material Information that is already in the public domain. Example of which include information on financial ratios that, although never been disclosed directly before, could be derived from realigning figures in financial statements disclosed previously.

#### **4. STRUCTURE AND ADMINISTRATION OF THE CORPORATE DISCLOSURE POLICY**

4.1 The Board is ultimately responsible for ensuring that this Policy is implemented effectively and the disclosure requirements as set out are fulfilled.

4.2 The Board shall be responsible, among others, for the following:

- (a) overseeing the Group’s disclosure controls, procedures and practices and ensuring adherence to this Policy;
- (b) ascertaining if any corporate developments, transactions and other events constitute Material Information and if so, ensuring the procedures outlined in this Policy are fully adhered to;
- (c) making a timely disclosure of Material Information in accordance with applicable securities laws, MMLR of Bursa Securities and other regulatory requirements, from time to time;
- (d) responding to any query raised by Bursa Securities or other relevant authorities; and
- (e) reviewing and updating this Policy to ensure compliance with MMLR and other regulatory requirements, from time to time.

4.3 The company designates a limited number of spokespersons (“**Authorised Spokespersons**”) responsible for communication with the investment community, regulators or the media. The list of the Authorised Spokespersons is as follows:

### **Primary Spokespersons**

- Chairman of the Board (“**Chairman**”)
- Chief Executive Officer (“**CEO**”)
- Chief Financial Officer (“**CFO**”)

The Chairman, CEO and CFO have been appointed to communicate with all audience constituents, providing information, data and analysis and responding to questions concerning all aspects of the Group’s operations and financial position, its future prospects and its strategies. They may also discuss matters relating to the Group’s governance and management, as well as its products and services, and initiatives

### **Secondary Spokespersons**

- Chief Operating Officer
- Company Secretary (“**Company Secretary**”)

*Notes:*

1. *There could be blanket delegation on routine matters, in the absence of any Authorised Spokespersons for matters which delegation is possible.*
2. *The Secondary Spokespersons are only authorised to communicate or respond with outsider with prior consent or being authorised by the Primary Spokespersons.*
3. *Primary Spokespersons shall be updated by Secondary Spokespersons on the progress or outcome of matters.*

- 4.4 The Authorised Spokespersons are authorised to deal with all aspects of the Company’s operations, financial positions, future prospects, strategies, governance, management, as well as products and services.
- 4.5 Authorised Spokespersons in response to specific enquiries from the public, shall not disclose Material Information that has not been previously made public.
- 4.6 Employees other than the Authorised Spokespersons shall not respond to inquiries from the investment community, regulators or media unless authorised to do so by referring to the Authorised Spokespersons.
- 4.7 If there is any ambiguity about the appropriateness of supplying information to an outsider, the Authorised Spokespersons should be contacted for advice.

## **5. MAINTAINING CONFIDENTIALITY**

- 5.1 Any Employee who is privy to the Material Information is prohibited from communicating such information to anyone else, unless required in the course of business or required by law or authorised by the Authorised Spokespersons. Efforts will be made to limit access to such Material Information to only those who “need to know” the information.
- 5.2 Outside parties privy to undisclosed Material Information concerning the Group will be told that they must not divulge such information to anyone else. Senior Management of the Company shall ensure that such outside parties confirm their commitment to non-disclosure under a written confidentiality agreement.
- 5.3 For prevention of misuse or inadvertent disclosure of the Material Information, the following general procedures shall be observed at all times:

**(a) Security and code names**

Documents and files containing Material Information should be kept in a safe place or within the Company's secured IT system, with accessibility restricted to individuals who "need to know" in the necessary course of their work. Code names should be used, where necessary.

**(b) Prohibition to discuss in public places**

Confidential matters should not be discussed in places where the discussion may be overheard, including but not limited to, elevators, hallways, restaurants, bars, restrooms, airplanes or taxis.

If confidential matters must, of necessity or urgency, be discussed on wireless devices in public places, caution should be exercised by the participants. In such cases, the identity of any relevant party should be cryptic or in code.

**(c) Exercise caution when reading confidential documents with devices**

One should exercise caution when reading of confidential documents on smart phone(s) or other personal digital assistant devices in public places.

**(d) Accompanying visitors**

Visitors should be accompanied by Company personnel to ensure that they are not left alone in offices or sites containing Material Information.

**(e) Minimal participation in social media on matters relating to Company**

To mitigate the risk of inadvertently disclosing or publishing material and non-public information, Employees are not encouraged to participate in internet blogs, chat rooms, similar social media forums (such as Twitter, LinkedIn or Facebook) or newsgroup discussions on matters pertaining to the Company's business and affairs or its listed securities unless authorised to do so by an Authorised Spokesperson.

**6. MATERIAL INFORMATION**

6.1 Pursuant to Paragraph 9.03 of the MMLR, Material Information is generally considered to be any information of the Group which is reasonably expected to have a material effect on:

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

6.2 Material Information may include information which:

- (a) concerns the Company's assets and liabilities, business, financial condition or prospects;
- (b) relates to dealing with Employees, suppliers, customers and others;
- (c) relates to any event affecting the present or potential dilution of the rights or interests of the listed issuer's securities; or
- (d) relates to any event materially affecting the size of the public holding of its securities.

- 6.3 Events which require immediate disclosure are set out in Paragraphs 9.04 and 9.19 of the MMLR. The list is non-exhaustive and the Company/Group will exercise its own judgment in determining the materiality of the information.
- 6.4 Decisions on the materiality of information will be made within the context of the Group's overall business affairs and dimensions based on certain financial ratios or operational impact as defined in the MMLR and the Group's policies from time to time. Such decisions must be made based on the guidelines and spirit provided by the relevant statutory requirements.

## **7. PROCEDURES AND PRACTICES ON DISCLOSURE OF MATERIAL INFORMATION**

- 7.1 The Authorised Spokespersons shall be fully informed of all developments of the Group that could potentially impact the disclosure process so as to:
- (a) facilitate determination of materiality, appropriateness and timing for public disclosure of the information, or whether the information should remain confidential;
  - (b) ensure appropriate understandings of significant developments and updates which may be relevant to ongoing communications with the investing public; and
  - (c) avoid denying significant developments when in fact, such developments are occurring.
- 7.2 The Authorised Spokespersons shall manage all of the Company's releases of announcements of Material Information to Bursa Securities through the Company Secretary or the appointed advisers in accordance with the MMLR and applicable rules and regulations.
- 7.3 The CFO and the relevant departments shall review and verify the accuracy of all financial data and all information contained in the announcement to ensure that disclosures are accurate and consistent with the prevailing accounting standards and guidelines.
- 7.4 All announcements shall then be reviewed and approved by the Board before releasing to Bursa Securities. The Authorised Spokespersons shall consider whether it is necessary to involve legal advisers before publishing such disclosures, and should consult legal advisers if the announcements have implications under the MMLR.
- 7.5 After the release of the announcement to Bursa Securities, it shall be made available on the Company's website as soon as possible to ensure widest possible public dissemination.
- 7.6 For news/media releases, the Authorised Spokespersons has the overall responsibility to ensure that the contents are clearly and effectively communicated to the intended substance and meaning of the information to the public.
- 7.7 When required, the Company is to file a material change report with Bursa Securities.

## **8. DISCLOSURE PRINCIPLES**

- 8.1 In complying with the requirement to disclose all Material Information under the applicable laws and MMLR in a timely manner, all Employees of the Group shall adhere to the following basic disclosure principles:

**(a) Timeliness of disclosure**

The Group's continuous disclosure obligations will only be satisfied through the release of formal disclosure announcements via Bursa Securities ("**Bursa Announcements**") (including annual and quarterly financial results announcements).

Certain announcements will require the prior approval of Bursa Securities or other relevant securities regulators. It is important to note that media releases, speeches, press conferences, analyst briefings and postings on Group's websites, on their own, are insufficient to satisfy the Company's disclosure obligations. Material Information which is in the possession of an insider and has not been disclosed to the investing public ("**Inside Information**") must first be disclosed via a Bursa Announcement before it is released in any other form.

Any transaction or event which is expected to constitute Inside Information for the Company must be announced through a Bursa Announcement as soon as reasonably practicable after it becomes known to the Directors, Company Secretary or Senior Management.

**(b) Consistent approach to materiality**

The Company will endeavor to take a consistent approach to materiality.

**(c) Material Information to be temporarily kept confidential if detrimental to the interest of the Group**

Material Information may be kept confidential temporarily if the immediate release of the information would be unduly detrimental to the interests of the Group. In such cases, the information will be kept confidential until the Authorised Spokespersons determines that it is appropriate to publicly disclose or that the Company has a legal obligation to do so.

When information is temporarily withheld, the Company must ensure that the strictest confidentiality is maintained, including limiting the number of persons having access to the Material Information and ensuring security of all confidential documents.

**(d) Factual and non-speculative disclosure**

Disclosure must be factual and non-speculative and must include any information where the omission of which would make the rest of the disclosure misleading.

**(e) Prompt disclosure of unfavourable Material Information**

Unfavourable Material Information must be disclosed as promptly and completely, consistent to favourable information.

**(f) Inadvertent disclosures to be disclosed immediately via Bursa Announcements**

If previously undisclosed Material Information has been inadvertently disclosed, such information must be broadly disclosed immediately via Bursa Announcements. In certain circumstances, applicable securities laws allow for selective disclosure where doing so is in the necessary course of business.

**(g) Immediate correction of material error in disclosure**

Disclosure must be corrected immediately if the Company subsequently learns that an earlier disclosure by the Company contained a material error at the time it was originally distributed.

**(h) Rumours and Reports**

The Company shall not comment on rumours unless there is significant reaction in the market for the Company's listed securities. The Company's Authorised Spokespersons or designates will respond consistently to all verbal rumours, saying, "It is our policy not to comment on market rumours or speculation."

However, should rumours be published in the printed form and relate to specific Material Information, the Authorised Spokespersons shall consider the matter and undertake due enquiry before deciding on the form of statement to be made regarding the rumour.

**(i) No informal meetings or “off the record” comments**

The Company shall not conduct any “informal meetings” or make any “off the record” comments.

**(j) Thorough Public Dissemination**

As soon as a Bursa Announcement is issued, the Inside Information can be released on the Group’s websites and can be distributed via media releases, speeches, press conferences, analyst briefings or other means, unless indicated otherwise by the Company Secretary.

All investors must have equal access to Material Information. Selective disclosure is not allowed for whatever reason until a Bursa Announcement has been published, unless express prior approval in writing has been obtained from the Authorised Spokespersons.

**9. RESTRICTIONS ON INSIDER TRADING**

9.1 The Company and parties who may be regarded as insiders must be fully aware of the provisions of the Capital Markets and Services Act 2007 and the Companies Act 2016.

9.2 Based on Section 188(1) of the Capital Markets and Services Act 2007, an “insider” is a person who:

- (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 securities; and
- (b) knows or ought reasonably to know that the information is not generally available.

9.3 Insiders, including the Directors and Employees of the Group, must not deal in the Company’s securities while in possession of the Inside Information as this constitutes insider dealing and is illegal. They also must not pass on the Inside Information to help another person deal in the Company’s securities.

9.4 The Directors and certain other staffs who are designated as “Restricted Persons” by the Company Secretary must not trade in the Company’s securities in the periods leading up to the release of quarterly and annual financial results.

9.5 The relevant provisions of the Capital Markets and Services Act 2007 apply to all insiders.

9.6 It is prohibited for anyone with knowledge of the Material Information affecting the Company which has not been publicly disclosed, to purchase or sell securities of the Company. Except in the necessary course of business, it is also illegal for anyone to inform or tip any other person of material non-public information.

9.7 Questions as to whether information is material, potentially material, Inside Information or whether such information has previously been disclosed in accordance with this Policy should be directed to the CEO, Executive Directors or Company Secretary.

9.8 All Authorised Spokespersons are prohibited from commenting on current period earnings, estimates and financial assumptions; and must also avoid initiating meetings (in person or by phone) with investment analysts, security holders, potential investors and the media on items significant to investors, other than responding to unsolicited inquiries concerning factual information.

- 9.9 Having stated the above, the Company does not stop all communications with analysts or investors during this period and may, for example, participate in investment meetings and conferences organised by other parties, as long as Material Information which has not been publicly disclosed, is not selectively disclosed.
- 9.10 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.

## **10. RESPONSE TO RUMOURS OR REPORTS**

- 10.1 Whenever the Company becomes aware of any rumour or report, true or false, that contains Material Information, the Company shall make due enquiry and immediately publicly clarify, confirm or deny the rumour or report which is in any form whatsoever and howsoever including that by word-of-mouth and not limited to an article or otherwise, published in a newspaper, newswire, magazine, a broker's market report or any other publication.
- 10.2 In the case of a rumour or report containing erroneous Material Information which has been circulated, the Company must immediately announce to Bursa Securities a denial or clarification of the rumour or report and provide facts sufficient to support the denial or to clarify any misleading aspects of the rumour or report.
- 10.3 A reasonable effort is expected from the Company to bring the announcement to the attention of the particular group that initially distributed report. In the case of an erroneous newspaper article, for example, this should be done by sending a copy of the announcement to the newspaper's financial editor, or in the case of an erroneous broker's market report, by sending a copy to the broker responsible for the report.
- 10.4 In the case of a rumour or report containing Material Information that is correct, an announcement setting forth the facts must be prepared for public release, which must include but not be limited to, an indication of the state of negotiations or of corporate plans in the rumoured area. Such announcements are essential even if the matter has yet to be presented to the Board for consideration.
- 10.5 Similarly, if there has been any breach of confidentiality or an unauthorised or inadvertent release of Inside Information, it may be necessary for a Bursa Announcement to be issued. Failure to do so may result in civil or criminal sanctions for the Company and/or its Directors and officers, and may also lead to a temporary halt of dealings in the Company's securities.
- 10.6 In the case of a rumour or report predicting future sales, earnings or other quantitative data, no response from the Company is ordinarily required. However, if such a report is manifestly based on or contains erroneous information, or is wrongly attributed to the Company, the Company must respond promptly to the supposedly factual elements of the rumour or report. In addition, the Company shall include in the announcement a statement to the effect that the Company itself has made no such prediction and currently knows of no facts that would justify making such a prediction.
- 10.7 To ensure compliance with its disclosure obligations, all actual or suspected instances of unauthorised or inadvertent disclosure of Inside Information or market rumours must be reported immediately to the Authorised Spokespersons.
- 10.8 The Company shall immediately announce the information withheld to Bursa Securities in accordance with Paragraph 9.07 of the MMLR, if the following circumstances occurs:
- (a) unusual market activity in the Company's securities which signifies that a "leak" of the information may have occurred;
  - (b) rumours or reports concerning the information have appeared; or



- (c) where the Company learns that there are signs that insider trading may be taking place.

## **11. FORWARD-LOOKING INFORMATION**

- 11.1 From time to time, the Company may convey its future direction to the public in order to assist the market to accurately value the Company's securities. The Company shall only discuss general trends, events, commitments and uncertainties that are reasonably expected based on historical and currently known data.
- 11.2 Documents containing forward-looking information must be accompanied by a "Cautionary Statement" which cautions the reader on the risks and uncertainties that could cause actual results and developments to differ materially from those envisaged in the forward-looking information. It includes a statement to disclaim the Company's intention or obligation to update the forward-looking information, whether as a result of new information, future events or otherwise.

## **12. FINANCIAL REPORTS AND ANNUAL REPORTS**

- 12.1 As required by Paragraphs 9.22 and 9.23 of the MMLR, the Board shall ensure that the Company:
- (a) publishes an announcement of the quarterly results of the Company not later than two (2) months after the end of each quarter of a financial year; and
  - (b) issue to its shareholders an annual report that includes annual audited financial statements together with the auditors' and Directors' reports in respect of each financial year within four (4) months from the close of the financial year.
- 12.2 Quarterly reports and annual audited results will be announced to Bursa Securities upon approval by the Board. The announced quarterly reports and annual audited financial statements will be posted on the Company's website and the websites of Bursa Securities. The Company will issue an announcement to Bursa Securities on the release date of the quarterly and annual results one week prior to release.
- 12.3 The annual reports of the Company shall be made available on the Company website.
- 12.4 The Board should present a balanced, clear and understandable assessment in annual reports, other price sensitive announcements and other financial disclosures required by the MMLR. It should also do so for reports to regulators and information disclosed under the applicable statutory requirements.
- 12.5 The Senior Management should provide sufficient explanation and information to the Board to enable the Board to make an informed assessment of the financial and other information before put it for approval to enable the Board as a whole and each Director to discharge their duties under the MMLR.
- 12.6 The Company should also disclose annually the details of any remuneration payable to the Senior Management in the annual reports on a named basis, in line with the MCCG.

## **13. CORPORATE GOVERNANCE**

- 13.1 The Company should set out an overview of the application of the principles set out in the MCCG by the Board to be included in its annual reports ("**CG Overview Statement**") and the application of each Practice set out in the MCCG ("**Practice**") during the financial year to be disclosed to Bursa Securities in a prescribed format ("**CG Report**") and announce the same together with the announcement of the annual reports.

- 13.2 The Company must ensure that the CG Report provides a fair and meaningful disclosure of the Company's corporate governance practices.
- 13.3 In disclosing the application of each Practice in the CG Report, the Company must provide meaningful explanation on how it has applied the Practice. If it has departed from a Practice, it must:
- (a) provide an explanation for the departure; and
  - (b) disclose the alternative practice it has adopted and how such alternative practice achieves the Intended Outcome as set out in the MCCG ("**Intended Outcome**").
- 13.4 The followings must also be disclosed if they depart from the Practice:
- (a) the actions which the Company has taken or intends to take; and
  - (b) the timeframe required, to achieve application of the Practice.

#### **14. ANNUAL GENERAL MEETING ("AGM") AND OTHER GENERAL MEETINGS**

- 14.1 The AGM is an important forum for shareholders' engagement with the Board and Senior Management and for shareholders to gain better insights into the Company's business and performance.
- 14.2 Notice of the AGM will be announced to Bursa Securities at least twenty-eight (28) days before the AGM.
- 14.3 Notice of the other general meetings will be announced to Bursa Securities at least fourteen (14) days before the general meetings or at least twenty-one (21) days before the meeting where any special resolution is to be proposed.

#### **15. COMMUNICATIONS WITH FINANCIAL ANALYST, MEDIA AND INVESTING PUBLIC**

##### **15.1 Analysts, Investors and the Media**

- (a) Authorised Spokespersons may meet with analysts, institutional investors, media and other market professionals on an individual or small group basis as needed and will initiate contacts or respond to their calls timely, consistently and accurately in accordance with this Policy.
- (b) All information to be provided or released to media, equity analysts, fund managers and investors is subject to this Policy. Inside Information must not be selectively disclosed to any party prior to being released via a Bursa Announcement.
- (c) Analyst briefings and press conferences are normally held (physically or through conference call) in conjunction with the announcement of the Company's quarterly financial results and major corporate developments. Primary Spokespersons will conduct the analyst briefings and press conferences with the assistance from Secondary Spokespersons.
- (d) No Inside Information may be disclosed or discussed in such meetings unless it has already been released to the market via a Bursa Announcement. If during such meetings or responses to the calls, there is inadvertent selective disclosure of previously undisclosed Material Information, the Authorised Spokespersons must be immediately informed; following which the Authorised Spokespersons will consult with the Company's advisers, as appropriate, concerning the actions and steps to be taken in light of such inadvertent disclosure of Inside Information; including an immediate disclosure of such information via a Bursa Announcement.

- (e) All enquiries from media, equity analysts, fund managers or investors should be referred to the Authorised Spokespersons. All materials for release or presentation to any such persons or for publication via website communications, speeches or other external media communications must be approved by the Authorised Spokespersons prior to release.
- (f) To protect against inadvertent disclosure of Inside Information, no interviews, meetings or presentations with any journalists, equity analysts, fund managers, institutional or individual investors or other comparable parties are to be held, nor any financial information released, in the period leading up to and concluding on the release of the Company's annual or quarterly results announcements, unless prior approval has been obtained from the Authorised Spokespersons.

#### **15.2 Investor and Industry Conferences**

- (a) Copies of presentations made during investor conferences will be made available on the Company's website.

#### **15.3 Analyst Reports**

- (a) Analysts may from time to time request the Company to review draft analysts' reports and only Authorised Spokespersons will comment on such reports. Comments will be limited to identifying publicly disclosed factual information that could affect the analyst's model and to pointing out inaccuracies or omissions with reference to publicly available information. The Company will not attempt to influence an analyst's conclusions.
- (b) The Company will not externally distribute analyst's research reports but, if requested, will advise which analysts follow the Company, accompanied by an appropriate disclaimer that the view expressed in any reports, including all forward-looking information, are the views of the analysts and not of the Company.

#### **15.4 Review of presentations and hand-out materials**

- (a) The investor relations personnel of the Company should provide an advance copy of all presentation materials to the Authorised Spokespersons who will review the presentation material, handouts and speaking notes for accuracy and consistency with other public disclosures.
- (b) The Authorised Spokespersons will confirm with the investor relations personnel whether the contents or remarks are acceptable from a disclosure perspective.

#### **15.5 Feedback and Company's website**

- (a) The Company has developed channels for shareholders and major stakeholders to provide their comments and feedback in relation to the Group's operational, performance, governance and strategic matters. Contact information is available on the Company's website.
- (b) The Company will consider the relevant comments and feedback received in establishing its corporate strategy.
- (c) The Company must publish the following information on the Company's website:
  - (i) all announcements made to Bursa Securities pursuant to these requirements, as soon as practicable after the same are released on website of Bursa Securities; and
  - (ii) a summary of the key matters discussed at the general meeting, as soon as practicable after the conclusion of the general meeting and the minutes of the general meeting not later than 30 business days from the date of general meeting.

- (d) The Company must ensure that its website contains the email address, name(s) of designated person(s) and their contact numbers to enable the public to forward queries to the Company.
- (e) The Company should ensure that its website is current, informative and contains all information which may be relevant to the Company's shareholders including analyst's briefings.
- (f) The Company's website is also an avenue for the shareholders, stakeholders and investing public to access information pertaining to the Company.

## **16. ELECTRONIC COMMUNICATION**

- 16.1 The Company shall take advantage of current information technology and use its website to disseminate relevant information to investing public and enhance its investor relations.
- 16.2 The Company's website shall contain information about the Company/Group, its products and businesses, announcements which have been made available to the public as well as other areas of interest to the public.
- 16.3 All timely disclosure and Material Information documents will be posted on the website as soon as possible after release by the news wire service.

## **17. NON-COMPLIANCE WITH THIS DISCLOSURE POLICY**

- 17.1 An Employee who violates this Policy may face disciplinary action which may result in the termination of employment. Actions under the applicable laws may also be instituted against the person.

## **18. POLICY SUBJECT TO PERIODICAL REVIEW**

- 18.1 The Authorised Spokespersons is responsible for regular reviews of this Policy and making any recommended changes to ensure that it continues to remain relevant, appropriate and consistent with the Group's practices, MCGG, MMLR or any other applicable regulatory requirements.
- 18.2 Any revisions and/or changes to the terms of this Policy as recommended by the Authorised Spokespersons shall be subject to the approval of the Board.
- 18.3 The Board should disclose the application of this Policy in the annual reports and on the corporate website of the Company.

This Policy is approved and adopted by the Board on 18 July 2024.