CORPORATE DISCLOSURE POLICIES AND PROCEDURES

1. Introduction

This Corporate Disclosure Policies and Procedures (CDPP) document outlines the policies and practices adopted by the Company to ensure full, fair, timely, and accurate disclosure of material information, in compliance with the ACE Market Listing Requirements (AMLR) of Bursa Malaysia Securities Berhad. The objective is to maintain investor confidence, uphold the integrity of the capital market, and ensure equal access to information by the investing public. The procedures serve as a guide to Directors, Key Senior Management, and employees in managing disclosure obligations and safeguarding confidential information until public disclosure is appropriate.

2. Definition of Material Information

Material information, in accordance with Rule 9.03(2) of the AMLR, constitutes information about the Group which are reasonably expected to have a material effect on the following:

(a) the price, value or market activity of any of the Company's securities; or

(b) the decision of a holder of securities of the Company or an investor in determining his/her choice of action.

Material information may include any or a combination of the following:

(a) information concerning the Group's assets and liabilities, business, financial condition or prospects;

(b) information relating to dealings with employees, suppliers, customers and others;

(c) information relating to any event affecting the present or potential dilution of the rights or interests of the Company's securities; and

(d) information relating to any event materially affecting the size of the public shareholding of the Company's securities.

Immediate disclosure of material information

The guidelines which the Company will follow to fulfil its obligation to make immediate announcement of material information:

(a) for the prescribed events which may require immediate disclosure as set out in the AMLR; and

(b) materiality can be very subjective and the Company will take the approach of assessing the likely effect of the information on the principal 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 AMLR.

In determining the materiality of a contract, the Company will assess the value of the contract relative to the annual revenue of the Group. Generally, a contract is deemed material if the value of the contract is expected to be 10% or more of the Company's latest annual published consolidated revenue, unless the value of the contract is less than 15% of the average annual revenue of the Group for the past three (3) years.

3. Disclosure Principles

The Company adheres to the following key disclosure principles, in line with the AMLR and Malaysian Code on Corporate Governance:

- **Accuracy and Completeness:** All disclosures must be factual, accurate, complete, and not misleading.
- **Timeliness:** Disclosure must be made immediately upon the information becoming known and confirmed.
- **Fair and Equal Access:** Information should be disseminated publicly in a fair and equitable manner.
- **Transparency:** Disclosures must be clear, concise, and not confusing.
- **Consistency:** Communications should be consistent across all official channels.

4. Responsibility to Report on Significant Corporate Developments

All employees, particularly Key Senior Management (KSM), have a responsibility to report material developments to the Board of Directors. These include:

- Strategic business decisions;
- Significant operational disruptions;
- Regulatory actions or notifications;
- Major transactions, investments, or divestments.

The Board of Directors and Senior Management hold the ultimate responsibility to ensure timely and accurate disclosures.

5. Disclosure and/or Communication Designated Person

The Board is ultimately responsible for ensuring that this CDPP is implemented and the disclosure requirements are fulfilled.

The Board delegates the implementation of this CDPP to the Disclosure and/or Communication Designated Person.

The Disclosure and/or Communication Designated Person (or any other employee(s) designated by the Company) will generally be responsible for overseeing matters relating to the corporate disclosure practices and ensure adherence to the implementation and monitoring of the compliance with this CDPP, within the extent of their specific roles within the Company.

The Disclosure and/or Communication Designated Person is the Chief Financial Officer and his general responsibilities are to oversee and coordinate disclosure of:

(a) material information in accordance with the AMLR and this CDPP, and disclosure of information to the regulators and shareholders; and

(b) information to shareholders, investment community, media and the general public.

6. Authorised Spokesperson

The Company designates specific spokespersons ("**Authorised Spokespersons**") which can be the Disclosure and/or Communication Designated Person or the Managing Director, Executive Director or Chief Financial Officer, responsible for communicating with shareholders, the investment community, regulators or the media. In the absence of any Authorised Spokesperson(s), the Authorised Spokesperson may appoint others within the Company to speak on behalf of the Company or to respond to specific inquiries.

Authorised Spokespersons

(a) Primary Spokespersons

- Managing Director and Chief Executive Officer;
- Chief Financial Officer;
- Chief Operating Officer; and
- Head of Business Development

The Primary Spokespersons may communicate with audience constituents and respond to enquiries in relation to the corporate vision, strategies, developments, future prospects, financial plans and operation matters.

(b) Secondary Spokespersons

- Chairperson
- Company Secretary (responsible for the release of announcements to Bursa Securities only); and
- Appointed Corporate Planning Consultant

The Secondary Spokespersons may communicate only in connection with their specific areas of responsibility and as authorised by a Primary Spokesperson either on a permanent basis (e.g. via functional scope of the position) or on a need basis.

No officers and personnel who have not been appointed by the Authorised Spokespersons shall respond under any circumstances to external inquiries. All such inquiries shall be referred to the appropriate Authorised Spokesperson(s).

The key responsibilities of the Authorised Spokespersons are as follows:

- may provide clarification on information which the Company has released to Bursa Securities but must not comment on any material information which has not been released to Bursa Securities; and
- may attend to all enquiries from the media, investment community or other external parties.

When communicating with the media, the investment community or other external parties, the Authorised Spokespersons shall exercise care to ensure comments which may spur speculation or rumors are not made.

7. Disclosure Process

The Disclosure Process in announcing material information to Bursa Securities is as follows:

(a) approval is given for release of material information based on approval process and responsibility levels, and in accordance with the procedures for disclosure.

(b) announcement to Bursa Securities to be made either on the same day, after market closure or during the permission window period. Should the information be released during trading hours, the Company may request for the temporary suspension of the trading of its shares.

(c) press release to all major newspapers and media services in Malaysia (where necessary), except in cases of announcements to Bursa Securities for administrative situations.

(d) the Company may hold investor, analyst or media briefing or presentation on the announcement of the Company's financial results and any major corporate development. Any public disclosure of material information must be made by an announcement first to Bursa Securities or simultaneously to Bursa Securities, 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. Any such presentation, briefing or press release will be on the Company's website after the announcement first to the Bursa Securities.

8. Procedures for Disclosure of Material Information

(a) The Chief Financial Officer will manage all of the Company's releases of announcements of material information to Bursa Securities through the Company Secretary or the appointed approved adviser in accordance with the applicable securities law and the AMLR and the announcement shall then be approved by the Board and authorise the Executive Director or such other persons duly authorised by the Board to release to Bursa Securities.

(b) The Chief Financial Officer 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.

9. Withholding Confidential Information

(a) The Company may, in exceptional circumstances, temporarily refrain from publicly disclosing material information, provided that complete confidentiality is maintained.

These include:

(i) when immediate disclosure would prejudice the ability of the Company to pursue its corporate objectives;

(ii) when the facts are in a state of flux and a more appropriate moment for disclosure is imminent; and

(iii) where the company or securities laws restrict such disclosure.

(b) If the material information is being temporarily withhold, pursuant to the AMLR, 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.

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 Bursa Securities.

10. Responding to Market Rumours or Reports

The Company generally does not comment on market rumours. However, under Rule 9.09 of the AMLR, a clarifying announcement may be necessary if:

- A rumour contains material information clearly attributable to the Company;
- It affects trading activity or investor sentiment;
- Bursa Malaysia requests clarification.

11. Response to Unusual Market Activity

Where unusual price movement, trading activity, or both ("**unusual market activity**") occurs, the Company shall immediately undertake a due enquiry to seek the cause of unusual market activity in its securities, regardless of the issuance of unusual market activity query by Bursa Securities. The Company shall consider, in particular, the nature of any information concerning the Group which may have accounted for the unusual market activity that:

(a) has recently been publicly disclosed;

(b) has not been publicly disclosed, in which case the unusual market activity may signify a leak of information; or

(c) is the subject matter of a rumour or a report.

Generally, if the Company determines that the unusual market activity results from material information that has already been publicly disclosed, no further announcement or response is required. If the unusual market activity results from a leak of previously undisclosed information, the Company shall disclose the information in question in accordance with AMLR. If the unusual market activity results from a rumour or report, the Company shall respond in accordance with AMLR and this CDPP.

If the Company is unable to determine the cause of the unusual market activity, the Company shall announce to Bursa Securities that there have been no undisclosed developments which would account for the unusual market activity.

12. Unwarranted Promotional Disclosure Activity

The Company must refrain from any form of promotional disclosure activity which may mislead investors or cause unwarranted price movement and activity in its securities.

13. Forward-looking Information

Forward-looking statements (e.g., earnings guidance, growth plans) may be disclosed if:

- They are based on reasonable assumptions;
- Accompanied by appropriate disclaimers;
- They do not mislead or misrepresent material facts.

Such statements should be monitored and updated if circumstances change materially.

14. Misrepresentation of Information

The Board shall be promptly notified if any person, to whom this CDPP applies, becomes aware of the following:

(a) misrepresentation or suspected misrepresentation of information publicly disclosed by the Company;

(b) there has been or may have been a failure to make timely disclosure of material information; or

(c) any alleged breach or violation of the policies and procedures set out in this CDPP.

The Board shall conduct a reasonable investigation of the notified matter and undertake necessary corrective action, with the priority of ensuring prompt disclosure in accordance with the AMLR and this CDPP.

15. Reviewing Analyst Reports

- The Company may review analysts' reports to correct factual errors;
- No endorsement of opinions, forecasts, or valuations is provided;
- No undisclosed or non-public information may be disclosed in response.

16. Restrictions on Insider Trading

- Directors, officers, and employees with access to material non-public information are prohibited from trading securities until such information is publicly disclosed.
- The Company enforces Closed Periods prior to financial results and major announcements.

  "Closed Period" is defined as a period commencing 30 calendar days before the targeted date of announcement or up to the date of the announcement of the Company's quarterly results to Bursa Securities.

  During Closed Periods, the Authorised Spokespersons and all Directors are prohibited from commenting on the current period earnings and financial assumptions. Communications shall be limited to commenting on publicly available or non-material information.
- All insiders must comply with the Capital Markets and Services Act 2007 (CMSA) and AMLR.

17. Governance and Review

- The Board of Directors is responsible for oversight of this policy with assistance from the Company Secretary;

- The CDPP and related procedures are reviewed annually to ensure ongoing compliance with regulatory developments and best practices.

This CDPP aligns with the AMLR and reinforces the Company's commitment to maintaining a high standard of corporate governance, transparency, and accountability. All personnel are expected to uphold these standards in all corporate communications and disclosures.