

## KECK SENG (MALAYSIA) BERHAD GROUP

<b>Subject:</b> Group Policy - Corporate Disclosure Policy	<b>Policy No:</b> 04-01
<b>Applies to:</b> All Employees and Directors	<b>Page:</b> 1 of 3
<b>Date:</b> 25 November 2022	<b>Approved by:</b> Board of Directors

### Objectives

1. To ensure timely disclosure of sufficient and useful information which is accurate and reliable to shareholders and other stakeholders including relevant authorities.
2. To ensure compliance with legal and regulatory requirements on disclosure set out in the Main Market Listing Requirements ("**MMLR**") of Bursa Malaysia Securities Berhad ("**Bursa Securities**").

This Policy applies to all Directors and employees of the Company and its subsidiaries ("**Group**"). It covers all disclosures made by the Group, whether made orally or written. Non-compliance of the Policy may result in disciplinary action.

### General

The Managing Director directs a task force to compile the necessary information and make the required disclosure, together with the Company Secretary. The Board of Directors ("**Board**") is ultimately responsible for ensuring that necessary disclosure requirements are complied with.

### Procedures and Practices on Corporate Disclosures

#### A. Material Information

Immediate announcements must be made of material information in accordance with the MMLR set out by Bursa Securities. An information is considered material if it has a material effect on the:

- Price, value or market activity of the Company's securities; or
- Investor's decision in determining his choice of action.

Such events may include, but not be restricted to: borrowing of funds, commencement of or involvement in litigation, proposal involving the issuance of new securities, acquisition or disposal of assets, decision by authorities on corporate proposals.

If in doubt on the materiality, the Company should announce to Bursa Securities for the benefit of the investing community.

All disclosures made must be in a reader-friendly format allowing for easy understanding by all parties. The Company is committed to disclosing information that is accurate, succinct, balanced, unambiguous and free of technical jargon.

#### B. Timing of announcements

Material information must be announced **immediately**. The Company should not wait until issuance of its quarterly report to announce the material information or event.

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### C. Procedures for Disclosure of Material Information

- i. The Company Secretary, Corporate Director or the appointed adviser will draft the announcement to ensure compliance with the MMLR.
- ii. The Group Accountant or appointed professionals may be engaged to review and validate all the facts relating to the disclosure, including any financial data contained in the announcement.
- iii. All announcements will be circulated to the Board for comments and approval. The Company Secretary will release the announcement to Bursa Securities once obtaining signing approval from the Managing Director or any designated persons.
- iv. After the announcement has been made, such announcement will be made available on the Company's official website.

### D. Exceptions to announcing material information immediately

- i. When circumstances arise where material information needs to be withheld or delayed temporarily, **complete confidentiality must be maintained at all times** to minimise leakage of information.
- ii. If confidentiality of information is lost or cannot be maintained, the Company must immediately announce the information to Bursa Securities.

### E. Thorough Public Dissemination

The Company shall release material information to the public via announcement first to Bursa Securities or simultaneously to Bursa Securities, the press and newswire services. No disclosure of material information shall be made on an individual or selective basis unless such information has previously been fully disclosed and disseminated to the public. The disclosure of information can often be made after the market closes. Where disclosure is immediately before or during trading hours, Bursa Securities may impose a temporary halt or suspension in trading of the Company's securities.

### F. Trading Halt and Suspension

In the event the Board believes that a trading halt is necessary to maintain efficient trading of the Company's securities and having the news or material information better understood and widely disseminated, the Company may request Bursa Securities for a suspension in the trading of the Company's securities, so that an announcement can be made.

### G. Clarification or confirmation of rumours or reports

If the Company becomes aware of any rumours or reports, true or false, which may contain material information, the Company must make due inquiry to ascertain whether the rumour or report contains undisclosed information which may require immediate disclosure to clarify or deny the rumour or report.

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If the rumour or report is **general** in nature, no disclosure or announcement is necessary unless it results in a market reaction.

The Company may make a **voluntary announcement** clarifying, confirming or denying the rumour or report after consulting with the Board.

#### **H. Response to unusual market activity (“UMA”)**

An immediate enquiry must be made with the relevant person(s) e.g. Directors, major shareholders or person(s) familiar with the affairs of the Company, to determine the cause of the UMA. Generally, if the cause for the UMA is the result of a recent disclosed material information, then no further announcement need to be made. However, if it is not so i.e. the UMA resulted from a leak or a rumour or report, the Company must then clarify viaan announcement to Bursa Securities.

If the Company cannot determine the cause of the UMA, the Company must announce that there have been no undisclosed developments which would account for the UMA.

#### **I. Unwarranted Promotional Disclosure Activity**

Guided by the principles of fairness and transparency, the Company should refrain from such activity that may have a misleading effect on its investors or cause unwarranted activity within its securities.

#### **J. Insider Trading**

Insiders must not trade on the basis of material information which is not known to the investing public.

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

#### **K. Review of the Policy**

The Board will review this Policy periodically to ensure that it continues to remain relevant and appropriate.

This Policy was last reviewed and adopted by the Board on 25 November 2022 and is made available on the Company’s website at <https://my.keckseng.com>.