

KECK SENG (MALAYSIA) BERHAD GROUP

Subject: Corporate Disclosure	Policy No: 04-00
Applies to: All Employees and Directors	Page: 1 of 3
Date: 28 February 2017	Approved by: Dato' Ho Cheng Chong @ Ho Kian Hock
	Signature:

Objective:

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.

Corporate Disclosure Policy (CDP) applies to all Employees and Directors of the Group and Company. It covers all disclosures made by the Group and Company, whether made orally or written. Non-compliance with CDP 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 (BOD) are ultimately responsible for ensuring that necessary disclosure requirements are complied with.

A. Material Information

An information is considered material if it has a material effect on the:

- Price, value or market activity of the Company's securities;
- 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.

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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Announcement procedures

- i. An announcement will have to be prepared and reviewed by the Company Secretary or Corporate Director and approved by the Managing Director.
- 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. The Company Secretary shall release the announcement to Bursa Securities once the announcement has been approved by the Managing Director & board of directors.
- iv. Once the announcement has been made, the Corporate Director will disseminate the information by posting it on the Company's official website.

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. The Company should implement the Code of Conduct or Whistleblowing policies where appropriate.

If confidentiality of information is lost or cannot be maintained, the Company must immediately announce the information to Bursa Securities.

B. Clarification or confirmation of rumours or reports

If the Company becomes aware of any rumours or reports that contain material information, the Company must enquire into it by consulting with its directors, major shareholders or such person(s) familiar with the matter to ascertain whether the rumour or report contains undisclosed information which may require immediate disclosure to clarify or deny the rumour or report. Refer to "Contents or Announcement" and "Announcement Procedures" under Material Information.

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

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

C. 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 unusual market activity. If the cause for the unusual market activity 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 via an 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 unusual market activity.

D. Unwarranted Promotional Disclosure Activity

The Company should refrain from such activity.

E. Insider Trading

Restriction is governed by Section 188 of CMSA and 9.14 and 9.15 of the Listing Requirements.

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