

Public Packages Holdings Berhad

Corporate Disclosure Policy

Introduction

Public Packages Holdings Berhad (“the Company”) and its subsidiaries (collectively “the Group”) are committed to providing shareholders, investors, analysts, media representative, regulators and the stakeholders with comprehensive, accurate and high-quality information in a timely manner to facilitate informed investment decisions.

This Corporate Disclosure (“CD”) policy has been established to provide a structured framework for the disclosure of the Company’s corporate information. It sets out the principles and procedures governing the identification, evaluation and dissemination of sensitive and material information to all stakeholders in accordance with Chapter 9 of the Bursa Malaysia Listing Requirements (“BMLR”), as well as Malaysia Code of Corporate Governance (“MCCG”).

The Company adopts a policy of full, fair, timely, accurate, and equal disclosure of material information to the public in compliance with regulatory requirements and best practices in corporate governance.

Objectives

- ✓ To raise awareness and provide guidance to Directors, Senior Management and employees of the Group’s disclosure requirements, procedures and practices;
- ✓ To establish clear policies and guidelines on the dissemination of corporate information and engagement with shareholders, investors, analysts, media representative, regulators and the stakeholders;
- ✓ To ensure that the Company complies with its disclosure obligations in accordance with the BMLR and regulations governing corporate disclosure and confidentiality for listed issuers and adheres to best practices as set out in the Corporate Disclosure Guide issued by the Bursa Securities, and
- ✓ To promote investor confidence in the integrity, transparency and governance of the Group.

Scope

This policy applies to Directors, Senior Management and employees of the Group, as well as, where applicable, its consultants, service providers and contractors. All such parties are expected to adhere to its provisions at all times.

It covers all methods used by the Company uses to communicate with the public, including but is not limited to the following:

- ✓ Documents filed with regulators; written disclosures in annual reports, financial statements, quarterly reports, press releases, letters or circulars to the shareholders; speeches by Directors; email communications; and information published on the Company’s website; and
- ✓ Oral communication, including individual or group meetings, telephone conversations, interviews, press conferences and video conferences with financial analysts, investors, and the media, as well as speeches at industry conferences, and interactions with the public generally.

Authorised spokespersons

The Authorised Spokespersons of the Company shall be the Executive Directors or their designees. They are responsible for communication with all stakeholders, investment analysts, the media and other external parties.

The Authorised Spokespersons shall: -

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

They shall exercise care to ensure that comments which may spur speculation or rumours are not made.

Any inquiries relating to undisclosed material information must be immediately escalated to the Authorised Spokespersons or Company Secretaries. No employee is permitted to respond independently.

Appointment of Designated Person

While the Executive Directors are generally responsible for the proper dissemination of information, the actual implementation may be delegated to specific person. For this purpose, the Company shall appoint designated senior officer to assume overall responsibility for ensuring compliance with the disclosure obligations under the BMLR.

The designated person is generally responsible for overseeing and co-ordinating disclosure of material information in accordance with the BMLR.

Corporate Disclosure Obligations

1) Immediate Disclosure of Material Information

Material information refers to information that is reasonably expected to have a material effect on: -

- ✓ the price, value or market activity of any of the Company's securities; or
- ✓ The decision of a holder of Company's securities or an investor in determining their course of action.

Material information includes, but is not limited to: -

- (a) information concerning the Group's assets and liabilities, business, financial condition or prospects;
- (b) information relating to dealings involving 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; or
- (d) information relating to any event materially affecting the size of the public holding of the Company's securities.

Obligation of Immediate disclosure

The Board, with the assistance of the Executive Directors and Company Secretaries, shall exercise due care and judgement in determining whether the information is material and requires immediate disclosure. Reference shall be made to Paragraphs 9.04 and 9.19 of the BMLR.

Withholding of material information

The Company may, in exceptional circumstances, temporarily withhold disclosure of material information as permitted under Paragraph 9.05(3) of the BMLR, provided that strict confidentiality is maintained.

Maintaining confidentiality

Where material information is being temporarily withheld, the Company shall ensure that such information remains strictly confidential until an appropriate announcement is made.

2) Public Dissemination

The Company shall disclose material information in a manner intended to achieve the fullest possible public dissemination.

If the disclosure is made before or during trading hours, the Bursa Securities may impose a temporary halt or suspension in the trading of the Company's securities to facilitate dissemination and evaluation of the information released.

Equal access to material information

No material information shall be disclosed on selective basis to the media, shareholders or any other external parties unless such information has already been publicly disclosed.

3) Clarification, confirmation or denial of rumours or reports

Whenever the Company becomes aware of a rumour or report, it should consult its directors, major shareholders and other relevant persons to ascertain whether: -

- (a) the rumour or report contains undisclosed material information, and
- (b) immediate disclosure is required to clarify, confirm or deny the rumour or report.

If disclosure is required under the BMLR, the Company must act proactive and make appropriate announcement without waiting for a query from Bursa Securities.

Where a rumour or report contains correct material information, the Company shall confirm it with relevant facts, including the status of any negotiations or developments.

The Company is not expected to respond to general or speculative reports unless they impact the price of securities or influence investment decisions (e.g. predicting of future sales, earnings or other financial or quantitative data.)

However, if a rumour is clearly erroneous or wrongly attributed to the Company, an appropriate clarification or denial must be made.

All announcements made must contain sufficient facts to support the clarification, confirmation and denial.

4) Respond to unusual market activity

Where unusual price movement or trading activity (“unusual market activity”) occur, the Company shall immediately conduct due enquiry to determine the cause, regardless of whether a query has been issued by Bursa Securities.

The Group shall consider, in particular any relevant information: -

- (a) has recently been publicly disclosed;
- (b) has not been publicly disclosed, indicating a possible information leak; or
- (c) is the subject matter of a rumour or report.

If the unusual market results from disclosed material information, no further announcement or response may be required, unless clarification is needed.

If it results from a leak, the Company must publicly disclose the information.

If the cause cannot be determined, the Company shall announce that there are no undisclosed developments that would account for the unusual market activity.

5) Insider trading

The Company and parties who may be regarded as insiders must comply with the Capital Markets and Services Act 2007 and the Companies Act 2016.

A person is an “insider” if that person:

- (a) possesses non-public information that would materially affect the price or the value of the securities; and
- (b) knows or ought reasonably to know that the information is not publicly available.

Insiders must not trade based on the such information or disclose it to others (tipping) regardless of intent.

Close period

A “close period” refers to the period commencing thirty (30) calendar days before the targeted announcement date to the date of the announcement of the Group’s quarterly results to Bursa Securities.

During this period, the Authorised Spokespersons are also prohibited from commenting on the current earnings and financial assumptions. Communication must be limited to publicly available or non-material information.

6) Unwarranted Promotional Disclosure Activity

The Company shall refrain from any form of promotional disclosure activity that may mislead investors or cause unwarranted price movements. This includes unjustifiable, exaggerated, flamboyant, overstated or over-zealous announcements, reports or advertisements.

Procedures for Disclosure of Material Information

All announcements shall be approved by the Board prior to being released to Bursa Securities by the Company Secretaries.

Review

This Policy will be reviewed annually or may be updated as necessary to ensure continued compliance with legal and regulatory requirements.