



**EUPE CORPORATION BERHAD**  
**Registration No. 199601005416 (377762-V)**  
 (Incorporated in Malaysia)

## **CORPORATE DISCLOSURE POLICY**

### **1. SCOPE AND OBJECTIVES OF POLICY**

This Corporate Disclosure Policy (hereinafter referred to as the “Policy”) aims to integrate the mandatory requirements set out in the Listing Requirements (“LR”) set by Bursa Malaysia Securities Berhad (“Bursa Securities”) Paragraph 9.03 Part C with the Recommendations promulgated by the Malaysian Code of Corporate Governance.

This document outlines the Company’s policy on the determination and dissemination of sensitive and material information to investors, stakeholders, local media, the investing public and other relevant persons in line with the applicable legal and regulatory requirements. This Policy is applicable to all Directors, Management staff, officers and employees of the Company and its subsidiaries (the “Group”).

### **2. IMMEDIATE DISCLOSURE OF MATERIAL INFORMATION**

Immediate announcements must be made of material information in accordance with the LR set out by Bursa Securities. Once materiality of the information has been assessed, the designated spokesperson is responsible for the timely disclosure of the information in accordance with the disclosure obligations set out in the LR. A general guideline to determine materiality is if the information is reasonably expected to impact on:

- price, value or market activity of any of its securities; or
- investors’ decision in determining his course of action.

The Board is aware of the confidentiality and sensitivity of undisclosed information and ensures that measures are in place to prevent divulgence of such information.

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.

Disclosures made are to adhere to the following protocols:

- all critical announcements are to be circulated to, and reviewed by, all members of the Board;
- all members of the Board are required to provide to the Chairman or Group Managing Director (“Group MD”) (or in their absence, the Company Secretary) with verbal or written approval of each announcement, prior to its release;
- any relevant parties referenced in the announcement should also review the announcement prior to its release, to confirm the accuracy of the information; and
- the Chairman or Group MD is to provide his approval of the announcement before release to Bursa Securities.



### **3. DESIGNATED SPOKESPERSON**

The Company shall elect a spokesperson to be responsible for the oversight and coordination of the disclosure of material information to the markets. The duties of the spokesperson shall include:

- creating awareness amongst the directors, management and employees of the Group on the importance of timely disclosures;
- review the material for disclosure to ensure adherence to regulatory requirements;
- ensures that the material is duly verified by the Board/ Group MD;
- ensures the information is disclosed in a timely manner as prescribed by regulations;
- maintain accurate records pertaining to all disclosures made; and
- is constantly updated on developing material information in relation to the Group.

The level of autonomy for the designated spokesperson is a matter for deliberation of the Board as a whole.

### **4. 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.

### **5. MARKET RUMOURS**

It is the policy of the Company to clarify/ confirm or deny any circulating market rumours upon becoming aware of the presence of any material information. Any clarification provided will be in a published format through Bursa Securities, for the purpose of dissemination to the investing public.

### **6. UNUSUAL MARKET ACTIVITY**

The Company shall carry out an enquiry to ascertain the cause of any unusual market activity in its securities. In the case of any misinterpretations, the Company shall issue a clarifying announcement in accordance with the LR or this policy. If the unusual market activity results from a leak of previously undisclosed information, the Company shall disclose the information in accordance with the LR.



**7. INSIDER TRADING**

The Company affirms its awareness of the provisions of Section 188 of the Capital Markets and Services Act 2007 in regard to insider trading. Directors, Management and employees of the Group shall not trade on the basis of any material information that has not been disclosed to the public.

**8. PROMOTIONAL DISCLOSURE ACTIVITY**

Guided by the principles of fairness and transparency, the Company shall not participate in any promotional disclosure activity that may have a misleading effect on its investors or cause unwarranted activity within its securities.

**9. ADMINISTRATIVE MATTERS**

On an annual basis, the Company Secretary will review and assess the effectiveness of the Policy. Any requirement for amendment shall be deliberated upon by the Board and any recommendations for revisions shall be proposed for approval.

The Policy will be held in the custody of the Company Secretary.