

Poh Kong Holdings Berhad

Corporate Disclosure Policy

1. Introduction

Poh Kong Holdings Berhad (“Poh Kong” or “the Company”) is committed to ensuring that communications to the public regarding its business, operations and financial performance of the Company are accurate, timely, factual, informative, consistent and broadly disseminated. References are also made to the Company and its subsidiaries as (“the Group”).

In formulating this Corporate Disclosure Policy (“CDP” or “Disclosure Policy”), the Company has taken into account the recommendations contained in the Malaysian Code on Corporate Governance (MCCG) 2012 and its disclosure obligations contained in the Main Market Listing Requirements (“MMLR”) of Bursa Malaysia Securities Berhad (“Bursa Securities”).

2. Objectives

The objectives of the Disclosure Policy are to :-

- Confirm the Group’s existing disclosure policies and guidelines and to ensure consistent approach to the Company’s disclosure practices throughout the Group;
- Ensure that all Poh Kong personnel or persons to whom this Disclosure Policy applies understand their obligations to preserve the confidentiality of material information;
- Effectively build good investor relations that inspires trust and confidence with the investing public; and
- Reinforce the Group’s commitment to compliance with the continuous disclosure obligations imposed by Malaysian securities law and regulations, and the MMLR of Bursa Securities.

3. Application of Disclosure Policy

This Disclosure Policy applies to all Directors, officers, employees, consultants and any other person or company that is engaged or may be engaged in a business or professional activity with Poh Kong personnel.

A copy of this Policy is made available to all Poh Kong personnel either directly or by posting of this Policy on the Company's website at www.pohkong.listedcompany.com

4. Disclosure Committee

The Disclosure Policy will be administered by a Disclosure Committee, to be headed by the Executive Chairman and Group Managing Director. The Disclosure Committee will be responsible for overseeing the disclosure practices, use and setting benchmarks for the

assessment of material information and ensuring adherence to policy, legal and regulatory requirements before its release.

The Disclosure Committee comprises the following :-

- i) Executive Chairman and Group Managing Director;
- ii) Executive Director;
- iii) Group Accountant;
- iv) Head of Corporate Affairs;
- v) Company Secretary.

Committee Members may be added to or removed from the above list upon agreement of the Disclosure Committee.

The Head of Corporate Affairs will serve as the primary contact person for the Disclosure Committee and will engage other members, as and when necessary, and appropriate. In his or her absence, other members can be contacted for matters referred to in this Disclosure Policy.

Material information is any information about the Company and its subsidiaries which are reasonably expected to have a material effect on :-

- Market price, value or market activity of the Company's securities; and
- The investor's decision in determining his or her choice of action.

Generally, disclosure of the Company's affairs to any person is deemed not material when such disclosure is not expected to affect the person's investment decision and will not give any advantage to the person making his or her investment decision.

Poh Kong personnel must inform the Disclosure Committee of any potential material developments so that it can assess and evaluate if such events could give rise to a disclosure obligation.

5. Authorised Spokespersons

Disclosure of corporate information and communication with investment analysts, potential investors, media or other parties will be made only by individuals who have been authorized for this purpose. They may, from time to time, authorize other persons to communicate with the media or the investment community.

Authorised Spokespersons for overseeing and co-ordinating the disclosure of material information are as follows:-

- i) Executive Chairman and Group Managing Director;
- ii) Executive Director;
- iii) Group Accountant;
- iv) Head of Corporate Affairs.

Employees other than Authorised Spokesperson(s) shall not respond to inquiries from the investment community or media unless authorised to do so. All such queries should be referred to the Authorised Spokesperson(s).

6. Policy Review

The Disclosure Committee will review and update the Disclosure Policy from time to time to ensure compliance with the MMLR of Bursa Securities and other regulatory requirements. Any material changes proposed to this Disclosure Policy will be subject to the approval of the Board of Directors.

7. Maintaining Confidentiality

Any employee privy to confidential corporate information is prohibited from communicating such information to anyone else, unless it is necessary to do so in the course of business or required by law or authorised by the Disclosure Committee. Efforts will be made to limit access to such confidential information to only those who “need to know” the information.

Outside parties privy to undisclosed material information concerning the Company will be told that they must not divulge such information to anyone else. Poh Kong’s senior management and officers shall ensure that such outside parties confirm their commitment to non-disclosure under a written confidentiality agreement.

All Poh Kong personnel who are in possession of price sensitive information should not disclose undisclosed material information and shall not disclose confidential information to others prior to the broad public dissemination of that information.

Disclosure of material non-public information to a selected group of people is prohibited.

Poh Kong personnel are expected to observe the following:-

- i) Not to discuss business affairs in places where the discussion may be overheard.
- ii) Exercise caution when reading confidential documents in public places or discarded where they can be retrieved. This includes using blackberries, smart phones or other personal digital assistant devices in public places.
- iii) Documents and files containing confidential information should be kept in a safe place with restricted access.
- iv) Transmission of documents by fax, email or other electronic means should be made only where it is reasonable to assume that transmission can be made and received under secure conditions.
- v) Documents containing confidential information should be promptly removed from the conference room and work areas after meetings are concluded. Extra copies of confidential documents should be destroyed.

vi) To immediately inform any member of the Disclosure Committee if they believe that there may have been an accidental or unintentional disclosure of material non-public information.

vii) Visitors should be accompanied by Company personnel to ensure that they are not left alone in offices or sites containing confidential information.

viii) To refrain from participating in Internet blogs, chat rooms, social media forums or newsgroup discussions on matters pertaining to the Company's business and affairs or its listed securities unless authorised to do so.

This is to mitigate the risk of inadvertently disclosing or publishing material and non-public information through the usage of social media.

8. Insider Trading

i) Anyone who has access to material information of the Company, its financial condition and its operations, is regarded as an Insider. Material information which is in the possession of an Insider and has not been disclosed to the investing public is Insider Information.

(ii) Insiders may not deal in the Company's securities while in possession of Inside Information, nor may they pass on that information to help another person deal in the Company's securities.

(iii) The relevant provisions of the Capital Markets and Services Act 2007 apply to all Insiders.

(iv) The Company Secretary will advise the Directors and principal officers on the trading restrictions in the Company's securities in accordance with the provisions of the Main Listing Requirements.

9. Unintentional Disclosure of Material Non-Public Information

If confidentiality of information is lost or cannot be maintained, the Disclosure Committee shall immediately take all appropriate steps to make immediate announcement of the relevant material information to Bursa Securities.

10. Enforcement of Disclosure Policy

Any personnel or officer who violates the Disclosure Policy may be cautioned or face disciplinary action including termination of employment with the Company or if it appears that the Listing Requirements have not been complied with, the Company may refer the matter to Bursa Securities for further investigations.

If any Poh Kong personnel have any doubts as to their responsibilities under this Disclosure Policy, they should seek clarification and guidance from the Disclosure Committee.

11. Corporate Website

All the Company's publicly disclosed material information and presentations to analysts and conferences will be made available through the corporate website from time to time.

The Investor Relations & Corporate Communications contact person is responsible to ensure that the Company's website be kept up-to-date with the Company's latest disclosures.

12. Disclosure Record

The Investor Relations & Corporate Communications department will maintain a file containing all public information about the Company (other than information that is already electronically filed with Bursa Malaysia), including all press releases, analysts' reports commented on, transcripts or recordings of conference calls, investor presentations, executive speeches, and as much as practicable, significant media articles on the Company.

13. Review of Disclosure Policy

This Disclosure Policy is at the discretion of Disclosure Committee, and is to be reviewed by the Board of Directors.

This Corporate Disclosure Policy was adopted by the Board of Directors on 20th October 2015.