



COMINTEL CORPORATION BHD
(Company No. 630068-T)
(Incorporated in Malaysia)

CORPORATE DISCLOSURE POLICY

1. INTRODUCTION

The policy outlines Comintel Corporation Bhd (“Comcorp” or “the Company”) approach toward the determination and dissemination of material information, the circumstances under which the confidentiality of information will be maintained, preventing abuse of undisclosed material information, monitoring and responding to market rumours, leaks and inadvertent disclosures and restrictions on insider trading. It also provides guidelines for achieving consistent disclosure practices across Comcorp and its Group of Companies (“Comcorp Group” or “the Group”).

2. OBJECTIVES

The primary objectives of Comcorp’s Corporate Disclosure Policy are:-

- a. To promote and maintain market integrity and investor confidence.
- b. To provide equal access to the Company’s material information in an accurate, clear, timely and complete manner and to avoid selective disclosure to the investing public.
- c. To exercise due diligence such that information disseminated to the investing public will be as far as possible accurate, clear, timely and complete.
- d. To have in place an efficient procedure for management of information which promote accountability for the disclosure and dissemination of material information to the investing public.
- e. To build good investor relations with the investing public based on the principles of trust, honesty, openness, transparency and sound understanding of the Company.

3. DEFINITIONS

a. Material Information

Material Information is any information about Comcorp Group which is reasonably expected to have a material effect on:-

- i. the market price, value or market activity of Comcorp’s securities; and

- ii. the decision of a holder of securities or an investor in determining his choice of action.

Examples of events which may require immediate disclosure are set out in Paragraph 9.04 of the Main Market Listing Requirements of Bursa Malaysia Securities Berhad (“LR”).

b. Authorised Spokesperson

The Authorised Spokesperson for Comcorp is the Chairman of the Board of Directors, the Managing Director, the Group Deputy Chief Executive Officer and any other Officers as may be authorised by the Managing Director.

The Authorised Spokesperson shall not disclose Material Information that has not been previously made public. He/she may, from time to time, respond to specific inquiries from the investment community or media.

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

If there is any doubt about the appropriateness of supplying information to an outside party, an employee should contact the Authorised Spokesperson for advice.

4. STATEMENT OF THE POLICY

The Company is committed to provide accurate, clear, timely and complete disclosure of Material Information pertaining to the Company’s performance and operations to the shareholders, stakeholders, analysts, journalists, the investing public or other persons in conformity with any and all applicable legal and regulatory requirements and ensuring equal access to such information to avoid selective disclosure.

This policy applies to all Directors, Management, Officers and employees of Comcorp Group. It outlines the Group’s approach toward the determination and dissemination of material information especially price-sensitive information, the circumstances under which the confidentiality of the information will be maintained and restriction on insider trading.

5. PROCEDURES AND PRACTICES ON CORPORATE DISCLOSURE

a. Disclosure of Material Information

The Company Secretary will manage all Comcorp's releases of announcements of Material Information to Bursa Malaysia Securities Berhad ("Bursa Malaysia").

The Company Secretary will draft the announcement which will then be reviewed by the Group Deputy Chief Executive Officer.

All announcements will be approved by the Board of Directors of Comcorp before release to Bursa Malaysia.

b. Withholding Confidential Information

The Company will only withhold Material Information from the public for legitimate business purposes. These include:-

- i. when immediate disclosure would prejudice the ability of the Company to pursue its corporate objectives; and
- ii. when the facts are in a state of flux and a more appropriate moment for disclosure is imminent.

Persons with the confidential Material Information shall not divulge the information to anyone else except in the course of business.

c. Responding to Market Rumours or Reports

- i. Whenever the Company becomes aware of any rumour or report, true or false, that contains Material Information, the Company will make due inquiry and immediately publicly clarify, confirm or deny the rumour or report through Bursa Malaysia.
- ii. The Company will publicly clarify any rumour or report which is in any form whatsoever and howsoever including that by word-of-mouth and not limited to an article or otherwise, published in a newspaper, newswire, magazine, a broker's market report or any other publication.

- iii. In the case of a rumour or report containing erroneous Material Information which has been circulated, the Company will immediately announce to Bursa Malaysia a denial or clarification of the rumour or report and provide facts sufficient to support the denial or to clarify any misleading aspects of the rumour or report.
- iv. In the case of a rumour or report containing Material Information that is correct, an announcement setting forth the facts will be prepared for public release, which will include but not limited to, an indication of the state of negotiations or of corporate plans in the rumoured area.

Such announcements are essential even if the matter has yet to be presented to the Comcorp's Board of Directors for consideration.

- v. In the case of a rumour or report predicting future sales, earnings or other quantitative data, the Company normally will not respond to the same.

However, if such a report is based on or contains erroneous information, or is wrongly attributed to the Company, the Company will respond promptly to the supposedly factual elements of the rumour or report as required under Paragraphs 9.09 and 9.10 of the LR. In addition, the Company will include in the announcement a statement to the effect that the Company has made no such prediction and currently knows of no facts that would justify making such a prediction.

d. Communications with Financial Analysts, media and Investing Public

- i. Only the Authorised Spokesperson and persons who are authorised by the Authorised Spokesperson are permitted to participate in briefing sessions with financial analysts, media and investing public on behalf of the Company.
- ii. Briefing materials/information from such briefing sessions will be made available on the Company's website, if appropriate after the presentation is made.
- iii. The Company will provide only factual and non-speculated information during such briefings.

- iv. If material non-public information is inadvertently disclosed at such a briefing, the Company will take immediate action to achieve broad public dissemination of the information in accordance with all applicable legal and regulatory requirements.
 - v. The Company does not discriminate among recipients of information. Under no circumstances will the Company confirm or attempt to influence a financial analyst's opinions or conclusions, speculate about future business plans or provide specific "bottom line" financial expectations for the Company. The Company will provide the same information to both financial analysts and individual investors when requested.
 - vi. The Company will not comment on opinions made by analysts except where it is a factual error.
- e. Forward-looking Information
- i. The Company may provide forward-looking information to the investing public to enable reasoned evaluations of the Company and its future performance prospects provided that it is not undisclosed Material Information, it does not deal with future earnings. Such information could include prospects, revenue or profits estimates, forecasts, projections or internal targets and key performance indicators. Such information will be consistent with and complementary to information that has been otherwise provided via timely disclosure documents such as annual reports, news releases, quarterly reports, etc.
 - ii. Documents containing forward-looking information will be accompanied by a disclaimer cautioning the reader that there are risks and uncertainties that can cause actual results to differ materially from what is indicated in the document. When making oral forward-looking statements, reasonable care will be taken to also include appropriate reference to such risks and uncertainties in the discussion.
- f. Restrictions on Insider Trading
- i. Anyone who has access to Material Information of the Company, its financial condition and 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 Inside 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. From time to time, 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 LR.

6. CONSEQUENCES OF NON-COMPLIANCE WITH THE DISCLOSURE POLICY

An employee who violates this policy may face disciplinary action, which may result in the termination of employment. The violation of this policy may also violate certain securities laws.

If the Company discovers that an employee has violated such securities laws, it may refer the matter to the appropriate regulatory authorities, which could lead to penalties, fines or imprisonment.